

**TABLE MOUNTAIN NATIONAL PARK
DRAFT CONSERVATION DEVELOPMENT FRAMEWORK
(2006 – 2010)**

COMMENTS & RESPONSES REPORT

Prepared for:



South African National Parks

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Joint Venture



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ACRONYMS

CDF	Conservation Development Framework
CoCT	City of Cape Town
EIA	Environmental Impact Assessment
EMP	Environmental Management Programme
HIA	Heritage Impact Assessment
IAPS	Interested & Affected Parties
NEM: PAA	National Environmental Management:Protected Areas Act
SANParks	South African National Parks
TMNP	Table Mountain National Park

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COMMENTS & RESPONSES REPORT

1. INTRODUCTION

1.1 Background

South African National Parks (SANParks) is required in terms of the National Environmental Management: Protected Areas Act (NEM: PAA, Act No. 57 of 2003) to prepare management plans, in consultation with stakeholders, for each national park. Each management plan must establish, *inter alia*, park use zones which ensure that the park's integrity is not compromised in providing visitors with a unique and memorable experience. SANParks has formalized a strategic planning process (pioneered by Table Mountain National Park) which establishes the use zones. The outcome of the process is a management tool known as a Conservation Development Framework (CDF). The purpose of the CDF is to reconcile conservation, development and recreational needs within and surrounding a park. It provides a spatial framework within which to manage a park's conservation, tourism and recreation activities.

A CDF comprises a map and a set of management guidelines, as presented for public comment. The CDF map covers the entire Park and its surrounds. The CDF map fixes access into and within a park (i.e. defines entry points and the movement network), identifies areas suitable for various recreational activities (i.e. delineates visitor use zones), and shows where and what level of visitor facilities should be provided (i.e. demarcates the Park's visitor sites). The CDF's guidelines cover management of visitor use zones, visitor sites, the movement network and Park interface.

The current CDF (2001 – 2006) was prepared by Setplan (consultants) in March 2001. The NEM: PAA requires that the management plan and CDF are revised every 5 years. The 5 year revision of the current CDF is therefore due and

Settlement Planning Services (Setplan) has been appointed to prepare the revised CDF. In preparing the revised CDF a stakeholder consultation process is being undertaken in accordance with the requirements of the NEM: PAA. This process is being facilitated by Setplan's Joint Venture partner DJ Environmental Consultants (DJEC). This document provides an independent record of the stakeholder consultation process and is therefore a key informant in the preparation of the revised CDF (2006 – 2010).

1.2 Approach to Synthesis of Comments

The stakeholder consultation process (see Section 2) was directed towards the solicitation of comments from stakeholders on a draft CDF which was prepared by Setplan. DJEC were responsible for synthesising the comments. Comments have been grouped in two main sections, namely:

1. General comments: included comments on the stakeholder consultation process, history of the TMNP and SANParks' approach to management of the TMNP.
2. Specific comments: included comments on the proposals made in the draft CDF relating to the regulation of public use of the Park, the use zones, visitor facilities, etc.

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 or to reflect comments verbatim. However, sample comments are cited to illustrate the sentiment of 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. A list of names which corresponds to the reference numbers is provided in [Annexure A](#).
- Detailed comments are not reflected. Copies of the original written comment received by DJEC is available for scrutiny at SANParks' offices in Westlake and at DJEC's office in Somerset West, on request.
- Setplan's and SANParks' response to comments is given, either to a group of comments or as specific response to individual comments.

This report provides a synthesis of comments formally submitted to DJEC and SANParks on the draft CDF (2006 – 2010). Debate in the press, email exchanges between groups, etc. that were not lodged with either DJEC or SANParks in terms of this process are not included.

1.3 Scope, Structure and Contents of this Report

The Comments and Responses Report serves as an independent record of the stakeholder consultation process undertaken for the revised CDF (2006 – 2010). As such it serves as a key informant in the finalization of the revised CDF. The report includes the following:

- **Section 1 - Introduction:** Provides background to, and the legal context, for the current revision of the CDF. This section also provides a description of the approach used by DJEC in synthesizing the comment received from stakeholders.
- **Section 2 - Stakeholder Consultation Process:** Provides an overview of the process undertaken to consult stakeholders in the preparation of the CDF including giving notification of the opportunity to engage in the process, the holding of an Open House event, the making available of draft documentation and the comment period.
- **Section 3 - Comments & Responses:** Provides a synthesis of the comment made by stakeholders during the comment period.
- **Section 4 - Conclusion and Way Forward:** Presents a summary of the overall sentiment of stakeholders and indicates a Way Forward in respect of the incorporation of comment in the preparation of the final CDF and availability of the report for stakeholder record keeping purposes.

2. STAKEHOLDER CONSULTATION PROCESS

2.1 Introduction

In order to comply with the NEM: PAA stakeholders have to be consulted in the process of preparing the CDF. The consultation process was designed specifically to solicit comment from stakeholders on the proposals contained in a draft CDF (2006 – 2010) presented in the format of a map showing use zones and a set of tables which included management guidelines for the various use zones. Through a process of reviewing the comments and concerns of stakeholders valuable informants in the finalization of the CDF (2006 – 2010) will be obtained.

The specific activities undertaken to ensure that stakeholders are adequately consulted during the process of revising the CDF are summarised in [Table 1](#).

Table 1: Summary of stakeholder consultation activities undertaken in preparing the CDF

Activity	Date
Phase 1: Stakeholder Notification	
Circulation of a Notification letter & Registration Form to stakeholders on database	28 June 2006
Notification advertisement placed in local newspapers	1 July 2006
Radio Interview – Cape Talk	5 July 2006
Media release to community newspapers	6 July 2006
Advertisement in local newspapers informing public of Open Days	29 – 30 July 2006
Background Information Document sent to registered stakeholders	1 August 2006
Phase 2: Review and Comment	
Public Open Days to present draft CDF	14 – 15 August 2006
Placement of draft CDF in local libraries and SANParks website for public review and comment	16 – 18 August 2006
Closure of Comment Period (comments up to 20 September accepted)	15 September 2006
Phase 3: Comments & Responses Report	
Compilation of Comments & Responses Report	6 October 2006
Distribution of Comments & Responses Report for public information (note: not for comment)	26 October 2006

Activity	Date
Phase 4: Final CDF	
Final CDF	30 October 2006
Phase 5: Ministerial Approval	
Submission of TMNP Park Management Plan (incorporating CDF) for Minister of Department of Environmental Affairs and Tourism (DEAT) approval	1 November 2006

The activities undertaken during the stakeholder consultation process (i.e. Phases 1 – 3 above) are outlined in more detail below.

2.2 Notification letter & Registration Form

SANParks prepared a Notification Letter & Registration Form which DJEC circulated among stakeholders registered on the TMNP stakeholder database. The Notification Letter & Registration Form is provided in [Annexure B](#). The database of registered stakeholders provided to DJEC by SANParks is provided in [Annexure C](#).

2.3 Notification Advertisement

SANParks prepared a notification advertisement and placed the advertisement in the local newspapers including:

- Cape Times (30 June 2006)
- Argus (1 July 2006)
- Die Burger (1 July 2006)

The notification advert (see [Annexure D](#)) requested that Interested and Affected Parties (IAPs) register on the project database, in the event that they wish to be consulted in the preparation of the CDF.

2.4 Radio Interview

A radio interview, whereby SANParks was interviewed by Cape Talk Radio, took place on 5 July 2006. During the interview SANParks indicated that stakeholders would be consulted during the preparation of the CDF, provided that they registered on the project database.

2.5 Advertisement informing public of Open Days

SANParks placed advertisements in the local newspapers informing the public of the Public Open Days which were to be held on the 14th and 15th of August 2006 at the Porter School in Tokai. The adverts were placed in the following newspapers:

- Cape Times (28 July 2006)
- Argus (29 July 2006)
- Die Burger (29 July 2006)

A copy of the advert is provided in [Annexure E](#). In addition, registered stakeholders were informed of the dates of the Public Open Days in the Background Information Document (see Section 2.5).

2.5 Background Information Document

A Background Information Document (BID) was prepared by SANParks (see [Annexure F](#)) and sent to all registered stakeholders. The BID advertised the date and location of the upcoming Open Days and illustrated the relationship between the parallel stakeholder process (i.e. the process involving the Park Management Plan and the Tokai – Cecilia Management Framework that would also be presented at the Open Days. Regarding the CDF, the BID explained the reason why the CDF is being revised and explained the rationale behind zoning the Park. Maps of both the current (2001 – 2006) and proposed CDF (2006-2010) were included.

2.6 Public Open Days

Public Open Days were held on 14 and 15 August 2006 at the Main Hall, Chrysallis Academy, Porter School, Tokai. At the Open Days Interested and Affected Party's (IAPs) were provided with information regarding the draft CDF and other related plans (e.g. Park Management Plan). The information was primarily displayed in the form of posters which presented the draft map showing the proposed zones and tables which indicated the proposed management guidelines.

IAPs reviewed the information on display and clarification regarding the available information and the stakeholder consultation process was provided by the facilitators. Once IAPs had formulated their comments, they were directed towards the comment sheets which they completed in writing and placed in comment boxes which were provided by the facilitators.

2.7 Placement of Draft CDF in Local Libraries and on SANParks Website

Following the Open Days the draft CDF (incorporating the map showing the proposed use zones, tables showing the proposed management guidelines and a brochure providing background to the draft CDF and the stakeholder consultation process was placed in the following public libraries throughout the Cape Metropole:

- Athlone;
- Mitchell's Plain;
- Tokai;
- Fish Hoek;
- Kommetjie;
- Muizenberg;
- Simon's Town;
- Camp's Bay;
- Rondebosch;
- Cape Town Central;
- Claremont;
- Hout Bay; and
- Bellville.

In addition copies were available from SANParks' office in Westlake and from DJEC's office in Somerset West. An electronic version of the documentation was placed on SANParks' website at the following address:

http://www.sanparks.org/parks/table_mountain/about/plan.php

2.8 Preparation of Comments & Responses Report

Following the closure of the comment period DJEC summarised all written comments submitted regarding the draft CDF. Responses to issues and concerns of stakeholders were provided by SANParks and Setplan. An Comments & Responses Report (this document) was then prepared to provide a record of the comments received from stakeholders. The document is a key informant in finalising the CDF (2006 – 2010) and will provide SANParks and stakeholders with a record of the process undertaken.

2.9 Placement of Comments & Responses Report in Local Libraries

The Comments & Responses Report has been placed in the libraries listed in Section 2.7 above for public record purposes. Note that due to the number of written correspondence received, original copies of the correspondence received by DJEC has not been included in the Comments & Responses Report. Copies of original correspondence have been compiled in a separate document which can be reviewed at SANParks' offices in Westlake or DJEC's offices in Somerset West.

3 COMMENTS & RESPONSES

3.1 Introduction

This section provides a synthesis of the comments received from stakeholders during the comment period (14 August – 15 September 2006) regarding the draft Conservation Development Framework (CDF) for the Table Mountain National Park (TMNP). Also provided are responses made by SANParks, primarily regarding management and policy issues, and by Setplan, primarily in regarding specific comments on the draft CDF.

In total approximately 450 letters, faxes & emails were received during the comment period (including those received at the Open Days). This included approximately 400 comments from dog walkers (see [Annexure G](#)).

3.2 Key Issues & Concerns

The key issues and concerns raised in the CDF consultation process were as follows:

- **Public participation process:** a significant number of stakeholders who submitted comment hold the opinion that SANParks is not committed to open and transparent consultation with the public. This is reflected in this process which many believed was inadequate given the sensitivity of the proposal made in the draft CDF.
- **The urban context of the Park and the issue of historical rights:** the majority of stakeholders who commented are of the opinion that Capetonians have a time-honoured right to access and use TMNP. As a result of the urban context of TMNP, SANParks should manage TMNP for use by Capetonians. The proposals made in the draft CDF suggest SANParks is departing from this, in trying to manage the Park as a pristine natural environment with the prime purpose of biodiversity conservation. Many also believe that SANParks is under obligation, as a result of original agreements made at the time of SANParks taking over TMNP, to ensure that the historical rights of Capetonians are not compromised.
- **Regulating use & enforcement:** A concern often expressed regarded the question of enforcement of the proposed restrictions. Many users note that policing TMNP is an almost impossible task given the open access nature of the TMNP. SANParks' resources will be even further stretched as a result of the proposals made in the draft CDF.
- **Concerns of dog walkers & consequences of restricting their access:** The main concern of the objecting dog walkers is that there appears to be no

grounds (either in terms of biodiversity impacts or visitor impacts) for the proposed restrictions on dog walkers. It needs to be noted here that a number of users objected against the extent to which dogs are allowed in the Park, citing undesirable encounters with dogs, dog faeces and impacts on fauna as grounds for this objection.

- **Zoning delineation:** Stakeholders queried the basis, appropriateness and practicalities of the various zonings in various ways. In some cases stakeholders have made specific suggestions.

3.3 General Comment

General comment refers to comment that is not specifically on the proposals made in the draft CDF (2006 – 2010). General comment related primarily to the following:

- Stakeholder consultation process; and
- SANParks' management approach.

The comments relating to these have been summarized in [Table 2](#).

Table 2. Summary of General Comments with Responses

Issue Group	Issue	Comment / Concern	Reference	Response
Stakeholder Consultation Process	Rationale	It is a waste of tax payers money to repeatedly engage the public every 5 years on the issue of the recreational use of TMNP.	CDF 17 CDF 25 CDF 60 CDF 170	SANParks is required by law to prepare management plans within a corporate policy framework. The current SANParks policy framework requires revision of the management plans on a 5 year cycle. Thus, recreational EMP's as part of the management structure of the TMNP should ideally be reviewed with the same frequency.
	Commitment to open, transparent and inclusive PPP	If the motivation behind confining various recreational activities into demarcated zones is to acquire power to control public access in terms of Section 22 of the National Environmental Management: Protected Areas Act 57 of 2003 as amended, then the public should be entitled to a properly publicised communication and consultation process.	CDF 312	The motivation is not to confine recreational activities to certain zones but to manage user impacts, limit conflicts between users and create and sustain the desired experiential qualities in different 'use zones' of the TMNP.
		Engaging the public is a farce as the proposals are already a <i>fait accompli</i> . This is typical SANParks style.	CDF 125 CDF 151	SANParks is following a consultative public process in terms of NEMA principles to engage with all Park users and solicit comment on the draft amendments to the CDF. Public comments will be evaluated and where appropriate, will result in amendments to the proposals.
		SANParks has not taken the opinions of the public seriously and its methods of engaging the public in this consultation processes are both inadequate and inappropriate for such an important issue (regulating recreational use of TMNP).	CDF 7 CDF 10 CDF 28 CDF 94 CDF 125 CDF 126 CDF 151 CDF 154 CDF 186 CDF 267 CDF 277 CDF 296	Response A: All public comment is considered and evaluated against current SANParks and TMNP policies, requirements of national legislation and best practice. The process of public engagement must be conducted within set timeframes and budgets. The TMNP wishes to submit that the process that was followed i.e. direct engagement with known stakeholders, two rounds of advertising in the local press and two open days is sufficient. This must also be considered within the framework of the previous CDF process. The current CDF revision is thus not a new document but builds on

Issue Group	Issue	Comment / Concern	Reference	Response
			CDF 301 CDF 338 CDF 400 CDF 421 CDF 442 CDF 450 CDF 451	the previous proposals as well as process. Furthermore recreational activities are managed in terms of the respective recreational EMPs and changes to current recreational user agreements can only be effected by amending the relevant EMP through public process.
		Wider consultation should be undertaken, including: <ul style="list-style-type: none"> Information notices at major access points into the Park Surveys of users and their requirements and desires Counting the numbers of dog walkers and non dog walkers Provide at least 3 months to collect information and comments 	CDF 296 CDF 213 CDF 421	See Response A. SANParks undertook a Park user survey in 1999-2000 and data from the survey was used to inform decisions regarding the current CDF and management planning. The TMNP plans to update this survey in 2007/08. One month is a standard comments period in processes such as this.
		Suggest that SANParks meets with the dog walker representatives to discuss the issue of further restricting dog walking in TMNP.	CDF 99 CDF 429 CDF 430 CDF 450	Noted. This will be done as part of the revision of the current Dog Walking Environmental Management Programme (EMP).
		Users of TMNP should be given special attention in this consultation process.	CDF 421 CDF 449	The process provides for this.
		TMNP prefers to consult small pressure groups where endorsement of their policies is ensured.	CDF 125	See Response A.
		The Park Forum was never established through a democratic process and as such is ineffective as a reference of public opinion.	CDF 125	The current Park Forum was established in 2004 through a widely advertised process of engaging all TMNP stakeholders and providing them an opportunity to elect stakeholder representatives reflecting a wide range of interest groups and sectors of society. A series of 3 workshops attended by over 100 representatives from different organisations led to the establishment of the Park Forum.

Issue Group	Issue	Comment / Concern	Reference	Response
	Extent of advertising	SANParks should have advertised the stakeholder consultation process in all the free local newspapers.	CDF 357 CDF 421	SANParks issued a press release to all the local community newspapers (see Annexure E). The press release informed the public as to the open days on 14 and 15 August 2006.
	Open Days	Handouts should have been given to people attending the Open Days	CDF4	The draft CDF Map with tables explaining zonation were made available at 13 libraries throughout the City where the public are able to view and copy the information. The various documents were also available on the TMNP website.
	Review Documentation	The draft CDF Map is poorly presented (difficult to orientate oneself) and as such does not promote effective public participation.	CDF 17 CDF 33 CDF 186 CDF 312 CDF 338 CDF 357 CDF 405 CDF 418 CDF 421 CDF 449	Noted. Labels were added to the maps presented at the Open Days and the consultants were on hand to answer questions.
		The tables in the background information document (dated 1 August 2006) and the brochure circulated during the comment period are not consistent with respect to guidelines for managing recreational activities in the Remote Zone. Which is correct?	CDF 362	The tables are consistent with the documentation released after 15 August 2006.
		The draft CDF is introduced in an attached brochure as having only two significant changes when compared to the previous CDF, namely the introduction of the Marine Coastal Park and the new Remote Wilderness Zone. There is no mention of the highly contentious proposal to limit dogs to the Quiet and Low Intensity Leisure Zones. For this reason the draft CDF has not had much media or public attention and as such the	CDF4	See Response A for extent of consultation process. Changes were made to the appropriateness of other recreational activities in various use zones as well. It should be noted that recreational activities are only one aspect of the CDF. However, it should be stressed that the draft CDF does not change the current dog walking arrangement – this can only be done through public process by revising the current Dog Walking EMP.

Issue Group	Issue	Comment / Concern	Reference	Response
		consultation process is fatally flawed.		
		The documentation included a map and guidelines but the rationale / motivation for the proposed restrictions is essential to allow effective public review.	CDF 17 CDF 33 CDF 186 CDF 312 CDF 338 CDF 357 CDF 405 CDF 418 CDF 421	The rationale for zoning of the TMNP is briefly explained in the Background Information Document (see Annexure F) that had been distributed to all registered interested parties. This essentially motivates the appropriate recreational and other activities or uses in terms of each zone.
		The documentation made available for public comment did not include any definitions of the various recreational activities. This is a major shortcoming and has limited the effectiveness of the public participation process.	CDF 125	Noted. The various recreational facilities will be clearly defined in the EMP's associated with each activity.
	Availability of documentation	The documentation was not available for public review in many of the customary venues and was not available for the full duration of the comment period.	CDF 47	See Response A . Documentation should have been available for the full comments period . SANParks has no control over how publications are managed in the various libraries
		Documents were placed in only 12 libraries in the entire peninsula. This is inadequate.	CDF 357	See Response A .
		The documentation was not available for public review in the Fish Hoek library.	CDF 301	The documentation was available in the Fish Hoek library.
		The documentation was not available in the Hout Bay library.	Telephone call	The documentation was made available in the Hout Bay library from 21 August 2006.
		The map published in the Cape Times was virtually illegible.	CDF 301	Noted. SANParks has no jurisdiction over independent publishers.
	Comment Period	Comment Period is too short. An extension or a further phase is required.	CDF4 CDF 33 CDF 47 CDF 154 CDF 301 CDF 421	The Background Information Document was sent out to registered IAP's on 01 August 2006 and the public open days took place on 14 and 15 August. The comment period closed on 14 September 2006 thus allowing the standard, full 30 day comment period. SANParks accepted comments submitted after this date to accommodate any confusion that may have existed. Any changes to existing EMP's or development proposals

Issue Group	Issue	Comment / Concern	Reference	Response
				requiring EIA / HIA approvals will be subjected to further public process.
		There is confusion regarding the comment closure date as the information in circulation indicates two dates, 14 and 15 September 2006. Which is it? This invalidates the entire process.	CDF 79 CDF 300	The closing date for comment was accepted as 15 September 2006.
SANParks' Management Approach	Alignment with the Park's vision – "A Park for all, for ever"	The draft CDF does not represent the desires and needs of the people of Cape Town and as such is not aligned with its vision.	CDF 7 CDF 17 CDF 69 CDF 307 CDF 312 CDF 392 CDF 396	The draft CDF is largely based on the existing, approved CDF which went through similar extensive public consultation in 2000. The previous CDF was in place since 2000 and the revised CDF is closely aligned with the current CDF which has been approved and accepted as aligned to the Park vision.
	Tourism versus maintaining an accessible conservation estate	SANParks is more interested in exploiting tourism rather than managing the TMNP for its local users. This is resulting in the country's prime wilderness areas becoming accessible only to the high-paying elite.	CDF 11 CDF 69 CDF 93 CDF 133 CDF 152 CDF 154 CDF 371 CDF 395 CDF 449	The TMNP is mainly an open-access park where users enter the Park for free. As such the Park is accessible to all and well used by local users. TMNP has invested substantial public funds in upgrading footpaths, signage, access points, picnic areas, alien clearing, firebreaks etc largely for the benefit of local users. In addition with a Cape Town Wild Card, purchased at a cost of R45, the Cape of Good Hope section for example can be visited 12 times per year by the holder. This equates to R 3.75 per visit. SANParks wishes to submit that this is very affordable.
	Strategic perspective	It is not necessary to promote hiking trails in TMNP as this area is already popular to tourists. Surely it is more appropriate to promote these types of tourist attraction in rural areas in South Africa where the local economies are in greater need of economic development.	CDF 395	The promotion of tourism products is part of the mandate of SANParks and is required in order to make conservation a sustainable undertaking. Based on the principals of economies of scale, it is good practice to provide appropriate tourism products where the majority of tourists visit. TMNP is capitalizing on the status of Cape Town as a tourism destination by using existing hiking routes to create new products, although 2 of the new Hoerikwaggo Trails (People's and Orangekloof trails) are affordable and aimed specifically at locals.

Issue Group	Issue	Comment / Concern	Reference	Response
				The success of these products will contribute to the local tourism economy, job creation and promote sustainable conservation practices.
	Historic rights	As an urban park the existing rights of the population of Cape Town must be entrenched. The proposals in the draft CDF disregard the rights of the public.	CDF 7 CDF 21 CDF 31 CDF 34 CDF 39 CDF 45 CDF 46 CDF 51 CDF 66 CDF 84 CDF 96 CDF 97 CDF 115 CDF 164 CDF 167 CDF 193 CDF 226 CDF 267 CDF 307 CDF 312 CDF 382 CDF 395 CDF 410	Response B: The CDF does not disregard the rights of the public and these have not been limited through the CDF process. The public open access park remains as it has always been. Any changes to current recreational use arrangements can only be effected through changes by public process, to the current Recreational EMPs. No new pay points or restrictions on free access are proposed in the CDF.
		One of the conditions that SANParks agreed to in taking over the management of the TMNP was that freedom of access should be retained and that the existing rights of Capetonians would be entrenched.	CDF 8 CDF 20 CDF 125 CDF 136 CDF 170 CDF 218 CDF 248 CDF 250 CDF 253	See above response.

Issue Group	Issue	Comment / Concern	Reference	Response
			CDF 256 CDF 257 CDF 258 CDF 300 CDF 312 CDF 326 CDF 333 CDF 370 CDF 395 CDF 410 CDF 411	
	Biodiversity conservation versus public amenity	Managing TMNP like a game reserve (i.e. attempting to return it to a pristine condition) makes no sense as the Park is an urban park and therefore should be managed equally if not more so for its public amenity value.	CDF 31 CDF 46 CDF 56 CDF 62 CDF 76 CDF 91 CDF 94 CDF 95 CDF 115 CDF 125 CDF 129 CDF 137 CDF 152 CDF 176 CDF 202 CDF 220 CDF 257 CDF 267 CDF 282 CDF 283 CDF 290 CDF 299 CDF 312 CDF 315	TMNP is a Natural World Heritage Site and SANParks is legislatively obliged in terms of national and international law and conventions to rehabilitate and maintain its unique biodiversity. The TMNP is managed uniquely from any other National Park in the way that free access is allowed and a range of recreational activities are accommodated, such as walking with dogs, mountain biking and horse riding, activities that are not normally allowed in the same way in other National Parks.

Issue Group	Issue	Comment / Concern	Reference	Response
			CDF 371 CDF 380 CDF 389 CDF 396 CDF 402 CDF 405 CDF 413 CDF 416 CDF 421 CDF 425 CDF 426 CDF 427 CDF 429 CDF 430 CDF 449	
	Public Relations	SANParks is assisted in the management of TMNP by the public. If SANParks alienates the public through poorly considered planning they will lose the support of the public and management of the Park will become more of a burden on SANParks.	CDF 152 CDF 328 CDF 389 CDF 404 CDF 442	Agreed. SANParks strives not to alienate the public. In this regard the TMNP operates a range of well supported volunteer programmes (fire, alien clearing, education, guiding etc) that has contributed 88 482 volunteer hours between 01 April 2005-31 March 2006.
	Development in and around national parks.	Support any developments in National Parks that promote tourism and conservation of biodiversity.	CDF 1	Noted. This is one of the aspects the CDF provides for.

3.4 Specific Comment

Specific comment refers to comment that is specifically made regarding the proposals contained in the draft CDF (2006 – 2010 revision). Specific comment related primarily to the following:

- Zoning Methodology;
- Regulation of Recreational Activities;
- Visitor Facilities;
- Coastal and Marine component;
- Priority Areas.

These are each addressed in the following sections.

3.4.1 Zoning Methodology

The comments relating to the zoning methodology have been summarized in [Table 3](#).

Table 3: Summary of Specific Comments with Responses – Zoning Methodology

Issue	Comment / Concern	Reference	Response
Rationale for Zoning	The stakeholders need to be shown the objective evidence that underpins the proposed zoning restrictions.	CDF 371 CDF 416	<p>The zoning of protected areas for different activities is applied in many countries around the world to ensure that visitors are ensured of a range of activities and facilities without compromising on the protection of biodiversity and to avoid clashes between different users. SANParks has applied the zoning process in line with best practice principles and also to meet the requirements of the Protected Areas Act. The Protected Areas Act mandates SANParks to:</p> <ul style="list-style-type: none"> • Protect Biodiversity, cultural heritage and scenic beauty • Provide environmentally compatible spiritual, recreational and tourism opportunities and • To contribute to economic development. <p>These three prime mandates are in conflict and the CDF process has been designed to minimise these conflicts and impacts. Thus, the CDF seeks to:</p> <ul style="list-style-type: none"> • Protect sensitive areas • Provide a range of visitor experiences without compromising on the integrity of the environment • Provide a gradation of nature based activities and • Separate where required the different users. <p>The zoning process is particularly relevant in TMNP where there is a largely open</p>

Issue	Comment / Concern	Reference	Response
			<p>access system and a wide range of visitor activities. The zoning of the Park does not seek to regulate activities, but strives to ensure that all users are able to access and use the Park in a responsible way and non- conflicting way.</p> <p>As stated above the CDF seeks to reduce impacts of activities on the environment and potential conflicts between users. The process was informed by a Sensitivity-Value analysis of biophysical factors, a heritage analysis and existing knowledge of the different activities.</p>
	<p>By concentrating users into designated areas the quality of the visitor experience will be negatively impacted and conflicts between user groups likely.</p>	<p>CDF 8 CDF 38 CDF 63 CDF 94 CDF 111 CDF 125 CDF 210 CDF 214 CDF 220 CDF 368</p>	<p>See above response.</p>
	<p>The Park should be available to as many users as possible, to widen public acceptance and to ensure long-term viability. If access and use is heavily regulated and restricted the current public support for conservation and the Park will dwindle.</p>	<p>CDF 184 CDF 370 CDF 384 CDF 414 CDF 426 CDF 447 CDF 452</p>	<p>SANParks recognises that the use of the Park should be extended to a wider public. As stated above in an open access system this could have very serious consequences if not properly managed. The CDF thus seeks to provide for the growing use of the TMNP.</p>
	<p>More restrictions will result in less people using the mountain and this will encourage criminal behaviour.</p>	<p>CDF 322</p>	<p>See above response.</p>
	<p>Tourists do not come to Cape Town to see wild antelope on the mountain. There are many other places in the province and in SA where they can do</p>	<p>CDF 315</p>	<p>The economic benefit that the Table Mountain National Park delivers to the City of Cape Town as well as to the</p>

Issue	Comment / Concern	Reference	Response
	this. What economic benefit is SANParks intending to derive from this plan?		regional economy has been the subject of a recent study by the Graduate School of Business of the University of Cape Town. The CDF is not intended to deliver an economic benefit <i>per se</i> , but to address the long term conservation of the resources of the Park, these resources being the drivers of economic benefits.
	While the majority of the public want a park that conserves the natural and cultural heritage they do not want a park that is full of restrictions and controls.	CDF 95 CDF 401	The CDF does not intend to introduce restrictions and controls but seeks to find a way that all users of the mountain can have a quality experience.
	Emphasis should be placed on managing use of TMNP rather than excluding activities. This should be done through specific EMPs.	CDF 363 CDF 370 CDF 414	Recreational EMPs will be compiled for all activities designated in the tables.
Recent research findings	Recommend integrating recent research findings that identify priority “hotspots” for floristic biodiversity on the Peninsula (SA J Bot, Helme & Trinder Smith, 2006) into the CDF Zonations with a view to protecting special and highly sensitive areas.	CDF 434	A Sensitivity - Value analysis of all known biophysical factors was conducted to ensure that sensitive and special areas are protected. Where necessary special management overlays for special areas will be placed on the map with special management guidelines for these areas. Alternatively, information from such findings will be incorporated at a more detailed level.
TMNP / CoCT interface	TMNP must ensure that planning within the TMNP is integrated with the CoCT planning.	CDF 6	Agreed. The CoCT are being consulted in a parallel process.
Appropriateness of zoning	The lower Silvermine Wetlands are included in the CDF but are not part of TMNP. Why has this area been included?	CD 445	Although it is not in the TMNP it is continuous with the Park. The area is included to guide SANParks on how they will respond to any activities or proposals in this area.
	Object to the zoning of Perdekloof as an urban node. This results in illegal and inappropriate	CDF 448	The zone is not designated as an urban node, but as a picnic area. The yellow

Issue	Comment / Concern	Reference	Response
	developments subsequently being condoned.		colour of the key for picnic area has been confused with the colour for urban area. This will be rectified on the final map.
	The zoning of the Redhill settlement as Quiet suggests that this settlement is being ignored by SANParks.	CDF 448	This settlement is not being ignored. SANParks fully supports the relocation of this community to a more suitable site as proposed by the local authority.
	Fully support the zoning of Remote Wilderness.	CDF 448	Noted
	None of the areas zoned as Remote Wilderness fit the description as these areas are frequently utilised by the public and have infrastructure etc.	CDF 2 CDF 176 CDF 442	It is possible that some structures occur in this zone. Where these have no heritage value or are not required for utility purposes they will gradually be removed. No new structures will be allowed in this zone.
	If the intention is to establish a Wilderness area within the Park then SANParks must keep absolutely everyone out of this area.	CDF 297	It is not the intention to establish a formal Wilderness Area as designated by the Protected Areas Act (PAA). The PAA does not exclude users from Wilderness Areas but seeks to achieve a special spiritual experience. There are no areas that meet the requirements of the PAA for Wilderness Area in TMNP. The intention of establishing <i>Remote Wilderness</i> in TMNP is to designate areas where a relative "Wilderness" experience can be experienced. In terms of the open access nature of the Park it would be impossible to exclude people out of some of these areas. Access will only be via designated footpaths.
	There is no area within TMNP which by the standards applied by the IUCN can be truly identified as Wilderness.	CDF 125	See above response.
	Why not include the entire Cape Point Reserve area as Remote Wilderness? There is no reason to designate any area south of Smitswinkel Bay as	CDF 105	This is not considered practical due to existing uses which are not compatible with the objectives of Remote Wilderness.

Issue	Comment / Concern	Reference	Response
	Remote Zone.		This would also exclude large numbers of visitors and make the area very exclusive.
	"Remote Wilderness" and "Remote" zones are incorrect designations owing to the extent of user activity and infrastructure such as roads.	CDF 49	The definition of the type of experience for Remote Wilderness and Remote is specific to the TMNP, relative to the proximity of the urban area and defined in terms of the nature of the desired experiential quality. It is important to note the level of intensity does not only refer to the number of visitors, but also to the level of facilities provided in the zone.
	There is no area within TMNP which can be regarded as Remote as all such areas can be readily accessed.	CDF 125 CDF 299 CDF 363 CDF 370 CDF 380 CDF 414	The intended experience of the Remote zone is relative to other areas and users in TMNP and the closeness of the urban environment. Although they are accessible to the public they are relatively less accessible than the Quiet zone.
	The designation of Silvermine and the Back Table as Remote in no way described the reality of the situation on the ground.	CDF 389	The Back Table and portions of Silvermine have been designated as Quiet.
	It is the public's expectation that all areas of the TMNP should be Quiet and that this status should be encouraged through the banning of all but the most essential vehicular transport, radios, music and rock-concerts in picnic areas.	CDF 125	The CDF zonation provides for experiential qualities appropriate to the different zones. The 'quite' qualities of this zone are carried through into the Remote and Remote Wilderness zones.
Implications of zoning	Concerned that private land owners may interpret the zoning of land as "quiet" as having enhanced development rights (in the form of guest houses, restaurants, or any other similarly inappropriate developments in the Cape Peninsula Protected Natural Environment (CPPNE). It needs to be made clearer that developments catered for in the quiet zone should only be considered in the Park and not on private land.	CDF 370	The definition of the Quiet zone has been amended so the provision of accommodation is only applicable to within the Park. Private land is subject to a different procedure in terms of the Land Use Planning Ordinance, environmental and heritage regulations for land use changes.
	If SANParks is serious about the Remote and Remote Wilderness zonings then it must exclude	CDF 371	The Remote area at Cape of Good Hope is not continuous, but is divided into

Issue	Comment / Concern	Reference	Response
	tour busses from entering these areas as the impact of bus loads of tourists should be considered unacceptable in these zones.		smaller areas by the various roads. As the visitor moves away from the roads on foot then the remote experience becomes more apparent. The main road has been designated as a transit route which excludes any facilities along the road. As there are no facilities along the road except for the Buffelsfontein visitor centre (a designated 'visitor site'), the experience of the open landscape from busses and other vehicles is a form of "remote" experience.
Definitions	High Intensity Leisure requires definition.	CDF 125	This has been defined as an area with commercialised tourism activities and facilities with high and concentrated visitor numbers.
	It is inappropriate to characterise "dog walking" as an activity separate from walking as many people are accompanied by dogs when doing other activities (e.g. alien clearing, hiking, etc).	CDF 312	This has been noted and the definition (to be included in the final document) will be amended accordingly. However it should be acknowledged that the vast majority of people who walk and hike in the Park do so without dogs (see response to General Response to Dog Walking Issue – Table 5)
	The draft CDF indicates that walkers are permitted in the Remote Zones but that runners may only do so under strict conditions. What is the difference between runners and walkers?	CDF 105	The reference to Running in remote areas refers to organised events only not recreational running.
	The distinction between "hiking" and "walking" is absurd. A rationale for this distinction needs to be provided. Clarity is required regarding whether this zoning is merely to accommodate the Hoerikwaggo Trail?	CDF 44 CDF 49 CDF 125	As many of the visitors to TMNP are either inexperienced or are not fit enough to embark on the more strenuous routes it has been necessary to distinguish between the two activities. Less experienced and less fit visitors will be encouraged to use the paths designed for walking. A definition which is specific to

Issue	Comment / Concern	Reference	Response
			TMNP has been compiled based on various dictionaries and the Mountain Club Guide to Table Mountain. There is no intention or need to use this definition to accommodate the Hoerikwaggo Trail.
	In "traditional" rock climbing "aids" might still include the use of pitons, hammered into ever-widening cracks when removed, or it might mean "free" climbing when rock faces are ascended with only a pair of shoes and a chalk bag. An example is "Arrow Face" directly below the upper cableway station which many climbers now ascend "free". How will this be categorised?	CDF 125	This has been noted and has been included in the definition of traditional climbing.
	In defining climbing / mountaineering activities, the activity of scrambling (combination of walking and climbing) has been omitted.	CDF 44	Scrambling has been included in the definition of walking.
	SANParks need to appreciate that the sport of rock climbing is constantly evolving and that attempts to categorise the various techniques is impractical. Agreed that control is needed for sport climbing but that the climbers and the organisations that represent them must be consulted and low impact routes appropriately determined and high quality equipment used.	CDF 125	All representative groups will be consulted in the compilation of respective EMPs.
Practicalities	It is impractical to apply the guideline of "suitable under strict conditions" for hiking and traditional climbing in the Remote Wilderness areas as by their nature they are virtually impossible to police.	CDF 49 CDF 125	Noted.
	Dog walking and mountain biking are two incompatible uses and should not be combined.	CDF 394	Noted.
	There are many people who like to cycle or horse-ride together with their dogs. As such the policy of separating recreational activities is impractical.	CDF 312	Unless visitors are able to control their dogs it is regarded that this will be disruptive to other users. The issue should be discussed when EMPs are revised.
Suggestions	While Devils Peak Game Park is considered	CDF 312	This concern will be considered in

Issue	Comment / Concern	Reference	Response
	suitable for the release of antelope this section should not extend above the (contour) road as this area currently has a very high recreational use.		planning the extension of the game camp.
	The Cape Peninsula Speleological Society (CPSS) wishes to be considered as one of the normal and current users and that caving be regarded as an activity and is provided for in the CDF	CDF 432	This activity will be included in the final CDF Technical Document.
Conditions of use	What are the conditions under which SANParks intends to allow hiking and traditional climbing.	CDF 82	There are currently no recreational EMPs for these two activities. Should this user community feel the need for such EMPs to ensure these are practised in terms of a responsible code of conduct, TMNP would be willing to engage in this discussion.

3.4.2 Regulation of Recreational Activities

The comments relating to the proposed regulation of recreational activities in TMNP, perceived as a direct consequence of the zoning proposals contained in the draft CDF, have been summarized in [Table 4](#). Due to the large volume of comment received regarding the issue of Dog Walking in TMNP, this has been summarized in a dedicated table ([Table 5](#)). Responses to individual comments made regarding the dog walking issue are not provided. Rather, SANParks has provided a general response at the end of [Table 5](#).

Table 4: Summary of Specific Comments with Responses – Regulation of Recreational Activities (other than Dog Walking)

Issue	Comment / Concern	Reference	Response
Support	In general the Red Hill Conservation Group support the proposals made in the CDF.	CDF 446	Noted.
Motivation	Do not support any further restrictions on recreational / leisure activities in TMNP as the current situation is satisfactory.	CDF 103 CDF 301 CDF 391 CDF 397	Comment B: The CDF does not disregard the rights of the public and these have not been limited through the CDF process. The public open access park remains as it has always been. Any changes to current recreational use arrangements can only be effected through changes by public process, to the current Recreational EMPs. No new pay points or restrictions on free access are proposed in the CDF. In addition it should be recognised that there is an ever increasing demand to access TMNP for recreational activities due to population growth increasing use by all groupings in Cape Town. The CDF strategically addresses these future needs to ensure that over and inappropriate use does not destroy the very resource that SANParks has been mandated to hold in custodianship for the peoples of South Africa.
Enforcement	It is critical that SANParks demonstrates its capacity to implement this plan otherwise it will be seen as nothing more than a bureaucratic tool rather than a sustainable environmental / conservation management tool.	CDF 273 CDF 312	Noted.
	SANParks law enforcement officers need to be more visible and be regarded as an effective policing force in TMNP.	CDF 273	Noted. Over the past year TMNP has employed an additional 40 Visitor Safety Rangers to be deployed in all high risk crime areas. These rangers also handle 6 dogs daily on patrols. TMNP also have daily interaction with City Police and SAPS. In addition, the TMNP Marine Section has had numerous successful operations against poaching in the Peninsula. However, being an

Issue	Comment / Concern	Reference	Response
			open access system, urban crime will always be a problem in these parts of the Park.
	By creating more rules and restrictions SANParks is increasing the burden upon themselves of enforcing these rules. Currently they cannot effectively police TMNP and enforce the existing rules. How are they planning on enforcing new rules?	CDF 216 CDF 262 CDF 317 CDF 322 CDF 335 CDF 389 CDF 392 CDF 429 CDF 430	The recreational EMPs and associated codes of conduct (prepared and agreed to by public process) are based on the principle of self enforcement by the recreational users themselves. If the recreational users undertook their activities in terms of the EMPs and codes of conduct, enforcement would only be required for the limited few serious and serial transgressors.
	How will SANParks enforce the CDF and how will users know when they are passing from one zone to another? Do not want a profusion of signage throughout the Park that detracts from the visual aesthetic quality of TMNP. Of the multitude of access points only two are subject to any control.	CDF 125 CDF 209 CDF 292 CDF 295 CDF 313 CDF 429 CDF 430	Recreational users will be guided by the conditions of the EMP relating to their specific activity which will designate respective recreational user areas based on common sense boundaries such as footpaths, tracks etc. A profusion of signage would be inappropriate so good communication via media, Wild Card system and awareness of Recreational EMPs by users will be necessary.
Informing users	Signage at access points should clearly indicate the need for a Wild Card to cover all activities other than walking and hiking.	CDF 442	See above response.
	The EMPs must be communicated to users when purchasing Wild Cards (which should be required for all activities except walking and hiking).	CDF 363 CDF 370 CDF 414 CDF 442	Agreed.
Horse riding	Horses are silent, non-polluting and cause very little impact on the natural environment. Horse-riders do not pose a threat to flora, fauna nor any aspect of the natural environment. Horse-riding directly and indirectly provides employment. As such consideration should be given to expanding horse-riding in TMNP.	CDF 184 CDF 353	The specific routes and impacts of horse riding is managed through the recreational EMP for this activity. The possible extension of the area for horse riding will be discussed during the revision of this EMP.
	Is it SANParks' intention to ban horse-riding from Noordhoek beach?	CDF 131	Horse riding is currently accommodated on Noordhoek beach as provided for by the Horse

Issue	Comment / Concern	Reference	Response
			Riding EMP and any changes can only be effected through the a review of the EMP.
	The equestrian community requires a piece of land which it would lease for the purposes of a training facility.	CDF 353	Noted.
Rock climbing, Bouldering & sport climbing	Is it SANParks' intention to discourage rock climbing from the TMNP.	CDF 44	There is no intention of discouraging rock climbing in TMNP although this activity is managed in terms of the appropriate EMP.
	What is SANParks' rationale for banning Bouldering from Remote Zones?	CDF 177	There was no intention to ban Bouldering and Sport Climbing from Remote zones. It was omitted by error and any concern that this has caused is regretted.
	Bouldering and sport climbing should be permitted in the "remote" zone.	CDF 49	
	How can SANParks consider banning bouldering in Silvermine South? This area is frequently used for Bouldering.	CDF 177	
	Is there an EMP for rock climbing?	CDF 125	No, but the intention is to compile one in consultation with the relevant representative organisations.
	By confining people to designated paths will have a significant impact on climbers as most rock faces favoured by climbers are inaccessible by designated footpaths.	CDF 125	It is recognized that there are routes to access recognised climbing routes. The use of these paths by the general public needs to be discouraged. The management of these climbing access routes is an issue that will need to be detailed in an EMP for climbing.
Sand boarding	The Fish Hoek dunes have been used by generations of children for sand boarding. Do not accept that the dunes are too sensitive for children to sand board on. These dunes should remain accessible for sand boarders.	CDF 370	In recent years the number of users and the intensity of this activity has grown to the extent that there is now a serious impact on the dune systems ie disturbance of vegetation which destabilises the dune. This activity has therefore been restricted for sound environmental reasons.
Running	Why are runners not allowed in the Remote Wilderness? They pass through an area quickly and usually quietly, have little impact on wildlife and do not litter.	CDF 405	It is believed that high energy activities such as running, particularly in groups and organised events is incompatible with the desired experiential quality of solitude and relative wilderness.
	Does the exclusion of running from the Remote	CDF 105	The puffer race will be allowed subject to

Issue	Comment / Concern	Reference	Response
	Wilderness Zones mean that the Puffer race would not be allowed to follow its current course?		conditions set by SANParks.
Mountain biking	Mountain biking has a minimal impact provided they keep to designated roads and tracks. Only where there is conflict between users of these tracks should mountain biking be restricted. In fact mountain biking access should be opened further and not restricted.	CDF 421	The current Mountain Biking EMP designates the areas and tracks where mountain biking is allowed. The EMP also contains a code of conduct for mountain biking in the TMNP. Any changes to these provisions will be addressed through the EMP revision.

Table 5: Summary of Specific Comments¹ – Regulation of Dog Walking

Comment / Concern	Reference
<p>Do not support the restriction of dog-walking from the Remote Wilderness and Remote Zones, particularly in the Silvermine area and Newlands. The main reasons for this include:</p> <ul style="list-style-type: none"> • there is no evidence to suggest accompanied dogs impact on biodiversity • dogs are of negligible nuisance to other users • dogs provide safety to their owners • dogs give users pleasure and provide companionship • many, particularly the elderly, feel that the proposed restriction would severely impact on their and their dog's physical and psychological well-being. 	<p>See list of objecting dog walkers (Annexure G)</p>
<p>Is it SANParks' intention in the long term to ban dogs completely?</p>	<p>CDF 17 CDF 422</p>
<p>By closing access to many parts of TMNP for dog walkers SANParks will be losing income generated through the sale of Wildcards</p>	<p>CDF 16 CDF 21 CDF 31 CDF 34 CDF 39 CDF 52 CDF 78 CDF 94 CDF 115 CDF 152 CDF 181 CDF 222 CDF 246 CDF 268 CDF 305 CDF 312 CDF 313 CDF 324 CDF 325 CDF 335 CDF 349</p>

¹ Note: SANParks has provided a general response to all the issues and concerns raised regarding the issue of dog walking at the end of Table 5.

Comment / Concern	Reference
	CDF 429 CDF 430 CDF 437 CDF 447
Many dog walkers have cleared alien plants on a voluntary basis and if they are restricted access to those areas then SANParks will lose the beneficial efforts of these volunteers.	CDF 7 CDF 11 CDF 15 CDF 20
Friends of the Dog Walkers' mission is to maintain the status quo and retain traditional rights of access to the Park for visitors who enter for legitimate purposes and wish to be accompanied by their dogs as provided for in the existing dog walking EMP.	CDF 312
Friends of the Dog Walkers do not want to see dogs being confined to any dog-walking zones or areas in future. They want to have free and open access to TMNP (except the prohibited areas).	CDF 217
Dog walkers prefer remote areas as this minimises 'undesirable' encounters with other users. Confining them to certain areas will increase the incidence of 'undesirable' encounters with other users.	CDF 31 CDF 63
Tourism is not negatively impacted by dogs on the mountain.	CDF 40 CDF 45
Safety is a major issue and limits the recreational use of TMNP and TMNP officials have been ineffective in ensuring people's safety to date. In their absence dogs provide this safety.	CDF 7 CDF 11 CDF 16 CDF 28 CDF 36 CDF 39 CDF 40 CDF 66 CDF 76 CDF 78 CDF 87 CDF 125 CDF 142 CDF 143 CDF 211 CDF 239 CDF 286 CDF 301 CDF 312

Comment / Concern	Reference
	CDF 317 CDF 340 CDF 360 CDF 364 CDF 385 CDF 400 CDF 433 CDF 439
Car guards who currently do a very good job in ensuring park visitors vehicles are safe are paid by users, most of whom are dog walkers. Restrict access for dog walkers and car guards will cease to function.	CDF 312
Agree that public access to parts of TMNP should be restricted for the purposes of biodiversity conservation but most areas currently utilised by dog walkers must remain accessible to these users primarily because the majority of TMNP users are dog walkers.	CDF 19 CDF 28 CDF 70 CDF 77 CDF 92 CDF 102 CDF 119 CDF 124 CDF 152 CDF 180 CDF 181 CDF 190 CDF 220 CDF 246 CDF 258 CDF 288 CDF 302 CDF 311 CDF 313 CDF 317 CDF 356 CDF 393 CDF 420 CDF 423 CDF 435
As many high altitude areas are being proposed as No-Go areas for dog walkers, dog walkers are effectively	CDF 7

Comment / Concern	Reference
<p>being denied from walking from the following areas:</p> <ul style="list-style-type: none"> • Suikerbossie to Camps Bay or on the Apostles • Kommetjie to Ocean View or on the Kommetjie Mountain • Hout Bay to Silvermine or on the greater Silvermine West area • Constantia Neck to Silvermine or anywhere in that area • Ou Kaapse Weg to Kalk Bay / St. James or anywhere in that area • Simons Town to Smitswinkelbay or anywhere on the Simons Town mountains • Ocean View to Red Hill or anywhere in that area <p>This is effectively most of the mountain chain.</p>	CDF 36
SANParks has promised dog-walkers that they will be able to walk dogs in the TMNP.	CDF 5
If SANParks believes that dogs cause environmental impacts then this must be substantiated through independent specialist assessment and the information made available to the public.	CDF 152 CDF 270 CDF 299 CDF 317 CDF 335 CDF 360 CDF 404 CDF 427
The dog walking EMP is a legally binding document. Has SANParks decided that this is ineffective?	CDF 17 CDF 78
Friends of the Dog Walkers accepts that dogs have an environmental impact but their impact has already been “graded” in Section 2 of the EMP and provision has been made in the EMP for minimising this impact.	CDF 312
If there are problems with the implementation of the dog walking EMP then the dog walking community will happily engage with SANParks to resolve this.	CDF 403
Surely it is necessary to draw a distinction between rogue or feral dogs that have a greater impact on the environment than on accompanied domestic dogs which cause negligible environmental impact and investigate ways to manage the rogue / feral animals?	CDF 412
If SANParks’ motivation for banning dog-walking is because of dog faeces impacting on visitor experience then this can be simply addressed through imposing a “pick-up” rule in certain areas where this is problematic (e.g. in parking lots and picnicking areas). There are many innovative, cost-effective ways of doing this.	CDF 15 CDF 30 CDF 67 CDF 73 CDF 76 CDF 77 CDF 86 CDF 132

Comment / Concern	Reference
	CDF 152 CDF 186 CDF 214 CDF 229 CDF 246 CDF 259 CDF 261 CDF 316 CDF 317 CDF 329 CDF 356 CDF 360 CDF 386 CDF 427 CDF 439
If the reason for banning dogs is because SANParks wishes to introduce indigenous antelope as a result of eradicating the Tahrs then Capetonians should have been informed that this would be a consequence of eradicating the Tahrs.	CDF 11
The only places where dogs potentially impact on visitor experience is in the car parks when at the beginning of their walks they tend to be over-excited. This is when they must be kept on leashes.	CDF 17
By restricting dog-walking to limited areas the intensity of the impact of dog-walking in those areas is increased. Surely it is better to dilute the impact?	CDF 7 CDF 17 CDF 65 CDF 180 CDF 301 CDF 305 CDF 312 CDF 335 CDF 338 CDF 368 CDF 381 CDF 404 CDF 422
By reducing the places where dog walking may be permitted, SANParks is effectively placing more pressure on Cape Towns suburban and inner city parks and beaches.	CDF 312
By constructing well-made paths in TMNP the impacts of dog-walking could be effectively mitigated.	CDF 7

Comment / Concern	Reference
By having more paths fewer users would come into contact with one-another and visitor experiences would be enhanced.	CDF 7
The existing EMPs, in combination with effective policing and enforcement, offer the best method of regulating recreational use of TMNP. Because of TMNP's poor capacity and commitment towards the latter, transgressions occur.	CDF 7 CDF 8 CDF 17 CDF 22 CDF 31 CDF 278
By informing users and through better enforcement on the part of SANParks unacceptable behaviour can be curtailed. SANParks has not demonstrated commitment in this regard.	CDF 7 CDF 8 CDF 16 CDF 17 CDF 158 CDF 162 CDF 183 CDF 209 CDF 221 CDF 231 CDF 233 CDF 251 CDF 258 CDF 273 CDF 287 CDF 298 CDF 308 CDF 309 CDF 316 CDF 318 CDF 329 CDF 333 CDF 334 CDF 341 CDF 342 CDF 346 CDF 351 CDF 356

Comment / Concern	Reference
	CDF 403 CDF 420
Dog walkers should be prepared to pay for the right to exercise their dogs. Finances generated could be used to establish a permit system to ensure that the numbers of dog walkers at any one time are maintained at acceptable levels	CDF 350
Suggest that dog walkers be allowed to use specific paths as transit routes through the Remote Zones.	CDF 369
Dog walking licenses could be issued for dogs that have passed tests that demonstrate their control when encountering wild fauna in the same manner as shooting dogs must past tests.	CDF 156 CDF 190
By further restricting areas for dog walking more and more people are being forced to travel by vehicle thereby increasing vehicular emissions (i.e. increasing the ecological footprint).	CDF 216
Dog walking on the lower slopes discourages wild animals from existing near the urban fringes where they would be under constant threat and in conflict with humans. Dog walking should therefore be encouraged on the lower slopes and in proximity to urban areas.	CDF 291
Surely it makes more sense to designate the areas in proximity to residential areas as suitable for dog walking and the areas at a greater distance from these areas as suitable for biodiversity conservation (i.e. where dogs should not be permitted).	CDF 158
Zone the lower elevations of the mountain as suitable for dog-walking and the higher areas unsuitable for dog-walking.	CDF 271
The designation of the Silvermine river path around the reservoir as a dog walking area is inappropriate as there will be conflict between dogs and picnickers.	CDF 63
The designation of the front slopes of Constantiaberg as a dog walking area is supported provided conflicts with baboons can be obviated and the tracks maintained.	CDF 63
The designation of the slopes around Rhodes Memorial as a dog walking area is inappropriate as there are fences, few paths, inadequate parking, heavily used by tourists and ticks are problematic.	CDF 63
Dog walkers enjoy both long walks with their animals and also short walks. It does not make sense to assume dog walkers mostly take short walks.	CDF 105
Any restrictions, via the proposed Coastal Marine Park and the new draft zonings for the marine areas of TMNP, of dog walking on beaches such as Noordhoek and Scarborough are seriously opposed.	CDF 312
The majority of dog walkers need circular routes close to urban areas where they can walk there dogs off-lead yet under control. The minority need to have access to contour paths to be able to move from one part of the mountain chain to the other.	CDF 8 CDF 109
Dog walkers would like a long walk from Silvermine to Constantiaberg. People in the Sea Point, Fresnaye and Camps Bay area all need to have access to the area around the Signal Hill path, Lions Head and Kloof Nek for themselves and their dogs. Also East Fort (Hout Bay) extending to Vlakkenberg is also an ideal place to increase dog walking.	CDF 9

Comment / Concern	Reference
Dog walkers require refuse bins in close proximity to the parking areas they frequent to allow them to dispose of dog faeces.	CDF 15 CDF 30 CDF 239 CDF 407 CDF 425
Dog walkers want less restrictions than what are currently in place.	CDF 409
The designation of the area inland from Noordhoek beach as a dog walking area is inappropriate as this area is unsafe and contains poisonous (to both man and dog) algae.	CDF 63
Many of the areas designated as allowing access for dog walkers are in reality inaccessible. This gives the (false) impression that dog walkers are being accommodated.	CDF 63
The designation of a narrow strip along the waters edge at Boulders penguin colony as a dog walking area is inappropriate as there will be conflict between dogs and penguins.	CDF 63
The designation of the area above Smitswinkelbay as a dog walking area is inappropriate as this area is unsafe and has a baboon presence.	CDF 63
The designation of the Oudekraal towards the pipe track area as a dog walking area is going to lead to conflict as this area contains Muslim holy sites.	CDF 63
Dogs should not be permitted in the Remote Zones but they should be permitted elsewhere.	CDF 405
Dog walkers litter beaches where children play and paths in the woods and mountains where people walk. Unleashed dogs also harass small children, particularly those of colour. Until such time as dog walkers control their animals and clean up their mess SANParks should ban dogs from nature reserves.	CDF 138
As a result of the lack of dog control in certain parts of TMNP we have reduced the frequency of our visits to TMNP. I don't want a dog licking me or my kids.	CDF 144 CDF 344
Dog faeces are everywhere and it undermines ones experience to be on the look-out for dog faeces all the time.	CDF 144
The majority of dog walkers do not abide by the regulations, particularly the keeping of dogs on leashes and the picking up of dog faeces).	CDF 144 CDF 171 CDF 235 CDF 294 CDF 344 CDF 355
A local paper (the People's Post) has a deceptive article quoting Geraldine Goncalves. Two dishonest statements that she makes are "about 70% of the Park users are dog walkers" and "this will definitely limit the enjoyment of the largest number of park users." Both statements are strongly refuted.	CDF 443
Dogs should be kept on a leash in any public place.	CDF 168
As it is virtually impossible to police dog walking in respect of keeping dogs on leashes and the picking up of dog faeces, dog walking should be banned from TMNP.	CDF 235 CDF 276

Comment / Concern	Reference
The chance of sighting wild fauna on the mountain is forever decreasing as a result of the increase in dog walking. In contrast wildlife has seen an increase in Kirstenbosch as a result of the ban on dog walking in that area.	CDF 276
There is an undeniable need to regulate dog-owners' (and dogs) behaviour in TMNP.	CDF 452

General Response to Dog Walking Issue:

Subsequent to the completion of the first CDF, when the issue of dog walking was also raised, the then Cape Peninsula National Park drafted an "Environmental Management Programme (EMP) for Walkers accompanied by dogs in the CPNP". This document was finalised in May 2002 with extensive input from the public and notably the Friends of the Dog Walkers. Section 6 of the EMP states that; "This is considered a bonding 'contractual' document between Park Management and dog walkers to facilitate responsible dog walking in the Park."

As such, the EMP is still in place and its status has not changed nor is it affected by the proposals contained in the draft revised CDF. Many of the comments submitted are in fact already addressed by the EMP. Thus, the traditional areas closed for dogs, such as the Cape of Good Hope Section of the Park, Orangekloof, etc. remain closed. The areas designated as dog walking areas, such as Silvermine, remain designated dog walking areas and the Code of Conduct as contained in the EMP remains in place. Furthermore, the requirement that any dog walker be in possession of a Wild Card permit and undertake dog walking as a recreational activity in terms of this permit also remains a prerequisite for any person wishing to walk with a dog in the TMNP.

The EMP also requires dog walkers to abide by the code of conduct outlined in the EMP, i.e. self-regulation is key to the effectiveness of the dog walking EMP.

The fact that the draft CDF (2006 – 2010), as presented to the public, did not provide for dog walking in areas zoned as 'Remote Wilderness' and 'Remote' was an indication of SANParks future intent with these areas when considering the experiential qualities that are associated with these two zones. Such intent would have to be tested at a greater level of detail and through further consultation with the specific user group. This process would consider the current EMP provisions in light of the CDF intentions.

In response to the issues raised, SANParks has now included dog walking as an activity suitable under certain conditions in the 'Remote Zone'. However, it is submitted that the current dog walking EMP must be revised to accommodate the increased use of the Park as well as to address issues of user conflict and impact on the experiential and natural quality of the environment in the Remote Zone.

With regard to the concept of zoning, it must be understood that whilst the draft CDF may have indicated that an activity such as dog walking is suitable for a particular zone, this does not mean that the whole area can necessarily be used for this particular recreational activity. Firstly, hikers, walkers and walkers with dogs are still required to remain on the designated footpath system that exists within the particular zone and secondly, existing excluded areas (as defined by the EMP) such as Cape of Good Hope, Orangekloof or the Rhodes Estate game camps, which may fall within or include a use zone considered suitable for walking dogs, will continue to clearly remain out of bounds to dog walking. Likewise for other recreational activities.

General Response to Dog Walking Issue:

During the stakeholder consultation process certain percentages were quoted for the proportion of Park users that walk dogs in the Park. The TMNP wishes to refute the mentioned figure of 70 % and supply the correct figures, based on the Park's 2000 visitor survey. It is evident from the Visitor Survey that only 15% of total number of annual visits to the Park are by dog walkers. Of the total number of local visitors to the Park, only 11% are dog walkers. It is noteworthy that certain areas of the Park are more heavily used by dog walkers. In this regard, 60 % of visitors to Newlands Forest, 49 % of visitors to Cecilia Plantation and 40 % at Constantia Nek walk with dogs. The revision of the EMP would have to specifically look at these areas and at the management of different users and impacts of their activities.

In conclusion, it is acknowledged that the TMNP is a unique National Park used by a variety of recreationalists and tourists for different activities. Local interests as well as tourist needs and expectations must be considered and the impacts of the different users on the environment must be assessed and minimised. This is precisely the purpose of the Recreational EMPs. Dog walking is but one of the activities conducted in the Park and cannot be allowed to take place to the detriment of the environment or to the detriment of other Park users.

3.4.3 Visitor Facilities, Coastal and Marine Component, & Priority Areas

Tables 5, 6 and 7 provide a summary with responses of the specific comments made regarding the visitor facilities in TMNP, the proposals in respect of the coastal and marine components of the draft CDF and on priority areas.

Table 6: Summary of Specific Comments with Responses – Visitor Facilities

Issue	Comment / Concern	Reference	Response
'Soft' restrictions	The very broad and undefined manner in which these facilities are described in the CDF is reason for concern. Parameters or guidelines for acceptable sizes and levels of impact need to be provided. This has to be done by TMNP in this document and not at a later stage or by another body.	CDF 448 CDF 448	The CDF is a medium term strategic document and cannot look at detail such as sizes of facilities. It is internationally accepted planning practice to use an approach where more detail is included as planning progress to a site level. More detailed planning is also subject to specific decision making requirements in terms of environmental and heritage regulations
Informal traders	Why is SANParks accommodating the informal traders? The current trading sites are unsightly.	CDF 125	TMNP has only accommodated informal traders at traditional trading areas inherited from the city with pre-existing rights in place. Informal trading is taking place immediately adjacent to the Park but outside its jurisdiction (eg Cape Point gate)
Appropriateness of facilities in urban park	SANParks should not construct any more visitor facilities, particularly accommodation facilities, in TMNP. Accommodation can be provided by the existing hotels, B&B operators and campsites outside the Park.	CDF 125	SANParks provide facilities that are unique, in designated sites and not provided in the areas outside the Park (eg hiking trails). As such there is no competition between facilities in the Park and in the CoCT as they cater for different markets and to provide different experiences..
	As a generalisation the recreational users of TMNP require nothing more than safe and organised places to park their vehicles.	CDF 125	This has been recognised in the CDF and TMNP has an ongoing programme to upgrade Park access points and improve safety at these access points.

Table 7: Summary of Specific Comments with Responses – Coastal and Marine Component

Issue	Comment / Concern	Reference	Response
Jurisdiction	Object strongly to the proposal that the coastline should be under the management and control of SANParks. SANParks has not demonstrated the any ability to effectively manage the mountain. They do not have the ability to manage our coastline.	CDF 357	SANParks currently only manages the coastline contiguous to the terrestrial areas it manages. The draft coastal zoning proposals will remain draft for ongoing discussions with the City, MCM and other authorities and stakeholders
	Fish Hoek beach is shown as High Density Leisure but this area does not form part of the TMNP. Why has it been designated as part of TMNP?	CDF 445	The CDF zones extend to land outside the TMNP. As with the terrestrial areas outside the Park, the draft coastal zones only indicate the TMNP attitude towards these areas - TMNP has no management responsibility over these areas.
Suggestions	Propose that the No-take Zone should be extended to include Smitswinkelbay	CDF 3	Noted. The marine area is managed by SANParks in terms of an agreement with Marine and Coastal Management (MCM), the authority responsible. Extension of the No-take Zones will have to be discussed with MCM.
Appropriateness of zoning	Query the zoning of the marine area surrounding the Miller's Point slipway. Surely it should be zoned high intensity leisure as a result of the use by ski-boats	CDF 3	The Coastal Zoning as shown on the CDF is merely indicative and will remain a draft proposal.

Table 8: Summary of Specific Comments with Responses – Priority Areas

Issue	Comment / Concern	Reference	Response
Soetwater	Draft CDF has not identified Soetwater as an area requiring detailed planning. Note that a spatial development plan has been prepared for this area and is available from Mr Greg Oelofse at CoCT: Environmental Planning	CDF 6	Noted.

3.4 Park Management Plan Comment

Several stakeholders, while commenting on the draft CDF, made comments that were of relevance to the draft Park Management Plan which was also subject to a period of stakeholder review. These comments have been included in the preparation of the Park Management Plan and detailed responses are provided in the Comments & Responses Report prepared in terms of that process. In addition the comments have been summarized in Table 4.

Table 9: Summary of Comments with Responses – Park Management Plan

Issue Group	Comment/concern	Reference	Response
SANParks Management Philosophy	The draft CDF asserts that “constructive relations, based on trust and respect, between the broader park community is essential to the sustainability of the Park” the relations between Park Management and the occupants of the adjacent suburbs is on an ever extending downward trajectory. Some of the proposals made in the draft CDF, particularly those concerning dog walkers, are further compromising this relation.	CDF 312 CDF 389	Noted.
Legal Context	SANParks is mandated in terms of the new Protected Areas Act to develop the CDF which primarily takes cognisance of their core business of biodiversity conservation and secondarily of tourism. If SANParks cannot ensure that TMNP is managed in accordance with the Protected Areas Act then there are two options: 1. Deproclaim the TMNP as a National Park; or 2. Obtain special exemption to meet the requirements of the population of Cape Town. Because of its unique context as an urban park its management needs special considerations or it must be deproclaimed.	CDF 7 CDF 84 CDF 125	The Protected Areas Act applies to all Nature Area's, (National, Provincial and Local). As such if the area is to remain as Nature Area, under public management, the Protected Areas Act applies.
	One of the principles of the National Environmental Management Act, Act 107 of 1998 which applies to all organs of state is: <i>“Environmental Management must place people and their needs at the forefront of its concern and serve their physical, psychological, cultural and social interests equitably”</i> SANParks therefore should adopt a more holistic approach to park use and not focus on a narrow conservationist approach that results in the exclusion of many of the Park's traditional users.	CDF 312 CDF 403	The TMNP embraces the principles of NEMA. Other principles of the Act are: <ul style="list-style-type: none"> • Development must be socially, <i>environmentally</i> and economically sustainable; • That the disturbance of ecosystems and loss of biological diversity are avoided, or, where they cannot be altogether avoided, are minimised and remedied; and that the development, use and exploitation of renewable resources and the ecosystems of which they are part do not exceed the level

Issue Group	Comment/concern	Reference	Response
Public Ownership	TMNP is not privately owned by SANParks. It is under public ownership – <i>res communis</i> and <i>res publica</i> in Roman law terms. SANParks cannot seem to understand the implications of this.	CDF 292 CDF 371	<p>beyond which their integrity is jeopardised;</p> <p>Although SANParks seeks to manage the land making up the Park in the public interest it does not do so in accordance with the Roman Law concepts of <i>res communis</i> and <i>res publica</i>. These Roman law concepts have no direct application in this country.</p> <p>Rather, as a statutory body whose powers and duties are prescribed by the National Environment: Protected Areas Act, 57 of 2003, SANParks manages the land in accordance with the provisions of that Act, as read with the South African Constitution. In this regard it is necessary to note, firstly, that in terms of section 20 of the Act a national park is established to:</p> <p>“(a) protect</p> <p>(i) the area if the area is of national or international biodiversity importance or is or contains a viable, representative sample of South Africa’s natural systems, scenic areas or cultural heritage sites; or</p> <p>(ii) the ecological integrity of one or more ecosystems in the area;</p> <p>(b) prevent exploitation or occupation inconsistent with the protection of the ecological integrity of the area;</p> <p>(c) provide spiritual, scientific, educational, recreational and tourism opportunities that are environmentally compatible;</p> <p>(d) contribute to economic development, where feasible.”</p> <p>Furthermore, the function of SANParks in managing national parks, in terms of section 55 of the Act is to:</p> <p>“protect, conserve and control those national parks and other protected areas, including their biological diversity;”</p> <p>Any actions of SANParks stand to be tested</p>

Issue Group	Comment/concern	Reference	Response
Linkages & Corridors	Critical to the success of biodiversity conservation in TMNP is the maintenance of biological corridors for flora and fauna movement. There is a rapidly diminishing corridor which potentially links TMNP to the Kogelberg Biosphere Reserve. The CDF must recognise the value of this buffer and support efforts to retain it as a functional biological corridor.	CDF 376	against these objectives as do any criticisms. The TMNP recognises the CoCT 'Biodiversity Network' which aims at linking critical habitats within the Cape Metro Area. The CDF and Park Management has taken this 'Biodiversity Network' in to account. Significant corridors are recognised in the CDF.
Management of Fauna	Concerned that the CDF makes no mention of baboons.	CDF 444	The zonation was based in several informing sub layers. Baboon home ranges we considered as one of these informing layers.

4. WAY FORWARD

In terms of the process of finalizing the CDF for TMNP (2006 – 2010) the issues and concerns raised by stakeholders have been considered by the consultants and SANParks and where appropriate have been incorporated into the CDF.

The Comments & Responses Report will be submitted to the national Minister of Environmental Affairs and Tourism as part of the process of approving TMNP's Park Management Plan (2006 – 2010), which includes the CDF (2006 – 2010), in terms of the requirements of the NEM: PAA.

The Comments & Responses Report will be made available for public record (and not for comment) purposes in the libraries listed in Section 2.7 of this report and on the TMNP website (www.tmnp.co.za).

Note that copies of the original written correspondence received by DJEC during the comment period will not be included as part of the Comments & Responses Report but copies have been compiled in a separate document which, if required, can be reviewed at SANParks' offices in Westlake or at DJEC's offices in Somerset West.

Should stakeholders wish to receive emailed copies of this report and any of the annexures then this can be requested from:

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Document	Format	Size
Comments & Responses Report	PDF	330 KB
Annexure A: List of Names and Reference Numbers	PDF	30 KB
Annexure B: Notification Letter and Registration Form	PDF	200 KB
Annexure C: Stakeholder List	PDF	50 KB
Annexure D: Notification List	PDF	50 KB
Annexure E: Advert for Open Days	PDF	50 KB
Annexure F: Background Information Document	PDF	590 KB
Annexure G: List of objecting dog walkers	PDF	30 KB

**ANNEXURE A:
List of Names and Reference Numbers**

**ANNEXURE B:
Notification Letter & Registration Form**

**ANNEXURE C:
Stakeholder List**

**ANNEXURE D:
Notification Advert**

**ANNEXURE E:
Advert for Open Days**

**ANNEXURE E:
Background Information Document**

**ANNEXURE G:
List of Objecting Dog Walkers**

Report Distribution Record

Project: Revision of the Table Mountain National Park's Conservation Development Framework

Project Number: 10075

Report: Comments & Responses Report

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