

Environmental Management Programme (EMP)

for

Equestrian Activities in Table Mountain National Park

compiled by

Table Mountain Equestrian Forum

and

SANParks

December 2023



Purpose of this document

This document is the Environmental Management Programme (EMP) for equestrian activities in the Table Mountain National Park as revised in 2023.

Where to find the EMP

Electronic copies, along with high resolution maps are available from the SANParks and Table Mountain Equestrian Forum websites at:

https://www.sanparks.org/parks/table_mountain/about/plan.php
www.tmef.co.za

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Acronyms and abbreviations used

CDF	Conservation Development Framework
EMP	Environmental Management Programme
NEMA	National Environmental Management Act, 1998 (Act 107 of 1998)
PAA	National Environmental Management: Protected Areas Act (PAA) No 57 of 2003
PMC	Peninsula Mountain Chain: comprises the mountains, valleys and lowlands of the Cape Peninsula under various management authorities (SANParks, City of Cape Town, SANBI etc.) and private owners
PMP	Park Management Plan
SANBI	South African National Biodiversity Institute
SANParks	South African National Parks
TMEF	Table Mountain Equestrian Forum (see section 5)
TMNP	Table Mountain National Park
UNESCO	United Nations Educational, Scientific and Cultural Organization

Glossary

Code of Conduct	Accepted rules and guidelines for equestrian activities in TMNP.
Commercial	A business operation in which a fee is charged for horse riding.
Cyclist	Generic term used for all riding cycles, including cyclo-cross cycles, road cycles, mountain bikes and other non-conventional cycles.
Equestrian/rider	Equestrian refers to horseback riding, but includes any person engaged in an activity with a horse.
Equestrian activity	Any activity done with a horse or horses in TMNP, such as riding a horse, walking alongside and leading horses, training horses from the ground, etc.
Horse-riding event	A once-off organised horse-riding activity within a defined area.
Jeep track	Vehicular access road, typically gravel.
Route/trail	Multiple tracks that take an equestrian from A to B.
Single track	Narrow, non-vehicle path suitable for horse riding, cycling or walking.
Track	A portion of a trail or route.
Yard	A place where horses are accommodated.

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1. INTRODUCTION

1.1 Purpose and scope of the document

This Environmental Management Programme (EMP) provides an overarching framework for the management and regulation of all recreational equestrian activities in the Table Mountain National Park (TMNP). The EMP covers recreational horse riding and other forms of activities involving horses that may arise in the TMNP currently and into the future (hereafter referred to as “equestrian activities”). This EMP excludes commercial services and events, which are subject to SANParks’ commercial permitting system.

This EMP only addresses equestrian activities within the defined extent of the TMNP and does not discuss such activities on any adjacent private and public land. The EMP may however prove useful in discussions with other landowners regarding access, especially where it can be integrated with approved TMNP routes.

The primary aim of this EMP is the sustainable utilisation of a natural asset with an emphasis on biodiversity management and diverse recreational opportunities in the TMNP within a national park and World Heritage site. This EMP is a revision of the “Environmental Management Programme for Horse Riding in the Table Mountain National Park” signed in March 2004 (hereafter called the “2004 EMP”), which was compiled by the Cape Peninsula Horse Riding Working Group and SANParks. Many changes have occurred in TMNP since 2004, including the Tokai and Cecilia plantation areas coming under TMNP management.

This EMP specifically aims to:

- Review the 2004 EMP.
- Sustain and strengthen a constructive partnership between TMNP management and people undertaking equestrian activities in TMNP.
- Identify and mitigate the impacts of equestrian activities on biodiversity and heritage resources.
- Identify and mitigate the impacts of equestrians on other recreational users and visitors.
- Designate appropriate routes within TMNP to be used for equestrian-related activities.
- Revise a Code of Conduct with rules and associated etiquette guidelines for equestrian activities in TMNP.

- Allow for a coordinated approach to the implementation, monitoring and enforcement of this EMP.
- Identify the roles and responsibilities of SANParks, the Table Mountain Equestrian Forum (TMEF) and other stakeholders in the implementation and enforcement of the EMP.
- Manage future growth and diversity in equestrian activities within the TMNP.

Commercial equestrian operations within TMNP, such as beach rides and trail rides, are regulated by the SANParks commercial permitting system. This equestrian EMP applies to any such permitted operations in terms of the Code of Conduct and designated trails, subject to SANParks permit conditions. *See SANParks website for permit application details.*

This EMP is intended to be used by equestrians, SANParks management, the Table Mountain Equestrian Forum and other horse and horse-riding related organisations. It is also intended for reference by all TMNP users, including hikers, walkers accompanied by dogs, cyclists, trail runners and the general public.

SANParks is the management authority within TMNP for the implementation of this EMP.

1.2 Context for recreational EMPs

TMNP is one of South Africa's 21 national parks and is managed by SANParks, which is a Schedule 3(a) Public Entity in terms of the Public Finance Management Act (PFMA, Act 1 of 1999). The core mandate of SANParks is the conservation and management of biodiversity through a system of national parks and in accordance with the National Environmental Management: Protected Areas Act (PAA, Act 57 of 2003) and accompanying regulations.

The Park forms part of the Cape Floral Region Protected Areas World Heritage Site, which was inscribed as a serial World Natural Heritage Site by the United Nations Educational, Scientific and Cultural Organization (UNESCO) in 2004, with an extension of the core World Heritage site approved in 2015. It falls within the fynbos biome, representing the Outstanding Universal Value of biodiversity and the unique ongoing ecological and biological processes associated with the evolution of the unique fynbos biome.

The Regulations for the proper administration of Special Nature Reserves, National Parks and World Heritage Sites (GN R.1061, 28 October 2005) issued in terms of section 86 (1) of the PAA govern all visitors and users of TMNP. These regulations cover various management aspects including admission, entry points, overnighting, pets, permitting activities, etc. within TMNP and World Heritage Sites.



Figure 1: Table Mountain National Park boundaries

TMNP is still in the process of land consolidation and at this stage is not a continuous unit but is fragmented by urban development and other public managed land. It is divided into three management areas:

- Area North: Extending from Signal Hill to Constantia Nek;

- Area South: The Central and Southern sections, extending from Constantia Nek to the Cape of Good Hope; and,
- Area Marine: Including the Marine Protected Areas.

TMNP is a popular destination for a wide variety of outdoor activities with approximately 25 recreational activities occurring. These include walking, hiking, mountain biking, horse riding, sport climbing, rock climbing, trail running, hang- and paragliding, picnicking, walking accompanied by dogs, etc. In addition, due to its proximity to the City of Cape Town and with world-renowned tourism destinations such as Cape Point and the Table Mountain Cableway, it is a popular tourist destination with well over four million visits per annum.

A significant challenge faced by TMNP Management is to provide for and administer these diverse recreational activities without compromising the experience of other visitors and users and to conserve the integrity of the Park's unique biodiversity and heritage resources. To this end, SANParks prepared in 2000, and revised in 2007 and 2015, a Park Management Plan (PMP) through an extensive stakeholder and public engagement process. The PMP was approved in terms of the PAA by the Minister of Environmental Affairs.

Part of the PMP is a spatial framework, the Conservation Development Framework (CDF), which identifies visitor use zones and visitor sites within the TMNP:

- **Use zones:** These zones define aspects such as the experiential qualities, type of activities, degree of interaction with other users, type and size of facilities, the sophistication of facilities, the type of access and the standards of roads within each zone. Horse riding or equestrian activities are classified as "suitable in certain locations under managed conditions" in the "Low Intensity Leisure", "Quiet" and "Remote" zones of TMNP, and the CDF further notes that it is one of the activities that will be subject to an EMP.
- **Visitor facilities and activities:** Tourism and visitor service infrastructure are generally located at designated visitor sites that are designed to fulfil a defined role. TMNP provides a wide range of facilities for visitors and recreational users. These include accommodation, food and beverages, restaurants, cable ways and event/function locations.

With the establishment of TMNP in 1998, it was agreed between Park stakeholders to formally recognise appropriate recreational activities that should occur within TMNP. The number of recreational activities and the number of users undertaking these activities had the potential to negatively impact on both the environment and other recreational users if not managed appropriately.

The recreational EMPs seek to provide a structured and consistent approach to addressing a range of environmental issues and impacts relating to recreational activities in TMNP. As such, Codes of Conduct, designated routes/areas, regulations, permits and EMPs apply to a number of activities in order to minimise the impacts on the environment and other users of the TMNP. Through public processes, EMPs have been developed, implemented and revised for walking with dogs, hang- and paragliding, sport/rock climbing, horse riding and mountain biking.

1.3 The equestrian activities user group

Horse riding is a popular and well-established recreational and commercial activity in specific areas of the TMNP. Historical records bear witness to equestrian activities (see Box 1) particularly in the following areas: Tokai (Upper, Middle and Lower Park), Constantia (Cecilia), Hout Bay (Orange Kloof and Sandy Bay), Noordhoek (Wetlands and Beach), and Glencairn to the Cape of Good Hope section of TMNP.

The number of horses being kept in and near TMNP was estimated in 2018 to be approximately 1 100 (Constantia \pm 200; Hout Bay \pm 200; Tokai \pm 200; Noordhoek \pm 400; and smaller numbers from Glencairn southwards). A pre-existing livery stable yard forms part of TMNP within the Tokai Manor House precinct, and a former SANDF yard in Glencairn is under the jurisdiction of TMNP. Many horses are also kept on the borders of the Park, where the sizes of properties permit the keeping of horses, as regulated by the City of Cape Town.

Equestrian properties vary in size from private yards with one or two horses to commercial livery stable yards of various sizes. These types of equestrian facilities all rely on safe access to and space for extensive and regular exercise off the properties to ensure the welfare of horses is met.

Box 1: History of equestrian activities in the TMNP area

Historical records about life on the farms in Tokai/Constantia Valley highlight the prevalence of horses and mules as a means of transport, working the land and facilitating logging in the forested areas, as well as for recreational purposes. The Noordhoek area was farmed in the 1920s and 30s, and the land was worked using oxen and horses.

When mechanisation reduced the need for horsepower, the recreational use of horses became paramount and evolved into the equestrian economy of today. By 1939 there were commercial beach rides operating in the Noordhoek area. Numerous riding schools and stable yards existed, and it was a common occurrence in the 1950s and 60s to ride horses on social visits or as a means of transport to equestrian events.

Muizenberg, Noordhoek and Hout Bay beaches were easily accessible for horses. Numerous sport horse breeding and training facilities emerged, including the racing stables in Noordhoek that still exist today. Large equestrian properties, riding schools and show grounds were prevalent across the area that is now TMNP.

From the early 1960s, the first effects of urbanisation were felt as farms and smallholdings were subdivided, roads were tarred, and fences erected. These developments made the network of greenbelts and access tracks on private or public land through the urban areas increasingly vital to the equestrian community. Equestrians have lost access to substantial portions of land that were previously open to horses, for example: Steenberg Farm (now the Steenberg Golf Estate) the Noordhoek salt pan (now Lake Michelle estate), and numerous open spaces in Constantia and Hout Bay. There continues to be loss of safe space for riding across the Peninsula.

1.3.1 Types of equestrian activities

This EMP defines “equestrian activity” as any activity done with a horse or horses. Equestrian activities can take on a number of forms, including training from the ground and walking alongside the horse. Equestrian activities in TMNP are predominantly exercise as part of a training programme for various equestrian disciplines or trail riding for equine health and welfare, scenic pleasure, fitness and recreational purposes. Equestrians typically ride either in small groups or alone, and the pace is dependent on terrain, ground-suitability, the abilities of the equestrians and the proximity to other user groups (such as hikers, cyclists and dog walkers).

While the pace is most often a walk or trot, most equestrians enjoy a canter where the terrain and ground allows it. Many equestrians also enjoy jumping natural obstacles such as small logs or ditches where it is safe to do so.

Equestrian activities also provide significant leisure and tourism value at yards that specialise in catering for local and international tourists who wish to ride horses in a beautiful natural setting. This scenic beauty and high biodiversity, coupled with proximity to popular wine farms, lends itself to the growth of horseback tourism, which is a growth industry around the world.

Riding excursions in the Park are typically round 1-2 hours in duration, with no overnight trail activities taking place within TMNP.

1.3.2 Socio-economic value

The socio-economic value created by the existence of horses in and near TMNP is widespread and significant. Service providers include, but are not limited to, grooms, feed merchants and delivery agents, bedding suppliers, manure removal services, yard managers, instructors, farriers and farrier assistants, veterinarians and specialists, equine physiotherapists, equine dentists and dentist assistants, equine chiropractors, alternative medical practitioners, tack shops and saddle fitters, tack manufacturers and medical suppliers. Repairs and maintenance to buildings, paddocks and arenas are ongoing and involve another sector of the industry.

There has been ongoing investment in infrastructure, such as arenas, stable yards and trails adjacent to TMNP, for example at the Noordhoek Riding Club (NRC) and the Tokai Pony Club Arena adjacent to the Lower Park. The TMNP Tokai Manor Precinct Plan makes provision for an equestrian zone with equestrian arenas adjacent to the SANParks Stables.

The equestrian community close to TMNP also provides support for equine welfare-related initiatives. These include the South African Riding for the Disabled Association (SARDA), the Cart Horse Protection Association (CHPA), Cape of Good Hope SPCA and other smaller organisations, such as the Tom Ro Haven in Noordhoek.

The continued existence of larger properties suitable for keeping horses, equestrian activity and associated economic activities, and the remaining 'rural', low-density nature of these areas is heavily dependent on access to riding trails within TMNP.

A recent study has found that the total annual recreational value of a wildlife area was 35 times higher than the cost for the management and investment carried out by local environmental authorities in more than 10 years (Lamhamedi, 2021).

1.4 Format of this EMP

- The EMP is structured as follows:
- Section 1 introduces the EMP, including its purpose, background and overview of the current status of the activity.
- Section 2 profiles the potential environmental impacts on the natural and heritage resources of TMNP and on other recreational users and visitors.

- Section 3 frames the overall vision and objectives for the EMP.
- Section 4 describes the implementation of the EMP, including identification of approved routes, the Code of Conduct and etiquette guidelines, and the identification of management and enforcement activities.
- Section 5 describes the institutional roles and responsibilities for the EMP.
- Section 6 identifies the broad scheduling for the implementation of the EMP.

1.5 Approach to preparing the document

The approved 2004 EMP, and the Tokai District Riding Association (TDRA) Handbook and TDRA Trails Document, formed the basis for this EMP which was prepared as follows:

- The 2018 document was drafted by an equestrian working group using the 2004 EMP and other documents.
- A series of meetings was held with equestrian communities to elicit input on the draft document and comments were included in a draft submitted to SANParks in 2018.
- SANParks internally workshopped all comments and, in April 2023, a meeting was held with the TMEF to give feedback on a draft of the revised EMP to be circulated for comment to relevant stakeholder groups.
- The draft revised EMP was made available for Park user groups' comment using the various TMNP and equestrian platforms in June 2023.
- This final EMP was prepared, taking into account all comments received, for approval by SANParks.

1.6 User groups' comments on horses and equestrian activities in TMNP

The key responses from meetings and interviews with stakeholders, including equestrians and other user groups, are detailed in a separate Equestrian EMP Stakeholder Comment and Responses Report.

2. ENVIRONMENTAL IMPACTS AND ISSUES

Equestrian activities, as with any other recreational use of land, have actual and potential environmental impacts. TMNP has adopted the EMP format as the management framework to identify and effectively manage negative environmental impacts and support positive impact to

enable equestrian activities to be undertaken without compromising the ecological, social and cultural integrity of the Park.

A number of North American and Australian studies provide a useful context for identifying the environmental impacts of horse riding and are provided in the references. The results of these studies will not be repeated in this EMP, but have been utilised for the purposes of rating of impacts and proposed mitigation measures. As far as the authors of this EMP are aware, no primary studies have been done in South Africa relating to the environmental impacts of equestrian activities. Until such time as detailed studies are undertaken in South Africa, and in the fynbos biome in particular, stakeholders must plan according to studies undertaken elsewhere.

In general, international studies have revealed that the primary potential impacts identified in relation to equestrian activities include trail damage (and related damage to vegetation alongside trails), the impacts of horse manure (the potential for introduction of alien species and soil nutrient imbalance), disturbance to wild animals, and some social impacts such as littering and user conflicts. Each of these are discussed in more detail below. It should be noted that the significance of some of the potential impacts will vary from area to area, as it will depend on the specific conditions present in a particular equestrian activity area and user numbers and frequency. For example, the impact of horses on erosion and compaction will depend on the erosion potential for the site, the intensity of the impact as well as the trail design and maintenance activities.

Few impacts identified have major significance and mitigation/elimination is possible if impacts are managed correctly (see section 4).

2.1 Discussion on soil erosion

The primary impacts on trails as a result of equestrian activities are soil displacement and compaction, and increase in trail width and depth. Studies have shown that impacts are generally highest in untracked areas (Lansberg, 2001). Impacts on established trails are generally associated with flat, poorly drained sections of trail, on steep trails, and on poorly planned and maintained trails. Impacts are lowest on constructed and maintained trails.

The susceptibility of paths/tracks to erosion is determined by several factors including prevailing geophysical conditions (topography, soil type, texture, organic content, rockiness, vegetation and

drainage), precipitation regime, track type (jeep track, single track), design (grade of trail, side-slope) and maintenance as well as type of work (walking, trotting or canter paths) and intensity of use. Local weather and extreme events (eg storms) also have an impact.

The impact of equestrian activities on designated trails can often be directly related to track design, intended use and use intensity. Equestrian activities on fairly flat jeep tracks that are hardened by regular vehicle use typically have minimal impact unless there has been prior track damage; whereas horse riding on steep single tracks may have a larger potential for trail damage. The majority of soil erosion issues on horse and hiking paths can be traced to poor path routing and design, for example, paths that traverse poorly drained soils, which can lead to users widening the paths to avoid quagmires. Muddy sections can be a temporary or seasonal problem. Trail slope alignment can play an important role in soil loss in mountainous terrain.

Intensity of use is an important factor when considering impact from horse riding activities. In the majority of studies comparing horse trail impacts with other user group impacts, intensity of use has been measured at the same level of intensity. These studies do not provide a suitable method of assessment of trail impact within TMNP, as the numbers of horses using the equestrian paths are limited predominantly to those horses living adjacent to the Park. Day visitors are low in numbers, owing to the complexity and costs associated with trucking horses. As a result, intensity of use is low relative to other activities, such as hiking or mountain biking, which are accessible to a larger pool of users, including those that travel via vehicles to engage in recreational activities in TMNP.

Excessive erosion often makes trails difficult or even dangerous to traverse, and can be self-perpetuating once started. As a result, considerable investment has been made into ongoing trail management and maintenance by equestrian organisations, such as the Tokai District Riding Association (TDRA), which identifies and mitigates impacts on a proactive basis. Various track- and alien-clearing projects have also been undertaken in Noordhoek, where local equestrians intend to form a body similar to the TDRA. This maintenance work reduces the fire risk and assists in the maintenance of jeep track access for emergency response.

Studies have found that the highest risk of soil erosion impact is as a result of the creation of informal trails. These are often poorly routed and not maintained, resulting in an increased

potential for degradation. It is noted that the creation of informal equestrian trails does not currently appear to be a significant problem in TMNP.

2.2 Discussion on the potential impacts of horse manure

Conservation biologists and natural resource managers are increasingly concerned with the invasion of non-indigenous or non-native species into natural ecosystems. Concerns have been raised regarding the potential for horse manure to serve as a means for the introduction and dispersal of exotic/alien plants into protected areas.

A paper published in *Natural Areas Journal* in 2010 noted that whilst several studies indicate non-native seeds can germinate after digestion by horses, *in situ* studies have not demonstrated causal links between horses and plant invasions (Quinn et.al 2010). Other studies on seed viability have typically involved assessing manure samples planted in soil which are then placed in a nursery environment for germination under optimal growing conditions, rather than testing viability under trail conditions. A study by Dr Gower from the Department of Forest Ecology and Management at the University of Wisconsin-Madison was conducted for trail conditions. This study determined that “Vegetation composition of transects perpendicular to the trail was dominated by native species both along the horse trails (94%-98%) and hiking trails where horses are prohibited (93%-99%). These findings show that non-native species composition did not differ significantly between horse and hiking (non-horse) trails, and ranged from 1%-7% for hiking trails and 2%-6% for horse trails.” The research found that “no plants grew in the manure and hoof debris plots.” The results of this study have been used for the development of *Equestrian Design Guidebook* for the United States Forest Service.

Although no studies have been conducted within the fynbos biome, in the Tokai, Glencairn, Orange Kloof and Noordhoek areas where horses have been ridden for many years, no notable outbreak or spread of seed as a result of horse manure has been documented. The dominant roughage diet for horse kept in the Cape Peninsula are teff, eragrostis, oat hay and lucerne. Horse owners are concerned about obtaining quality feed that has been properly planted, harvested and baled, and as a result weed content in feed is limited. Many horses are also fed processed or pelletised feed. Pasture grazing tends to be limited due to space availability at most yards and control of weeds forms part of standard pasture management, which is critical in ensuring horses

do not ingest toxic plant species. Horse trails are also largely limited to jeep tracks, which are not conducive environments for plant growth.

Within the context of manure impacts it is noted that the equestrian activities are limited to day-time excursions with no overnighting facilities. The manure from horses living adjacent to the park is eliminated primarily in their paddocks and stables. The relatively small volume of manure produced over the network of tracks is expected to have only limited, localised impact of soil conditions. Once deposited, total mineralisation of manure takes place in as short a time as 21 days with the majority of the solid portion breaking down within six days. Nutrients tend to volatilise rapidly into the atmosphere. One of the challenges of preserving nutrients in horse manure is to get them turned into the soil as rapidly as possible before the nutrients are lost to the air (Quinn 2004). The localised nutrient increase is considered to be insignificant in the context of the fynbos biome which supported a diverse large mammal faunal population (>20kgs) before permanent European settlement in the mid-17th century heavily impacted on the region, including populations of Cape mountain zebra (*Equus zebra zebra*) (Radloff, 2008). There are no known toxic effects on humans due to exposure to horse manure (Quinn, 2001).

It is noted that the seeds of exotic plants can attach to horses' coats and hooves. However, this is also the case with other recreational users where seeds can attach to footwear, bicycle tyres, vehicle tyres and clothing (Bouchard et.al 2015 and Smith, 2020). The relatively limited extent of horse track routes is taken into account in the assessment of this impact.

2.3 Discussion on the potential disturbance to wild animals

Horses, like all other users of a protected area, might cause a disturbance to animals such as nesting birds, mongooses, small antelope or baboons. However, as horses are animals (and specifically prey animals not predators), equestrians often experience that other animals are less disturbed by them being on horseback than if they were on foot. Equestrians speak of riding close to caracals and baboons without any impact on the animals as the animals do not perceive the horses to be a predator threat. A horse on a trail provides sound in the cadence of a four-footed prey animal, which informs wildlife of a non-threatening presence. For terrestrial life forms, the percussion pulse provides warning, which diminishes energy-consuming flight response (Quinn, 2001). Disturbance to nesting birds would be limited with riders adhering to designated tracks.

2.4 Discussion on social impacts and benefits

Social impacts such as littering are not specific to equestrians per se and may occur with any user group. The management guidelines applicable to this type of behaviour should be as applicable to equestrians as to other users and enforcement rules should apply. Responsible equestrians also have positive social impacts in terms of revenue generation from the industry, tourist attractions, crime deterrents, and interactions with young children. Riders can be used as a volunteer and advocacy group. In addition, equestrians are additional eyes to provide a complementary support service to the TMNP management, by alerting them to emergency situations (e.g. fires, injured animals, itinerant occupation and arsonists) or identifying broken fences and gates due to vandalism, natural disrepair or other TMNP infrastructure maintenance issues (e.g. excessive erosion). Equestrians tend to be environmentally conscious and, as such, can be of benefit to TMNP management. Horse traffic can also be used to maintain firebreaks and seldom-used trails (Quinn, 2004).

2.5 Discussion on impact on other users

Equestrian activities are restricted to approved trails. In most instances these trails are shared with other users. In terms of SANParks signage, horses have right of way over cyclists and pedestrians, including walkers with dogs. This is important for safety reasons.

It is highly beneficial for horse-riders to have access to suitable trails and riding areas that are not shared with cyclists and dog-walkers, as well as to areas with shared trails where it is safe and appropriate. International best practice in urban parks is to have a system of user trails alongside but separate for various activities, which promotes safety and visibility within a shared space, and signage that warns other user groups to expect horses. An example of a combination of exclusive trails and shared spaces can be found in the EMP for cyclists in TMNP.

In general, pedestrians and hikers are not impacted by horse-riding in any significant way and it is customary for horse-riders to slow down and warn pedestrians of their approach. Some user groups, including horse-riders, mountain bikers and dog walkers, are required to have Activity Permits and are subject to specific Codes of Conduct, which have as a primary aim to minimise negative impacts on other user groups. Adherence to these various Codes of Conducts governing users under the Activity Permit system will ensure that the impact between user groups is minimal.

Where these Codes of Conduct are not adhered to, horse-riding can have an actual or perceived impact. For example, owners of free-running dogs that are not under proper control in shared spaces may perceive horses as a threat, or cyclists travelling at speed on shared trails may not want to slow down and give way to horses. However, dogs that are not under control and run up to, harass and attack horses and cyclists riding at speed have a significantly higher negative impact for horses than a horse and rider have on dogs or cyclists.

Two important factors are key to achieving rider safety and user group harmony. The first is the widespread publicising of Activity Permit requirements and user-group Codes of Conduct through ongoing communication by SANParks in partnership with user group organisations and appropriate signage. The second is visible and regular enforcement of Activity Permit conditions and adherence to the Codes of Conduct by SANParks staff.

2.6 Summary of environmental impacts

This section provides a high-level assessment of the potential environmental impacts of equestrian activities in TMNP, and the significance of those impacts. The listing of these environmental impacts is not a value judgement of the relative desirability of equestrian activities when measured against other recreational activities. The scale of many of these impacts is relatively small, or in some cases only suspected. It must be noted that impacts will be more intense if access is restricted to fewer routes or tracks, as numbers of users will be higher.

The identification of these key environmental impacts provides for:

- The development of the environmental vision and objectives for the EMP (section 3).
- The identification of the routes available for equestrian activities (section 4).
- The establishment of the Code of Conduct, comprising rules and etiquette and rules and any other management activities required to mitigate these impacts (section 4).

The potential equestrian activity impacts have been identified are presented in Table 1. The significance of these potential impacts, with and without management, is reflected in the table as follows: if they are positive (+ve); if they are slight/neutral (0); or if they are negative (-ve). Question marks depict issues where the significance is uncertain or unproven.

Table 1: Potential environmental impacts of equestrian activities in TMNP

Activity	Potential Impact	Significance	
		Without management	With management
Arriving and departing TMNP (<i>Note: very few horses arrive in motorised transport, so there is minimal to no impact at parking areas</i>)	Increased parking requirement	0	0
	Increased litter at parking areas	0	0
	Increased noise at parking areas	0	0
	Conflict with other users at parking areas	0/-ve	0
	Damage to indigenous vegetation at parking areas	0	0
Equestrian activities	Damage to trails and adjacent areas (erosion, loss of vegetation cover, dune erosion)	-ve	0
	Damage of indigenous vegetation (trampling, compaction)	-ve	0
	Damage to watercourses (harm to banks, alteration of flow, formation of quagmires)	-ve	0
	Proliferation of informal trails/shortcuts/illegal routes	-ve	0
	Introduction of alien vegetation	-ve/?	0
	Soil nutrient balance	-ve/?	0
	Disturbance of animals	0	0
	Disturbance of heritage sites	0	0
	Interactions with hikers	+ve	+ve
	Interactions with dog walkers	-ve or +ve	0
	Interactions with cyclists	-ve or +ve	0
	Security for all users/crime deterrent/emergency support	+ve	+ve
	Increased litter on trails	0	0
	Increased noise on trails	0	0
	Increased fire hazard	0	+ve
	Physical exercise	+ve	+ve
Tourist experiences	+ve	+ve	
Trail maintenance	Introduction of alien vegetation and/or construction material	-ve	0
	Disturbance of in situ soil and substrates	-ve	0
	Increased litter	-ve	+ve
Civil/institutional arrangements	Funding for conservation and management	0	+ve
	Economic growth and employment opportunities	+ve	+ve

Key: 0 = neutral; -ve = negative; +ve = positive; ? = unknown

3. VISION, PRINCIPLES AND OBJECTIVES OF THE EMP

3.1 EMP Vision

In line with the original overall vision of “A Park for All, Forever” for the TMNP, TMNP Management strives to balance the core business mandates (biodiversity, social transformation, heritage and tourism management) required by SANParks with the need for management excellence within an urban environment.

The following vision is proposed to guide the implementation of this EMP:

To ensure responsible equestrian access to, and use of, designated routes within Table Mountain National Park, in keeping with conservation and heritage objectives, for the benefit and use of current and future generations of equestrians.

3.2 Principles

The environmental principles provide a framework for setting of objectives and actions. Equestrians using the trails in TMNP must be aware and committed to the following principles:

- Minimising the impact of equestrian activities on the environmental integrity of TMNP.
- Avoiding impacts on the cultural and heritage environment of TMNP.
- Identifying, assessing and mitigating the environmental impacts of current and potential routes.
- Adhering to conditions for opening new routes or rerouting/closing existing ones. Opening new trails and maintaining existing ones must comply with National Environmental Management Act (NEMA) regulations, and trails within TMNP should link with trail networks outside TMNP.
- Cooperating with, recognising and responding to TMNP Management’s concerns.
- Monitoring equestrian activities to promote compliance with these principles.

3.3 Objectives

The objectives to achieve the vision and principles of the EMP are as follows:

Objective 1: To identify equestrian routes in TMNP.

Objective 2: To ensure adherence to the Code of Conduct (compliance and etiquette) that governs behaviour of equestrians and manages impact on other users.

Objective 3: To implement an effective monitoring and maintenance programme for the equestrian activities route network, including gravel roads, trails, management tracks and single tracks.

Objective 4: To ensure effective and ongoing communication and the provision of relevant and useful information between TMNP management and user groups.

Objective 5: To strive for the sustainable and equitable provision of resources to mitigate the impacts of equestrian activities, while supporting wider biodiversity conservation initiatives and programmes to ensure the integrity of the Park.

4. MANAGEMENT FRAMEWORK FOR EQUESTRIAN ACTIVITIES

This section seeks to operationalise the vision and objectives described in Section 3. It identifies the rules for equestrian activity access, discusses ideal trail design, explains the design and proposed routes in TMNP for equestrian activities, and clarifies the procedures to open new trails. It addresses interactions with other TMNP users and provides the Code of Conduct for equestrians.

4.1 Accessibility

A Level 3 Activity Permit provides the right to undertake equestrian activity in the Park and regulates the conditions under which this may be done. The permit should be carried at all times while in TMNP and be produced for inspection whenever required by a TMNP official. This Activity Permit can be obtained from designated TMNP sales offices. *See SANParks website for applicable fees and requirements.*

There are areas within TMNP that are subject to additional access permission, such as Orange Kloof and the Tokai picnic site where equestrian activities are managed in partnership with equestrian organisations in these areas. Equestrian access from Zwaanswyk in Tokai is managed by the property owners' association (ZAPO) in conjunction with the TDRA.

4.2 Trail design for equestrian activities

A key issue for equestrians is the availability of equestrian activity areas and trails. Like athletes, horses require regular exercise and for many equestrians riding is their daily form of physical activity. A fit horse and rider can easily undertake a 20-30km ride over a few hours, but equestrians typically ride for 30-60 minutes on shorter rides of 6-12km. It is therefore beneficial for a variety of routes to be available for equestrians.

Equestrian activity trails or routes should:

- Have convenient and safe access through designated access points from horse yards in and near TMNP, from parking areas designated for visiting equestrians, and from greenbelt areas adjacent to the Park.

- Be circular where feasible from various starting points near yards or parking areas, or offer several options so that overlapping or repeating sections are minimised to prevent trail damage through over-use.
- Be wide enough to pass other horses and users safely.
- Avoid running alongside busy vehicle roads, where possible, or alternatively provide a wide sidewalk.
- Incorporate proper road crossings where necessary.
- Allow some options away from other users, such as dog walkers and cyclists, to ensure that horses can gradually be accustomed to interactions with these users.
- Be a mixture of single tracks and jeep tracks/service roads. Jeep tracks are suitable for faster and side-by-side equestrian activities, while single tracks require a slower pace.
- Have a suitable surface, as both extremely thick/soft sand and extremely hard/stony ground can cause injuries to horses if not ridden with care in these areas.
- Have a gradient that is not too steep, as regular use of such tracks could lead to erosion. Should tracks traverse a steep slope, the track design should zig-zag or traverse gently and have other erosion-prevention measures such as water bars at regular intervals to channel water off the track.
- Have clear and adequate signage. Approved equestrian trails and trails that do not allow equestrian activities should be clearly marked, as should equestrian trails where other users, such as dog-walkers and cyclists, are not permitted. Trails that are temporarily closed for rehabilitation or maintenance should be marked and the local equestrian community notified so that they can inform members. Where cyclists cross trails with horse-riders, these points should be clearly marked with vegetation trimmed to ensure clear visibility.

Recommendations for preservation of riding trails and equestrian activity trail design

- Trails with clear design problems that are leading to damage must be corrected. Regular maintenance of trails is necessary to ensure they are kept in good condition for equestrian activities. A list of equestrian trail maintenance and development needs is to be maintained by the TMEF and updated at least bi-annually.
- The TMEF and/or local equestrians should be invited by the SANParks authorities to provide input regarding trail design, track characteristics and route accessibility when designing new trails, conducting maintenance, and evaluating trails for temporary or permanent rehabilitation.
- The TMEF email address info@tmef.co.za should be used by TMNP management to efficiently communicate information relating to trails. The TMEF will ensure such information is distributed via the various equestrian associations near TMNP.

4.3 Designated routes and proposed additional trails

The main equestrian activity areas in TMNP are Tokai (including Upper, Middle and Lower sections), Noordhoek (Wetlands and Beach), Glencairn, Hout Bay (Orange Kloof and Sandy Bay) and Cecilia. The sections below deal with each area (see maps in Appendix B).

4.3.1 Tokai (Upper, Middle, Lower)

For many years most of the Tokai area of TMNP was a commercial pine plantation under the management of the government's forestry department with SAFCOL and MTO. Tokai comprises three areas known as Upper, Middle and Lower Tokai. Most local equestrians belong to the Tokai District Riding Association (TDRA), which was established to represent the interests of local equestrians, and the Tokai Pony Club.

Upper Tokai

Upper Tokai (Map 1) covers an area stretching from the Silvermine Section of TMNP in the south to the saddle on the Tokai Mast Road in the north-west. It is bordered by the Porter Estate (incorporating the Chrysalis Academy), farmland and residential areas in the east and the Constantiaberg mountains in the west.

Access to Upper Tokai for equestrians is via:

- The Arboretum parking area and main access road, and the brick road off this near the bridge which leads to SANParks offices.
- The Zwaanswyk Close gate and other access gates along the Zwaanswyk fence.
- The firebreak entrance at the Tokai/Zwaanswyk Road intersection.
- The Chrysalis gatekeeper gate between the SANParks stable area and Porter Estate, which is managed by the TDRA.

A historical trail from Blue Valley Avenue in Hout Bay over the mountain saddle linking up with Level 4 is no longer a common access point due to crime, the stony condition of the trail and private properties becoming fenced.

Riding Trails in Upper Tokai

An estimated 100 equestrians access Upper Tokai on a daily basis and the Mounted Police also make use of the area for patrols. Equestrians are permitted to use all former forestry tracks in

Upper Tokai, many of which have been named for convenience. The tracks follow contours on Levels 1 to 5. The track that bisects TMNP from the Tokai Field Office up to Level 2 is known as Central Track. The track from the Arboretum parking area up to Level 3 is known as Main Track. As shown on the SANParks map depicting recreational activities, the area south of Main Track is only to be used by equestrians and walkers/hikers, while the area north of Main Track and Levels 4 and 5 to Silvermine is shared by equestrians, walkers/hikers and cyclists.

Proposed trails to be opened for equestrian activities in Upper Tokai

Historically, equestrians used a network of single tracks in Upper Tokai in addition to forestry tracks through the planted pine compartments. Equestrian activities in the pine plantations caused little damage, and single tracks wove through the trees and zig-zagged up steep slopes to prevent erosion. When the management of the land was given to SANParks, equestrian activities were restricted to the forestry tracks. Due to high communal usage and the hard stony nature of some of the jeep tracks, the TDRA has identified additional single track routes that allow access between the levels away from other users.

These are:

- A track to separate horses from cyclists along shared trail between level 1 and level 3, as a safety measure.
- The Arboretum outer link, a short piece of single track to allow riders to stay on the outer boundary of the Tokai Arboretum.
- An approved trail off Central Track, that requires final alignment.

It is noted that requested horse-rider access through the Arboretum is not supported by SANParks.

Middle Tokai

Middle Tokai (Map 2) connects Upper Tokai and Lower Tokai and also links with the Constantia greenbelt trails which are popular for equestrian activities. Middle Tokai is an important area for equestrians as it is flat, has suitable ground for horses and it is not open to dog walkers. It extends from the Stone Church in the north to Orpen Road in the east, the Arboretum in the west and the Upper Tokai Road in the south.

Several horse yards border on, or are located in, Middle Tokai, making it a vital equestrian hub. Approximately 150 horses and their riders have access to Middle Tokai on a daily basis. This

section encompasses part of the Tokai Manor House Precinct, as well as the Equestrian Sub-Precinct which contains the SANParks Stables and the land earmarked by SANParks for horse riding arenas¹. It is also a key access point for horse trailers entering the Tokai area of TMNP. Middle Tokai borders the Porter Estate managed by the Western Cape Provincial Government, which encompasses the Chrysalis Academy and an equestrian tenant. No equestrians are permitted access to the Porter Estate unless they are tenants of the livery yard or members of the TDRA.

Access to Middle Tokai for equestrians is via:

- The Stone Church access to/from the Constantia greenbelt.
- The Lions' Gate/Orpen Road crossing to/from Lower Tokai.
- The southern Orpen Road crossing to/from Lower Tokai.
- The gap in the fence at the Tokai/Zwaanswyk Road intersection.
- The Arboretum parking area access to/from Upper Tokai, and other access points such as the weir and bridge on Upper Tokai Road near the Manor House.
- The Chrysalis gatekeeper gate between the SANParks stable area and Porter Estate land.
- The Picnic Site entrance in Upper Tokai Road and near the Chrysalis climbing wall.

All routes that are available to equestrians are demarcated on Map 2 and include the main tracks (numbered 1 to 4 from south to north, and the perimeter trail) and existing single tracks that link Track 1 to 2 and Track 2 to 3.

Proposed trails to be opened for equestrian activities in Middle Tokai

SANParks recognises the equestrian importance of Middle Tokai but notes that routes in this area require further final agreed routing.

These are:

- The existing old forestry track from the picnic/braai site to the old Orpen Road with the final route near the wetlands still to be determined,
- A parallel link along Orpen Road along the inside of the fence, following an existing broken single track and which would need further design in the future to connect these separate track segments.

¹ SANParks, 2012. Tokai Manor Precinct Plan, August 2012

SANParks cannot support proposed equestrian-use space on the old bowling green near the arboretum as this would conflict with the approved Tokai Manor Precinct Plan. An alternative site for a novice rider/equestrian-use space has been identified in a disturbed area below the Chrysalis sports fields.

Lower Tokai

Lower Tokai is the area of TMNP situated east of Orpen Road, north of the Dennendal area of the Tokai suburb, and south of the wetland area near Soetvlei Avenue. It is used by numerous members of the public for various activities, including walking with dogs and cycling. It is likely that over 100 equestrians have access to or could potentially use Lower Tokai on a daily basis, and the Mounted Police also make use of the area for patrols. It also provides an important access route to and from the Tokai Pony Club Arena in Dennendal West Road.

Access to Lower Tokai for equestrians is via:

- The Lions' Gate/Orpen Road crossing to/from Middle Tokai.
- The southern Orpen Road crossing to/from Middle Tokai.
- The bridge to the Keyzers River Trail (greenbelt) along the M3 highway.
- A private access trail from the horse yard adjacent to the Cape Academy for Maths, Science and Technology on Soetvlei Road.
- The entrance at the Tokai Pony Club arena off Dennendal West Road.

Lower Tokai has a laterite path around most of its perimeter. This path is popular with walkers, cyclists and dog walkers. Horses are not permitted on the path, however the main perimeter horse trail is directly alongside and equestrians must cross the path at certain access points.

Incidents between dogs and horses are an issue in this area, due to their extreme proximity and a number of dogs not under the full control of their owners. Signage is erected at all entrances and provides clarity that all other users should give way to horses. The EMP for walking with dogs stipulates that owners must have their dogs under control at all times, whether with leash or recall.

Proposed trails to be opened for equestrian activities in Lower Tokai

SANParks recognises that Lower Tokai is an important historic horse-riding area. Equestrian activities in the Lower Tokai have been affected significantly by several trail closures where fynbos

rehabilitation is underway. Historically, equestrians could use the entire Lower Tokai area and trails wove in amongst the pine trees, with larger forestry tracks existing through the current fynbos area. While it is recognised that Lower Tokai is a highly significant fynbos restoration area, it is recommended that dedicated paths to accommodate walking, dog walking and horse riding should be maintained in this area².

SANParks does not support opening the previous equestrian tracks through the fynbos rehabilitation area until this area is considered for future recreational uses. The question was asked whether there might be one or more of the loops/tracks that were in a less sensitive section than others, and the SANParks team agreed to consider this in the future.

SANParks does not support detour routes through fynbos in areas of high user activity. Instead, the established hierarchy of users is applicable, which is that other users must give way to horses. Water management interventions are required to ensure year-round access to the existing perimeter equestrian trail.

4.3.2 Noordhoek/Kommetjie (Wetlands and Beach)

The Noordhoek Valley is home to over 400 horses, and the area is popular for its unique scenery and riding trail potential. Noordhoek/Kommetjie wetlands and beach are an ideal area for horse riding with a number of established routes. The wetlands abut directly onto the prominent horse-keeping areas with easy access to this section of TMNP. There are trails along the northern edge of the wetlands and an access path onto the beach. The beach is particularly popular with both local equestrians and riders transporting horses in trailers from outside the area.

The Noordhoek Riding Club (NRC) operates an equestrian competition venue on Katzenellenbogen Street. This riding club backs directly on to TMNP. The Noordhoek Pony Club is affiliated with the international Pony Club and has close ties with the NRC, who together host events and educational programmes for children and their families. There are facilities on the Noordhoek and Imhoff ends of the beach that offer trail rides for tourists. Noordhoek is also home to an equine charity, the Tom Ro Haven, which works with rescued horses to facilitate animal therapy with at-risk youth from local communities.

² SANParks, 2009. Tokai and Cecilia Management Framework, May 2009; page 15

The NRC works with local environmental groups to monitor alien vegetation in the wetlands, and the equestrian community has been responsible for considerable fundraising efforts to support the removal of the invasive species.

The NRC is in a process of formalising a working group of riders to represent the non-competitive interests of the Noordhoek riding community. This body will be responsible for communicating between club members, the public and official bodies like SANParks. They will also optimise the collaboration between existing community organisations like the Noordhoek Ratepayers Association and Noordhoek Environmental Action Group (NEAG). The group will work towards improving the safety and quality of existing trails through collaboration with SANParks by reporting track degradation and facilitating maintenance and local fundraising. The NRC will be the primary equestrian community representative ensuring the compliance of the equestrian community through various channels of communication.

Noordhoek/Kommetjie Wetlands

The wetlands host a network of existing trails that run along the northern section of the wetlands adjacent to Katzenellenbogen Street between the Lake Michelle housing estate and the beach access path behind the NRC. A portion of these trails are on land owned by the City of Cape Town, with the remainder being under management of TMNP.

Map 3 shows the current layout of the existing trails in the wetlands. Over time various trails officially marked on SANParks trail maps have become inaccessible due to access and maintenance issues. The path south from Lake Michelle requires a safe river crossing previously facilitated by a bridge. However, the bridge is a constant target of vandalism, leaving it impassable. As a result, the link between the Imhoff trails along the southern edge has been broken, leaving these trails unattended. This has resulted in increased intensity of use on the trails along Katzenellenbogen Street, as there are now only five kilometres of trails that are not directly on the beach for use by the 400 horses of Noordhoek. The effects of this can be seen in the multiple smaller branching of trails along the routes as riders seek safer footing off the more eroded paths.

Noordhoek Beach

The beach is a popular recreational hotspot for many different user groups in Cape Town. It is particularly attractive to equestrian users as it is one of the few remaining beaches without a time cut-off for horses, it has ideal footing for riding and its length provides ample space for riders of all skill levels to enjoy. One of the key features of Noordhoek beach is the seasonal back-shore lagoon that has water level changes between the seasons, as well as after single storm events.

This lagoon is representative of the dynamic natural processes occurring constantly on the beach and in the wetlands. However, this changing landscape can cause conflict between different users and between users and the natural environment.

Many horse riders currently ride either on the dry pan or along the edge of the water, inland from the ocean. This area is attractive to riders because of the conditions of the ground, the distance from potential hazards to nervous horses, the lack of other user groups, and the space available for faster paces. The ocean edge is the most popular area for dog walkers and the unpredictability of other users who are not familiar with horses in this area has caused serious incidents with riders. The ocean is loud and constantly moving which can make some horses nervous, and the rip currents leave the surface dangerous with unseen level changes and patches of sinking sand. Therefore, many riders prefer the relative safety of riding between the dunes and the seaward edge of the pan.

The following rules are proposed for the beach area affected by seasonal conditions with a full lagoon in winter and a dry lagoon in summer. Please see map below.

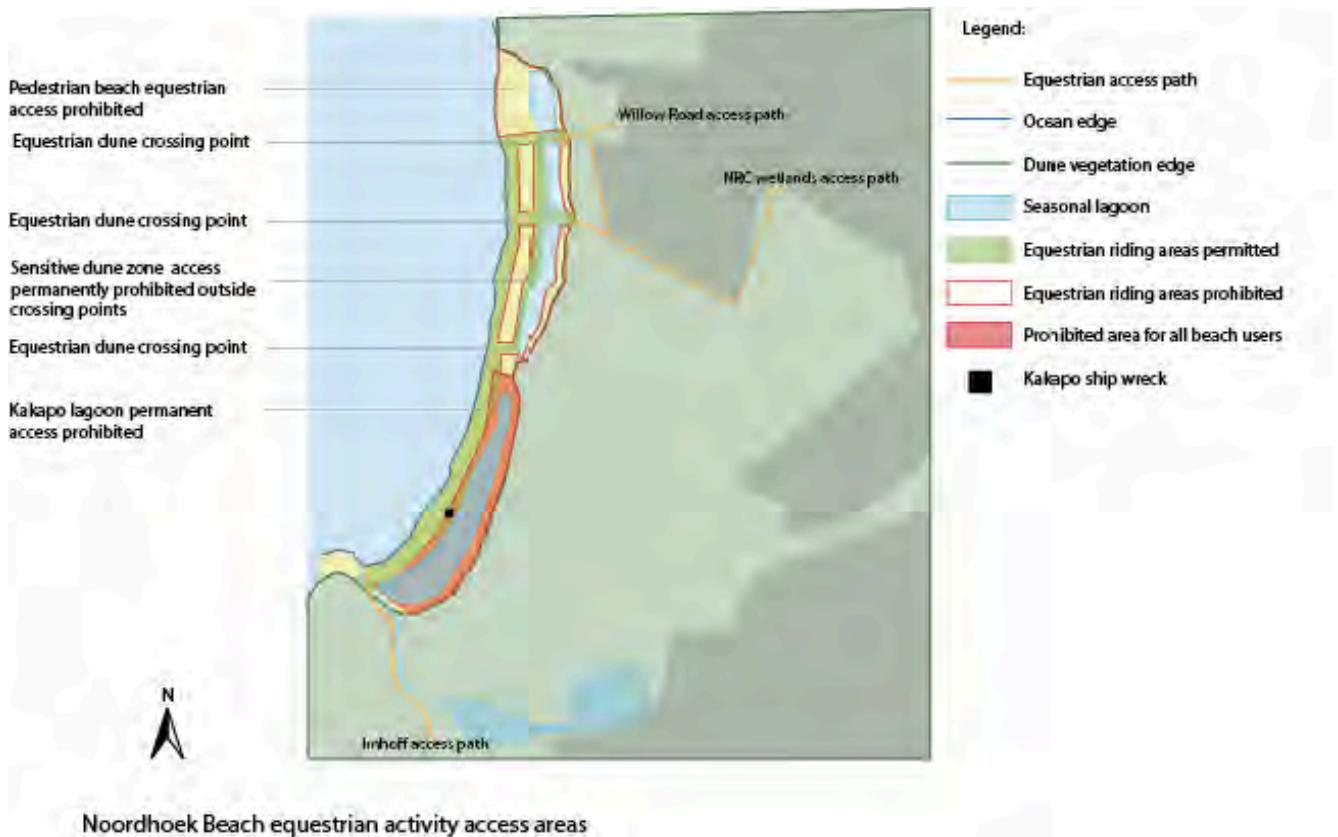


Figure 2: Equestrian access around Noordhoek beach, dunes and lagoon.

Permanent no-go zones: These include the lagoon area behind the Kakapo Wreck, the soft dunes between the high tide mark and the lagoon edge, except for the three designated crossing areas, and any area in the immediate vicinity of wildlife.

Full lagoon: The full lagoon results in a large expanse of the surface of the beach, nearing 50%, being covered in water. This habitat is essential for many bird species, and the following rules aim to protect the local ecology while providing safe conditions for horse riding:

- Horse riders are to avoid disturbing wildlife at every opportunity.
- Horses to follow the designated riding routes along the ocean, and to only ride along the seaward (western) edge of the lagoon.
- Horses not to be allowed along the dune side of the lagoon (eastern edge).

Dry lagoon: The dry lagoon offers ideal footing for horse riders and will therefore always be the most attractive riding surface to beach riders. The following rules aim to guide horses away from sensitive breeding areas and make the presence of horses more predictable to other users:

- Riders must keep away from the sensitive dunes on the edge of the wetlands.
- Riders must limit crossing the dunes between the pan and the ocean to the three designated crossing areas.
- Riders must exercise caution while riding on the receding lagoon edge as the newly revealed sand is prone to areas of sinking sand.

The following general beach etiquette guidelines are applicable:

- Pass other beach users slow and wide.
- Alert other users to your presence.
- Give clear instructions to other users should you find yourself in a dangerous situation ie. “please leash your dog”, “please slow down”.
- Stay in designated areas for horse-riding.

It is to be noted that, while the above is applicable to equestrians, the lagoon is often the site of illegal water sport activities that disturb both wildlife and other TMNP users. Equestrians should report illegal water sport activities to TMNP as soon as possible.

Noordhoek has historically been woven through with equestrian trails that were rideable from Imhoff to Silvermine with many routes through the wetlands. Currently there are two access points to the beach from Noordhoek, with one requiring substantial time walking through the Chapman’s Peak suburbs, or the alternative taking riders through a path overgrown with alien vegetation. This, coupled with the inaccessibility of other paths due to maintenance issues, has caused greater intensity of use on the limited trails off Katzenellenbogen Street and on the beach. Imhoff has access to the southern end of the beach, however that area remains cut off from the wetland trails.

The main issue is on land owned by the City of Cape Town. The key to reinstating currently inaccessible approved tracks (marked with purple dotted lines on Map 3) is the repair/replacement of the bridge crossing the Lake Michelle stream, which has been vandalised. SANParks will support equestrian efforts to take this project forward with the City of Cape Town. Should the bridge be rebuilt in a sustainable manner, SANParks supports the re-opening of the otherwise inaccessible trails shown on the map.

Proposed trails to be opened for equestrian activities in Noordhoek

- Some of the existing and proposed wetland trails (A, B, C) are on City of Cape Town land. SANParks has agreed to defer decisions about trails on this section to the City of Cape Town.
- SANParks supports Track A along an old jeep track with some possible re-routing to ensure that equestrian use does not impinge on the wetlands.
- SANParks does not support new trail proposals through the wetlands area of TMNP, which comprise thick reed beds.
- There was a proposal to open a new area for horse riding, Silvermine East and Silvermine West. SANParks has given this consideration and is not in favour of permitting horse-riding in these areas due to levels of current use by hikers, walkers, dog-walkers, trail runners and mountain-bikers. The northern loop is core hiking territory and several routes further south are single tracks with multiple users. However, SANParks is open to application for tourism initiatives and one-off equestrian events in parts of Silvermine, which would require specific permission.

4.3.3 Glencairn area

The Glencairn area (Map 4) is primarily used by equestrians keeping their horses at the Glencairn Stables and private yards in the Red Hill area and near the entrance to the Cape of Good Hope section. From time to time, other equestrians arrive by horse trailer and park at the various access points on the Glencairn Expressway or Da Gama Road.

The tracks as shown on the map are supported by SANParks. It should be noted that a few historic previously approved tracks from the 2004 EMP are no longer viable due to access through private land having been curtailed or because of serious security concerns.

4.3.4 Hout Bay (Orange Kloof, Sandy Bay and Cecilia)

Two separate areas of TMNP are connected to the suburb of Hout Bay where numerous horse yards are located. Sandy Bay (Map 5) is on the south-west side of the valley and Orange Kloof (Map 6) is located at the northern end of the valley.

Hout Bay also has a greenbelt area along the river that bisects the valley and this and the road-verge network serve to connect equestrians to the various areas. The area above the Ruyteplaats Private Mountain Estate is also available for equestrians but is not discussed here as it falls under the management of the City of Cape Town. Hout Bay and Tokai were connected via a historical route across the mountain above Blue Valley Avenue which is no longer in use.

Hout Bay has a number of riding schools, livery stables and private yards that make equestrian activities available to riders from the valley as well as the surrounding suburbs. The Hout Bay Riders Club has been active since 1990 and represents both competitive and recreational equestrians.

Sandy Bay

The dunes in Hout Bay and towards Sandy Bay are an important riding area in lower Hout Bay valley, which is home to the well-established Hout Bay Riding Centre and other stable yards.

Access for equestrians to Sandy Bay is via:

- The constructed bridle track adjacent to Eustegia Way in Kronenzicht.
- The Hout Bay dune system, along Rocket Road and/or down along the TMNP management track to Sandy Bay.
- Riding trails to the north on the Sandy Bay side, which are located partially on private land.

Concerns raised include security issues, the rocky state of Rocket Road and the possible erosion of smaller trails in the dunes of the Hout Bay side that will have to be monitored in the future. Several trail routes in the Sandy Bay area are situated on City of Cape Town land or privately owned land, and these segments of trail do not fall under the management of SANParks.

Orange Kloof

Orange Kloof is the predominant area for equestrians in the north of the valley where there are very limited safe outrides. Orange Kloof borders Cecilia and access for horses between the two is along a narrow trail between a boom and a steep drop. Orange Kloof is an environmentally sensitive area, has restricted access and is only available for equestrian activities through a keyholder system managed together with local riders.

Access for equestrians to Orange Kloof is via:

- A locked gate at the end of Forest Hill Road, a cul-de-sac with limited parking in the quiet Longkloof area in Hout Bay.

Proposed trails to be opened for equestrian activities in Orange Kloof

- SANParks does not support changing the informal routes used by riders into approved trails, as there are internal SANParks plans to use the Orangekloof buildings and surrounding areas. This will have implications for approved equestrian trails. Once plans are finalised, SANParks will hold discussions with the equestrian community to manage future access to this part of Orange Kloof.
- Riders requested access to the longer trail B through Orange Kloof. SANParks has agreed to support equestrian access to this trail on a permit basis. This could be managed through a formal community structure based in Hout Bay, such as the HBRC, together with riders located in the area adjacent to Orange Kloof who regularly use the area.

4.3.5 Constantia (Cecilia)

Cecilia (Map 6) lies on the eastern lower slopes of Table Mountain, south of Kirstenbosch National Botanical Garden and north of Constantia Nek, and borders the Constantia suburbs where there are several horse yards and a network of greenbelts suitable for equestrian activities. The slopes of Cecilia are gradually being restored to the natural Peninsula Granite Fynbos interspersed with silver tree forest, as the plantations of pine and gum trees are removed.

SANParks supports the continued use of Cecilia as an area for horse-riding. Equestrians are permitted to ride on all the former forestry tracks shown on Map 6.

Access to Cecilia for equestrians is via:

- Orange Kloof from the Hout Bay side (access managed by Hout Bay riders group).
- The parking area at Constantia Nek.
- The Constantia greenbelt network (from part of the Diep River greenbelt trail) at the intersection of Southern Cross Drive and Rhodes Drive.

- The parking area at the intersection of Hohenort Avenue and Rhodes Drive.

Cecilia is also used by an increasing number of mountain bikers and walkers with dogs. In some instances, dogs are not under voice control and may pose a danger to horses. SANParks reiterates that all users are expected to adhere to their respective Codes of Conduct. Cyclists, hikers and dog walkers are expected to give way to horses, and dogs must be under voice control or on a leash.

Cecilia has some circular routes used by equestrians but several others are dead-ends due to the boundaries of Kirstenbosch National Botanical Garden. SANParks supports discussions with Kirstenbosch to explore whether existing or potential links can be developed to create more circular tracks for riders.

SANParks notes that the paved road to the top of the back table of the mountain, which is in regular use by municipal water department vehicles, is not an approved equestrian trail.

4.4 Procedures to open new equestrian activity routes or tracks

Any proposed new track or area will only become available for equestrian activities once the required procedures have been completed and any necessary trail interventions have been implemented.

A proposed new route or track should adhere to one or more of following principles:

- Links currently designated routes within TMNP
- Links to routes that involve different landowners or managers (e.g. connecting City of Cape Town public open space to TMNP)
- Creates more circular options to prevent over-use of certain tracks
- Alleviates congestion and possible conflict with other user groups
- Allows alternative entry/exit points to a route
- Follows an existing jeep track or single track

The following procedures should be undertaken to open a new equestrian activity route:

- **Who may propose a new equestrian activity trail, and procedure for making a proposal:** An individual equestrian can propose a new route to the TMEF. New route proposals must be submitted in writing and include a plan of the proposed route alignment, as well as a funding and maintenance plan.

- **Process and criteria for considering a proposal:** The TMEF must inspect the proposed route and consider a variety of criteria and standards, such as whether the proposed route is suited to equestrian activities, potential for trail conflict with other users, erosion, avoidance of sensitive biodiversity habitats, maintenance and funding crime prevention and safety, and any other considerations. The proposed route should be mapped.
- **Possible need for baseline biodiversity and heritage studies:** Routes may not be approved if they disturb sensitive habitats or rare indigenous plants or animal species or the integrity of a cultural heritage site. A biodiversity baseline study and possibly a heritage impact study may be required to assess the maintenance and opening of new routes where necessary. Botanical reports may be required for the maintenance and opening of new routes.
- **Consideration by SANParks:** Once the proposal has the written support of the TMEF it must be forwarded to SANParks for assessment. SANParks may support, amend or reject the proposal and should do so within a reasonable timeframe (preferably 30 days).
- **Feedback from SANParks:** If supported, SANParks will inform the TMEF if there is a need to conduct an Environmental Assessment (in terms of the NEMA regulations) of the proposal, or proceed to public and stakeholder comment if necessary.
- **Public and stakeholder comment:** If deemed necessary, the new route will be advertised on the SANParks and equestrian websites for public comment for a 30-day period. Key interested and affected parties (e.g. cyclists, dog walkers) should also comment within this period.
- **Approval:** Based on comments received, SANParks may approve, with applicable conditions (construction, maintenance, management, signage etc.), amend or reject (with reasons) the proposal. This process should preferably be completed within 30 days.

4.5 Equestrian Code of Conduct

This Code of Conduct has been drawn up jointly by SANParks and equestrian bodies to regulate equestrian activity in TMNP. The objectives are to ensure compliance with TMNP rules, to ensure

the conservation of the unique environmental and cultural resources of TMNP, and to promote respect and courtesy between horse-riders, other users of TMNP and Park officials.

All horse-riders should be made aware of the Code of Conduct when applying for an Activity Permit. There should be ongoing communication of the relevant Codes of Conduct to all user groups on an ongoing basis in partnership with representative organisations.

Rules for horse-riding (compliance)

- All horse-riders must have a valid Level 3 Activity Permit, which must be carried and shown on request to any TMNP official. Riders are to dismount, if necessary.
- Access to the TMNP is permitted during daylight hours only, unless permission is granted for organised rides outside these hours. Hours vary seasonally, as indicated on the SANParks website.
- Horse-riding is only allowed on designated equestrian trails as approved in the EMP for equestrian activities. Riding is not allowed on laterite (clay) paths in TMNP but is allowed on similar clay paths provided by the City of Cape Town.
- Horse-riders must stick to the existing paths and not ride alongside them, which causes widening and loss of flora.
- Horse-riders have right of way above other users, including dog walkers, cyclists and hikers, but should always ride in a safe manner with due regard for other users. No galloping is allowed in Lower Tokai Park.
- Horse-riders may not be accompanied by dogs unless with permission of TMNP authorities, in which case these dogs must be under voice control at all times.
- Riders who contravene any of these rules may be fined or have their Activity Permits revoked.

Recommended guidelines for horse-riders (etiquette)

Be friendly and courteous

- Every rider is an ambassador for the equestrian community and should behave in a courteous and respectful manner towards other riders, other Park users and TMNP officials.

- Slow down when passing other users to ensure safety for all. Be considerate to families with small children, the elderly and people with disabilities.
- Approach unleashed dogs with extreme caution and allow owners time to restrain/call their dogs.
- Slow down when approaching other users from behind. Alert them to your presence, ensuring that you are able to pass safely.
- Do not ride horse in the Park for three days after using a deworming medication to prevent potential toxic effects for dogs.
- Express appreciation to other users, and thank motorists, cyclists and other users who give way.

Riding safely

- Wear the correct safety gear and ride with reflective clothing in poor light.
- Ensure that your tack and equipment is in good order to prevent accidents and that your horse is under control at all times.
- Ride at an appropriate pace for the terrain, so as not to cause erosion or damage to trails and to be able to safely negotiate hazards.
- Keep left on roads, ride in single file and give way to authorised vehicles.
- Ensure you have a fully charged cell phone with ICE contact numbers and identification and contact numbers attached to your saddle in case of an accident or loose horse.

Equestrian etiquette

- Always ride with due regard to other riders and their horses.
- Slow down and announce your approach when coming up behind other horses. Ask permission to pass and then to increase speed.
- Give other horses space to pass.
- Novice riders should be accompanied by a competent rider or supervisor on foot.

Help protect the TMNP

Horse-riders should be the eyes and ears of the Park. Report any illegal activity to the SANParks 24-hour Emergency line 0861 106 417.

Report incidents with other users and trail damage to representative equestrian groups.

- Tokai area – the Tokai District Riding Association (TDRA)
- Hout Bay – Hout Bay Riders Club
- Noordhoek – Noordhoek Riding Club and Wetland Riders Facebook group
- Constantia – Friends of Constantia Equestrian and WhatsApp group
- Table Mountain Equestrian Forum (TMEF) info@tmef.co.za

4.6 Interactions with other user groups

Horse-riders encounter other users on most trails in TMNP. The vast majority of interactions between horse-riders and other users are uneventful. Most horses are habituated to motor vehicles, pedestrians, cyclists and dogs that do not pose a threat.

However, in an urban context, there are users who do not expect to come across horses and who may be unfamiliar with the behaviour of horses, which may appear intimidating. Horses are flight animals that may react unpredictably in situations they perceive as threatening.

Adherence to the relevant user groups' Codes of Conduct, courtesy and respect is key to ensuring the enjoyment of all users in a safe and harmonious manner.

4.6.1 Dog walkers

A dog's instinct may be to chase, just as flight is instinctive to horses. Clashes between horses and dogs that chase horses can lead to serious injuries to both parties. Both equestrians and dog walkers have the responsibility to minimise potentially dangerous interactions. The following is recommended:

Equestrians have the responsibility to:

- Familiarise their horses with dogs so they do not over-react to the presence of dogs.
- Slow down when approaching dogs to allow owners time to call their dogs to heel and leash them if necessary.
- Warn dog walkers when approaching from behind if the dog walker is not aware of the approaching horse.
- Abide by the equestrian Code of Conduct and always carry their Activity Permit.

Dog walkers have the responsibility to have their dogs under control at all times by:

- Training their dogs to ignore horses. Dogs not habituated to horses should be leashed in public spaces where horses are visible until they learn to ignore horses.
- Not allowing their dogs to approach horses in any way.
- Calling their dogs to their sides and preferably putting them on a leash when horses are approaching.
- Abide by the dog-walkers Code of Conduct and always carry their Activity Permit.

4.6.2 Hikers/walkers and trail runners

Hikers/walkers, trail runners and equestrians share most of the tracks in TMNP and are likely to encounter one another regularly. Interactions are usually positive. Equestrians should always slow down when passing hikers/walkers or runners and warn them when approaching from behind.

4.6.3 Mountain bikers/cyclists

Cyclists and horse-riders have the potential for negative interactions on shared trails. This is because the speed at which cyclists sometimes travel poses a threat to the safety of both horses and equestrians, particularly if they appear suddenly and/or at high speed. Horses can be frightened by bicycles and this may result in accidents and possible injury to one or both parties.

Both equestrians and cyclists should attempt to minimise incidents by exercising responsible and respectful behaviour.

Equestrians have the responsibility to:

- Familiarise their horses with bicycles as much as possible.
- Warn cyclists when approaching them from behind and wishing to overtake.
- Wear bright clothing for increased visibility.
- Communicate with cyclists by using hand signals (the universally-recognised “slow down” hand sign) or voice.
- Observe TMNP rules, including not using trails designated exclusively for cycling, abide by the equestrian Code of Conduct and always carry their Activity Permit.

Cyclists have the responsibility to:

- Slow down when approaching horses.

- Slow down when negotiating blind corners or on trails where other users, including equestrians, may be obscured.
- Warn equestrians when approaching them from behind and wishing to pass by calling out or using a bell well in advance.
- Observe TMNP rules, including not using trails where cycling is not permitted, abide by the cycling Code of Conduct and always carry their Activity Permit.

Management recommendation about interactions with other user groups

All incidents between equestrians and other user groups should be reported to the TMEF and SANParks. Should action be necessary (e.g. erection of further signage, creating a one-way route, etc.), this should be negotiated between all interested parties.

5 INSTITUTIONAL FRAMEWORK

The Table Mountain Equestrian Forum (TMEF) was established during this EMP review process with the aim of creating a single point of contact between SANParks and equestrian communities in and around TMNP. The TMEF is not a formal legal entity or constituted body, but this may change in future. Individual equestrians should be encouraged to take up issues with the TMEF rather than approaching SANParks directly.

The roles and responsibilities of the parties in relation to the EMP are as follows:

South African National Parks (SANParks)

SANParks is the managing authority of TMNP and is the ultimate decision-making authority within the boundaries of the national park. SANParks is mandated with managing the environmental integrity of TMNP and establishes rules regarding all activities within the Park.

In terms of this EMP, SANParks (TMNP management) is responsible for the following:

- Monitoring equestrian activities
- Approving signage
- Maintaining designated trails with the voluntary assistance with the equestrian user group
- Closing illegal or non-approved trails

- Meeting with the TMEF to discuss this EMP
- Enforcing the PAA and the EMP
- Supporting the TMEF
- Communicating with the TMEF on any matters that may affect equestrian activities in TMNP
- Encouraging equestrian groups, individual equestrians or members of the public with equestrian issues to engage with and through the TMEF.

Table Mountain Equestrian Forum (TMEF)

The TMEF is responsible for the following:

- Representing equestrian communities and the interests of all riders using TMNP.
- Liaising with equestrian communities and maintaining regular communication with all riders with regards to matters affecting their use of the Park.
- Liaising with TMNP on a regular basis on equestrian activity management matters in the Park.
- Acting as the first point of contact for equestrians in respect of TMNP matters.
- Assisting with designated route maintenance in partnership with TMNP.
- Assisting with safety and reporting incidents.
- Where possible, assisting TMNP with the monitoring of equestrian activities.
- Informing and educating equestrians about the contents of this EMP and the equestrian Code of Conduct, which shall be posted on its affiliate organisations and SANParks' websites and distributed via local yards, riding clubs, tack shops, feed merchants and other suitable outlets.
- Liaising with TMNP in designing signage and trails.
- Meeting with TMNP officials to discuss implementation of this EMP and any changes.
- Assisting with revisions and updates of this EMP.

Various civil society organisations exist to manage and coordinate equestrian activities along the Peninsula. While some are facilities-based and primarily focused on shows and events, other groups and organisations, such as Tokai District Riding Association, Hout Bay Riders Club, Cape Equestrian Forum, Noordhoek Riding Club and Wetlands Riders, Friends of Constantia

Equestrians and others, are involved in maintaining and securing equestrian activity trails and areas and promoting horse-riding in general. Individual equestrians and yard owners are also involved. This list of equestrian-related organisations and groups active in the areas relevant to TMNP is not exhaustive and will need to be updated regularly.

Table 2: Equestrian-related organisations active in TMNP area

Association Name	Web Link
Cape Equestrian Forum	Facebook page
Constantia Valley Riding (CVRC)	Facebook page
Friends of Constantia Equestrian	www.friendsofconstantiaequestrian.com
Hout Bay Riders Club (HBRC)	www.houtbayridersclub.squarespace.com
Hout Bay Pony Club	
Noordhoek Riding Club (NRC)	www.noordhoekriding.com
Noordhoek Pony Club	Facebook page
Noordhoek Wetlands Riders	Facebook page
South African Riding for the Disabled Association (SARDA)	www.sarda.co.za
Table Mountain Equestrian Forum (TMEF)	www.tmef.co.za
Tokai District Riding Association (TDRA)	www.tdra.co.za
Tokai Pony Club	www.tokaiponyclub.co.za

6 Implementation of the EMP

This section describes the activities required to enable implementation of this EMP, including key activities identified, the prioritisation of the activity and responsibility for the activity.

Table 3: Key implementation activities identified in this EMP

Activity	Priority	Responsibility
1. Adoption and initial communication of the EMP		
Adopt the final EMP.	High	TMNP
Initiate focused public communications in different media about the EMP and its contents.	Moderate	TMNP TMEF

Circulate the final EMP to all registered interested and affected parties and current holders of Activity Permits.	High	TMNP
Develop a leaflet with the approved routes, and the Code of Conduct to accompany the issue of Activity Permits.	High	TMNP
Communicate the agreements contained in, and responsibilities for, the EMP to affected TMNP staff.	High	TMNP
Publish the updated EMP on the TMNP and user group websites.	High	TMNP TMEF
2. Trail safety and maintenance		
Undertake maintenance of trails by accredited persons in accordance with an approved maintenance programme.	Ongoing	TMNP TMEF
Tracks to be mapped and inspected to determine stability, alignment, erosion potential and equestrian safety.	Ongoing	TMNP TMEF
Update SANParks approved signage for equestrian activity: e.g. direction, trail difficulty.	Moderate	TMNP TMEF
All routes should be rated in terms of the Risk Guidelines for South Africa Trail Managers.	Moderate	TMNP TMEF
Apply a consistent approach to signage complying with SANParks signage guidelines and signage conventions applicable to equestrian activities.	Ongoing	TMNP TMEF
Compile a risk management plan in conjunction with TMNP, Mountain Rescue and City of Cape Town to cover incidents such as serious injury and fire.	High	TMEF
3. Activity Permit and self-regulation		
Educate and awareness of permit requirements.	Ongoing	TMNP TMEF
Investigate equestrian identification mechanisms.	Moderate	TMEF
4. Ongoing communication, education and awareness of EMP		
Conduct a communication strategy including: permits, behaviour, safety and risk, and signage and way finding.	High	TMNP TMEF
Ensure ongoing information is made available to equestrian organisations and publications, digital media channels,	Ongoing	TMNP TMEF

newsletters etc, and in local weekend, daily and community newspapers.		
Consider employing social and digital media specialist for communicating with equestrians.	Low	TMNP TMEF

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Appendix A: TMNP trail user stakeholder groups

Equestrian activities and interests
Tokai District Riding Association
Glencairn Equestrian Centre
Hout Bay Riders Club
Noordhoek Riding Club
South African Riding for the Disabled Association
Tokai Pony Club
Noordhoek Pony Club
Noordhoek Wetland Riders
Cape Equestrian Forum
Constantia Friends of Equestrian
Cycling/mountain biking
TMMTB Forum
Hiking
Mountain Club of SA
Hikers Network
Peninsula Ramblers
Trail running
WP Trail Running
Walking with dogs
Friends of Dog Walkers
General
Friends of Tokai Park
City of Cape Town
Parkscape
Take Back Our Mountains
Kommetjie Environmental Action Group
Noordhoek Environmental Action Group

