

TEMPLATE FOR COMMENT ON THE DRAFT TOKAI CECILIA IMPLEMENTATION PLAN

Please make this template your own, using your own words and thoughts, based on the content provided. Making the template your own will add validity to your right to exercise your views and participate in the TCMP process.

The template provides a comment letter followed by further points which you may want to include.

Key points are in bold type for ease of reference.

All comments are to be sent to tcmf@sanparks.org

Please cc your comments to secretary@parkscape.org.za

Dear Dr Hendriks and Prof Foden

Comment: Draft Tokai Cecilia Management Plan 2022

The Draft Tokai Cecilia Management Plan is disappointing and fails to take into account community needs for shade and safety, particularly within the Lower Tokai area and the remaining Cecilia plantations.

1. Shade planting proposals rejected

The Draft Plan states that SANParks is unable to support proposals for shade planting and indicates that seven (7) proposals (Proposals 233 to 239) supporting shade planting are “not feasible and/or impractical for implementation” but without providing viable reasons. In doing so the Draft Plan fails to realise that these proposals are made by and/or on behalf of a large and varied community of people that come from all parts of the Cape Town. The Draft Plan ignores much of the Parkscape proposal – except where it aligns with biodiversity conservation. It ignores the Parkscape community’s calls, which support trees and shade, and particularly the call to retain the remaining Tokai Forest as a place of safe shaded recreation which meets community needs.

2. Tokai and Cecilia forests to be felled

The Draft Plan indicates that Lower Tokai and Cecilia will be felled by 2024 – completely ignoring the original Tokai Cecilia Management Framework and the extensive public participation process that led to it – which would have provided shade spaces for at least another 50 years.

3. Public participation/City agreement ignored

It further ignores the extensive public participation conducted by UCT’s Environmental Evaluation Unit in 1994, which recognized the critical recreational value provided to the public by the plantations, and which underpins the Heads of Agreement between the City and SANParks (and led to the formation of the Park).

Instead the Draft Plan relies on a 2004 national government decision to exit forestry in the Western Cape – a decision evidently made without public consultation. Given that the plantations were included in the original World Heritage Site nomination and that they reflect the history, heritage and “Capeness” of the Constantia Valley, while meeting critical recreational needs, they should never have been included in the Forestry Exit Strategy.

4. Needs of people ignored

Hundreds of people use the plantations every day – families, wedding parties, horse riders, joggers, trail runners, dogwalkers, cyclists, rambblers, hikers. In an increasingly dense urban environment, the plantations, as treed areas, are fundamental to the needs of urban and suburban residents – increasingly meeting the needs of not only those from nearby suburbs but also those from under-resourced communities which have no easily accessible shade spaces.

5. Alternatives to felling ignored

The plantations should not be removed – and if they are to be removed, it should be done on a piecemeal basis, and transitioning from pine and gum species to local or non-invasive exotic species as proposed by Parkscape.

6. ‘Park for All’ vision ignored

The Draft Plan recommends that users seek out other areas for shade recreation. This is an approach that deliberately excludes people from their national park including areas which they have enjoyed access to for at least six decades. It makes a mockery of the concept of “A Park for All, Forever”.

7. Greenbelt shade under threat

The Draft Plan recommends that users seeking shade use greenbelts and/or the Porter Estate or Firgrove Common. This shows SANParks lack of understanding of the Constantia Valley. Many of the greenbelts are not well shaded (eg Keyser’s River, Grootbos, sections of the Alphen trail). Many shaded greenbelts are being denuded of trees given the NEMBA 2014 exotic species regulations, and many are seeing increased fynbos planting in favour of trees. Firgrove “common” is not a common but a successful land claim and will be developed. Porter Estate is a Western Cape government property which houses Chrysalis Academy under the strict terms of the Porter Will Trust. The public are not permitted on the Estate except for reasons of business with the Academy. The land may also be subject to a land claim by First Nations people. Additionally, just as SANParks rejects the proposal for dogwalking up to Level 1.5 because of risk of conflict with baboons, it ignores that the baboons roam freely over Porter Estate. Even if permission were granted to plant trees in any of these areas (with the exception of Firgrove), it would take at least 30 years for the trees to provide reasonable shade – by then climate impacts, particularly urban heat, will have wreaked havoc on urban and suburban communities, and communities will have been left without easily accessible and safe shade space during that time. Plant new trees first, let them mature, then fell old growth.

8. Shade proposals insufficient

The Draft Plan’s suggestions for shade are too limiting. Broken shade on the perimeter of Lower Tokai is insufficient to meet user needs and will result in user conflict by crowding too many people into too small a space. Other areas referenced for possible shade are inaccessible to many (the elderly, disabled and very young), and exclude a number of users, most notably those who walk with dogs, ride horses or cycle – e.g. the Arboretum and Tokai picnic sites.

9. Threat to urban forest

The Draft Plan ignores the importance of shade and increasing loss of the urban forest, and in doing so, it ignores the urban reality of Cape Town and the situation of Table Mountain National Park as a national park within an increasingly dense city. Table Mountain National Park is not separate from the City of Cape Town, it is a fundamental part of the city and must be managed accordingly.

The Draft Plan ignores the critical role that trees and the urban forest play in the well-being of Cape Town as a means of reducing temperature and pollution. The Draft Plan ignores that the Tokai and Cecilia plantations have, for over 130 years made up much of the urban forest of Cape Town. The City intends to increase its urban forest – the ideal place for much of this to take place is in and around the existing treed areas and in the buffer zones of the Park.

10. Property values threatened

Removing the plantations has a knock-on risk of adversely affecting property values in the adjacent suburbs – given research indicates that property values increase in treed neighbourhoods.

11. Buffer zone requirements ignored

Bringing CSF onto the urban edge and without a buffer zone, currently provided the plantation, brings with it increased risk of human wildlife conflict, increased risk of wildlife fatalities, increased fire and crime risk.

The Tokai plantation is far more heavily utilized than the fynbos section. If the plantation were to go, and be closed during the initial restoration period, people will be excluded from their park. This is not in keeping with the people-centric nature of environmental legislation.

12. Key Sanparks mandates ignored

The Draft Plan leans heavily in favour of SANParks' conservation mandate. It seemingly ignores, to a large extent, the mandates of socio-economic transformation and tourism, critically, local tourism. The proposals for shaded recreation in Lower Tokai have been rejected with an "IP Status" of "--". (Not implementable) with the reason given being a conflict of interest with the "critical biodiversity mandate for protecting CFSF in Lower Tokai".

13. Rehabilitation experiment risky

There is no certainty that CSF can be restored in this area without considerable input of resources and it is well known that SANParks lack these resources. Climate impacts on rehabilitation should also not be ignored. You will be removing a valuable asset in favour of a costly and potentially unsuccessful rehabilitation experiment. Further, attempts to restore Upper Tokai area plagued by invasive infestations of exotics, which SANParks has acknowledged may take up to a hundred years to restore.

14. Restore much-loved treed spaces

Rather focus on restoring Upper Tokai before removing much needed and much-loved treed space which will be subject to the same issues of exotic infestation. Better yet, why not return forestry to the whole of Tokai and Cecilia as was always intended – forestry is at least a business and business has the ability, unlike a state owned conservation agency, to conserve effectively. Or consider partnering with forestry and enabling a mix of forestry and fynbos in a manner which befits the heritage of the Constantia Valley, meets human needs and enables the City to reach its urban forest goals.

15. Retain existing safe, treed spaces

I urge you to reconsider your position on removing the remaining compartments of Tokai and Cecilia plantations, and to factor in the proposals of Parkscape and others to retain safe, treed areas within the national park.

Yours sincerely

NAME

OTHER ITEMS FOR CONSIDERATION:

1. There is **no clear indication that the Ribbon Gate will be preserved in situ, or that Franziska Blochliger's cross will be protected in perpetuity**. Both these sites are powerful reminders of the scourge of Gender Based Violence. Please do not remove either.
2. In ignoring the proposals for shade space and in continuing to fell treed areas, SANParks is **destroying the rich cultural landscapes of the Constantia Valley** (wine farms, plantations, kramats, First Nations heritage, slavery, horse-riding) which were incorporated into the Park and the World Heritage site. As such, SANParks is destroying the unique "Capeness" of Cape Town.
3. The Draft Plan indicates, contradictions notwithstanding, a number of **trail and path closures**, failing to recognize the importance of access to the Park for urban wellbeing, health and recreation. In doing so, SANParks again reveals a focus on conservation over people, failing to acknowledge that TMNP is a national park in an urban setting.
4. The Draft Plan seems to indicate that **Listers** will not be opened as a tea-room or restaurant serving light meals. The Aboretum and Listers together offer a wonderful family space for outdoor recreation. It was always popular. No one is really interested in a museum type facility and if and when you've visited it once, you will not be likely to return. A tea room will always generate repeat business.
5. The Draft Plan makes considerable reference to **the Tokai Manor House Precinct Plan**, but this plan is now subject to change given the intent to bring in a concessionary. No decisions can be taken about the area without first seeing the tender documentation for the Tokai Manor Precinct. Please make the tender documentation available. If any changes are to be made to the original Tokai Manor Precinct Plan, the Plan will need to go through a public participation process.
6. **The Draft Plan contradicts itself** in several areas – on the matter of trails closures vs trail maintenance/new trails, dog access etc.
7. The Draft Plan refers to several **other "plans"**, but these plans have not been shared with the public. These plans must be made available to the public. Failure to do results in a lack

of transparency of the process and leads to a flawed process.

8. **The Draft Plan reads as though it was planned before the process began.**
9. SANParks acknowledged well into the public participation process that it was also a stakeholder and would be commenting in the process. It was requested that **SANParks provide their own proposal**. This has never been forthcoming.
10. SANParks stated some way into the public participation process that there were non-negotiables. These **non-negotiables have never been revealed**.
11. **The Presentation of the Draft Plan, the Plan and the Annexure differ widely.** The Presentation of the Draft Plan is pure spin by comparison to the content of the Plan and its Annexure. Why would SANParks attempt to mislead the public? This points to a flawed process and lack of transparency.
12. The Plan refers to many proposals as “suited for implementation with minor amendment” but makes no indication as to what amendments might be required. This leads to a **process that is lacking in transparency**. History indicates that any proposal not accepted outright (✓✓) will be ignored as the time progresses. Most of the proposals made are at risk of never being implemented. Critically, many of these proposals include those from First Nations groups.
13. The **proposals that are accepted as being able to be implemented are in large part those that pertain to biodiversity and/or fire management** and already being implemented. 72% of proposals for biodiversity, alien species, rehabilitation and fire have been accepted as “proposals well suited for implementation”. Every other proposal in the over 330 proposals made stand between 11% and 14%. These include proposals for the Arboretum, ceremonies, medicinal gardens, tourism, recreation and recreational routes, planted landscapes, safety and security, heritage, environmental education and interpretation, social matters and volunteers.
14. It is not clear from the text of the Draft Plan whether what has been provided is a Draft Plan or the basis for a Draft Plan – see pg 6 *“the proposals and recommendations were documented to provide a basis for a draft implementation plan for the management of the Tokai and Cecilia areas.”* On pg 7 the document states: *“To streamline and rationalize the Draft Implementation Plan, the proposals have been grouped as Programmes or Projects...”* Do we have a **Draft Plan or the basis for a draft plan?** The lack of clarity flaws the process. Further, the notion of implementation is limited by a footnote on pg 6 which says, *“Implementation is always subject to budget and resource availability.”* This provides an “out” for SANParks before the Plan is even finalized.
15. **The Draft Plan lacks clarity** on a number of points – for example: How long does SANParks seek to retain a long term management of the Manor House from the Province? What are the terms of the concession for the Manor House Precinct? What is the intent of any landscape plan for the Arboretum, the management of heritage trees?