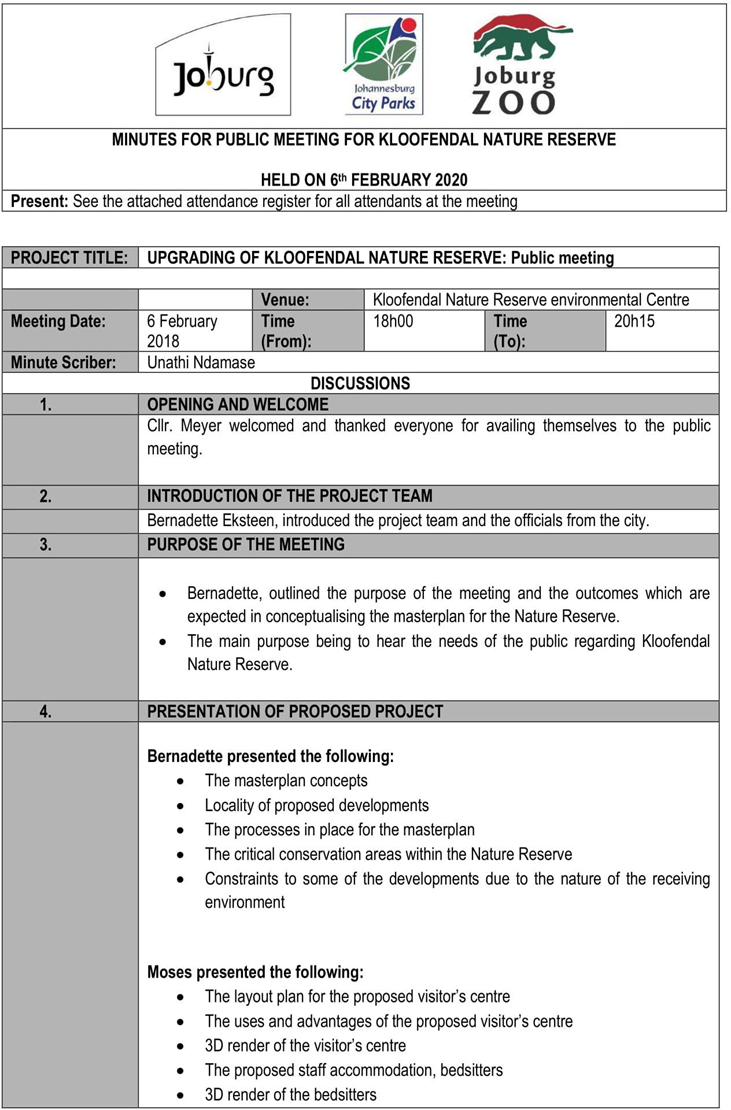
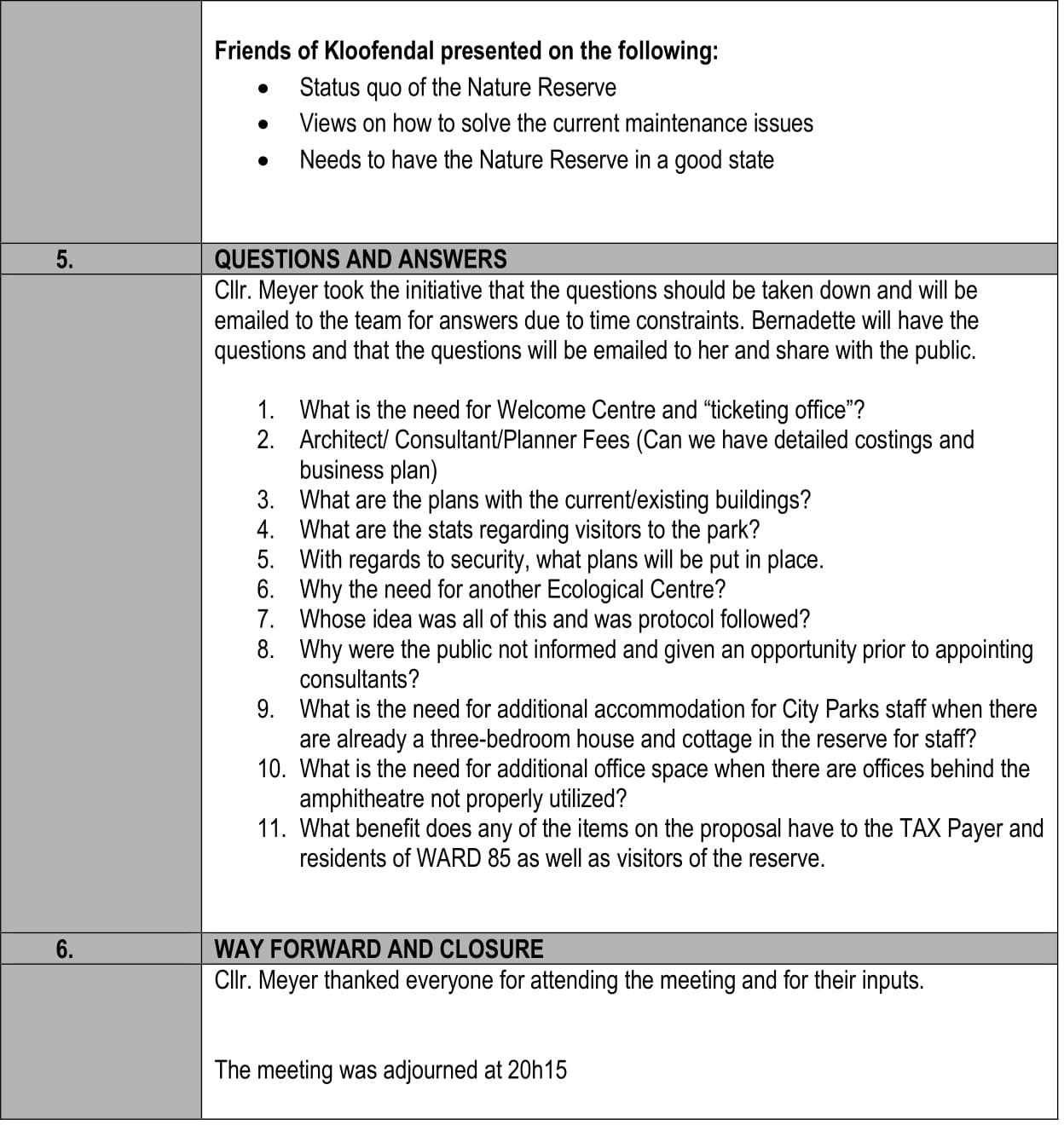
# The Friends of Kloofendal reject the proposed development for the following reasons:

* **No market or opinion survey has been presented.** This should have happened before building plans were drawn up. The entire process is flawed and should be scrapped.
* In our opinion, **maintenance issues should be 100% under control** before new buildings are even planned.
  + **Maintenance of existing structures and facilities is falling behind**, for example Fencing & Gates, Sewage, Dam Spillway, Toilets and Taps frequently leaking and Toilet Seats cracked, Roof of Braai and Lapa need repair, Stage roof needs maintenance
  + In many ways the **management of the reserve is not up to standard**, for example Parking, Lawn, Paths, Invasive Alien Control, Bush Encroachment Control.
* The R1 million 2019/2020 (rate-payers money!) for planning was spent with **no public participation or consultation**.
* This entire project is tied into the City of Johannesburg’s **application for Kloofendal Nature Reserve to be declared a Provincial Nature Reserve**. **JCPZ has been extremely non-transparent** in this process, showing no recognition of the public's interests.
  + We are concerned that Johannesburg's excellent **Public Open Space By-laws in this process will be “adjusted” not to apply anymore** to the Amphitheatre and the reserve, especially in terms of alcohol and electronic music.
* **Most of the facilities in the proposed visitors centre are already available in the Reserve**, namely Ecological Centre and toilets.
  + The existing Ecological Centre was described by JCPZ as a “Centre of Excellence” when it was built but was barely used by JCPZ. FroK is grateful for use of the Centre and furnishing it with displays over the last four years. **We look forward to continued collaboration with JCPZ in Environmental Education for all.**
* **We totally reject the proposed staff quarters** to accommodate four employees that are justified by a “may be” regulation. Staff can commute as is the case with normal employees throughout Johannesburg. We also have concerns about the quality of training that the current interns, environmental monitors and EPWP are receiving. The onus should be on JCPZ to prove the quality of their training.
* The “**canteen**” would highly likely turn into a full-blown restaurant with alcohol and music; **a noisy party venue, which would be a disaster for peaceful enjoyment of the Reserve**. There are many restaurants near the Reserve, so there is no need for one in the Reserve. There are already complaints by neighbours of alcohol-induced noise coming from the reserve and people leaving it. FroK is grateful for the support of the Ward Councillor in stopping abuse of the by-laws in Kloofendal.
* There must be a **guarantee that there will be proper on-going consultation with the community**. JCPZ 's record over many years has been poor in this regard.
* The **city has limited funds** and ratepayers have the right to know that their rates and taxes are spent on what is needed rather than on showcases and other unnecessary expenditure.

Appendix E5 – Minutes of any public and/or stakeholder meetings





Appendix E6 - Comments and Responses Report

Reference

KLOOFENDAL NATURE RESERVE, Part 2: ECOLOGICAL MANAGEMENT PLAN, Prepared by Ekotrust cc, Dr Noel van Rooyen, Prof Gretel van Rooyen, 31 December 2014. Available at <https://kloofendalfriends.yolasite.com/resources/1Final%20Report%20EMP%20PART%202%20KDNR%20Dec%202014.pdf>

Frequent reference is made to “Section 4(1) of the Regulations for the Proper Administration of Nature Reserves (GN R99 of 8 February 2012) in terms of the National Environmental Management: Protected Areas Act (Act No. 57 of 2003) makes provision for the managing authority (JCPZ) to ….”

Here are some relevant sections from these [regulations](http://extwprlegs1.fao.org/docs/pdf/saf112798.pdf)

##### CHAPTER2

##### POWERS AND RESPONSIBILITIES OF MANAGEMENT AUTHORITIES

##### Functions

4(1) The management authority may in managing the nature reserve-

*(e)* carry out any development and construct or erect any infrastructure necessary for the management of a nature reserve, subject to an environmental authorization in terms of section 24 of National Environmental Management Act and the management plan;

*(h)* provide accommodation and facilities for visitors and staff, including the provision of food and household supplies;

*(j)* authorise any person, subject to such conditions as it may determine, to-

(i)carry on any business or trade, or provide any service, which the management authority may carry on or provide in terms of this section; and

(ii) provide the infrastructure for such business, trade or service;

(k) by agreement with-

(i) a municipality, provide any service in a nature reserve for the management of the nature reserve which that municipality may be mandated to provide in terms of legislation; or

(ii) any other organ of state, perform a function in a nature reserve which that organ of state may perform in terms of legislation; or

##### CHAPTER3

##### ESTABLISHMENT OF ADVISORY COMMITTEES FOR NATURE RESERVES

##### Establishment of advisory committee

##### 9. A management authority may establish one or more advisory committees in respect of a nature reserve.

##### Procedure

##### 10. In establishing an advisory committee contemplated in regulation 9 a management authority must-

##### (a) invite community organisations, non-governmental organisations, residents of and neighbouring communities to the nature reserve to nominate persons, who could be taken into consideration when members of the advisory committee are appointed;

##### (b) set the minimum requirements and other criteria which it must take into consideration when deciding which persons to appoint as members of the advisory committee; and

##### (c) determine a method which will enable the invitation contemplated in paragraph (a) to reach the greatest number of residents of and, neighbouring communities to the nature reserve.

##### (Then more also on “Closing date for nominations”, “Composition” and “Mandate”.)

##### Entrance and accommodation in a nature reserve

21. Any person entering or staying in a nature reserve is subject to conditions set by the management authority.

Comments received from Friends of Kloofendal (FroK) during their presentation at the Master Plan Public Meeting – Upgrading of Kloofendal Nature Reserve held on 6 February 2020

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|  | **Comments** | **Response** | |
|  | *FroK’s view of the current needs in Kloofendal Nature Reserve:* | | |
|  | **Original Points from the Public** | **EIA Response** | **FroK’s Response to EIA Points** |
| 1 | Security:  The current fence needs to be upgraded. Temporary repairs have been made but there are still broken parts of the fence. The poor quality sections should be replaced.  The security guards need an all-weather shelter in the parking area. | The upgrade of the fence is covered by the OPEX (operational expenditure) budget from Facilities Management. All maintenance matters are covered in the Maintenance Plan for Kloofendal Nature Reserve.  A guard house has been included on the ground floor of the Reception/ Visitor’s  Centre. | Security - Guard house could be a separate construction with good visibility of the parking area. A good quality portable Zozo-type hut would be fine, no building is needed. |
| 2 | Parking  The parking needs to be upgraded | The parking will be upgraded according to the Master Plan. The final pavement structure will based on the founding conditions on site as per the Geotechnical Investigation Report,  practicality, economics and the availability of materials. | Parking - Good! We trust that the paving this time will be of a good quality as the paving laid down about ten years ago, fell apart very soon!  In the same process, a wheelchair friendly path could be constructed from the top eastern part of the parking lot through the forest directly to the Ecological Centre/ Visitor/ Information Centre. Wheelchair friendly parking could be made at the beginning of the path. Of course there will needs to be an entrance gate into the amphitheatre there, and the old, rusty big gate into the amphitheatre area would become purely a gate for maintenance vehicles, as it has been used for a long time already.  The wheelchair friendly path to the Ecological Centre could be extended to the toilets including good access to the disability toilet. The present access is poor. The Ecological/ Visitor/ Information Centre is situated close to the existing toilets. |
| 3 | Sewerage system  An assessment of the current situation needs to be undertaken. Rehabilitation is required as well as ongoing maintenance. | Joburg Water is responsible for the sewerage system in Kloofendal Nature Reserve. This matter has been referred on to them and this response will be updated once they have responded.  The Project Engineer said that an underground services detection/ scan or CCTV camera scan may be required to identify the existing services (water/ sewer/ storm water drainage) and condition thereof respectively. | Sewerage system. Upgrading the sewerage system in Kloofendal will be an expensive process. We are grateful that Joburg Water has been asked to upgrade the whole system! Expenses saved by not building unnecessary buildings in Kloofendal could perhaps be transferred to the sewerage system upgrade in Kloofendal? Isn’t an upgrade a capital expense? |
| 4 | Toilets  Thank you JCPZ for clean toilets and for  supplying toilet paper.  An upgrade is needed. Broken taps need to be repair or replace.  Would it not be advantageous to install single-flush cisterns? | Ablutions are included on the ground floor of the Reception/ Visitor’s Centre. These new ablutions will include the installation of water efficient plumbing fixtures and greywater re-use, intended to lower water wastage to address freshwater shortages. Harvested rainwater will also be used for ablution flushing systems as well as gardening. The maintenance of existing infrastructure is Covered in the Maintenance Plan for Kloofendal Nature Reserve. | Toilets  (i) There is already a Reception/ Visitors Centre is in Kloofendal, so there is no need to build another one.  (ii) The present ablution block in the amphitheatre area needs to be upgraded, there is no need for building another ablution block.  (iii) There is no justification of building new buildings (which will require maintenance) if the present buildings are not even adequately looked after and maintained.  (iv) The current gardening would be better replaced by water-wise gardening than putting up roofs to provide water for gardening. |
| 5 | Paths  Paths are dangerously loose and inadequately drained resulting in erosion & gully formation. The paths need to be upgraded. More logs and better drainage is needed. | Maintaining the trails in good condition is an operational activity. This is covered by the Management Plan for the Nature Reserve. | Paths This operational activity has not worked, the paths in the higher parts of the reserve are in bad condition and need professional guidance, which costs money According to the Ekotrust cc Ecological Management Plan, December 2014, “A high standard of maintenance should be ensured through regular patrolling to ensure that the trail stays in good condition, guard against erosion and defacement of rocks, trees and route markers”.  “The following general guidelines should be considered when planning erosion control measures:  • First priority should be given to erosion that is in the initial stages rather than the advanced stages and control should be concentrated at the heads of gullies.  • The type of gabion (or barrier) that is used should be determined by the availability of material close to the areas to be treated. Silt traps should be placed in the upper reaches (or head) of the erosion system. Materials such as rocks, geotextile netting and brush can be used.” |
| 6 | Protection of heritage assets  A roof is needed over the Struben Stampmill, | A Heritage Impact Assessment (HIA) has been conducted as part of the authorisation process. It has been recommended that a Phase II HIA study be conducted on site to enhance the heritage resources at Kloofendal.  Furthermore, as part of the current development, future development or re- nomination and grading of the site; a detailed Integrated Conservation Management Plan (ICMP) is proposed for the Kloofendal Nature Reserve and all its heritage resources. The ICMP will work as a guideline for the protection, conservation and promotion of cultural and natural heritage resources in the reserve. As part of the ICMP, detailed Heritage Public Participation (H-PP) should be undertaken to get inputs from interested and affected parties (I&APs) such as the City of Johannesburg; Department of Arts and Culture: Directorate Immovable Heritage whose blue plaque is found at the Struben Mill Stamp, the Gauteng Department of Arts and Culture and Friends of Kloofendal Nature Reserve. | Protection of heritage assets The stamp mill was placed in Kloofendal in May 2009, it has been exposed to the elements ever since, it needs a roof for its protection and conservation. Design and implementation of a stamp mill roof is a civil and structural engineering project which has nothing to do with the JCPZ's present building proposal of a Reception/ Visitor Centre nor the four JCPZ staff bachelor accommodation quarters.  In the past there was a plan for such a stamp mill roof by JCPZ, but it was rejected for structural and safety reasons. |
| 7 | Lawns  FroK has asked JCPZ for expert advice for years because the lawn keeps deteriorating due in large part to overcutting by brush cutters. Weeds have widely taken over from grass.  Why has JCPZ lawn management been so bad?  Will it improve and how?  Perhaps it’s a matter of simply cutting higher and less often? | Maintaining the lawns in good condition is an operational activity. This is covered by the Management Plan for the Nature Reserve.  Kloofendal Nature Reserve is currently in the process of being declared a Nature Reserve in terms of the National Environmental Management: Protected Areas Act (Act No. 57 of 2003). Once this declaration is made by the Gauteng Department of Agriculture and Rural Development (GDARD), the management authority (JCPZ) will be required to adhere to the Norms and Standards for the Management of Protected Areas in South Africa (GN 382 of 31 March 2016). This includes the establishment of an Advisory Committee where issues such as lawn management can be discussed and solutions sought. | Lawn The lawn in the Kloofendal amphitheatre has been deteriorating over many years (+/- 15 years). [The Ekotrust cc Management Plan for the Kloofendal Nature Reserve December 2014](https://kloofendalfriends.yolasite.com/resources/1Final%20Report%20EMP%20PART%202%20KDNR%20Dec%202014.pdf), does not address management of the amphitheatre lawn.  The process of the Kloofendal Nature Reserve being declared a nature reserve under NEMPA has been ongoing for years, while the state of the lawn has continued deteriorating into the shocking state it is now, many bare, hard sections of soil, other sections hardly any grass, just weeds.  The Reserve manager, Phillip Mkhombo, stopped the weekly mowing of the lawn on the right side as you enter the reserve. Thank you for that. He did have the interest but not the authority to do the same for the open areas immediately below the service road into the Amphitheatre. Healthy veld grasses will flourish within a couple of years if the frequency of grass cutting is hugely reduced. |
| 8 | Dam spillway repair  A stitch in time saves nine.  Damage was caused by storm-water overflow from the dam. Following a few more storms could destroy the spillway and then the dam. | All storm water related matters falls within the jurisdiction of Joburg Roads Authority (JRA). This matter has been referred on to them and this response will be updated once they have responded.  The Project Engineer has noted that the structural integrity of the spillway dam needs to be assessed by a Structural Engineer. | Dam spillway repair -Thank you! Looking forward to receiving their response soon, before the rains destroy the spillway and dam.  Dr Steve Spottiswoode has verbally offered to the EIA Reviewer, Natalie Pullen, to advise on simple but effective repairs that do not need qualified engineers to assess the situation or to oversee the work. The basic requirement is to fill in the hole with a firm base and to lay paving consisting of a layer of thick slasto held together with high quality cement grout to form a smooth and strong surface to carry storm water. |
| 9 | More Invasive Alien Plant (IAP) Control Great work was done by JCPZ years ago on pines and eucalypts below Swift Street.  City parks has done some good work on their own on a few species of IAPs.  FroK has taken the initiative through own efforts and using EPWP people allocated by JCPZ.  More should be invested in IAP control. | Alien invasive control and bush encroachment control are operational issues that takes place according to the Alien Invasive Clearing Plan, and the broader Management Plan for the Nature Reserve. | Invasive Alien Plant (AIP) Control The Ekotrust cc Management Plan for Kloofendal lists many AIP’s and their control, a big task in which FroK and the community have taken an active part for many years.  While we appreciate the work JCPZ has done, we wish for more teamwork, transparency, actively involving FroK and the community in the AIP Control management plan work and giving some acknowledgement, thanks to FroK and the community for work done on AIP’s in the reserve over many years. |

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| 10 | Persist with bush encroachment control Block burning and physical bush encroachment control was initiated in 2018. Block burning has resulted in improved veld conditions – please keep it up! More follow-up of physical bush encroachment control is needed. |  | *Bush encroachment Control*. Here is an example of a deviation from the Ecoplan. On 13th September 2018, a block burn in block 13 ran out of control from lack of supervision and burnt into block 10 which is specifically excluded from burning in the management plan. |
| 11 | The children’s playground  The children’s playground can be improved. FroK presented some ideas at the meeting | A play area has can be accommodated in the overall Master Plan for the site. JCPZ facilities management can install playground equipment. | The children’s playground FroK, as part of a Scout Springbok Project, is in the process of having a jungle gym designed, to be submitted to JCPZ for their approval, after which if all is correct, it can be constructed by the Scouts in Kloofendal amphitheatre. |
| 12 | Information at entrance gates  More visible information is required at the entrance gates.  These existing notices have helped the security guards, but they need to be replaced and upgraded.  A decent upgrade would include a better notice board than the one inherited by FroK  from WESSA. | Appropriate signage will be erected as part of the development of the Reception/ Visitor’s Centre. | Information at entrance gates We trust that the needed signage will be put up without the development of a new Reception/ Visitors Centre.  May 2019, FroK, at ward councillor request, put up some temporary signage to display public open spaces bylaws, which JCPZ manager ensured would be replaced by formal signage. |
| 13 | Improved wheelchair access  The current situation should be assessed by a competent person to recommend the necessary improvements. | This is being addressed in the Landscape Master Plan. The detailed design phase will need to take cognisance of the topography of the site.  The Reception/ Visitor’s Centre will take into account universal access principles. | Improved Wheelchair access  As addressed under 2. Parking |
|  | *FroK’s perspective on the JCPZ proposal* | |  |
| 14 | Reception area  None of the other Nature Reserves in Johannesburg has a fully operating reception office that is used by the public. Would it work here? |  | Reception area  The original comment still stands. |
| 15 | Office  There is already an office behind the stage. This office is frequently locked while the managers go about their business in the Reserve and other areas. | The existing office will be converted into storerooms and a workshop to manage and maintain the Reserve. This will include a staff change area. | Office Presently the three kiosks are being used as staff change area. The tools are stored in an already existing storeroom which I think, could be used as a workshop.  The one ex-change room from the time the stage was used for performances, is used as the JCPZ manager’s office, a convenient place as it is right next to the “electrical control for the whole amphitheatre area” room. The other ex-change room is used by another JCPZ staff member as his office. Each office has its own toilet and handwash basin, the one (may be both) has a shower as well. |
| 16 | Canteen  This looks as if this could be turned into a restaurant that could lead to all sorts of problems, such as liquor licence, electronic music and being open at night  Would it enhance the value or usage of the reserve?  The Friends of Kloofendal envisages the Kloofendal Nature Reserve preserving natural fauna and flora, managed according to sound ecological principles, where many people enjoy the natural environment in safety and peace. | Section 4(1) of the Regulations for the Proper Administration of Nature Reserves (GN R99 of 8 February 2012) in terms of the National Environmental Management: Protected Areas Act (Act No. 57 of 2003) makes provision for the managing authority (JCPZ) to carry on any business or trade or provide other services for the convenience of visitors and staff, including the sale of liquor. The managing authority can authorise any person, subject to such conditions as it may determine, to carry on any business or trade or provide any service, which the management authority may carry on or provide in terms of this section; and provide the infrastructure for such business, trade or service.  Restaurants are part of many conservation areas, including the SANParks, and are managed without impact on the biodiversity of the protected area.  The conditions of operation of such a facility should be defined in conjunction with the Advisory Committee. The EAP recommends that the operating hours of the canteen at the Visitor’s Centre must be aligned to the open hours of the Nature Reserve and not be permitted to remain open beyond the closing time of the Reserve, which is18:00. Music from the canteen must be limited to avoid disturbance and annoyance to fauna and visitors of the Reserve. | Canteen The Public Open Spaces Bylaws prohibit consumption of alcohol and electronic music in a public open space (“no electronic music in a public open space”) – Kloofendal Nature Reserve, its amphitheatre area and parking area are public open spaces.  JCPZ and the security guards have been successfully enforcing these bylaws, the community is grateful for that!  The proposed restaurant/ canteen is destined to be in a public open space. How can it be allowed to break these bylaws?  The music will disturb the peace and ambiance of the reserve particularly in the case of parties(the Bylaws actually state no electronic music in a public open space), people consuming alcohol in the restaurant/ canteen can freely go into the reserve and misbehave.  The plans show an “outside seating area” and “roof garden” so electronic music and people noise will be very audible, and open windows will also allow electronic music to be heard in the reserve    See comments above about the necessity of the advisory committee. |
| 17 | Education and information centre  Kloofendal already has an Environmental Education Centre. This is operated by the Friends of Kloofendal through a written agreement three years ago when it became apparent that JCPZ did not have the means to staff it.  Why have another such Centre? How would it operate? | The Reception/ Visitor’s Centre provides for an entry point into the Nature Reserve. The existing Ecological Centre is too far into the site to provide an arrival point for visitors. It would require a total refurbishment to accommodate the proposed elements of the Reception/ Visitor’s Centre. The existing Ecological Centre can however, be used as a conference/ meeting facility. The current exhibits can be better displayed in a more appropriate manner in the new Visitor’s  Centre. | Education and information Centre  (i) A wheelchair friendly path could be constructed from the top eastern part of the parking lot through the forest directly to the Ecological Centre. There will need to be an entrance gate installed from the parking lot into the amphitheatre there, the path will be wheelchair friendly and provide a short, pretty walk through the forest to the Ecological Centre.  The old, rusty big gate from the parking lot into the amphitheatre area would become purely a gate for maintenance vehicles, as it has been used for years already.  The Ecological/ Visitor/ Information Centre is conveniently situated close to the toilets. The wheelchair friendly path to the Ecological Centre could be extended to the toilets including good access to the disability toilet. The present access is poor.  (ii) The current displays, mostly specimen from the reserve, are displayed in an appropriate manner in the Ecological Centre, with information on each specimen, interpreted by qualified guides who provide the community and learners with environmental education opportunities, mainly in the reserve itself, with the educational displays in the Centre supplementing what is experienced/ enjoyed in the reserve – this valuable service will not be provided by just a new building.  There are display cabinets in the Ecological Centre for the displays, but generally the guides prefer the specimen outside the cabinets as then they can allow the community members and learners to see the specimen better and point out the interesting facts about them more clearly. Also touch is permitted with some of the specimen. |
| 18 | 4 bedsitters to house JCPZ staff  Provision of permanent structures for on-site accommodation of workers in an urban area is very unusual.  The established house in the Reserve is currently used by the Reserve Manager. It is sufficient to house both a manager and a deputy manager.  There is also a small cottage in use on site. | Section 4(1) of the Regulations for the Proper Administration of Nature Reserves (GN R99 of 8 February 2012) makes provision for the managing authority (JCPZ) to provide accommodation and facilities for visitors and staff.  The proposed staff quarters are to accommodate four employees for the purposes of the better management of the Reserve. These quarters will be within the same area designated for the existing Reserve Manager’s residence.  Section 21 of the above Regulations states that any person entering or staying in a nature reserve is subject to conditions set by the management authority. As the Staff Quarters have been designed as four single quarters, the conditions of the accommodation should restrict the number of people living in these staff quarters to one person per bed-sitter. | 4 bedsitters to house JCPZ staff  (i) The JCPZ Conservation manager and his family are already living in a house, garage and garden inside the reserve. There is also another cottage used for staff in the reserve. Why should there now be more staff quarters built in the reserve?  (ii) Employees are not usually provided with living quarters at their places of employment, particularly not in a reserve with a critically endangered ecosystem  (iii) Does the reserve manager have the authority to make his present free accommodation (at cost of our taxpayers) of house, garage and big garden in the nature reserve a private village for his staff? Single staff members living there will have family and friends visiting them. |
| 19 | Parking  Has there been a study to recommend the need for doubling the existing parking area? Do we need a huge parking area?  The lower (proposed) section could still be used without paving for the very occasional “special event”. | The upgrade of the parking will be included in the Master Plan. It is envisaged that the upper parking, opposite the Reception/ Visitor’s Centre, will be formal parking i.e. tarred/ paved area. The lower section will be less formal, and will be left as grassed or grass blocks. | Parking The quality of paving is an important issue. The previous paving in the parking lot was of poor quality and started falling apart quite soon after its construction |
| 20 | JCPZ’s stated motivations  Has the following been undertaken:  Needs analysis?  Market Research?  State of current assets?  The big area marked as “Environmental Assets” is actually the worst example of bush encroachment and Invasive Alien Plants (>10 species).  Bush encroachment control has started but needs a lot more work. | The proposed development is in line with the strategy of JCPZ and CoJ, and is in accordance with the Management Plan for the Nature Reserve. | JCPZ’s stated motivations  (i) The Ekotrust cc Management Plan for the Kloofendal Nature Reserve December 2014 states:  “An interpretive centre could be located at the starting point or base camp to provide information on a variety of topics related to the particular trail such as geology, vegetation, wildlife and history.”  i.e. One interpretive centre, not two!  (ii) There is no mention of staff accommodation in the Ekotrust cc Management Plan for Kloofendal Nature Reserve December 2014 |
| 21 | Is the money available to JCPZ best used on the proposed buildings, with possible adjustments or on some parts of the 13 points listed and summarised above? | CoJ has provided JCPZ with the funding to develop the Reception/ Visitor’s Centre.  The budget for the maintenance of the Nature  Reserve is allocated separately from the OPEX budget from Facilities Management. | OPEX vs CAPEX JCPZ is not managing adequate maintenance of the present structures in Kloofendal e.g. Leaky toilets and taps, parking lot in a bad shape, poor condition of paths, poor condition on parts of the fencing around the reserve, hazardous broken paving on steps and entrance stoop into Ecological Centre which was replaced by tiling by FroK in July 2018  i.e. Money should be spent on maintenance of the present structures, not on new buildings, which also will need maintenance. |
|  | **Response from EAP**  FroK has raised valid concerns regarding the ongoing maintenance of the Nature Reserve. The Norms and Standards for the Management of Protected Areas in South Africa (GN 382 of 31 March 2016) requires a sound relationship between the protected area management authority and neighbouring communities (Section 10) allowing for the neighbouring communities to contribute positively to the success of the protected area. The neighbouring communities must be allowed the opportunity to provide input, where relevant, into decisions relating to protected area management. According to Section 20(c), a process to evaluate stakeholder’s feedback should be in place for the protected area. The indicators for Section 20(c) state that the protected area should receive a high level of support as a result of co- management consultation and high quality visitor experiences emanating from effective protected area management; it should have a functional protected area advisory committee, representative of all stakeholders of the protected area. This Advisory Committee for Kloofendal Nature Reserve should include, at a minimum, representatives from JCPZ, the relevant sections from CoJ, Joburg Water, JRA, PHRA-G, FroK, etc. The committee should meet at regular intervals to discuss pertinent issues relating to the management of the Nature Reserve.  Reference to Section 20(c) should perhaps refer to Section 10 (c)?  **Correction please**. Section 9 of the (GN R99 of 8 February 2012) regulations state that “A management authority may establish one or more advisory committees in respect of a nature reserve” There is no obligation for the Management Authority to establish an advisory committee. **We need such an undertaking in writing please.** | | |

Comments received from members of the public during the Master Plan Public Meeting – Upgrading of Kloofendal Nature Reserve held on 6 February 2020

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|  | **Comments** | **Response** |  |
| 1 | What is the need for the Welcome Centre and “ticketing office”? | It is not unusual for municipal Nature Reserves to have a nominal entry fee. Frequent visitors are often exempted through their membership to “Friends” groups.  It is not the intention to levy an entry fee on a day to day basis, at this stage, but it may be done if there are specific events. |  |
| 2 | Architect/ Consultant/ Planner Fees (Can we have detailed costings and business plan) | The appointment of the Master Plan project team and environmental consultant was made through the JCPZ procurement policy and process. | Question still stands. |
| 3 | What are the plans with the current/ existing buildings? | The current buildings will be incorporated within the Master Plan. It is envisaged that the existing office behind the Amphitheatre stage will be converted into storerooms and a workshop to manage and maintain the Reserve, including staff changing area.  The existing Ecological Centre can be used as a conference / meeting facility. The current exhibits can be displayed in a more appropriate manner in the new Visitors Centre. The existing ablution block will remain for use by visitors. | Plans for current buildings . (i) Presently the three kiosks are being used as staff change area. The tools are stored in an already existing storeroom which could also be used as a workshop.  The one ex-change room from the time the stage was used for performances, is used as the JCPZ manager’s office, a convenient place as it is right next to the “electrical control for the whole amphitheatre area” room. The other ex-change room is used by another JCPZ staff member as his office. Each office has its own toilet and handwash basin, the one (may be both) has a shower as well.  i.e. all needs are met, no further new buildings are needed  (ii) The current displays, mostly specimen from the reserve, are displayed in an appropriate manner in the Ecological Centre, with information on each specimen, interpreted by qualified guides who provide the community and learners with environmental education opportunities, mainly in the reserve itself, with the educational displays in the Centre supplementing what is experienced/ enjoyed in the reserve – this valuable service will not be provided by just a new building.  There are display cabinets in the Ecological Centre for the displays, but generally the guides prefer the specimen outside the cabinets as then they can allow the community members and learners to see the specimen better and point out the interesting facts about them more clearly. Also touch is permitted with some of the specimen.  The Ecological Centre is already used as a conference/ meeting facility. It needs a good booking system.  The Ecological Centre is conveniently situated close to the toilets. A wheelchair friendly direct path to the Ecological Centre from the parking lot could be extended to the toilets, including improving access to the disability toilet as the present access is poor. |
| 4 | What are the stats regarding visitors to the park? | All visitors entering the Nature Reserve fill in a register. This also indicates the number of people in a vehicle. Access to this information has been requested. | Visitor Stats. This should broadly be open information, for example numbers by year, by month, by days of week and typical hours of use. |
| 5 | With regards to security, what plans will be put in place. | Security will continue as currently takes place to guard the City’s infrastructure.  A guard house has been included on the ground floor of the Reception/ Visitor’s Centre. | Guard House Small stand-alone structures are in common use around the country and could be provided at the parking lot where security currently sit. |
|  | **Comments** | **Response** |  |
| 6 | Why the need for another Ecological Centre? | The proposed facility is more than just another Ecological Centre. It provides a reception and entry point into the Nature Reserve. The existing Ecological Centre is too far into the site to provide an arrival point for visitors. It would require a total refurbishment to accommodate the proposed elements of the Reception/ Visitor’s Centre. The existing Ecological Centre can however, be used as a conference/ meeting facility. The current exhibits can be better displayed in a more appropriate manner in the new Visitor’s Centre. | Ecological Centre  A wheelchair friendly path could be constructed from the top eastern part of the parking lot through the forest directly to the Ecological Centre. There will need to be an entrance gate installed from the parking lot into the amphitheatre there, the path will be wheelchair friendly and provide a short, pretty walk through the forest to the Ecological Centre. i.e. instead of a new, expensive building, only a wheelchair friendly path to the Ecological Centre and an entrance gate at the beginning of that path is needed.  The Ecological Centre is already used as a conference centre at times. Using it as a Conference Centre needs a competent booking system.  The old, rusty big gate from the parking lot into the amphitheatre area would become purely a gate for maintenance vehicles, as it has been used for years already.  The Ecological/ Visitor/ Information Centre is conveniently situated close to the toilets. The wheelchair friendly path to the Ecological Centre could be extended to the toilets including good access to the disability toilet. The present access is poor.  (ii) The current displays, mostly specimen from the reserve, are displayed in an appropriate manner in the Ecological Centre, with information on each specimen, interpreted by qualified guides who provide the community and learners with environmental education opportunities, mainly in the reserve itself, with the educational displays in the Centre supplementing what is experienced/ enjoyed in the reserve – this valuable service will not be provided by just a new building.  There are display cabinets in the Ecological Centre for the displays, but generally the guides prefer the specimen outside the cabinets as then they can allow the community members and learners to see the specimen better and point out the interesting facts about them more clearly. |
| 7 | Whose idea was all of this and was protocol followed? | The proposed development is in line with the strategy of JCPZ and CoJ, and is in accordance with the Management Plan for the Nature Reserve. | Protocol  The Ekotrust cc Management Plan for the Kloofendal Nature Reserve December 2014 states:  “An interpretive centre could be located at the starting point or base camp to provide information on a variety of topics related to the particular trail such as geology, vegetation, wildlife and history.”  i.e. one interpretive centre, not two! |
| 8 | Why were the public not informed and given an opportunity prior to appointing consultants? | Due process was followed in appointing the consultants. The information of the proposed development was conveyed to the ward councillor and a meeting was held to discuss this. | Due process  FroK was only informed by the ward councillor in November/ December 2019. If we recall correctly, our ward councillor had only just received information on the proposed plans.  A public meeting was decided on as soon as the holidays were over to get public participation on how this money allocated to Kloofendal should be spent.  At the Public Meeting on 6th February 2020 at the Kloofendal Ecological Centre, where the public was asked to give their input on the proposed spending of the allocated R1000 000 on Kloofendal infra structure upgrade, it appeared that this money had already been spent by JCPZ on JCPZ’s building proposal i.e**.. there had been no public participation in deciding what upgrade was needed/ wanted by the community for Kloofendal Nature Reserve!** |
| 9 | What is the need for additional accommodation for City Parks staff when there are already a three-bedroom house and cottage in the reserve for staff? | The proposed staff quarters are to accommodate four employees for the purposes of the better management of the Reserve. These quarters will be within the  same area designated for the existing Reserve Manager’s residence. | Additional accommodation for City Parks staff.  (i) **It is odd, irregular, unusual to say the least, that staff is given accommodation at their place of work, or in their managers’ place of residence.**  (ii Why should the reserve manager have free accommodation (including free electricity and water) at cost of our taxpayers of house, garage and big garden in the nature reserve?  (iii) Why should this privilege be extended to 4 more JCPZ staff members, again at cost to the taxpayers?  (iv) Is all this accommodation going to become a private JCPZ staff village –people living in single accommodation will have family and friends visiting them, perhaps staying with them. |
| 10 | What is the need for additional office space when there are offices behind the amphitheatre not properly utilized? | The existing office will be converted into storerooms and a workshop to manage and maintain the Reserve. This will include a staff  change area. | Additional office space Presently the three kiosks are being used as staff change area. The tools are stored in an already existing storeroom which could be used as a workshop.  The one ex-change room from the time the stage was used for performances, is used as the JCPZ manager’s office, a convenient place as it is right next to the “electrical control for the whole amphitheatre area” room. The other ex-change room is used by another JCPZ staff member as his office. Each office has its own toilet and handwash basin, the one (may be both) has a shower as well. |
| 11 | What benefit does any of the items on the proposal have to the tax payer and residents of Ward 85 as well as visitors of the reserve? | According to Section 18 of the Norms and Standards for the Management of Protected Areas in South Africa (GN 382 of 31 March 2016), visitor facilities must contribute positively to the visitor experience without negatively affecting the environment. It is believed that the Reception/ Visitor’s Centre will enhance the visitor’s experience and the provision of additional staff quarter will assist with effective management of the Nature Reserve. This is important because the Reserve supports human well-being and promotes liveable communities. The Reserve also promotes physical activity, health, and social inclusion as well as identity and psychological well-being. These services preserve areas of scenic beauty and cultural  value. | Benefit to the tax payer (i) As mentioned over and over, there is no need for two Visitor/ Information/ Education Centres, the present Ecological Centre is great as it is, it is enhancing the visitors experience etc.  (ii) Besides all the building costs the new Visitor Centre will add additional expense of salaries of staff for this new centre, probably making it necessary to start charging entrance fees. which would be contrary to your statements:  “JCPZ seeks to provide an inclusive open space for all and not only for those who can afford the entry fees of the Botanical Gardens”.  “It is not the intention to levy an entry fee on a day to day basis. This may however be done if there are specific events or for large groups”.  Regarding “provision of additional staff quarter”, staff can commute as is the case for the vast majority of employees in Johannesburg. |

Comments received from I&AP | Anthea van der Zel

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|  | **Comment** | **Response** |  |
| 1 | There is no mention of the raised money being used on the Nature Reserve. | Kloofendal Nature Reserve receives funds from the City of Joburg for the management and maintenance of the Reserve. It is not the intention to levy an entry fee on a day to day  basis. | The new Visitor/ Information Centre will need staff to run the Centre, who will need salaries, an ongoing expense, which is likely to necessitate charging entrance fees into the reserve.  The community does not want to have to start pay entrance fees for a commodity that is not needed, nor wanted. |
| 2 | There is traditionally a FREE entrance into the Kloofendal Nature Reserve | It is not unusual for municipal Nature Reserves to have a nominal entry fee. Frequent visitors are often exempted through their membership to “Friends” groups.  It is not the intention to levy an entry fee on a day to day basis, at this stage, but it may be done if there are specific events or large groups. | Free Entrance into the reserve  The new Visitor/ Information Centre will need staff to run the Centre, who will need salaries, an ongoing expense, which is likely to necessitate charging entrance fees into the reserve.  The community does not want to have to start pay entrance fees for a commodity that is not needed, nor wanted. |
| 3 | The present (already constructed) Ecological Centre is large enough for offices and is already used as an information and education centre. There is also office space behind the amphitheatre. | The proposed facility is more than just another Ecological Centre. It provides a reception and entry point into the Nature Reserve. The existing Ecological Centre is too far into the site to provide an arrival point for visitors. It would require a total refurbishment to accommodate the proposed elements of the Reception/ Visitor’s Centre. The existing Ecological Centre can however, be used as a conference/ meeting facility. The current exhibits can be better displayed in a more appropriate manner in the new Visitor’s Centre.  The existing office will be converted into storerooms and a workshop to manage and  maintain the Reserve. This will include a staff change area. | Ecological Centre Instead of a new, expensive building, a wheelchair friendly path could be constructed from the top eastern part of the parking lot through the forest directly to the Ecological Centre, an entrance gate installed from the parking lot into the amphitheatre at the beginning of this path  The Ecological Centre is already used as a conference centre at times. Using it as a Conference Centre needs a competent booking system.  The old, rusty big gate from the parking lot into the amphitheatre area would become purely a gate for maintenance vehicles, as it has been used for years already.  The Ecological/ Visitor/ Information Centre is conveniently situated close to the toilets. The wheelchair friendly path to the Ecological Centre could be extended to the toilets including good access to the disability toilet. The present access is poor.  (ii) The current displays (mostly specimen from the reserve) are displayed in an appropriate manner in the Ecological Centre, with information on each specimen, interpreted by qualified guides who provide the community and learners with environmental education opportunities, mainly in the reserve itself, with the educational displays in the Centre supplementing what is experienced/ enjoyed in the reserve – this valuable service will not be provided by just a new building. |
| 4 | The toilets in existence need only to be upgraded and maintained. New ones are not needed, and there is one for disabled people behind the amphitheatre. Maybe improve the signage. | Ablutions will be included on the ground floor of the Reception/ Visitor’s Centre. These new ablutions will include the installation of water efficient plumbing fixtures and greywater re- use, intended to lower water wastage to address freshwater shortages. Harvested rain water will also be used for ablution flushing systems as well as gardening.  The maintenance of the existing toilets is covered in the Maintenance Plan for Kloofendal Nature Reserve.  Appropriate signage will be erected as part of the development of the Reception/ Visitor’s  Centre. | Toilets - The Ecological Centre is conveniently situated close to the public toilets. A wheelchair friendly path directly to the Ecological Centre from the Parking lot, could be extended to the toilets including good access to the disability toilet. The present access is poor. Signage should be made more prominent. |
| 5 | A rustic jungle gym and a protective roof over the historic stampmill would be beneficial, as would decent paving in the parking area; including regulatory bus access with entry/exit platform. | A play area has can be accommodated in the overall Master Plan for the site. JCPZ facilities management can install the playground equipment.  A Heritage Impact Assessment (HIA) has been conducted as part of the authorisation process. It has been recommended that a Phase II HIA study be conducted on site to enhance the heritage resources at Kloofendal.  Furthermore, as part of the current development, future development or re- nomination and grading of the site; a detailed Integrated Conservation Management Plan (ICMP) is proposed for the Kloofendal Nature Reserve and all its heritage resources. The ICMP will work as a guideline for the protection, conservation and promotion of cultural and natural heritage resources in the  reserve. As part of the ICMP, detailed Heritage  Public Participation (H-PP) should be undertaken to get inputs from interested and affected parties (I&APs) such as the City of Johannesburg; Department of Arts and Culture: Directorate Immovable Heritage whose blue plaque is found at the Struben Mill Stamp, the Gauteng Department of Arts and Culture and Friends of Kloofendal Nature Reserve.  The parking will be upgraded according to the Master Plan. Busses will be accommodated. The circulation of the bus would be to come in, drop off and then go and  park, this would follow a more or less circular route. | The children’s playground  FroK, as part of a Scout Springbok Project, is in the process of having a jungle gym designed, to be submitted to JCPZ for their approval, after which if all is correct, it can be constructed in Kloofendal amphitheatre  Stampmill roof  Protection of heritage assets - the stamp mill was placed in Kloofendal in May 2009, it has been exposed to the elements ever since, it needs a roof for its protection and conservation. Design and implementation of a stamp mill roof is a civil and structural engineering project which has nothing to do with the JCPZ's present building proposal of a Reception/ Visitor Centre nor the four JCPZ staff bachelor accommodation quarters.  In the past there was a plan for such a stamp mill roof by JCPZ, but it was rejected for structural and safety reasons. |
| 6 | The sewerage reticulation system in both the Nature Reserve and the Amphitheatre area needs to be assessed and completely renewed. The constant breakdowns are of a hygienic/ health concern and certainly not conducive to wild life. | Joburg Water is responsible for the sewerage system in Kloofendal Nature Reserve. This matter has been referred on to them and this response will be updated once they have responded.  The Project Engineer said that an underground services detection/ scan or CCTV camera scan may be required to identify the existing  services (water/ sewer/ storm water drainage) and condition thereof respectively. | Sewerage Thank you for bringing Joburg Water into this matter. |
| 7 | The new accommodation proposed for employees should be critically assessed as it may impact negatively upon the Kloofendal Nature Reserve. Imagine extended-hour foot traffic, car access and the normal noises of occupation and recreation. It would require its own fencing and entrance. | Section 4(1) of the Regulations for the Proper Administration of Nature Reserves (GN R99 of  8 February 2012) makes provision for the managing authority (JCPZ) to provide accommodation and facilities for visitors and staff.  The proposed staff quarters are to accommodate four employees for the purposes of the better management of the Reserve. These quarters will be within the same area designated for the existing Reserve Manager’s residence.  Section 21 of the above Regulations states that any person entering or staying in a nature reserve is subject to conditions set by the management authority. As the Staff Quarters have been designed as four single quarters, the conditions of the accommodation should restrict the number of people living in these staff quarters to one person per bed-sitter. | Staff quarters  (i) **It is odd, irregular, unusual to say the least, that staff is given accommodation at their place of work, or in their managers’ place of residence.**  (ii Why should the reserve manager have free accommodation (including free electricity and water) at cost of our taxpayers of house, garage and big garden in the nature reserve?  (iii) Why should this privilege be extended to 4 more JCPZ staff members, again at cost to the taxpayers?  (iv) Is all this accommodation going to become a private JCPZ staff village –people living in single accommodation will have family and friends visiting them, perhaps staying with them.  There is no guarantee at the stage that the “management authority” could change the rules regarding the use of the “single quarters”. Better not even to take this chance if the reserve does not actually need this accommodation. |
| 8 | The Kloofendal Nature Reserve outer fencing is in desperate straits and needs upgrading and monitoring. It is broken, crumbling & patched and provides little protection for the animals. This will prevent undesirable people coming through at night, camping out, placing  and checking snares or stacking loot and destroying the environment. | The upgrade of the fence is covered by the OPEX budget (operational expenditure) from Facilities Management. All maintenance matters are covered in the Maintenance Plan for Kloofendal Nature Reserve. | OPEX vs CAPEX. Both come out of CoJ’s budget. Rather spend the CAPX on necessary OPEX |
| 9 | The pathways in the Nature Reserve need to be repaired and kept in good condition especially after rain and the resultant erosion in the past months. The present paths are dangerous. | Maintaining the trails in good condition is an operational activity. This is covered by the  Management Plan for the Nature Reserve. | Paths – This operational activity has not worked, the paths in the higher parts of the reserve are in bad condition and need professional guidance, which costs money According to the Ekotrust cc Ecological Management Plan, December 2014, “A high standard of maintenance should be ensured through regular patrolling to ensure that the trail stays in good condition, guard against erosion and defacement of rocks, trees and route markers”.  “The following general guidelines should be considered when planning erosion control measures:  • First priority should be given to erosion that is in the initial stages rather than the advanced stages and control should be concentrated at the heads of gullies.  • The type of gabion (or barrier) that is used should be determined by the availability of material close to the areas to be treated. Silt traps should be placed in the upper reaches (or head) of the erosion system. Materials such as rocks, geotextile netting and brush can be used.” |
| 10 | I can only see JCPZ’s proposal with a restaurant & reception area as a money making business which would do nothing for the Nature Reserve. It copies the W. S. Botanical Gardens not far away. It would be difficult to envisage any financial gain to be directed at the Nature Reserve. This is a severe impact. | JCPZ seeks to provide an inclusive open space for all and not only for those who can afford the entry fees of the Botanical Gardens.  Section 4(1) of the Regulations for the Proper Administration of Nature Reserves (GN R99 of 8 February 2012) in terms of the National Environmental Management: Protected Areas Act (Act No. 57 of 2003) makes provision for the managing authority (JCPZ) to carry on any business or trade or provide other services for the convenience of visitors and staff, including the sale of liquor. The managing authority can authorise any person, subject to such conditions as it may determine, to carry on any business or trade or provide any service, which the management authority may carry on or provide in terms of this section; and provide the infrastructure for such business, trade or service.  Restaurants are part of many conservation areas, including the SANParks, and are managed without impact on the biodiversity of the protected area.  The conditions of operation of such a facility should be defined in conjunction with the Advisory Committee. The EAP recommends that the operating hours of the canteen at the Visitor’s Centre must be aligned to the open hours of the Nature Reserve and not be permitted to remain open beyond the closing time of the Reserve, which is18:00. Music from the canteen must be limited to avoid disturbance and annoyance to fauna and  visitors of the Reserve. |  |
| 11 | Nature lovers, joggers, walkers and such people would not be happy to face a daily entrance fee. Litter would become more of a problem. Noise from an enterprise such as is proposed (restaurant and extended accommodation) would not be conducive to the animal life. The green belt in Kloofendal would become another “zoo lake” style pleasure resort. | It is not unusual for municipal Nature Reserves to have a nominal entry fee. Frequent visitors are often exempted through their membership to “Friends” groups.  It is not the intention to levy an entry fee on a day to day basis, but it may be done if there are specific events.  It is recommended that the operating hours of the canteen at the Visitor’s Centre be aligned to the open hours of the Nature Reserve and not be permitted to remain open beyond the closing time of the Reserve, which is18:00. The City of Joburg’s Public Open Spaces by- laws must be enforced at all times. Music from the canteen will be limited to avoid disturbance and annoyance to fauna and visitors of the Reserve. | The new Visitors, Information Centre will need staff to be there/ to run it, their salaries will be additional ongoing cost, where is that money going to come from? Would it not be from entry fees?  Thank you for “Frequent visitors are often exempted through their membership to “Friends” groups.” |

Comments received from I&AP| Contact Willem J. van der Zel

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|  | **Comment** | **Response** |  |
| 1 | Consider I was an Animal, Bird, or Plant and heard about the great Benefit to my Nature Reserve.  What would I wish for?  Less, or no disturbances at night – please let me grow, fly, run or pro-create.  No bright lights on poles - It messes with my life.  People to stay on the paths and not break my nest or my food source.  Less noise (Car / People / Machines / Drones / Loud Concerts).  None of this smelly affluent! That makes us sick.  Keep the river flowing, the dam clean; rubbish = poison.  No late meetings in the Ecology Centre – Cars and Noise Impact us negatively.  No objection to automatic camera’s videos and being counted – that can only help.  Some type of ecological control over over-population or pestilence.  Please no more buildings, keep Kloofendal for US not for THEM.  KISS Keep It Simple – Naturally!  Talk about us, explain us, create publicity and love.  A little bird told you all this. | The preservation and conservation of the Reserve will take place in accordance with the approved Management Plan.  There will not be late night activities on site beyond the closing time of the Nature Reserve. The City of Joburg’s Public Open Spaces by- laws will be enforced at all times, which limits loud noises.  The proposed new development is restricted to the area zoned for such development, according to the Zoning Plan, and falls within the disturbed area currently used for parking. | The parking area (the “disturbed area”) is part of the reserve, buck wonder around there frequently, from my experience, noise in the parking area is pretty audible in the amphitheatre  2. Keeping the dam and river system clean from litter is an ongoing project partly by JCPZ and in a big part by members of the community  3. No late meetings in the Ecology Centre. Exception of use of the Ecological Centre in the evening would be environmental educational events organised by FroK over many years on nocturnal animals (frogs, bats, nocturnal birds such as owls) and astronomy |

Comments received from I & AP | Contact Roger Leighton

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|  | **Comment** | **Response** |  |
| 1 | The infrastructure at Kloofendal Nature Reserve is badly in need of maintenance. If Johannesburg City Parks and Zoo cannot maintain the existing infrastructure, then how can they expect to maintain additional  infrastructure? | All maintenance matters are covered in the Maintenance Plan for Kloofendal Nature Reserve. | Maintenance Ekotrust cc. Managers Plan of Kloofendal Nature Reserve states: “Maintenance and regular patrols of the fences and roads should be undertaken. The findings of each patrol should be documented and filed.” – more details on page 8.  Maintenance of existing structures by JCPZ is not sufficient. Money should be spent on maintenance, upgrade of fencing and sewerage system, upgrading paths, professional managing amphitheatre lawn under professional guidance, instead of on new buildings. |
| 2 | The current access is adequate. Visitors consist mainly of the surrounding community who do not need or want a visitor’s centre. | Kloofendal Nature Reserve has heritage significance and also provides the community and learners with environmental education opportunities.  The proposed Reception/ Visitor’s Centre will contribute positively to the visitor experience  without negatively affecting the environment. | Visitor’s centre There already is a visitors/ information/ education centre, no new one is needed |
| 3 | The existing stage is a good example of  unused infrastructure which has proved to be a waste of money. |  |  |
| 4 | As a Johannesburg ratepayer who receives very poor service for my money, I object to a  further waste on non-essential items | Your objection is noted. |  |

Comments received from I & AP| Contact Wendy & Jo Human

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|  | **Comment** | **Response** |  |
| 1 | We do not need a visitors centre or Staff  Accommodation – we have Walter Sisulu Botanical Gardens just over the hill | JCPZ seeks to provide an inclusive open  space for all and not only for those who can afford the entry fees of the Botanical Gardens. | Visitor’s centre We do not need a second Information/ Visitors Centre in Kloofendal. The Ecological Centre is free entry to everyone, is well equipped to fulfil the function as described in the Ekotrust cc Management Plan of the Kloofendal Nature Reserve, December 2014:  “An interpretive centre could be located at the starting point or base camp to provide information on a variety of topics related to the particular trail such as geology, vegetation, wildlife and history. Information on the route and the length of the trail, what to see along the trail e.g. plants, birds, archaeological sites and caves and potable water, can be conveyed to the visitor in the form of inexpensive maps and brochures.” |
| 2 | This will just be another white elephant once built and waste of our monies. | The proposed development is in line with the strategy of JCPZ and CoJ, and is in accordance with the Management Plan for the  Nature Reserve. | No need, the proposed development is a waste of taxpayer’s money, as explained above |
| 3 | The Nature Reserve is used by Walkers and Flat dwellers and there are more than enough facilities to cater for these needs as it is right now. | Kloofendal Nature Reserve’s heritage resources are significant to the broader city and the province and also provides the community and learners with environmental education opportunities.  The proposed Reception/ Visitor’s Centre will  contribute positively to the visitor experience without negatively affecting the environment. | No need for a second Visitors, Information, Educational Centre, it is a waste of money, as explained above.  Your statement that “The proposed Reception/ Visitor’s Centre will contribute positively to the visitor experience without negatively affecting the environment.” needs to be supported by evidence. |
| 4 | It should be left as it is - natural and unsullied by unnecessary and wasteful expenditure | Your objection is noted. |  |

Comments received from I & AP | Contact Jo-anne Yule

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|  | **Comment** | **Response** |  |
| 1 | The fencing surrounding KNR to be replaced/repaired. The current fencing provides no security to the animal life within KNR (many traps are removed on a daily basis). Homes that are on the boundary of KNR are being broken into regularly by way of illegal entry into KNR. | The upgrade of the fence is covered by the OPEX budget from Facilities Management. All maintenance matters are covered in the Maintenance Plan for Kloofendal Nature Reserve. | Fencing JCPZ manager of the Kloofendal Nature Reserve stated on 6th May 2020 that there were no funds for fencing upgrades – this was in connection with dogs inside the reserve killing wildlife and JCPZ not being able to cope with keeping them out.  According to Ekotrust cc Management Plan of Kloofendal Nature Reserve, December 2014: “Regular fence patrols (weekly) should be done to prevent poaching, escape of animals and to fix/replace broken wires, droppers or posts”., records kept of location of all missing/ damaged posts and holes in the fence, regular maintenance and servicing of all the gates. |
| 2 | The sewage system within KNR needs to be upgraded. Many a time one has to dodge flowing sewage on a hike. Animals are eating the grasses that are covered in faeces and are dying. If, and only if, there are any further funds available after the above has been attended to, I am in favour of a Visitors' Centre being erected. To be situated in the vicinity of the present parking area and NOT inside KNR itself. | Joburg Water is responsible for the sewerage system in Kloofendal Nature Reserve. This matter has been referred on to them and this response will be updated once they have responded.  CoJ has provided JCPZ with the funding to develop the Reception/ Visitor’s Centre.  The budget for the maintenance of the Nature Reserve is allocated separately from the OPEX budget from Facilities Management.  The Reception/ Visitor’s Centre will be situated in the vicinity of the present parking area,  within the area zoned for this development, and not inside the Nature Reserve. | Sewage There is no need for a second Visitors/ Information Centre. Money allocated for this new centre should be given to Joburg Water specifically to spend on upgrading the sewerage pipes running through the reserve. |
| 3 | I am vehemently opposed to, and object to, the following:  1) Any form of Kiosk, Cafe, Restaurant, Pub, etc. This will just cause extra litter and noise in and around KNR. In any case, there are many little restaurants within the surrounding area that can be utilised and supported, or bring own picnic. | Section 4(1) of the Regulations for the Proper Administration of Nature Reserves (GN R99 of 8 February 2012) in terms of the National Environmental Management: Protected Areas Act (Act No. 57 of 2003) makes provision for the managing authority (JCPZ) to carry on any business or trade or provide other services for the convenience of visitors and staff, including the sale of liquor. The managing authority can authorise any person, subject to such conditions as it may determine, to carry on any business or trade  or provide any service, which the management authority may carry on or | Canteen etc The Public Open Spaces Bylaws prohibit consumption of alcohol and electronic music in a public open space – Kloofendal Nature Reserve and its amphitheatre area are public spaces. JCPZ and the security guards have been successfully enforcing these bylaws, the community is grateful for that.  The proposed restaurant/ canteen is destined to be in a public open space, even if it is called a “disturbed site”. How can it be allowed to break these bylaws? The music will disturb the peace and ambiance of the reserve particularly in the case of parties(the Bylaws actually state no electronic music in a public open space), the canteen/ restaurant has people sitting on the outside veranda, also open windows, no ways can the music sounds and noisy people be contained. People consuming alcohol can freely go into the reserve and misbehave. |
|  |  | provide in terms of this section; and provide the infrastructure for such business, trade or service.  Restaurants are part of many conservation areas, including the SANParks, and are managed without impact on the biodiversity of the protected area.  The conditions of operation of such a facility should be defined in conjunction with the Advisory Committee. The EAP recommends that the operating hours of the canteen at the Visitor’s Centre must be aligned to the open hours of the Nature Reserve and not be permitted to remain open beyond the closing time of the Reserve, which is18:00. Music from the canteen must be limited to avoid disturbance and annoyance to fauna and  visitors of the Reserve. |  |
| 2) Any staff accommodation that is extra to what there currently is available. KNR is not an isolated Reserve with no access to public transport, etc. The staff can quite easily get to and from work. There is absolutely no need to have extra staff/ noise on the Reserve. | Section 4(1) of the Regulations for the Proper Administration of Nature Reserves (GN R99 of  8 February 2012) makes provision for the managing authority (JCPZ) to provide accommodation and facilities for visitors and staff.  The proposed staff quarters are to accommodate four employees for the purposes of the better management of the Reserve. These quarters will be within the same area designated for the existing Reserve Manager’s residence.  Section 21 of the above Regulations states that any person entering or staying in a nature reserve is subject to conditions set by the management authority. As the Staff Quarters have been designed as four single quarters, the conditions of the accommodation should restrict the number of people living in these staff quarters to one person per bed-sitter. | 4 bedsitters to house JCPZ staff  (i) The JCPZ Conservation manager and his family are already living in a house in the reserve. There is also another cottage used for staff in the reserve. Why should there now be more staff quarters built in the reserve?  (ii) Employees are not usually provided with living quarters at their places of employment, particularly not in a reserve with a critically endangered ecosystem  (iii) As stated, there is public transport access for staff to come to and from work. Why should the JCPZ staff, not, like the other employees in Kloofendal, use the public transport?  (iv) Does the reserve manager have the authority to make his present free accommodation (at cost of our taxpayers) of house, garage and big garden in the nature reserve a private village for his staff? Single staff members living there will have family and friends visiting them. |
| 4 | I would like to suggest, as a fund-raising effort towards upkeep for KNR, that an entrance fee is charged for all visitors who are wanting to picnic. I feel that this would be justified. However, if a visitor is merely hiking, then they should be able to enter for free. | Your suggestion is noted. It is not unusual for municipal Nature Reserves to have a nominal entry fee. Frequent visitors are often exempted through their membership to “Friends” groups. Kloofendal Nature Reserve receives funds from the City of Joburg for the management and maintenance of the Reserve. It is not the intention to levy an entry fee on a day to day basis. This may however be done if there are  specific events or for large groups. | Entrance fee to picnic JCPZ booking department does charge for use of the reserve for groups of 20 or more people, this is difficult to enforce.  We are very fortunate to have security guards enforcing the Public Open Spaces Bylaws and questioning bigger groups whether they have booked and payed or not. |

Comments received from I & AP | Contact Gladys Bell

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|  | **Comment** | **Response** |  |
| 1 | As you can see from the subject line --- Kloofendal is a “Nature Reserve”. By the sound of it, you want to change the place into a “Theme Park”.  It is one of the last places which is unspoilt by commercialism. People come to Kloofendal to  get back to nature and find peace and rest. | The development of a Reception/ Visitor’s Centre will not change the Nature Reserve into a “Theme Park”. Kloofendal Nature Reserve’s heritage resources are significant to the broader city and the province and also provides the community and learners with  environmental education opportunities.  The proposed Reception/ Visitor’s Centre will contribute positively to the visitor experience without negatively affecting the environment. It is agreed that people come to Kloofendal to get back to nature and find peace and rest. Open spaces are the “Life Support System” of the City of Joburg. Ecological services have social importance. They support human well- being and liveable communities. They promote physical activity, health, and social inclusion as well as identity and psychological well-being. These services preserve areas of scenic  beauty and cultural value. | Theme Park There is no need for a second Reception/ Visitors Centre, the Ecological Centre is a beautiful, spacious educational centre with plenty of information and displays of specimen found in the reserve. The Ecological Centre with its qualified, passionate guides provides the community and learners with environmental education opportunities, mainly in the reserve itself, with the educational displays supplementing what is experienced/ enjoyed in the reserve – this valuable service will not be provided by a new building.  The new building itself will not promote physical activity, health etc, the information that can assist, which is already present in the Ecological Centre. |
| 2 | Erecting houses for the staff is not a good idea. The staff will bring their families to live, and extended families will join them, and before you know it, there will be a squatter camp. A case in point is Innesfree Park in Sandton. The owner lived on the property, then allowed his staff to live there. Then these people had children, then they got married, had children, then in-laws moved in, then cousins etc.  This is especially pertinent in the EWC context. | Section 4(1) of the Regulations for the Proper Administration of Nature Reserves (GN R99 of  8 February 2012) makes provision for the managing authority (JCPZ) to provide accommodation for staff.  The proposed staff quarters are to accommodate four employees for the purposes of the better management of the Reserve. These quarters will be within the same area designated for the existing Reserve Manager’s residence.  Section 21 of the above Regulations states that any person entering or staying in a nature reserve is subject to conditions set by the management authority. As the Staff Quarters have been designed as four single quarters, the conditions of the accommodation should restrict the number of people living in these  staff quarters to one person per bed-sitter. | 4 bedsitters to house JCPZ staff  Does the reserve manager have the authority to make his present free accommodation (at cost of our taxpayers) of house, garage and big garden in the nature reserve a private village for his staff? Single staff members living there will have family and friends visiting them, may be even staying with them.  Do the 4 extra JCPZ staff members also get free accommodation, water and electricity? |

Comments received from I & AP | Contact Keith Cogdell

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|  | **Comment** | **Response** |  |
| 1 | There will be changes at Kloofendal if this proposal goes ahead, as per the document(s) you should receive.  The visitors centre might be used for collecting money for entrance to the Reserve.  There will be more on-site staff and perhaps their families with attendant disruptions. | It is not unusual for municipal Nature Reserves to have a nominal entry fee. Frequent visitors are often exempted through their membership to “Friends” groups. Kloofendal Nature Reserve receives funds from the City of Joburg for the management and maintenance of the Reserve. It is not the intention to levy an entry fee on a day to day basis. This may however be done if there are specific events or for large groups.  As the Staff Quarters have been designed as four single quarters, the conditions of the accommodation should restrict the  number of people living in these staff quarters to one person per bed-sitter. | Families of staff Groups of more than 20 people utilising the reserve are supposed to book with JCPZ booking department who do charge a fee, we have been aware of quite a substantial fee being charged.  Are staff members staying at the single accommodation quarters not going to have visitors coming to spend time with them even after the reserve is closed i.e. taking advantage of their free accommodation in a public open space. |

Comments received from I & AP | Jackie Zietsman

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|  | **Comments** | **Response** |  |
| 1 | We are concerned about the deterioration of the boundary walls, in some areas complete collapse of the walls, which has resulted in the need for security guards. | The upgrade of the fence is covered by the OPEX budget from Facilities Management. All maintenance matters are covered in the  Maintenance Plan for Kloofendal Nature Reserve. | Boundary walls The management plan for the Kloofendal Nature Reserve, Ekotrust cc, December 2014, states that fences should be patrolled weekly, a fence patrol sheet should be filed in which missing/ damaged posts and holes in the fences are specified, gates (paintwork, hinges, chains and locks) maintained and serviced regularly. Much of this is not happening. |
| 2 | The overflowing of overburdened sewerage lines on a constant basis into the Reserve's river and subsequently, dam. | Joburg Water is responsible for the sewerage system in Kloofendal Nature Reserve. This matter has been referred on to them and this  response will be updated once they have responded. | Sewerage |
| 3 | The deterioration of the paths, and hiking trails, despite Operations Manager Mr Phillip Mkhombo's best efforts with the limited resources available to him. | Maintaining the trails in good condition is an operational activity. Funds are made available through the OPEX budget from Facilities Management. This is covered by the  Management Plan for the Nature Reserve. | Paths / Trails Management of the paths needs professional advice and supervision |
| 4 | I am worried about the use of funds, that in my opinion, should be used in the protection, and rehabilitation of the Reserve, and its fragile fauna and flora.  There is already a perfectly functional Visitors Centre, in the Reserve.  The building of living quarters for staff, will be putting more strain on the Reserve, and leaving a 'footprint' on land that is supposed to be there for the protection of our regional fauna and flora. | CoJ has provided JCPZ with the funding to develop the Reception/ Visitor’s Centre.  The budget for the maintenance of the Nature Reserve is allocated separately from the OPEX budget from Facilities Management.  The Reception/ Visitor’s Centre provides for an entry point into the Nature Reserve. The existing Ecological Centre is too far into the site to provide an arrival point for visitors. It would require a total refurbishment to accommodate the proposed elements of the Reception/ Visitor’s Centre. The existing Ecological Centre can however, be used as a conference/ meeting facility. The current exhibits can be better displayed in a more appropriate manner in the new Visitor’s Centre.  The proposed staff quarters are to accommodate four employees for the purposes of the better management of the Reserve. These quarters will be within the same area designated for the existing Reserve Manager’s residence.  As the Staff Quarters have been designed as four single quarters, the conditions of the accommodation should restrict the number of people living in these staff quarters to one  person per bed-sitter. | OPEX vs CAPEX & pressure on the Reserve It will be easy to make a pretty pathway from the parking area to the Ecological Centre through the forest.  The current exhibits are well displayed in the Ecological Centre, with people knowledgeable on the reserve and the specimen able to provide the public visiting the centre with the appropriate, interesting information about each one.  With a proper booking system in place, the present Ecological Centre can be used as a conference centre and has been used as such in the past.  The JCPZ Conservation manager and his family are already living in a house in the reserve. There is also another cottage used for staff in the reserve. Why should there now be more staff quarters built in the reserve?  Employees are not usually provided with living quarters at their places of employment, particularly not in a reserve with a critically endangered ecosystem |

Comments received by I & AP | Nicci Clausen

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|  | **Comments** | **Response** |  |
| 1 | I regularly run/ hike in the reserve and value the quiet. I also volunteer, removing invasive plants. | Thank you for being an active citizen. Section  10 of the Norms and Standards for the Management of Protected Areas in South Africa (GN 382 of 31 March 2016) allowing for the neighbouring communities to contribute positively to the success of the protected area. A sound relationship between the protected area management authority and neighbouring communities must be encouraged. The neighbouring communities must be allowed the opportunity to provide input, where  relevant, into decisions relating to protected area management. |  |
| 2 | I am of the opinion that the sewerage system,  fencing around the reserve (for security and to protect the fauna), as well as invasive flora removal, are top priority to preserve the reserve. | Joburg Water is responsible for the sewerage  system in Kloofendal Nature Reserve. This matter has been referred on to them and this  response will be updated once they have responded.  The fencing around the Reserve as well as the removal of alien invasive plants are operational issues that takes place according to the Alien Invasive Clearing Plan, and the broader Management Plan for the Nature Reserve.  The upgrade of the fence is covered by the OPEX budget from Facilities Management. | Sewerage, fencing & IAPs The manager of the JCPZ reserve informed us that there is no money to upgrade fencing around the Kloofendal Nature Reserve (WhatsApp on 6th May 2020). Prior to Lockdown we have seen little work done on Invasive alien plant removal. Alien invasive plants spreading into the reserve is a big problem. |
| 3 | I do agree that parking should be upgraded and an entrance could be built. Entrance should be charged for groups using facilities for picnics and gatherings where water and clean-up services will be required. Hikers, runners and bird watchers should not be charged. | The upgrade of the parking will be included in the Master Plan. It is envisaged that the upper parking, opposite the Reception/ Visitor’s Centre, will be formal parking i.e. tarred/ paved area. The lower section will be less formal, and will be left as grassed or grass blocks.  It is not unusual for municipal Nature Reserves to have a nominal entry fee. Frequent visitors are often exempted through their membership to “Friends” groups. Kloofendal Nature Reserve receives funds from the City of Joburg for the management and maintenance of the Reserve. It is not the intention to levy an entry fee on a day to day basis. This may however be done if there are specific events or for large  groups. | Parking, entrance & entry fees Entry fees : Your statement “JCPZ seeks to provide an inclusive open space for all and not only for those who can afford the entry fees of the Botanical Gardens” ie. no entry fees as per adjacent statement, but, aren’t entry fees likely when there will be staff, probably three, who need to run the Visitors/ Information Centre and of course each need a salary? |
| 4 | The Walter Sisulu and Botanical Garden is there to be manicured and presented flawlessly (which it isn't). Kloofendal should be left as natural as possible and assisted to be only indigenous. It should not be developed commercially. | The area zoned for facilities at the entrance to the Nature Reserve, that includes the existing Amphitheatre, Lapa and Ecological Centre, will be maintained for such purposes to facilitate picnics etc. The Landscape Master Plan will address the integration of this area. Only indigenous vegetation will be planted.  The remaining areas within the Reserve will be left in their natural state. | Lawn quality and natural vegetation Surely building accommodation of 4 bachelor flats and a second Visitors Information Centre in the Kloofendal Nature Reserve and its subsequent usage is disturbing its natural environment? |

Comments received from I & AP | Helene De Villiers

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|  | **Comments** | **Response** |  |
| 1 | The perimeter fence needs to upgraded. This is of the upmost importance as it is the only way to ensure that there is no encroachment of unwanted elements into the area. We have animals in the area that domestic dogs chase and these too need to be kept out. It will also ensure the safety of  visitors to the Reserve. | The fencing around the Reserve is an operational issue that takes place according to the Management Plan for the Nature Reserve.  The upgrade of the fence is covered by the OPEX budget from Facilities Management. |  |
| 2 | The sewerage overflow that occurs from time to time is a big health concern. This should be repaired, fixed up before even thinking of  spending money on any other facilities to attract public. | Joburg Water is responsible for the sewerage system in Kloofendal Nature Reserve. This matter has been referred on to them and this  response will be updated once they have responded. |  |
| 3 | The current buildings need general overall maintenance. | This project is aimed at igniting life into the Nature Reserve as part of the JCPZ’s role of managing all City’s Reserves. | Building maintenance People come to enjoy the reserve, not the buildings, especially the JCPZ staff accommodation. The reserve already has a lovely Visitor/ Information Centre in the form of the Kloofendal Ecological Centre, why build another one? |