

Public Participation in Planning for the Cathedral Peak Hutted Camp

July 1995

by

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*Research Report prepared in partial fulfillment of the
requirements of the degree of Master of Philosophy in
Environmental Science*

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Executive Summary

I. Long Title

A critique of the public participation process followed during planning for the development of an eco-tourism facility by the Natal Parks Board, in the Natal Drakensberg Park in the province of KwaZulu-Natal, during a period of political transition in 1994/95.

II. Background to and Rationale for this Study

A Preliminary Environmental Assessment was conducted for the Natal Parks Board (NPB) as a group project by five students¹ from the Masters Class in the Department of Environmental and Geographical Science, University of Cape Town. The scoping stage of the assessment focused the collection and assessment of base line data. The Masters Group evaluated the alternatives identified during scoping against the criteria of equity, sustainability and efficiency and based on this evaluation one of the alternatives was recommended to the NPB. The results were presented in a three-volume document consisting of the *Main Report*, the *Public Participation Report* and the *Appendices*.

Individual members of the masters group have selected different aspects of the Environmental Impact Assessment (EIA), which was done as a group exercise, for more in depth analysis and critique for submission in partial fulfillment of the requirements for the degree of Master of Philosophy. Public participation in the planning process followed by the NPB has been chosen for this thesis because it is felt that it has been inadequate to date and could be improved upon.

III. Aims and Objectives of the Thesis

This thesis draws on the experience gained by the Masters Group during the scoping phase and aims to identify how the EIA fitted into the planning process followed by the NPB. The focus is on examining the extent to which the approach to public participation in

¹ Osman Asmal, Nina Askeland, Andy Spitz, Piet Theron, Penny Urquhart

the planning process complied with the requirements of Integrated Environmental Management. The NPB's commitment to public participation has been used as a baseline against which the effectiveness of involvement of the public in the planning process has been measured.

The aim of the thesis was to establish:

- ◆ how the EIA fitted into the broader planning process;
- ◆ whether the approach to public participation facilitated input from all Interested and Affected Parties (I&APs);
- ◆ whether involvement of the public fulfilled the requirements of Integrated Environmental Management (IEM) and of the stated commitment by the NPB to public participation;
- ◆ what difficulties were experienced by the project proponent in converting the theory of IEM and public participation into practice;
- ◆ whether any improvements could be made to the process.

It is felt that the information presented in this thesis could be useful to the NPB in continuing this project and in the planning of other eco-tourism developments.

IV. Findings of the Report

IEM Theory in Practice

The thesis examined whether involvement of the public fulfilled the requirements of IEM. The findings of the report should be seen in the light of the difficulties that project proponents and EIA practitioners experience with putting IEM theory into practice. Some of these difficulties have been outlined below:

- ◆ **In this development the project proponent and the permitting authority were one and the same.** There are no guidelines in the IEM Documents on how vested interests and accountability are to be dealt with in this situation.
- ◆ **IEM Guidelines are unclear on where in the planning process the EIA should be commissioned.** The requirements are that an Environmental Impact Assessment should examine both the Need and Desirability of the project *and* the detailed design of the proposal. This means either that:

- 1) the EIA starts at the very early stages of the project and goes through to the detailed planning of the proposal, or
- 2) the EIA is done at a stage in the process when the proposal is sufficiently detailed to identify specific impacts.

Project proponents are often not clear on where in the process an EIA should be commissioned to satisfy these requirements.

- ◆ **There is too much emphasis on the EIA report.** IEM aims to integrate environmental considerations into the planning process, yet the Guidelines define the roles of scoping and review in terms of their relevance to the assessment and the report and not to the planning process itself. The result is that much effort goes into the EIA document rather than concentrating on how information should be fed into and used in the planning process (see also draft regulations on EIA in South Africa). This situation creates the perception among many project proponents that scoping is aimed at informing the assessment and not their planning process.

Aims of Public Participation in the NPB Planning Process

There is a lack of consensus on the aims of public participation. Several sources were used to clarify what were the aims of public participation in the NPB's planning process: the *Statement of Intent* (Appendix 6), *Opportunities for Integrated Conservation and Development in KwaZulu-Natal* (NPB, 1994a), the *Neighbour Relations Policy* (NPB, 1992b) and personal communications with the NPB. From these sources the following aims were identified as being the aims of public participation in the planning process of the proposed development:

- ◆ to allow public participation in development planning and decision making,
- ◆ to ensure an opportunity for all I&APs to raise concerns and issues which would serve to focus the environmental impact assessment of the proposed development site at Cathedral Peak, and
- ◆ to identify how an eco-tourism development at Cathedral Peak could catalyse rural development in the area (spin-offs) and contribute to empowerment and capacity building.

The thesis analysed the process in terms of the effectiveness of public participation in meeting these aims. For a number of reasons it must be concluded that these aims were not met.

Public Participation in the Planning Process - Too Little Too Late

Public participation by its very name implies a shift in power away from the traditional decision makers to the public. Participation is not possible if there is no power shift. The later the participation, the less real decision making power people will have to influence the project direction. In the case of the proposed development at Cathedral Peak the public was involved too little too late.

It became apparent during scoping that different I&APs had different reasons for wanting to participate in the planning process. Urban interest groups were interested in participating in formulating the proposal on a conceptual level. Rural communities were more interested in participating during construction and implementation by interacting with the development in some way. The effectiveness of public participation in respect of urban and rural interest groups must, therefore, be separately considered.

Participation of Rural Communities

The scoping stage was the first time in the planning process that rural neighbouring communities were approached. Since decisions to locate the proposed development at Cathedral Peak had been made and the detailed design of the camp had already been completed, the community had been excluded from this phase of planning and were presented with a *fait accompli*.

Scoping revealed that the main interest shown in the development by rural communities was to participate in the construction and implementation phases of the development. However, there were no negotiating structures in the community. Participatory development requires a high degree of community organisation and well developed communication and facilitation channels. With no representative organisations or structures in the community, the Masters Group communicated through meetings and house-to-house surveys. Although this method allowed many issues to be raised, and the concerns of a representative group of the local population to be recorded, interpretation of the input obtained had unfortunately to be done *outside* the communities by the Masters Group. This input was presented to the NPB as recommendations on how the participation of local communities could lead to empowerment and capacity building. If the aim is to empower these communities it will be necessary to work with the communities to develop the ideas into strategies.

The NPB has recognised the need for negotiating forums in its neighbour relations policy which states that "participation in reserve management and planning through creating neighbour liaison forums" should be encouraged. The Neighbour Relations Policy assigns

the responsibility for facilitating the formation of neighbour liaison forums to the NPB. Without such structures the neighbouring communities will not be in a position to participate in the construction and implementation phases of the development. If eco-tourism development is to act as a catalyst for rural development, the involvement of rural communities is essential.

Participation of Urban Interest Groups

Capacity building and empowerment were not necessarily the reasons behind the participation of urban interest groups. The type of knowledge that these interest groups could and wanted to contribute to the planning process were, however, also affected by the approach that the NPB took to the planning of the proposed development.

Analysis of the process followed by the NPB found that a "fast-slow" or technocratic approach to planning had been followed. The fast-slow approach was characterised by the fact that

- ◆ specialist or "expert" input dominated the planning phase,
- ◆ the approval stage (the current stage of the project) will be time consuming compared to the planning phase. The environmental assessment of the proposed development will be followed by public and expert review of the assessment before a final decision on whether to go ahead is taken.
- ◆ the project proposal presented to the public for comment had been planned to a considerable level of detail, presenting the public with a situation perceived by most as a *fait accompli*,
- ◆ urban interest groups were not able to contribute to the planning of the development and nor to identify how the proposed eco-tourism venture could catalyse rural development. They were able to contribute to focusing the assessment on the issues of concern.

The effect of the fast-slow approach to planning was that the Environmental Impact Assessment was seen as little more than an attempt to justify and confer validity on a development proposal which had not been evaluated or subjected to public scrutiny during the planning process. Town and Regional Planning and nature conservation organisations objected to the process followed by the NPB and questioned the Environmental Impact Assessment as a valid basis for decision making.

The Need for a Defined Policy on Public Participation

The fact that the NPB's policy on public participation was not clearly defined meant that the participation exercise conducted by the Masters Group during the environmental assessment was regarded with suspicion in the community and that the role of the community in further planning of the proposed development was unclear. The process of consultation with rural communities on how participation could occur in the implementation and construction phases of the development was initiated by the Masters Group as consultants for the NPB. It is important that the NPB should recognise its responsibility in carrying forward this participation process and developing it.

Different interest groups do not have the same access to information. As long as there is no defined policy on public participation, in terms of which all I&APs are actively informed and their input facilitated, privileged groups will continue to influence the planning process and decision making to a greater extent than disadvantaged communities. Generally disadvantaged communities are unable to exert any influence at all. The aims of the Integrated Environmental Management Procedure and the Reconstruction and Development Programme are to promote economic development that contributes to empowerment and capacity building. Public participation must be recognised as an essential mechanism to achieve these goals.

Executive Summary

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Glossary

Alternative 1	Development of a 200 bed hutted camp on the composite site (upper and lower site) chosen by the NPB for development. This proposal is contained within the concept layout (Map 3).
Alternative 2	Development of a 200 bed hutted camp on the lower site only. This alternative was identified during scoping.
Alternative 3	No development of a hutted camp at Cathedral Peak.
Eco-tourism	Includes purposeful travel to natural area to understand the cultural and natural history of the environment, taking care not to alter the integrity of the ecosystem while producing economic opportunities that make the conservation of natural resources beneficial to people.
Environment	The external circumstances, conditions and objects that affect the existence and development of an individual, organism or group. These circumstances include biophysical, social, economic, historical, cultural and political aspects (DEA, 1992, Document 6).
Environmental Impact Assessment	The process of collecting, organising, analysing, interpreting and communicating data that is relevant to some decision.
Environmental Impact Statement	A report documenting the Environmental Impact Assessment findings.
Integrated Environmental Management	The process of the Department of Environmental Affairs and Tourism, designed to ensure that environmental considerations are integrated into all stages of the development process in order to achieve a balance between conservation and development.
Interested and Affected Parties	Individuals or groups concerned with an activity and its consequences. Includes authorities, specialists etc.
Masters Class	The 1994/95 year of Mphil students in Environmental Science in the Environmental and Geographical Science Department at the University of Cape Town.
Masters Group	Five students from the Masters Class: Osman Asmal, Nina Askeland, Andy Spitz, Piet Theron, Penny Urquhart.
Public Involvement	In this thesis it has been used as synonymous with public participation.

- Public Participation** an iterative on-going process between an informed public and the professional team concerning the conceptualisation, development, assessment and decision making of alternative proposals which affect the environment and a commitment by the participants (that is the public, professional team and decision making authorities) to adhere to the agreed upon process and the outcome of that process.
- Rural communities** Refers to the local people around the Cathedral Peak Node of the Natal Drakensberg Park. In this definition it is accepted that the community is not a homogeneous group but rather comprise a combination of disaggregated units.
- Scoping** A procedure for narrowing the scope of an assessment and ensuring that the assessment remains focused on the truly significant issues or impacts.
- Urban interest group** All the interested parties in the development excluding the rural communities. This distinction reflects different methodologies used in approaching and communicating with interested parties

Acronyms

EIA	Environmental Impact Assessment
EIS	Environmental Impact Statement
I&APs	Interest and Affected Parties
IEM	Integrated Environmental Management
NEPA	National Environmental Policy Act
NPB	Natal Parks Board

Chapter 1

Introduction

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1. Introduction

1.1 Long Title

A critique of the public participation process followed during planning for the development of an eco-tourism facility by the Natal Parks Board, in the Natal Drakensberg Park in the province of KwaZulu-Natal, during a period of political transition in 1994/95.

1.2 Background to this Study

The Natal Parks Board were approached by the 1994/95 Masters Class from the Department of Environmental and Geographical Science, University of Cape Town, in November 1994 for potential projects in Environmental Impact Assessment (EIA) (Appendix 1). These would need to meet the requirements of the Master of Philosophy Degree as well as provide the client with a product of professional standard.

In January 1995, the Natal Parks Board commissioned the Masters Group to conduct a Preliminary Environmental Assessment of Natal Parks Board's proposed hutted camp development in Cathedral Peak State Forest, Natal Drakensberg Park (Map 1).

The Terms of Reference were to assess the proposed development of a hutted camp on a composite site, comprising sections of the Tryme Shelf and a broad spur in the vicinity of the existing Park headquarters (Map 2).

Three alternatives were considered in the Preliminary Environmental Assessment:

1. Alternative 1 - the development of a 200 bed hutted camp on the site comprising both the spur of land adjacent to the existing Park headquarters site (Camp C) and the Tryme Shelf (Camps A & B). This is the proposal contained within the concept layout (Map 2).
2. Alternative 2 - development of a 200 bed hutted camp restricted to the spur of land adjacent to the existing Park headquarters site. This is the site proposed for Camp C, in Alternative 1. This option excludes any development on the Tryme Shelf. According to

earlier Natal Parks Board investigations of alternatives, it would be possible to accommodate a 200 bed camp on this site alone (Map 2).

3. Alternative 3 - no development of a hutted camp at Cathedral Peak on either the Tryme Shelf or the spur adjacent to the Park headquarters site - the "No-go" option.

Alternative 2 was suggested as a possible additional alternative by the Masters Group based on:

1. the Geomorphological Feasibility Study, commissioned by the Natal Parks Board, which pointed out several constraints to development on the Tryme Shelf and which preferred the lower site (Camp C) out of the three site options,
2. the Terms of Reference for the Masters Group which allowed alternatives within the parameters of the proposal under consideration,
3. consultation with Interested and Affected Parties (I&APs), which revealed that there was concern among Conservation Groups about impacts associated with the choice of the Tryme Shelf for development.

Since scoping revealed that the need and desirability of the proposed development: a 200 bed hutted camp at Cathedral Peak, was being questioned, the No-go option, Alternative 3, was also identified by the Masters Group.

The Natal Parks Board had gone a considerable way towards completing their planning for Alternative 1 when it was decided that an EIA would be required before the final decision was taken to go ahead. The Masters Group was commissioned to do this environmental assessment.

1.3 Rationale for this Particular Study

Individual members of the masters group have selected different aspects of the EIA , which was done as a group exercise, for more in depth analysis and critique for submission in partial fulfillment of the requirements for the degree of Master of Philosophy. Public participation in the planning process followed by the Natal Parks Board has been chosen for this thesis because it is felt that it has been inadequate to date and could be improved upon. More specific reasons are:

1. The Natal Parks Board has committed itself to following Integrated Environmental Management (IEM) procedures. This means that it is responsible for ensuring that there are adequate opportunities for public input, as well as for facilitating such input and ensuring that it occurs at appropriate times in the planning process.
2. At the time the Masters Group was commissioned the planning process was far advanced. Scoping was therefore restricted to comments on alternatives within the parameters of the proposal under consideration.
3. If insufficient Public Participation was allowed early on in the planning process, before the commissioning of the Preliminary Environmental Assessment, the validity of that Assessment might be called into question by I&APs.
4. During scoping several ways in which the local community could in the future participate in the construction and implementation phases of an eco-tourism facility at Cathedral Peak were identified. Recommendations were made in the Preliminary Environmental Assessment (Volume 1 and 2). Enactment of these recommendations would require the Natal Parks Board to involve the local communities to some degree in planning and decision making regarding aspects of the proposed development.
5. The involvement of the Masters Group in the project ended with the submission of the Preliminary Environmental Assessment Report. Many insights gained during the project were not documented in this Report because they fell outside the terms of reference for the study but could provide information that would be useful to the Natal Parks Board. In this thesis positive suggestions have been made based on some of these insights and shortcomings have been pointed out in the process that was followed.

1.4 Aims and Objectives of the Thesis

The Preliminary Environmental Assessment of the proposed development of a huttled camp at Cathedral Peak documented the planning process followed by the Natal Parks Board before the Masters Group was brought in to assist. The terms of reference did not include an analysis of the planning process followed by the Natal Parks Board although the process was documented to some extent.

One of the principles underpinning IEM is that development should follow the “cradle to grave” approach to development. In practice, however, an EIA is usually commissioned only when there is an advanced proposal, usually well beyond the cradle stage. The result

is that the theoretical aims of IEM and public participation can often not be realised in practice because the principles are applied too late in the process.

This thesis draws on the experience gained by the Masters Group during the scoping phase and aims to identify how the EIA fitted into the planning process followed by the Natal Parks Board. The focus is on examining the extent to which the approach to public participation in the planning process complied with the requirements of IEM. The Natal Parks Board's commitment to public participation has been used as a baseline against which the effectiveness of involvement of the public in the planning process has been measured. The following aspects of the planning process are investigated:

- whether there was any public participation in the different phases of development planning;
- how the I&APs were identified and notified;
- how I&APs participated in the process;
- how participation was facilitated?

The thesis then aims to establish:

- how the EIA fitted into the broader planning process;
- whether the approach to public participation facilitated input from all I&APs;
- whether involvement of the public fulfilled the requirements of IEM and of the stated commitment by the Natal Parks Board to public participation;
- what difficulties were experienced by the project proponent in converting the theory of IEM and public participation into practice;
- whether any improvements could be made to the process.

The study draws on experiences gained by the Masters Group during the Preliminary Environmental Assessment, to provide information that could be useful to the Natal Parks Board in continuing this project and in the planning of other eco-tourism developments. This includes making positive suggestions, such as highlighting opportunities for maximising information exchange, as well as pointing out shortcomings in the process that was followed.

Chapter 2

Thesis Structure

2. Thesis Structure

This thesis is structured as follows:

Chapter 1 - this chapter provides a background to the study and sets out the rationale, aims and objectives of the thesis.

Chapter 3 - in this chapter the theoretical background to environmental planning is outlined. The South African IEM procedure is set out in some detail with particular emphasis on the requirements of consideration of alternatives and public participation. The environmental planning procedures followed in other countries, e.g. the Netherlands and Canada, and by organisations such as the World Bank, are also included. The chapter sets the scene for the analysis of the Natal Parks Board's planning process which is contained in chapter 5. The different aims of public participation and the consideration of alternatives are discussed. The chapter is concerned mainly with the theory behind public participation in the planning process rather than a description of specific participation techniques.

Chapter 4 - this chapter contains a description of the planning process followed by the Natal Parks Board from the identification of the need for a development up to the submission of the Preliminary Environmental Assessment. The emphasis of the description is on the type and extent of public participation in the various stages of the planning process. The description provides information which will be used for the analysis of this process in chapter 5.

Chapter 5 - this chapter contains an analysis of how public participation in the different stages in the planning process fulfilled the aims of environmental planning as well as the aims inherent in the notion of public participation, namely, empowerment and capacity building.

Chapter 6 - in this chapter some difficulties of putting the theory of IEM and of public participation into practice are discussed. Difficulties specific to this development proposal as well as general difficulties with the theories of IEM and public participation are outlined.

Chapter 7 - this chapter contains a conclusion and an outline of some of the difficulties which arise in putting the theory of good environmental planning into practice in the South African context. Recommendations are made on where efforts should be concentrated in the public participation process.

Chapter 3

Public Participation in Environmental Planning

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3. Public Participation in Environmental Planning

This chapter provides a theoretical background to the description and analysis of the planning process followed by the Natal Parks Board. The Natal Parks Board is primarily a conservation organisation, with a commitment contained in its mission statement to provide accommodation for the public in areas under its control. The Natal Parks Board has a policy to use IEM in the planning of eco-tourism developments. IEM is a planning tool developed for South Africa which aims to ensure environmentally sound planning. The central concepts of IEM are **consideration of alternatives** and **public participation**. In this chapter the crucial role that alternatives and public participation play in planning are described.

3.1 *Environmental planning - an introduction*

Environmental planning, interpreted by McHarg (1969) as "Designing with Nature", means planning that takes into account biological, physical and social constraints and opportunities in development. Although there is an inherent contradiction in the idea of designing *with nature*, it is certainly possible to design *with an understanding of nature* and, in this sense environmental planning amounts to no more than "good planning practice". It is possible to envisage two ways in which the design of projects can take place with an understanding of nature:

1. By undertaking an EIA of a project or plan, where a separate document is produced.
2. By integrating the concept of EIA into the project or plan. While it can be argued that no separate documentation would necessarily have to be prepared, some evidence of the environmental assessment would need to be furnished within the documents associated with the plan making process (Wood, 1988).

The National Environmental Policy Act (NEPA), passed on 1 January 1970 in the United States, was the first legal requirement for EIAs in the world. It made EIAs a statutory requirement for major Federal Projects. NEPA required the project proponent to prepare

an Environmental Impact Statement, a report which predicts the environmental impacts of the proposed development (Burton, Wilson and Munn, 1983).

NEPA has served as a role model for legislation passed in many other developed¹ countries including the Netherlands, Germany and Sweden (Burton, Wilson and Munn, 1983).

The emphasis in environmental planning, where NEPA has set a strong precedent, has been on the production of a report to provide decision makers with an indication of the likely consequences of their actions. A major problem with this approach experienced in the US was that, although NEPA forced environmental impacts to be explicitly stated in a report, there was no provision to ensure that the recommendations of the report were followed, or that it was taken into account in the decision-making process. It therefore relied on openness in decision-making processes and accountability to put pressure on decision makers to take note of the Environmental Impact Statements. Lengthy legal battles surrounding the comprehensiveness of the report tended to lead to costly delays in development planning with little apparent environmental benefits.

It also became evident that the authorization of proposals is not the only point at which decisions are taken (Wathern, 1988), that there are many decision makers involved in the evolution of project proposals, and that the influence of most of these is exerted long before the formal project authorization. This extended view of decision making and the lessons learnt from the pioneering legislation on environmental planning in the US, have served to lead the way in the development of environmental planning guidelines for South Africa, under the name of Integrated Environmental Management (DEA, 1992). These guidelines have attempted to merge environmental considerations into the planning process. However, the emphasis on the production of a separate document has remained. The background to the IEM procedure as well as the aims and principles underpinning it are outlined in sections 3.2 and 3.3.

Many guidelines for environmental assessment exist, developed for individual countries as well as development organisations such as the World Health Organisation and the World Bank. These have in common the view that EIA is an integral part of the planning process and that the environmental consequences should not be considered as an afterthought.

¹ "developed" and "developing" countries are used as a common form of speech to separate wealthy countries, with sophisticated economies from poorer countries, with smaller, less sophisticated economies. The terms do not intend to convey a value judgement.

The idea of merging environmental performance into planning is what is referred to in this thesis as *environmental planning*.

This thesis draws on different sources, in addition to the South African IEM procedure, to describe aspects of environmental planning, and to analyse the planning procedure followed by the Natal Parks Board.

3.2 Brief Background to the IEM Procedure

As discussed in section 3.1, IEM was developed in order to formulate an environmental evaluation procedure suitable for South African needs (Hill and Fuggle, 1988). The procedure is based to a large extent on experiences gained since an EIA was made a statutory requirement for Federal Projects in the United States of America on 1 January 1970, and on the experiences of EIAs in other developed countries which have enacted similar legislation since then (Hill and Fuggle, 1988).

In formulating the procedure, it has been recognised that the American model for EIA is not entirely suited to the context of developing countries. There are several reasons for this (Fuggle, 1989):

- In developed countries, nature conservation and resource conservation are usually a high priority amongst voters. In developing countries basic human needs have to be met, and the natural environment is seen as a means of meeting these needs through intense exploitation.
- Economic growth is usually seen as a priority in developing countries and environmental considerations, especially negative impacts on the bio-physical environment, are often not considered important enough to redirect development to make it more sustainable.
- EIAs are not statutory in most developing countries and where EIAs are undertaken, there are usually no mechanisms in place to ensure that the findings are taken into account in decision making, or that the recommendations of an assessment are implemented.

In countries faced with pressing economic and social development needs the pertinent question to ask is not whether to proceed, but how to proceed. If this is recognised, environmental assessment has most to offer in guiding the location and form of projects (Swaffield, 1982). The IEM procedure has been developed to perform the function of guiding development. It is therefore a planning tool, rather than an assessment procedure for a project proposal. The role of IEM is to ensure that the planning process is informed, that is to direct the planning process. Planning and environmental assessment should be integrated from the earliest stages in the planning process so that all the important decisions and trade-offs made, from the conception of the development, are assessed and evaluated. The need for a large scale, single point assessment before the final authorisation would therefore almost be a recognition of the failure to direct the project from its earlier stage.

3.3 Aims and Principles of the IEM Procedure

Environmental evaluation should be incorporated as early on in the planning process as possible in order to ensure that consecutive decisions in the planning stages are informed by environmental considerations. By incorporating the principles of IEM into the early planning stage of the project, as well as the later stages of implementing and decommissioning, the aims of applying this procedure can be realised. These aims are to:

- guide rather than impede development;
- ensure that the environmental consequences of development, development policies and programmes are understood and accurately considered;
- resolve and mitigate negative environmental impacts and enhance positive social impacts.

Principles underlying the procedure include:

- Informed planning and decision making - specialist input is required to inform the planning procedure;
- Democratic regard for individual rights - consultation, participation and accountability are central concepts to the IEM process;

- Recognition of the interplay between the bio-physical and social environments. Since economic sustainability ultimately depends on bio-physical sustainability **environment** is defined broadly in IEM, encompassing both the bio-physical and social environment;
- Consideration of alternative options;
- Application of these principles from “the cradle to the grave” of the project.

The aims and principles underpinning IEM are applicable to all project planning whether by private or government proponents. Figure 1 provides an illustration of the IEM procedure.

3.4 *The Scoping Phase*

The IEM procedure recognises three central concepts in environmental planning: *Scoping*, Specialist Investigation, and Report production (DEA, 1992, Guideline Document 1).

Scoping is the pivotal stage in the impact assessment.

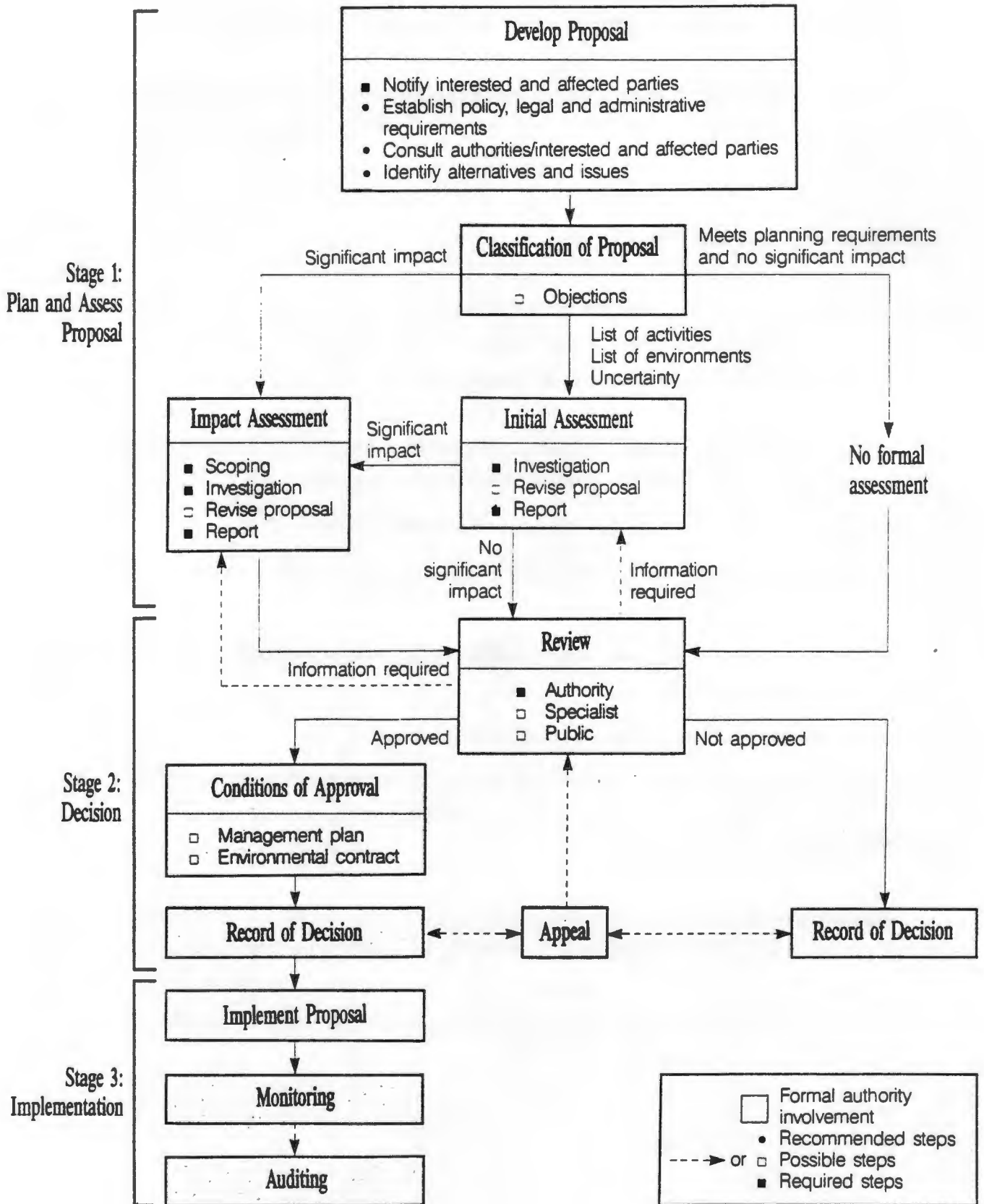
Scoping is an on-going, dynamic process concerned with determining the extent of and approach to an EIA or evaluation, and involves the following tasks:

- Identification and involvement of relevant authorities and other I&APs;
- Reaching agreement on the details of the evaluation and decision making process to be followed;
- Identification of the roles and responsibilities of the various players involved in the evaluation procedure;
- Identification and selection of reasonable alternatives;
- Identification of issues of concern, and potential impacts (positive and negative) as well as community concerns and priorities for consideration and investigation.

(DEA, 1992)

Scoping is the name given to the set of activities aimed at focusing the impact assessment on the relevant issues as identified by I&APs (which include the project proponent, relevant authorities, specialists and other interested parties). The identification and selection of alternatives is part of the *Scoping* phase in the planning process and is discussed in more detail in the next section.

Figure 1 The IEM Procedure



3.5 Consideration of Alternatives in Environmental Planning

Consideration of alternatives is the most fundamental way in which Integrated Environmental can ensure that development proceeds with the least negative and the greatest positive impacts. To consider alternatives is to make sure that different ways to achieve a stated objective are examined so that the decision makers are assisted to choose an alternative which has the least adverse and greatest beneficial environmental, social and economic consequences (Tomlinson, 1984).

The role of alternatives is so fundamental to decision making and environmental assessment that even the notion of a "proposal" is described by NEPA in terms of alternatives:

"a proposal exists at that stage in the development of an action when an agency subject to the act has a goal and is actively preparing to make a decision on one or more alternative means of accomplishing that goal, and the effects can be effectively evaluated". (Weiner, 1979, 67)

The requirement to consider alternatives has been included in the draft regulations on IEM, issued in terms of s26 of the Environment Conservation Act 73 of 1989 (Table 1). However, these regulations are still in draft form, and are unlikely to come into force in the near future (W Fourie, Department of Environment Affairs and Tourism, *pers. comm.*, 1995). It has been argued that some form of standard legal requirements to examine purposes, needs and alternatives is the most effective way in which environmental assessment processes can force proper integration of environmental considerations into the crucial early stages of the planning of new undertakings (Gibson, 1993).

3.5.1 Identification, Generation and Selection of Alternatives

What is the problem

What are the alternatives

Which alternative is best?

(Weiner, 1979)

While the reason behind consideration of alternatives may be readily agreed upon, problems arise when considering the following aspects:

1. What is a reasonable range of alternatives to be considered either in terms of number or variety?
2. How should alternatives be identified?
3. What level of examination should be applied to each alternative?

(Tomlinson, 1984)

In attempting to answer these questions it is important to bear in mind how the adequacy of the examination of alternatives will be evaluated and by whom (see Bacow (1982) for discussion). In South Africa there are no legal requirements regarding consideration of alternatives. There are therefore no standard requirements to guide either the project proponent undertaking the EIA or the authority which has to make a decision with the help of, or on the basis of, the EIA. In circumstances where an independent Review Specialist is called for he/she should ensure that all relevant issues and alternatives, and the linkages between them, have been investigated. The review specialist should therefore be involved from as early a stage as possible, preferably at the Scoping stage (Preston, 1995). Recommendations by several different sources on how consideration of alternatives should occur in practice are given below:

3.5.2 The Range of Alternatives that Need to be Considered

The draft regulations on IEM require that a comprehensive Environmental Impact Report considers the alternatives listed in Table 1.

The Californian Environmental Quality Act (1972) further narrows down the alternatives that need to be considered to alternatives "capable of accomplishing the objectives in a successful manner, within a reasonable period of time, taking into account economic, social, environmental and technological factors."

Table 1 Alternatives to consider in environmental planning.

- (i) maintaining the status quo,
 - (ii) alternative sites,
 - (iii) alternative projects (i.e. demand alternatives),
 - (iv) alternative processes (i.e. activity alternatives),
 - (v) alternative designs,
 - (vi) alternative materials (in-put alternatives) and
 - (vii) alternative methods (including mitigation alternatives).
-

Similar alternatives were recommended to the Dutch Ministry in a report in 1981 (Ministerie van Cultuur, 1981).

3.5.3 The Level of Examination Required for Each Alternative

The IEM draft regulations give no guidelines regarding the level of examination that is required for each alternative. If it can be assumed that alternatives from Table 1 should only be pursued if they are reasonable then the first step is to determine reasonableness. Criteria identified in the report to the Dutch Ministry for determining the reasonableness of alternatives include:

- Controversiality of issues associated with alternatives,
- Conflicts with existing policies, plans and programmes,
- Conflicts with Regional and National interests,
- Conflicts with International Agreements and Obligations,
- Establishment of an undesirable precedent,
- Foreclosure of future options,
- Damage to important natural resources or cultural, scientific and historic sites,
- Environmental appropriateness of technology,
- Financial costs to local authorities and communities,
- Financial costs to the project proponent.

(Ministerie van Cultuur, 1981)

The US Fish and Wildlife Service (1980) provide the advice that all reasonable alternatives should be at least initially considered, but only practical alternatives need to be discussed in the EIA. Hence, more detailed investigations need to be done only on those reasonable alternatives that are selected for consideration. Selection of practical alternatives to be considered is part of scoping and should be done in consultation with I&APs.

3.6 Consultation with, and Participation of, Interested and Affected Parties in Environmental Planning

In the IEM procedure the consultants to a large extent determine when and how the public become involved. The following section explores the reasons for and aims of public participation that should guide involvement of I&APs in scoping.

EIA is frequently used "to assist the determination of decisions that have already been made in principle, in the sense that the assumptions behind the decisions, and the predominant pattern of thinking that has led up to the proposal have not been subjected to comprehensive evaluation or public scrutiny." (O'Riordan 1976). If EIA is to be properly implemented and followed public participation and environmental assessment should not be seen as distinct planning phases but rather as integral parts of the process as a whole.

3.6.1 Reasons for Public Participation

The South African style of government has until recently been highly centralised, deeply authoritarian and highly secretive and opportunities for public involvement in legislation and administration have been extremely limited (Sowman, 1994). The elitist approach to planning, which advocates that those who are best qualified and technically most knowledgeable should be responsible for making societal decisions has meant that there has been very little opportunity for public participation in decisions taken on matters affecting the environment and quality of life (Sowman and Gawith, 1993).

In the last two decades, there has been increasing demand by people for more participation in the formulation and making of decisions directly affecting the quality of their lives and their environments (de Tolly, 1991). This has forced decision makers to seek ways of involving affected communities in the planning and decision making process (Sowman, 1994). The Reconstruction and Development Programme (RDP) has recognised the right

of the public to participate in decisions as one of its six basic principles: "Democratisation must begin to transform both the state and civil society" (ANC, 1994, p7). It is also specifically stated that "Environmental management must be transformed to promote the active participation of Civil Society" (*ibid.*, p41).

Three arguments for public participation given by the UNCHS (1984) are:

1. *Empowerment*

Participation is an end in itself. People have the right and the duty to participate in the execution (i.e. planing, implementation and management) of projects which profoundly affect their lives.

2. *Efficiency*

Participation is a means to improve project results. If people participate in the execution of projects by contributing ingenuity, skills and other untapped resources, more people can benefit, implementation is facilitated, and the outcome responds better to the needs and priorities of the beneficiaries.

3. *Capacity Building*

Participation is a self generating activity which stimulates people to seek participation in other spheres of life. Participation builds up self-reliance and co-operative spirit in communities. It is a learning process whereby people become capable of identifying and dealing actively with their problems (UNCHS, 1984).

In terms of furthering the goal of environmental planning, greater public participation is valuable for four reasons:

1. Public involvement should provide an opportunity for an exchange of information. It can also provide valuable information about local needs;
2. It should build the foundation of the long-term relationship between the proposal proponents and I&APs, which will exist for at least the life span of the project.
3. I&APs provide checks and balances to ensure that all realistic alternatives are on the agenda. This ensures that the broadest and most complete view possible is taken of the project proposal.
4. Public participation allows people who are not involved in planning and decision making to contribute to project planning and includes the participation of all authorities having a specific interest in the proposal and responsibility for the area, proposed

activity, or other development planning that would potentially conflict with or affect the proposed development.

(Fowkes, 1992 and Sowman, 1994)

One reason why public participation is often regarded with suspicion is that too many I&APs have vested interests to protect (Preston, 1995). This is known as the NIMBY or Not In My Back Yard syndrome. Furthermore, some consider that participation at both the *Objection* stage (during Scoping) and/ or the *Appeal* stage in the IEM procedure is sufficient. However, confining public participation to these two stages in the process reinforces the elitist approach to planning by denying affected parties an adequate opportunity of influencing the project direction. If a function of public participation is to enhance the acceptance of a project or plan it is necessary that input is allowed before all major decisions have been made.

3.6.2 Who is the Public?

“The public” includes those directly affected as well as those who, because of their particular concern or expertise, may have relevant information about the scope, nature and particulars of potential environmental effects. “The public” therefore includes national, regional or local authorities, consulting engineers, experts on cultural property, environmental Non-Governmental Organisations (NGOs), grass roots organisations concerned with environmental quality, anti-poverty groups, etc. (World Bank, 1991).

3.6.3 Definition of Public Participation

There is no clear consensus on what is meant by public participation. Different definitions reflect the different ideological interpretations of development and different approaches to planning. In addition, different interpretations and definitions reflect different project aims. Private project proponents will be interested mainly in profitability and the financial success of the project. Consequently public participation will be employed to achieve this aim. Governments and development organisations may be more interested in the potential of the project to bring about change and self improvement, and public participation will be a self generating activity which stimulates people to seek participation in other spheres of life (UNCHS, 1984, p.6). The UNRISD in 1979 identified the real objective of public participation in development projects as being

“...to increase control over resources and regulative institutions in given social situations, on the part of groups and movements of those hitherto excluded from such control” (UNRISD, 1979, p.8)

This definition implies the assumption that participation involves an inevitable sharing and then transfer of power as social groups deliberately attempt to control their own lives and improve their own living conditions. In this context tension can develop between a project proponent, e.g. the state, trying to ‘promote’ participation to achieve centrally desired objectives and the target groups who in the process of participation are trying to increase their control over resources (Moser, 1989).

A definition much less challenging to authority is provided by the Federal Environmental Assessment Review Office (FEARO) in Canada:

“Public involvement is the process by which the views of all parties interested in agency decisions - interested and affected individuals, organisations, provincial and local governments - are integrated into an agency’s decision making process” (FEARO, 1988).

This definition is characteristic of public participation in planning processes where communities are directly affected, but not necessarily the main beneficiaries. Such participation will not usually involve much sharing or transfer of power.

There is, then, a lack of consensus on what public participation is, why it is needed, what purpose it should serve and what it ought to accomplish.

Sowman (1994) defines Public Participation in more detail as being:

- a) an iterative, on-going process between an informed public and the professional team concerning the conceptualisation, development, assessment and decision making of alternative proposals which affect the environment, and
- b) a commitment by the participants (that is the public, professional team and decision making authorities) to adhere to the agreed upon process and the outcome of that process.

This definition allows all the participants to agree upon the degree of participation and power sharing that will take place in the planning process. It also highlights the fact that public participation should occur throughout the planning process and is not confined to the assessment stage of project planning. This is the approach taken to public participation

in the *Manual on Public Involvement in Environmental Assessment: Planning and Implementing Public Involvement Programs* (FEARO 1988). The definition also deals to some extent with the problem of the NIMBY syndrome since the roles of the different players is set out clearly at the beginning of the process. This definition of public participation will be used in this thesis.

3.6.4 Key Principles for Facilitating Public Participation

There are many guidelines and manuals for Public Participation. Table 2 lists participation techniques as well as the conditions under which they work best. The Guidelines for Scoping (DEA, 1992) provide more detailed information on several of the techniques found in table 2. The choice of technique for any particular project will depend entirely on the project parameters:

“You simply cannot make intelligent choices about what public involvement techniques you should use until you have a clear idea of what it is that you want to accomplish at each step of the decision making process” (FEARO,1988).

Once I&APs have been identified and asked to participate, (using whatever technique is considered most suitable in the circumstances) the participants can assist in identifying what type of techniques would be most appropriate for each sector of the “public”, for each tasks, and at each stage in the process (Sowman, 1994). Sowman recommends that a scoping committee comprising elected representatives from major interest groups, affected parties and responsible government agencies should be established early on during scoping. Consultation and negotiation with the project proponent should take place with this committee which would be collectively accountable and responsible for guiding the evaluation process and facilitating on-going public involvement.

There are two key-principles in public participation:

- That participation starts at the outset of any process, with agreement being obtained on the need for the project and on the nature of the proposed process.

Table 2: Evaluation Criteria for Table 2

Audience Size	Small 1-15; Medium 16-50; Large 51+;
Expertise Required	Skills required by the proponent/consultant to facilitate participation - such as facilitation and group interaction skills, questionnaire design experience etc.;
Resources Required	Resources such as time, person power and funds required to achieve participation objectives;
Information Exchange	The potential for information exchange and public input into the various stages of proposal planning, assessment and implementation;
Education Potential	The potential to raise the level of awareness and understanding of issues, impacts and concerns, amongst all participants;
Issue Identification	Potential to identify contentious and significant issues associated with the proposal;
Problem Solving Value	The potential to resolve problems and assist in the resolution of outstanding issues;
Performance with Diverse groups	Ability for information exchange where diverse communities are involved;
Performance with Disadvantaged Groups	Ability to involve representative members from disadvantaged communities;
Facilitates Empowerment	Potential to develop a sense of responsibility, self-reliance and empowerment.

- That project planning should follow a “slow-fast” rather than a “fast-slow” sequence (de Tolly, 1991). In the fast-slow sequence, project planning is largely a technical exercise and once complete, the public is asked to comment. The involvement of I&APs tends to be kept to a minimum since strong opposition is expected. Project preparation time is reduced but the project approval time is protracted because of negative responses. The “slow-fast” sequence, starts with obtaining agreement on the need for the study, the issues and the goals. Reviews of progress, in terms of meeting goals and addressing issues, is carried out throughout the process. Plan preparation is slow, but approval is usually only a formality.

Although it is convenient to discuss *the public* as a uniform group, in practice the public consists of many different interest groups. Not every citizen will want to be involved in every issue or at every level of planning from site to region. Participation programmes must be matched to the scale of planning and the desired level of involvement. The different stages in the planning process will attract different I&APs. Different stages in the planning process can thus involve different I&APs, and similarly, reaching the different segments of the public often involves several different participation techniques (Federal Environmental Assessment Review Office, 1988). Much of the challenge is in developing effective communication in order to apprise people fairly about their role in decisions that might affect them (World Bank, 1991). Identification of all the I&APs, early on in the process, is essential to ensure proper input into decision-making processes.

3.7 *Public Participation in the Identification of Alternatives*

There is a large technical component in the identification of alternatives. The identification/ generation of alternatives is therefore done by people with the relevant technical expertise and training and a long-term vision such as engineers and planners. The cost of alternative courses of action is often an overriding consideration in project design and the project proponent will consider the choice as his/her prerogative. However, the large socio-economic component in identification of alternatives must also be recognised (for example employment needs, development plans for an area, culturally significant sites). Turnbill (1984) has investigated the relationship between public opposition to Highway Schemes in the UK and the stage in the planning process at which input from the public is sought. Initial observations were that involvement of the public in formulating aims, issues, and concerns at the outset in order to guide the generation of

alternatives reduced opposition of the public to the schemes, compared to a situation where the public was only involved once the alternatives had been generated.

De Jongh (1983) distinguishes between the technocratic approach to decision making where the decisions are made by specialists and are considered to be objective and not open for discussion, and the participatory decision making or sociocratic approach where discussion of alternatives is stimulated and the emphasis is on subjective choices (see Hill, 1992). The technocratic approach is what is referred to above as a "fast-slow" sequence in the context of planning. Planners prepare a plan as a technical exercise. In this sequence plan preparation time is reduced but the approvals time is protracted because people tend to react negatively to proposals that affect them and which have been drawn up without their involvement. The sociocratic approach, or the "slow-fast" sequence, is where participation starts with obtaining agreement on the need for a study, continues through issues and goals definition, involves plan review in the light of agreed upon goals, and continues through approval to implementation and monitoring of implementation. Plan preparation is slow but approvals tend to be a formality.

The relative importance of the roles of science and of social values in EIA have been illustrated in what is known as the Beanlands' curve, Figure 2 (Beanlands, 1983). The technical/expert input (stage II), and the public/social input (stage I and III), complement each other and are both needed at different times in the planning process. Although there is an important quantitative, technical aspect to impact identification (stage II), determining the importance of the impacts is a value judgment:

"...change has no intrinsic value: it is through social scoping that change becomes impact" (Tomlinson, 1984).

A disadvantage of Beanlands' curve is that it gives the impression that the *one* important decision is at the *end* of the EIA (stage IV). As was recognised by Wathern (1988), and as can be seen from figure 2, decisions are made throughout the planning process. Beanlands' curve does, however, illustrate that decisions always contain value judgments. Scoping ensures that the value judgment reflects the values of society.

Figure 2 Beanlands' curve showing the relative importance of roles of science and of social values in EIA.

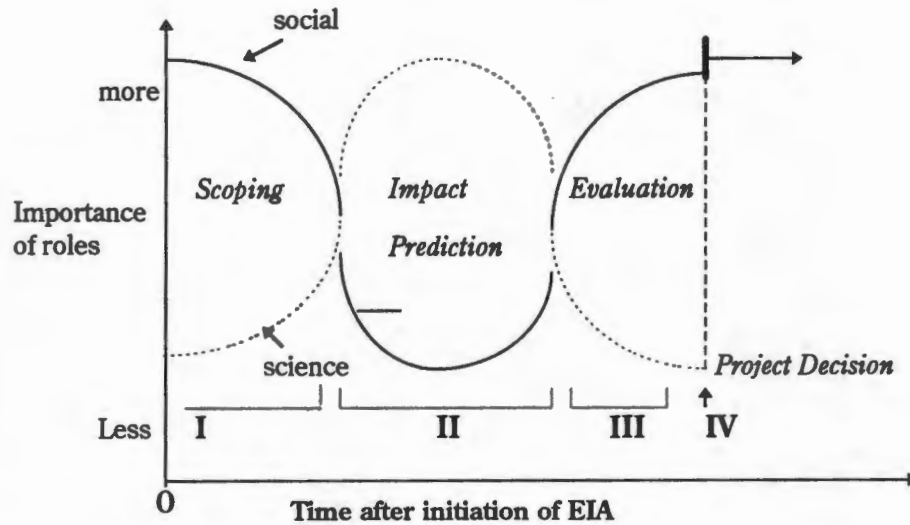
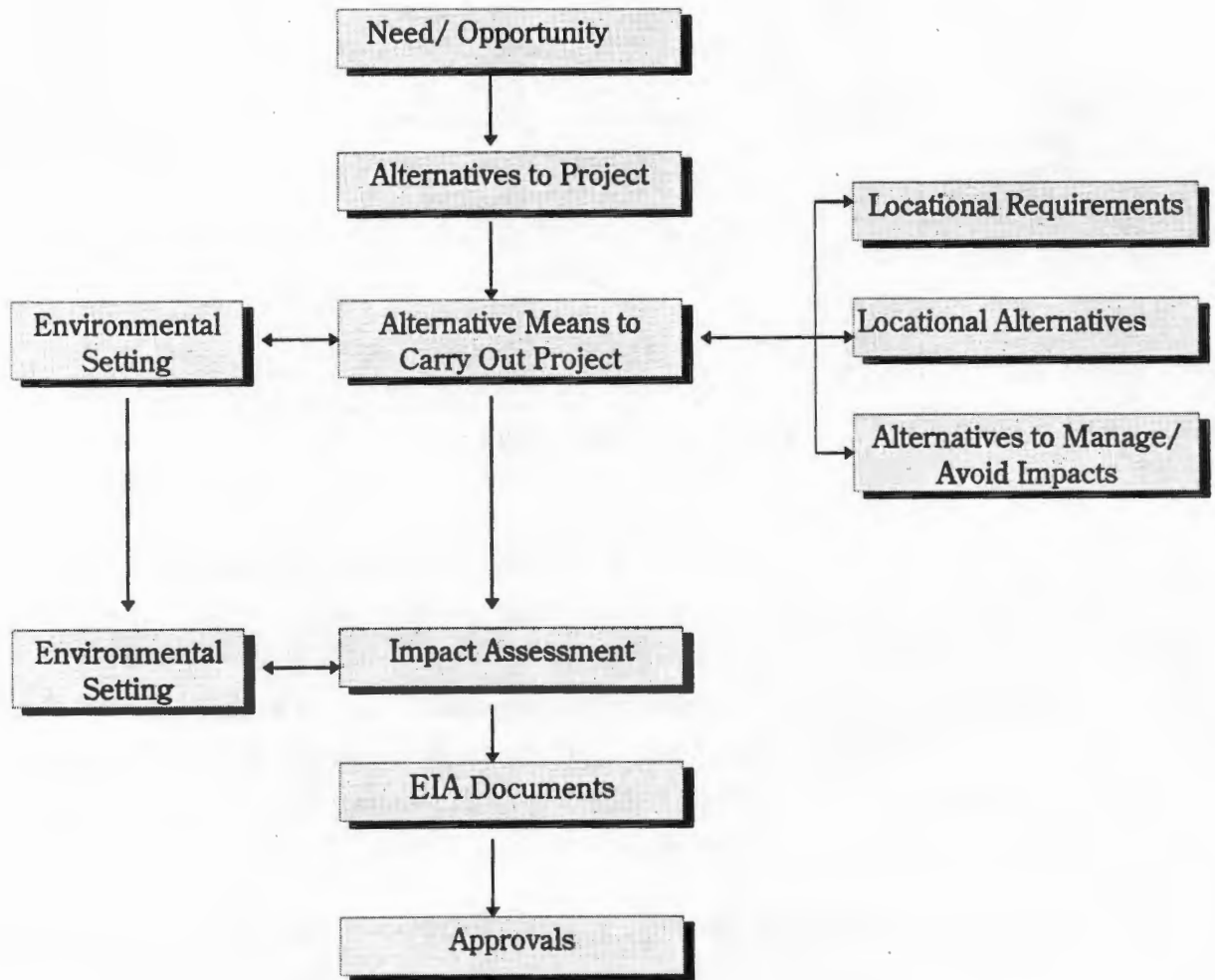


Figure 3 illustrates how choices are made at different levels and stages of a planning process (Lawrence, 1994). Note that the EIA is placed at the end of this planning process. It is necessary in such a case to ensure that consultation with I&APs starts at the beginning of the process to ensure that the important decisions in each approval stage are scrutinised and assessed (see Lawrence (1994) for discussion on the drawbacks of this type of planning process and EIA). The Federal Environmental Assessment Review Office (1988) recommends the following:

“Design your public involvement programs so that public comment is as necessary at key decision points as your engineering, environmental, social or economic data”

Figure 3 Alternatives to Project and Alternative Means to Carry Out Project (Lawrence 1994)



Chapter 4

Natal Parks Board's Process to Date

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4. Natal Parks Board's Planning Process

This chapter contains a description of the planning process being followed by the Natal Parks Board and outlines future action that should be taken. It provides the background for the discussion and analysis of this process in Chapter 5.

The planning process being followed by the Natal Parks Board is illustrated in Figure 4, from conception of development plans up to the stage reached when the group study evolved and continuing to cover the final decision about whether or not to proceed. The diagram reflects the "extended view of decision making" (see section 3.1) where decisions are made at various stages in the planning process, long before the formal project authorisation.

The IEM procedure recognises only three stages (Figure 1):

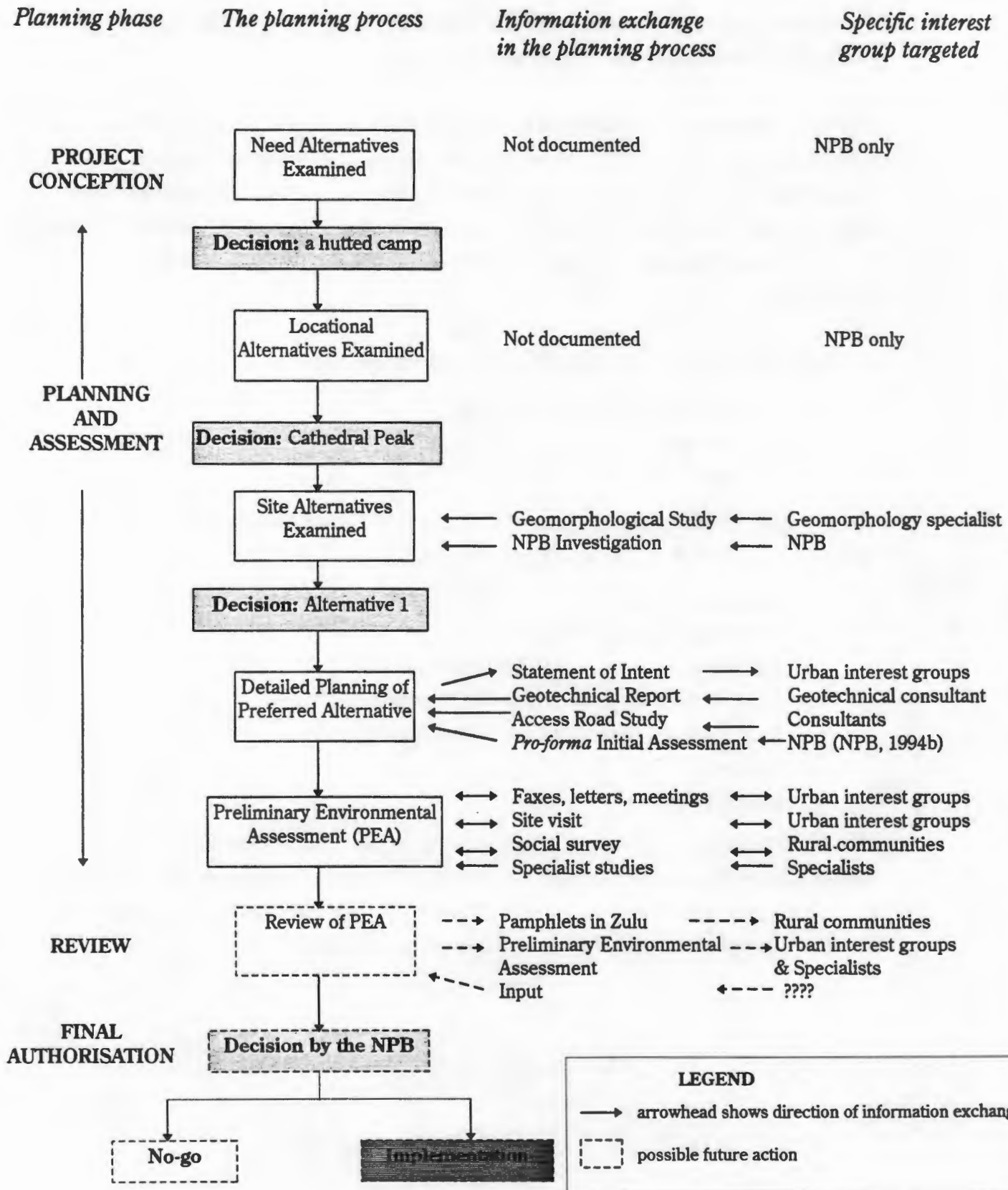
1. *Planning and Assessment of Proposal;*
2. *Decision and*
3. *Implementation.*

The description of the planning process followed by the Natal Parks Board has been divided into seven different stages (Figure 4):

1. *Project Conception;*
2. *Locational Alternatives Examined;*
3. *Site Selection for the Proposed Development;*
4. *Detailed Planning of the Preferred Alternative;*
5. *Preliminary Environmental Assessment Report;*
6. *Review and*
7. *Final Decision.*

The IEM Procedure's "*Planning and Assessment of Proposal*" stage has effectively been divided into six stages to draw attention to the points at which important decisions were made in the planning process. Chapter 5 will investigate how alternatives were considered at each stage and how I&APs were involved in these decisions.

Figure 4 Natal Parks Board's Planning Process



4.1 Project Conception

In terms of its Mission Statement (Natal Parks Board, 1993) (Appendix 2) the Natal Parks Board has the responsibility to provide a range of tourist accommodation facilities in protected areas under its control.

The intent to develop at least one hutted camp somewhere in the newly acquired State forest in the Northern Drakensberg was stated as early as 1991 by the Natal Parks Board in a Financial Mail Survey. The Natal Parks Board had acquired 250 000 ha of State forest from the Department of Forestry in April 1988 (Financial Mail, 1991). Tendele hutted camp at Royal Natal National Park (Map 1) was completed in 1992. This camp has been very successful, recording occupancies averaging 90%. Although the Natal Parks Board receives state subsidies for conservation it does not receive a subsidy for eco-tourism development. The "user-pays" principle is being applied to all of Natal Parks Board's eco-tourism ventures (day-visitor facilities such as picnic sites, do not carry user-pay charges and the State still carries responsibility for developing road and path systems which allow day visitors access to the park). Because the Natal Parks Board is a statutory body, governed by Nature Conservation Ordinance No. 15 of 1974, enacted by the Provincial Council of the Province of Natal, it is different from other provincial conservation bodies in that the revenue it generates can be used within its overall budgetary need and does not have to be passed on to the central treasury (Financial Mail, 1991). In theory, profits from eco-tourism could be used to subsidise conservation. Currently, there is cross-subsidisation between eco-tourism ventures.

The role of eco-tourism is to provide accommodation and thus allow the Natal Parks Board to fulfill its mission statement. The Natal Parks Board also regards the role of its eco-tourism facilities as conferring benefits both locally and in the regional and national economic context. To optimise the contribution that eco-tourism can make the four core strategies for enacting the Natal Parks Board Mission Statement include:

"to further increase the Board's contribution to social stability through economic development in the region. This will be achieved by promoting and developing eco-tourism, and further improving the use of protected areas as catalysts for rural development" (Hughes, 1993)

It has been recognised by the Natal Parks Board that empowerment is fundamental to rural development (Natal Parks Board, 1994a). The Northern Berg has been identified as a sub-region in need of opportunities to build its economy and to develop its human resources (Natal Parks Board, 1994a).

4.2 Locational Alternatives in the Northern Berg Examined

Investigations into development opportunities for the Northern Berg by the Natal Parks Board had identified Cathedral Peak State Forest as a future major development node (Bainbridge 1991). A major development node would consist of some or all, of the following:

- a hotel and/or restaurant;
- a hutted accommodation of up to 200 beds;
- a caravan park, of up to 50 sites;
- a tented camping area, of up to 50 sites;
- educational and/or interpretive facilities;
- a visitor centre, containing a supply or curio shop; and
- a service zone, to provide the necessary support services and staff accommodation.

By supplying a range of facilities at major development nodes, the Natal Parks Board can work towards fulfilling part of its mission statement by making protected areas under its control available to as wide a variety of the country's inhabitants as possible. The Natal Parks Board are in the process of drawing up a management plan for recreational development in the Drakensberg, based on the Recreation Opportunity Spectrum (Smail, 1993). The aim is to manage development so as to retain maximum diversity of recreation opportunities in the Drakensberg, ranging from "urban" experiences, to "wilderness" experiences.

The Natal Parks Board has motivated its choice of Cathedral Peak for hutted accommodation by pointing to the current lack of facilities at this node. Currently there is one private sector development within the Park, the Cathedral Peak Hotel. There is also a basic camp site, but no formal Natal Parks Board hutted accommodation.

4.3 Site Selection for Proposed Development

Once Cathedral Peak had been selected for the development of a hutted camp, a survey was done to identify possible sites within the park for the development.

a) Feasible Site Alternatives Identified

It is understood that the Natal Parks Board initially identified eight **feasible** sites, which were chosen because of their flat topography. The exact location of all of these sites was not documented.

b) Practical Sites Selected

Of the eight sites that were initially identified, five sites were eliminated for reasons briefly discussed in Haynes and Bainbridge (1993). The three sites that were considered **practical** were selected on the following technical and financial grounds:

- no bridges needed to be built in order to access the sites,
- no land purchase was required and
- the sites were not too near the edge of the park, away from the scenic focal attraction of the escarpment.

The three sites that were short-listed (Map 3) were:

- a site located at the base of Mike's Pass,
- a site located at the existing Park headquarters,
- a site located on the Tryme Shelf, below the Tryme Hill.

A geomorphological survey of the three sites was commissioned. The geomorphological report, completed by an outside consultant, showed that none of the sites was totally unfeasible for development. The site located at the existing Park headquarters was found to be most suitable. The Tryme Shelf, although a possibility, would be by far the most expensive site to develop.

Based on this investigation, an in-house preliminary investigation was conducted. The in-house preliminary investigation examined the sites against 19 criteria, including

geomorphological characteristics, cost of infrastructure and service requirements, current zonation in terms of the Drakensberg Approaches Policy (Martin, 1990) and the Drakensberg Policy Statement (Phelan, 1976). The investigation found the Tryme Shelf to be the least suitable site for development and recommended that the choice of the core site for the development of a 200 bed hutted camp should be between the Mike's Pass and the Park headquarters sites.

c) Composite Site Selected

Following the preliminary investigation a composite site was selected for development of the hutted camp, comprising of the spur of land adjacent to the Park headquarters, and a portion of the Tryme Shelf site (Map 2).

Reasons given for the choice of the Tryme Shelf for development, despite the contrary recommendations of the two available site investigations, were that:

- the preliminary investigation document had not been accepted as an official document by the board;
- the preliminary investigation had investigated the suitability of the sites for the entire camp. The proposed development would locate only part of the camp on the upper site. The constraints identified to siting the entire camp on the Tryme shelf did not therefore apply;
- The Natal Parks Board executive staff favoured the Tryme Shelf because the sense of place of this site would be comparable to that of the Board's successful Giant's Castle and Tendele hutted camps which have occupancy rates of 70-90% throughout the year. Constraints similar to those identified on the Tryme Shelf have been successfully overcome at Giant's Castle and Tendele.
- The new hutted camp was scheduled to be opened in December 1997 to coincide with the Natal Parks Boards' 50th anniversary. It seemed that a prestigious development is wanted for this event.

4.4 Detailed Planning of the Preferred Alternative

When the composite site had been selected, detailed planning of the camp on this site began. A concept layout for the proposed development was drawn up by the Natal Parks

Board planning division. In anticipation of an EIA of the proposed development being commissioned, a press release was issued on December 22 1994 notifying the public of the intention of the Natal Parks Board to develop a 200 bed hutted camp at Cathedral Peak (see Appendix 3). The advertisements appeared in two English speaking newspapers the *Natal Witness* and *Natal Mercury*, and in the Afrikaans newspaper *Die Beeld*. These adverts invited comments on the proposal from the public, but no responses were received.

Planning of the hutted camp on the preferred composite site continued. At the time of involvement of the Masters Group the proposal had been planned to the level of detail given below. Since there was no formal development proposal formulated by the Natal Parks Board, the information on the development proposal has been drawn from the draft project brief, the statement of intent and concept layout as well as verbal interaction with the Planning Division of the Natal Parks Board.

- **the site:** the composite site comprising the Tryme Shelf (Camp C) as well as a spur of land adjacent to the Park headquarters site (Camp A & B) (Map 2);
- **the type of accommodation:** hutted camp;
- **the size of the Camp:** 200 beds;
- **the concept layout:** the number of huts to be located on the upper and lower sites, respectively;
- **the infrastructure:** a restaurant, a reception and curio area and conference facilities;
- **the target market:** international and national visitors, minimum tariff of R90 per person per night.
- **the context:** the proposal to develop a hutted camp at Cathedral Peak would occur within the context of the proposed upgrading of the existing camp-site, day-visitor facilities, entrance gate and craft market. The proposed site for these developments had already been selected by the Natal Parks Board.

Two feasibility reports, a Road Access Study and a Geotechnical Feasibility Report, had been conducted by independent consultants. These reports assessed the feasibility of developing on the selected composite site only.

Towards the end of the Masters Groups involvement a Zulu advertisement was released by the Natal Parks Board in the *Ilanga* newspaper, and on *Radio Zulu* and radio *iAfrica* (a copy of the advertisement forms Appendix 3).

4.5 Environmental Assessment Report

The Masters Group was commissioned in January 1995 to conduct a preliminary environmental assessment of the proposed development at Cathedral Peak.

The following section contains a description of the process followed by the Masters Group in involving the public in the environmental assessment. The scoping process followed by the Masters Group, is described in detail in the Preliminary Environmental Assessment (Masters Group, 1995) and has here been summarised in two sections, rural communities (section 4.5.1) and urban interest groups (section 4.5.2). This division reflects the different methodologies used in scoping.

The approach to scoping with different interest groups, and the time and resources used in the process, were guided by the following considerations:

- Who would be **directly affected** by the proposal?
- **To what degree** would they be affected by the proposal?
- What kind of knowledge could be brought to the planning process?

4.5.1 Rural Communities

Scoping in the rural communities at Cathedral Peak aimed to ensure an opportunity for people to raise issues of concern regarding the proposed development as well as identifying what opportunities the communities saw with development of this type in the region and thereby identify how social benefits from the proposed development could be maximised.

Since there are many rural communities in the Cathedral Peak area, one of the first tasks during scoping was to decide how to draw the boundaries for the investigation. The study area chosen by the Masters Group was the eMhlwazini Ward which borders the park directly. The reasons for this was that the eMhlwazini ward was a distinct political entity, it was the closest ward to the park and the existing labour practice of the Natal Parks Board meant that this ward had most interactions with the park. The chief of the Ward, Sergeant Zondo, was a Natal Parks Board employee. Recruitment in the area by the Natal Parks

Board was done through Sergeant Zondo. This meant that most jobs were distributed in his ward and people in neighbouring wards complained of this practice. For the above reasons it was assumed by the Masters Group that the people living in the eMhlwazini ward would be most strongly affected by the proposed development. This assumption was also based on reactions from people in wards further away from the park during introductory meetings at the beginning of scoping stage. Although the study focused on this area in collecting quantitative data in order to highlight living conditions and basic needs of people in the community, the Masters Group recorded issues, concerns and suggestions of people in wards further removed from the park as well.

Scoping in the rural communities surrounding the eMhlwazini ward could be divided into two types activities:

a) collection of **qualitative information** in order to:

- examine the attitude of the sample group to an eco-tourism development and to the Park and the Natal Parks Board;
- highlight the community needs as recognised by people within the eMhlwazini ward;
- assess the potential negative impacts that the proposed development could have on the eMhlwazini residents, as perceived by the community, and suggest ways to mitigate such impacts;
- assess potential positive impacts;
- discuss how people see themselves being able to interact with the Natal Parks Board in the proposed development, to optimise mutual benefits;
- briefly highlight issues arising from investigations in the other two wards, nGoba's and Magangangozi and
- document additional issues raised in informal discussions with groups of people in the eMhlwazini ward;

b) collection of **quantitative information** in order to:

- establish patterns of living standards, agricultural and livestock activities, and the utilisation of natural resources.
- obtain a social and economic profile of the affected local community from this information;

These were the aims of Scoping in the rural communities at Cathedral Peak. A very brief explanation of the methodology used is presented here. More detail is contained in the Preliminary Environmental Assessment (Masters Group, 1995). Because there were no existing representative structures in the communities through which to work the Masters Group attempted to reach as broad a section of the population as possible by interviewing all groupings that could be identified. These included spaza (small shops) owners, inyangas and sangomas, taxi drivers, teachers, craftswomen and people working in the community vegetable garden. A house to house survey was undertaken simultaneously to obtain quantifiable data and to reveal the nature of the relationship between the Natal Parks Board and the local inhabitants. An understanding of these interrelationships was considered vital to an holistic understanding of the concerns of the community.

The qualitative data obtained from the community, that is the concerns, issues and ideas that were raised, were interpreted and put into context with the help of the statistical data collected using the formal questionnaires.

The information gathered in the survey was assessed and positive and negative potential socio-economic impacts of Natal Parks Board's proposed development were identified. The analysis was informed, primarily, by the concerns raised in the community. Measures to mitigate against negative effects and optimise positive impacts of the proposed development were also identified. Recommendations put forward by the Masters Group regarding mitigation and optimisation measures are found in Appendix 4.

4.5.2 Urban interest groups

"Urban interest groups" was a collective name given to all other interest groups. These interest groups consisted mainly of organisations and were contacted through their representatives. Urban interest groups provided input by raising issues of concern and helping to identify alternatives, thereby focusing the Preliminary Environmental Assessment on relevant issues.

Urban interest groups were identified through networking - the process of identifying I&APs by a chain referral system. This involved contacting individuals and organisations potentially interested in the proposed development and requesting further names of I&APs. It resulted in the identification of 40 different interested parties (Table 2) at the Assessment stage in the process. Mostly the Masters Group was able to communicate with urban interest group by fax, telephone and mail.

A meeting for urban interest groups was held in Pietermaritzburg on February 6, 1995 and following this a site visit for interested parties. Of the 29 organisations that were invited to the meeting, only 13 attended. The organisations that were represented at the meeting are shown in *italics*.

Table 3. Interested Parties: Urban interest groups identified through networking.

Grassroots Environmental Organisations: Earthlife Africa; Environmental Justice Network.

Nature Conservation Organisations: *Wilderness Action Group; Wilderness Leadership School; Wilderness Foundation; Wildlife Society of South Africa; Botanical Society of South Africa.*

Anti-poverty Organisations: AFRA; CORD; Natal Rural Forum; MIDNET; Upper Tugela Liason Committee; Bergville Development Forum.

User groups: *Bergwatch; Mountain Backpackers Club; Mountain Club of South Africa; University Mountain Club.*

Local and Regional Government Departments: Department of Economic Affairs and Tourism; Department of Nature Conservation, Environment Affairs and Traditional Authorities; KwaZulu Department of Nature Conservation; Town and Regional Planning; Natal Parks Board; *Tukela Joint Services Board*; Department of Water Affairs, *Cathkin Park Local Council.*

Tourism Bodies: SATOUR; Drakensberg Resort Owners Association; Drakensberg Publicity Association; FEDHASA;

Property Owners: *Cathedral Peak Hotel; SAPOA.*

Specialist Organisations: CSIR; *Institute for Natural Resources.*

Political: Mr Kheswa, local politician.

The aim of the meeting was to identify issues and concerns that needed to be addressed in the environmental assessment and to provide an opportunity for the interest parties to ask questions regarding the proposal and the environmental assessment that was being

undertaken. The methodology used to raise issues was a visual gathering technique called *participlan*. An explanation of the technique as well as the results of using this technique to raise issues is shown in Appendix 5.

Meetings with individual interest groups were set up in order to obtain more specific concerns regarding the proposed development than were raised at the meeting. Several groups that did not attend the meeting were consulted in such a way. Comments made during such interviews and meetings were also recorded in the Public Participation Report in order to get as complete a record as possible of ideas, views, concerns and issues raised by I&APs at this stage in the planning process.

4.6 Public and Specialist Review

The Preliminary Environmental Assessment recommended that the report should go for both public and specialist review. It was recommended that a simplified Zulu pamphlet with the main findings of the report, especially the recommendations regarding community involvement, would be made available to people in the community. The responses would be included with the Preliminary Environmental Assessment to form the completed report on which a decision could be based.

4.7 Final Decision

Pending the outcome of the Specialist and Public Review a decision on whether or not to go ahead with the proposed development would be taken. The news release stated:

“In announcing its intention to conduct more detailed planning and an EIA of the site at Cathedral Peak, the Board is committed to considering a wide range of opinion on the desirability of the development and its potential to contribute to local and regional economies” (Natal Parks Board News Release, 22 December 1994).

Chapter 5

Analysis of the Public Participation in the Planning Process

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5. Analysis of Public Participation in the Planning Process

5.1 Introduction - the Aims of Public Participation in the Planning Process

In Chapter 3 the lack of consensus over the aims of public participation was highlighted. An analysis of public participation in the Natal Parks Board planning process should thus start with a clarification of what the aim of public participation was in the proposed eco-tourism development at Cathedral Peak. As has already been said, there was no clear statement by the Natal Parks Board of the aims of public participation. Quinlan (1993) states that the first step to identifying the nature of the relationship which the project proponent wishes to establish with the affected parties is to look at the development proposal. Since there was no formal development proposal, information has been drawn from the following sources: the *Statement of Intent* (Appendix 6), *Opportunities for Integrated Conservation and Development on KwaZulu-Natal* (Natal Parks Board, 1994a), the *Neighbour Relations Policy* (Natal Parks Board, 1992b) and personal communication with the Natal Parks Board.

The Natal Parks Board intended the development to be in line with the principles and aims of the RDP (Natal Parks Board, *pers. comm.*). The basic principles of the RDP are that it is a

“coherent programme, that it builds a nation, that it is people driven, that it provides peace and security for all, that it links reconstruction and development, and that it democratises the state and society” (IDRC *et. al.*, 1994).

The RDP stresses that development policies should be people driven, and should ensure the active involvement of communities, thereby contributing to their empowerment. Programmes should also contribute towards the development of disadvantaged sections of society, to eliminate the socially unequal distribution of development in the past (Natal Parks Board, 1994a). The Mission on Environmental Policy (IDRC *et. al.*, 1994) which reviews and gives recommendations on environmental

issues within the overall context of the RDP, states that the history of environment as a “white” issue demands that new links between environment and development are made in the new political climate. One important link has been identified by the Natal Parks Board in recognising that “conservation which incorporates community participation, provides substantial and sustainable development opportunities, particularly in impoverished rural areas.” (Natal Parks Board, 1994a, 8). The Natal Parks Board also recognises that spin-offs including demand for local crafts and produce, visitor accommodation outside of parks, and the development of viable service and retail sectors in areas surrounding parks play a crucial role in spreading the benefits of investment in protected areas thereby ensuring equity and efficiency (Natal Parks Board, 1994a, 26).

- a) The *Statement of Intent* states that the Natal Parks Board is “accountable to the public in terms of IEM procedures”, and that the Board has a declared policy on public consultation. It further states that “public participation in development planning and decision making is acknowledged by the Board as an essential step in ensuring environmentally acceptable development”. In announcing the intention to conduct more detailed planning and an EIA of the proposed development site at Cathedral Peak, “the Board commits itself to considering a wide range of opinion on the desirability, the viability and the potential of this development to contribute to the local and regional economy.”

From these sources the following aims can be identified as being the aims of public participation in the planning of the proposed development at Cathedral Peak:

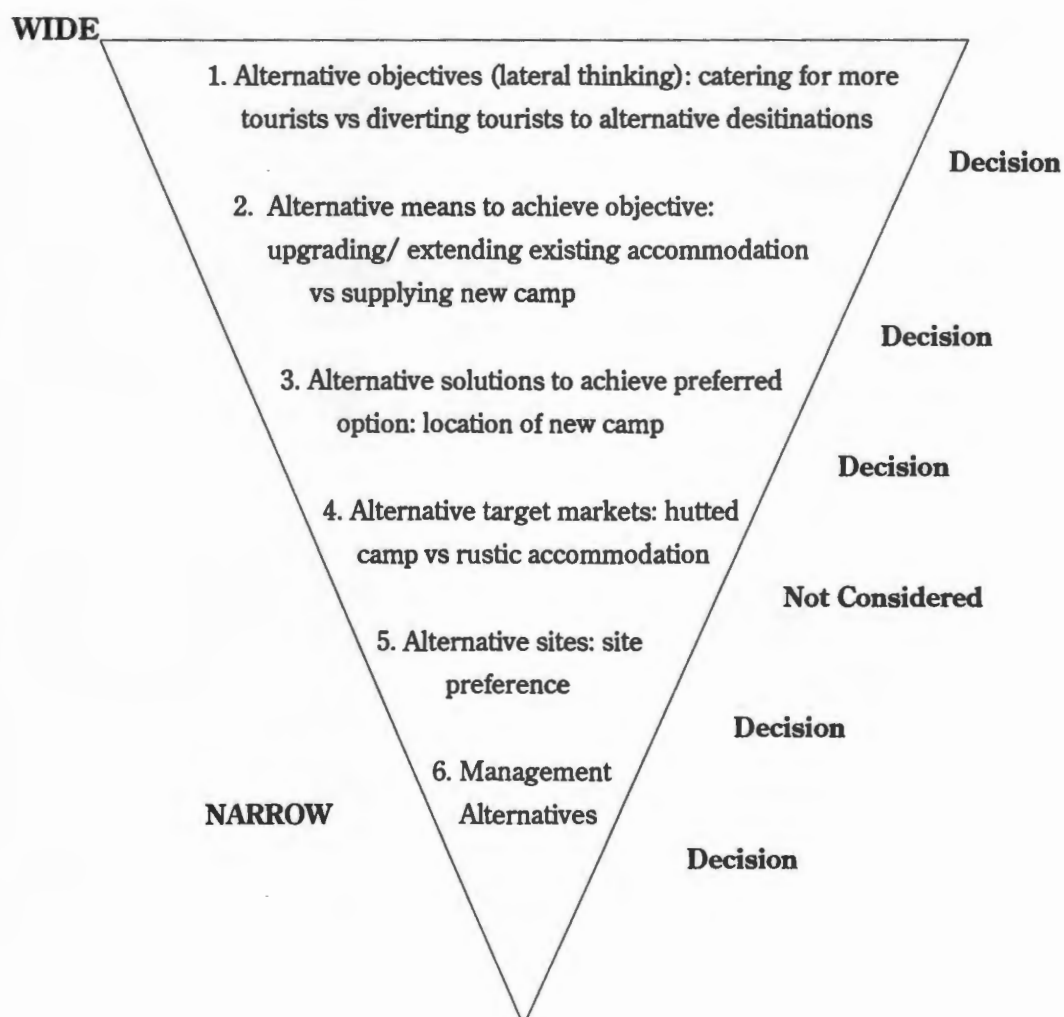
- to allow public participation in development planning and decision making,
- to ensure an opportunity for all I&APs to raise concerns and issues which would serve to focus the EIA of the proposed development site at Cathedral Peak, and
- to identify how an eco-tourism development at Cathedral Peak could catalyse rural development in the area (spin-offs) and contribute to empowerment and capacity building.

This chapter considers to what extent public participation in the planning process was able to meet these aims.

5.2 An Interpretation of the Planning Process

Figure 5 shows how the planning process of the Natal Parks Board *could* have unfolded to arrive at the project proposal that was assessed by the Masters Group. Some of the stages illustrated on the diagram are based on guesswork because there was no documented decision. The alternatives have been ordered in a definite hierarchy, from decisions on policy level, affecting national and regional interests, to decisions on a local level, affecting individual members of the public. The figure also reflects the order in which the alternatives were raised during scoping.

Figure 5 Hierarchy of alternatives in the planning process for the proposed development of a hutted camp at Cathedral Peak. The planning was initiated as a result of a perceived demand for accommodation in the Northern Drakensberg (adapted from Hill (1994)).



5.3 Was Public Participation Adequate in the Earliest Phase of Planning?

The intention to develop a hutted camp in the Northern Berg originated at least as early as 1991 (Financial Mail, 1991), although Cathedral Peak was not identified for development until 1993.

It is difficult to assess at what stage a proposal is ripe for public scrutiny. There has to be an idea to present in order to guide input, but important decisions on alternative courses of action should not be made without evaluation and some form of scrutiny by I&APs. According to the NEPA definition of a *proposal* (section 3.5), a proposal exists almost as soon as there is an *aim* and a *choice*. Because of the lack of documented decisions regarding the early phases of the planning process, the original aims of the project were not clear. The motivation for the proposal to build a hutted camp at Cathedral Peak suggests that the original aim might have been any of the following:

1. to build a hutted camp in the Northern Berg,
2. to supply an up-market type of accommodation in the Northern Berg, or
3. to build a successful eco-tourism venture in the Northern Berg.

Each of these aims has a different underlying motivation and therefore different choices, or alternatives associated with it. Criticism recorded during scoping from a former senior Natal Parks Board employee was that the Natal Parks Board had not demonstrated the need for an additional hutted camp in the Northern Berg, and that there was ample scope for upgrading and expanding existing accommodation.

I&APs generally force a project proponent to clearly define its aims and to identify alternative means of achieving them. Since I&APs were not consulted by the Natal Parks Board at this stage there was no pressure on the Natal Parks Board to demonstrate the need and desirability of the proposed development, or to define its aims precisely.

It would have been appropriate at this early stage in the planning process to identify and inform National, Regional and Local Authorities and other groups with a potential interest in development of this kind in the Northern Berg and to obtain their input. IEM procedures require that I&APs including authorities be notified and consulted at the very early stages of "Develop Proposal" (See IEM flow diagram, Figure 1).

In this context it should be mentioned that efforts by the Masters Group to obtain input from several of these interest parties (the Department of Economic Affairs and Tourism (Provincial); the Department of Nature Conservation, Environment Affairs and Traditional Authorities (Provincial), KwaZulu Department of Nature Conservation and SATOUR), were unsuccessful. One reason for this could have been that there was a lack of interest. It may also have been that these groups had nothing to contribute at an advanced stage in the planning process. Other possible reasons were that there was little experience of interaction between different planning bodies, and that responsibility for this kind of input had not been delegated within these organisations.

5.4 *Was Public Participation Adequate in the Selection of the Location?*

The choice by the Natal Parks Board of Cathedral Peak as the location for development of a hutted camp was in accordance with existing Natal Parks Board plans for the area (Bainbridge, 1991). Although there were several reasons for Cathedral Peak being one of the *possible* locations considered for the proposed development, there was no documentation on the reasons for *preferring* this option to other locations. The decision to site the proposed hutted camp in Cathedral Peak State Forest was taken by the Natal Parks Board without any input from I&APs.

Scoping revealed that the question of the location of the development was not always easy to separate from the nature of the development or the type of accommodation proposed. Communication with I&APs revealed that organisations representing hikers, called into question the choice of Cathedral Peak for *this type* of development.

“In particular the question should be asked whether there should be a hutted camp at all in this area which at the moment is probably the most popular hiking destination in the berg for hikers rather than up-market holiday-makers” (Bergwatch, letter to Natal Parks Board and the Masters Group, February 1995).

The survey done to assess the impact of a hutted camp development on the Sense of Place of Cathedral Peak (Masters Group, 1995, Volume 3) indicated that hikers felt that such a

development would be detrimental to the sense of place. It was also pointed out that existing users of Cathedral Peak State Forest such as hikers were not being catered for.

Although it is seldom possible to please everybody, comments received from I&APs during scoping highlighted the need for establishing agreement on the goals of a project early on in the process (see section 5.2). The comments received showed that certain I&APs believed that alternatives, such as more rustic accommodation, appropriate to the type of user group presently attracted by the naturalness and undeveloped nature of Cathedral Peak should have been considered. Bergwatch notes:

“Several members commented that it [the proposed hutted camp] could in fact virtually create a new and different market rather than meet the needs of an existing one” (Bergwatch, letter to Natal Parks Board and the Masters Group, February 1995).

The Natal Parks Board's response was that the development of a hutted camp was part of a wider development concept, encompassing an upgrading and expansion of facilities for campers, hikers and day-visitors. However, this concept had itself been developed without input from I&APs and did not seem to take into account that hikers and campers for whom this upgrading and extension was aimed, are attracted to the area because of its undeveloped nature. A change in the sense of place, brought about by the introduction of a hutted camp and an additional 200 beds, may well alter the user pattern of the park.

The Natal Parks Board failed to consult with the local communities on the question of whether Cathedral Peak State Forest was a suitable location for the proposed development. Subsequent scoping revealed that the community was in fact in favour of a development. The opportunity that eco-tourism development presented for the development of human resources at Cathedral Peak, and the need for such development in the area, was highlighted in the social survey. Out of the sample group of adults, 24% were formally employed. An extrapolation for the entire eMhlabuzini ward suggested an unemployment figure of 76%, which is more than twice the national unemployment figure of 32%. eMhlabuzini residents identified employment as the most important contribution that the proposed development could make to the area.

With that hindsight it could be concluded that the local community supported the location. This was, however, not something which should have been assumed. There may have been good reasons for the community to oppose the location of the development at Cathedral Peak. Recently the community, primarily with a view to obtaining grazing rights

in the Park, lodged a land claim to the entire area. While the claim is almost certain not to succeed in the land claims court, the fact that it was lodged highlights the importance of establishing how the community itself views the area and what priorities it places on the land. Interestingly, a potential land claim to an area might motivate the Natal Parks Board to develop the area as a means of combating the claim.

Four points of view emerged in the scoping phase:

- rural communities favoured development at Cathedral Peak;
- conservation organisations such as the Wilderness Leadership School and the Wildlife Society of Southern Africa were opposed to development in parks in general and did not favour development of a hutted camp at Cathedral Peak;
- the Mountain organisations (or user groups) favoured development but wanted to see a different type of accommodation at Cathedral Peak, i.e. more rustic accommodation aimed at the current main user group of this area,
- the Natal Parks Board was in favour of development and regarded the proposal to build a hutted camp at Cathedral Peak as an accurate reflection of the preference of a large potential user group.

In an attempt to cater for these four viewpoints two alternatives to the proposed development were considered. These were Alternative 2 (development on the lower headquarters site only) and Alternative 3 (No development of a hutted camp). It was not possible within the terms of reference to look at supplying alternative types of accommodation in Cathedral Peak State Forest. If the public had been consulted at an earlier stage in the planning process, alternative types of accommodation might have been brought into consideration.

According to IEM Guidelines consultation with I&APs should help to identify the alternatives and the issues that should be considered in planning and assessing the proposal. The intention of IEM is that this occurs at the inception of the development proposal so that the planning and assessment stages are integrated (section 6.1 deals with the frequent misinterpretation of the guidelines in this respect).

5.5 Was Public Participation Adequate in Selection of the Site within Cathedral Peak State Forest?

The process of identifying and selecting alternative sites within Cathedral Peak State Forest was completed by the Natal Parks Board without the involvement of other interest groups. The decision on the selection of this site was not documented. The correctness of the procedure followed has been called into question by urban interest groups, including the Town and Regional Planning Commission:

“The site selection process is viewed as critical to the acceptable outcome of the project as a whole” (Town and Regional Planning Commission, in letter to Masters Group, March 1995).

As has been mentioned in Chapter 4, existing documentation evaluating the three sites short listed for development by the Natal Parks Board did not support the choice of the Tryme Shelf for part of the development. These included a Geomorphological Study and a Natal Parks Board Preliminary Investigation. The preliminary investigations pointed out the relatively high costs associated with development on the Tryme Shelf, as well as other factors, such as existing policy and zonation of the Natal Drakensberg, which favoured the choice of the two other alternatives initially short listed by the Natal Parks Board.

The fact that the preliminary investigations, which were to advise the Natal Parks Board on the selection of alternatives, seemed to have been largely ignored, is at odds with the Natal Parks Board’s core strategy of being “credible, responsible and transparent” (Hughes, 1993). When questioned on the issue the Natal Parks Board explained that the recommendations of the preliminary environmental assessment had been based on the premise that the entire camp would be situated on the Tryme Shelf. The proposal under consideration was a split development with only part of the camp situated on the Tryme Shelf. It was argued that the constraints identified to development on the Tryme Shelf did not, therefore, apply.

The choice of the Tryme Shelf was a more costly and more controversial option than either of the other two sites short listed (see section 4.3). It became apparent during scoping that opinions were divided within the Natal Parks Board on the choice of the Tryme Shelf for development. A comment that was frequently made was that the choice was based on the preferences of executive staff members. In its manual on public participation the Federal

Environmental Assessment Review Office (1988, 15) writes "agencies often have difficulty explaining decision making processes in simple language because the agency itself lacks clarity on the process".

The inability or unwillingness of the Natal Parks Board to motivate their choice of the Tryme Shelf for development called into question the accountability of decision makers within the organisation, and the role of the Preliminary Environmental Assessment in the decision process. Interest groups such as nature conservation organisations, Mountain organisations, Town and Regional Planning and private landowners in Cathedral Peak State Forest were quick to point this out.

The observation made by de Tolly (1991) that people tend to react negatively when asked to comment on something which is seen as a "fait accompli", was apparent in this process. Interest groups tended to want to back-track on the planning process rather than to take it forward.

5.6 Was Public Participation Adequate in the Detailed Planning of the Preferred Alternative?

After the preferred site had been selected and the concept layout for the proposed development had been drawn up an English and Afrikaans news release on 22 December, 1994 notified the public of the proposed activities and the plan to undertake an Impact Assessment. IEM Guideline Document 2 (DEA, 1992) recommends this approach of notifying I&APs, where the public is not clearly definable.

By issuing the press statement, notifying the public of the intent to conduct an EIA on the proposed development, and inviting people to comment, the Natal Parks Board did recognise the responsibility, in terms of its commitment to the IEM procedure, to inform the public, and to allow for input in the EIA.

The timing of the statement of intent reveals the perception within the Natal Parks Board, common among many project proponents, that public participation means involvement in the EIA Report, rather than in the planning of the project. This misperception stems in part from the definition of scoping as a procedure that occurs during the EIA of a project proposal (see section 6.1). The underlying assumption is, however, that the EIA is

conducted at a very early stage in the planning process, and that the information and recommendations contained in it can substantially influence the decision process. Chapman (1981) states that if EIA is to be anything more than a reluctantly accepted procedural requirement, it must be carried out at a stage which permits consideration of alternative courses of action. In a case where the EIA is commissioned when the planning process is already far advanced, public participation and scoping should start well before the assessment, if they are to inform the decision making process (see IEM procedure, Figure 1). Public participation should then be continued during the assessment, to inform the evaluation of the alternatives under consideration.

Although the Natal Parks Board recognised the need to inform the public of its intent to develop, the following criticism should be made:

- As a notification of the intent to develop, the press release was far too late in the process, considering the level of detail to which the proposal had already been planned (see section 4.4).
- The press release was aimed at a literate, English or Afrikaans speaking public.
- There were no information meetings or follow-up to the advertisement which could have facilitated input from members of the public and clarified their role in the planning and decision making process.
- No response to the advertisements was received by the Natal Parks Board. Possible reasons for this were that:
 - a small advertisement in a newspaper is easily missed;
 - the general public might not have been informed enough about the issue to be able to contribute without further information and follow-up;
 - a newspaper advertisement is not conducive to a response: "No one responds to newspaper adverts" (Conservation representative at Meeting in Pietermaritzburg, 6 February, 1995);
 - the press advertisement did not reach the communities around Cathedral Peak who would be directly affected by the proposed development;
 - it was not clear from the advertisement alone how the public were expected to contribute, or how their contributions would be considered.

- Rural communities at Cathedral Peak who would be directly affected by the proposed development were not notified. Newspaper advertisements are an entirely unsuitable method of notifying such communities because:
 - a large number of people are not literate;
 - newspapers are not readily available in that area;
 - there is no tradition of participation or input, and an advertisement cannot convey information needed by such communities to participate and
 - there were no structures or organisations in place to facilitate effective input.

5.7 Was Public Participation Adequate in the Environmental Assessment of the Proposed Hutted Camp?

An EIA should be guided by social as well as specialist input, and the Masters Group therefore concentrated on identifying and involving I&APs during the environmental assessment.

Since rural communities around the park would be affected to a much greater extent than any other interest groups, it was considered important to ensure that people in this area were heard in the decision making process.

The Masters Group assumed that the general public outside the Cathedral Peak area was adequately represented by interest groups identified during networking (the urban interest groups). However, the interests of people neighbouring the park were not represented by any organisations, and scoping had to be done by conducting house-to-house interviews, as well as by talking to identifiable groups within the community, such as craftswomen.

Informed views of diverse segments of the affected population were critically important to the environmental assessment process because different groups used and were familiar with different parts of the environment, and would therefore be affected to different degrees by the project. Within the rural communities, craftswomen and Sangomas raised issues that were specific to their sphere of interest, and which were not raised by other interest groups. Urban interest groups expressed concerns that were totally different from the concerns of the rural communities.

A comparison of the issues raised by rural communities with those raised by urban interest groups brings to light some important differences in peoples' understanding of their role in public participation and the disparity between the relatively informed urban interest groups and the totally uninformed rural communities. The following important issues were identified:

- **The need to agree on the conditions for participation**

Neither neighbouring communities nor urban interest groups were informed of what their role would be in the planning process. The purpose of input in the environmental assessment was negotiated between the Masters Group and I&APs. However, it was not clear either to I&APs or to the Masters Group exactly what purpose public participation served in the Natal Parks Board planning process at this stage. The intention of IEM is to integrate assessment and planning stages. The fact that the assessment was commissioned so late in the planning process and to some extent the lack of communication between the Masters Group and the Natal Parks Board during scoping meant that input during scoping was aimed at the assessment and the report, rather than at the planning process which went on independently of the assessment.

- **The need for early involvement in the planning process**

During the social survey of adjacent rural communities at Cathedral Peak the most common questions were "Why are you asking us?" and "What do you want from us?". The absence of a tradition of consultation in the rural communities meant that:

- people did not understand *what* they could contribute to the proposal,
- people did not understand *how* they could contribute;
- people did not know *how* to participate: participation requires organisational structures through which individuals can express concerns;

Neighbouring communities had not been consulted on how their input would count in the decision making process. Such consultation is fundamental to meaningful public participation in order to define and agree on the extent to which I&APs can expect to influence decisions, the extent and type of involvement, and the type of information that they can contribute to the planning, and decision making process.

Urban interest groups, on the other hand, raised specific question about the role their input would have in the decision process and were more informed about public participation and the process that should be followed by a project proponent in consulting I&APs. These groups were therefore able to respond very quickly when

invited to participate, both in criticising the process and in identifying issues, alternatives and concerns. The question of how this input would affect the proposal was, however, unclear.

Urban interest groups were of the opinion that the decision making process followed by the Natal Parks Board was not transparent and that too many decisions had already been taken without consultation. They were skeptical about the extent to which the EIA would be taken into account in the final decision on the project. There was also concern over how an EIA at this stage in the process could effectively deal with the issues and concerns that were raised regarding the Natal Parks Board's planning process. During the meeting for urban interest groups in Pietermaritzburg on 6 February 1995, a representative of the Cathkin Park Local Council walked out of the meeting in protest and a representative of several nature conservation organisations expressed strong reservations about co-operating with the planning of a proposal that the organisations had not been party to drawing up.

- **The need for scoping committees or negotiation forums in rural communities**

The process of involvement of rural neighbouring communities was initiated by the Masters Group with a house-to-house survey. The aim was to enable community members to register concerns and issues about the proposed development and to ensure that the possibilities envisaged by local residents as arising out of a development of this kind in the area were documented and communicated to the Natal Parks Board.

As a participation exercise, the survey method was not adequate because individual members of the community were not in a position to exert any influence on the decision making process. Participatory development requires a high degree of community organisation and well developed communication and facilitation channels between the proponents, their consultants and the community (Friedman and Pollett, 1991).

The same observation could be made with regard to urban interest groups. There was no response to the newspaper advertisements which called on people as individuals to give their input, but considerable input was obtained from organisations representing members of the public.

The need for representative structures, such as scoping committees (see section) or negotiating forums, that represent the interests of a group of people was observed during scoping. Such structures will need to be formed in the rural areas around

Cathedral Peak to place the rural communities in a position where they can negotiate about their role in the planning process.

- **The need to ensure that all I&APs have a fair chance to participate in the process, and to facilitate proper input from all I&APs**

Some of the issues which distinguished alternative 1 (developing on the composite site) from alternative 2 (developing on the lower site only) were:

- the *zonation policy* for the Drakensberg (see Phelan (1976) and Martin (1990)),
- the *setting of a legal precedent*,
- *visual impacts* and
- *impacts on the sense of place*.

Urban interest groups raised these issues during scoping. Urban interest groups were able to take an active approach to the project proposal, and came up with well developed arguments against development of a hutted camp, and/or against development on the Tryme Shelf.

Rural communities did not have any knowledge of most of these issues. The focus of concern was the need for jobs in the area. Low levels of skills meant that entrepreneurial activity was not well developed within the community. Lack of education was seen as a source of poverty and adult education, schools and a technikon were identified as high priority development needs. Expectations of the opportunities a tourism venture could bring to the area tended to swing between two extremes. Many people saw the proposed development as providing low-skill jobs, that is, as an employer only. Others hoped it could provide schools, technikons, electricity and industry to the area. The interpretation superimposed by the Masters Group on this input from rural communities was that people wanted the development to contribute towards the needs of education and skill-building in some way. Ideas on how this could be done were recommended to the Natal Parks Board. Although many of these ideas had their origin in the communities, much interpretation went into formulating them as recommendations. The formulation of ideas *for* rather than *by/ with* the communities was necessitated because of the lack of organisational structures in the communities and time constraints during the assessment. However, if the aim is to empower these communities it will be necessary to work with the communities to develop the ideas into strategies. (See section 6.1 on the difficulties of public participation in disadvantaged communities)

- **The need to ensure that public participation is guided by considerations of who will be directly affected by the proposed development, and to what extent they will be affected**

In public participation, there is always a potential for concentrating on the objections of more vocal interest groups that have clearly expressed objections and ideas, and who expect to be consulted. Such interest groups can often lobby support for their viewpoints and delay the planning process if they feel they are not being consulted. The urban interest groups fell into this category in the development proposal for Cathedral Peak. After the meeting for I&APs in Pietermaritzburg, a social visit to a bar facilitated the further exchange of information between the Natal Parks Board and I&APs. Rural communities had no access to informal exchange of information of this kind. Since rural people have little access to information, no organisational support through which to communicate, and with the disadvantage of communicating in a language different to that of the project proponent, much more effort would have been needed to ensure that information reached them.

The levels of interest shown in the proposed development by urban interest groups was smaller than expected. The relatively poor attendance at the meeting held in Pietermaritzburg for urban interest groups could probably be attributed to the development being remote (approximately 200 km from Pietermaritzburg) and of indirect relevance and low controversy to many of the interested parties that had been contacted. Other factors which might have contributed to the low level of interest shown by many I&APs was the lack of information about the proposal itself, as well as the large number of competing issues and meetings for many development organisations. From the attendance, and from communication with I&APs, it seemed that the development created most interest and controversy among nature conservation groups and user groups (see Table 3 of organisations that attended the meeting in section 4.5.2).

- **The need to continue and develop the involvement of rural communities that was started during scoping**

The lack of understanding of the notion of public participation and of the role of public participation in the planning process resulted in rural communities being suspicious of the motives of the Masters Group. The Masters Group travelled around in Natal Parks Board cars and this created the impression that they were Natal Parks Board employees and not independent consultants. This made people reluctant to disclose their attitudes toward the Natal Parks Board. The area also derives substantial income

from growing cannabis, and frequent police raids had made people cautious about talking to strangers. Added to this was suspicion created when recent promises made to communities in the area by unidentified political figures in the run-up to the 1994 General Elections were never realised.

The willingness of local people to co-operate with the Masters Group in the environmental assessment was a gamble for them, with no assurances of any results. It is essential that the process started by the Group of consulting people in the Cathedral Peak Area is continued as soon as possible and that the results of the assessment are communicated to the community. The ultimate decision whether to proceed with the project lies with the Natal Parks Board. Recent communication with the Natal Parks Board suggests that financial considerations may force the Natal Parks Board to shelve their plans for the eco-tourism development. If the proposed development does not go ahead, for any reason, rural communities have a right to know, and to be given reasons why such a decision has been taken.

5.8 Public and Specialist Review

The intention at the time of submitting the Preliminary Environmental Assessment to the Natal Parks Board was that it would be subject to specialist and public review. Comments from the public would be collected and enclosed with the report which would then constitute the finished document on which a decision could be based.

A Review Specialist is called for where consultants undertaking the EIA are not independent of the project proponent. The role of such a specialist is to ensure that all relevant issues and alternatives, and the linkages between them, are investigated (Preston, 1995). The potential for "sweetheart reports" is then reduced. The Review Specialist should be appointed by the authorities in consultation with all I&APs, including the project proponent and the consultants.

In this instance, the Natal Parks Board is both the proponent and the permitting authority and the role of the review should be clarified. The review should:

- a) ensure that the EIA was not biased, either towards or against the Natal Parks Board and
- b) provide a further opportunity for the public to voice objections to the proposed development.

However, the final decision whether or not to proceed with the proposed development still rests with the project proponent, the Natal Parks Board, and not, as is usually the case when a review is undertaken, an independent authority.

5.9 The Final Decision

The IEM procedure is a planning tool to integrate environmental considerations into planning. Thus, when unacceptable impacts are identified for one alternative the planning process goes back to the previous step and considers different courses of action. In each case, the no-go option is an alternative if impacts are considered totally unacceptable. In practice this means that the need for a large scale, single point assessment before the final authorisation amounts to a recognition of the failure to direct the project from its earlier stage (Swaffield, 1982).

Figure 4 shows the planning process followed by the Natal Parks Board, including the process that will be followed up to the final decision. The No-go option was identified as an alternative in the environmental assessment because the need for the development had been questioned.

The major negative impacts identified by the Preliminary Environmental Assessment had all been acknowledged by the Natal Parks Board at earlier stages in the planning process, and the Natal Parks Board was aware of the high costs of developing on the composite site compared to developing on the lower site only. A decision to develop on the lower site only or not to develop at all would be presumably be based on the negative impacts identified during the planning process. This would raise the question why the planning process was allowed to advance so far before a different alternative was chosen.

Chapter 6

IEM Theory in Practice

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6. IEM Theory in Practice

The aim of the thesis was to evaluate the extent to which the approach to public participation in the planning process complied with the requirements of IEM. However, difficulties with putting IEM theory into practice pose a constraint to complying with IEM requirements. Some of the difficulties identified here are relevant to this particular study but others are more widely applicable as was evident at workshop discussions with EIA practitioners during the 15th Annual Meeting of the International Association for Impact Assessment, in Durban, 26-29 June

6.1 *An Informed Public*

It is clear that public participation requires an informed public. There are two aspects to this. Preston (1995) points to the difficulty of involving I&APs who do not make the effort to make themselves informed of the issues and I&APs who have vested interests. However, it is equally important that a public is informed about how input into the planning process should occur. It was clear during scoping that urban interest groups were informed about issues surrounding the development proposal, but despite this there were no responses to the advert. Possibly this was due to the fact that it was not clear exactly what type of input was wanted nor how it was to be used. The I&APs were not informed about the participation process itself.

The task of informing the public effectively can be enormous when there is no obvious point of entry into the community and when there are constraints on time and money. In urban areas, the task of informing disadvantaged communities can sometimes be started by piggybacking on meetings of other organisations, such as civics (Fareida Kahn, *pers. comm.*). At Cathedral Peak there were few organisational structures in the rural community. The Masters Group started the task of informing the communities of the proposal, but did not tackle the second aspect, ensuring that the community was informed about how participation fitted into the planning process of the Natal Parks Board.

6.2 *On-going Public Participation*

The scale and type of development will determine how much public involvement is needed. Although there is consensus on the need for public participation in development planning

among EIA practitioners, in practice it is often considered too time consuming to involve the public on an on-going basis in planning and involvement occurs only when there is considerable detail available about the proposal so that issues and concerns can be recorded. Guidelines and manuals on public participation, such as the Canadian FEARO publication (1988) and the IEM guidelines do emphasise that the public should be involved as early as possible. This usually means that further involvement is needed when more details are available on the proposal. As quoted in section 3.7 from the FEARO publication (1988):

“Design your public involvement programs so that public comment is as necessary at key decisions points as your engineering, environmental, social or economic data”

Accounts of experience of EIA practitioners with public involvement are needed such as that provided by Johnson (1993) in an article in the Harvard Business Review: *How I made a hostile public into useful consultants*. The theory of “why” needs to be supplemented with “how to” in a South African context (see Sowman (1994)).

6.3 *Limitations to Achieving Aims Inherent in the Notion of Public Participation*

“It is utopian to imagine that the interest group representatives, who are not used to formal decision making bodies, will be able to automatically articulate their interests without some kind of general leadership training courses or, in the case of women, a specific gender awareness and assertiveness training” (Friedman, 1991a). An important question is who is responsible for paying for the necessary on-going organisational development, facilitation and leadership training work. The extent to which empowerment and capacity building can be achieved without such work may be very limited. In the Natal Parks Board eco-tourism ventures, local control is probably most feasible at the levels of organisation of community garden groups, chicken farming, etc. The Natal Parks Board could facilitate funding from donor organisations to contribute to setting up community initiatives related to the proposed development. The Natal Parks Board already acts as a facilitator for accessing funding from donors in several communities neighbouring parks in KwaZulu-Natal.

During scoping certain interest groups raised the point that the development of eco-tourism facilities should be done by communities outside the park rather than by the Natal Parks Board. The issue was raised by I&APs who are opposed to development in parks and the point was made to support their own position rather than as a constructive suggestion.

Given the levels of skill and training and the lack of capital in rural communities around Cathedral Peak the possibility of setting up their own tourism ventures would be very limited. An Natal Parks Board eco-tourism venture could, however, present attainable and real opportunities to these communities.

6.4 The IEM Procedure

The Preliminary Environmental Assessment called for a public and specialist review before a final decision on whether or not to go ahead was taken by the Natal Parks Board. The *Review* stage in the IEM procedure was developed for cases where an in-house EIA is conducted. The effectiveness of a review in ensuring that an assessment has adequately assessed alternatives and addressed relevant issues relies on the presence of an independent authority that takes the final decision. The final decision should rest with the authority both at the scoping and the review stage. In this case, however, the Natal Parks Board is both the proponent and the permitting authority. There are no guidelines on how vested interests and accountability are to be dealt with in this situation.

It is not clear what the "cradle" stage is in IEM. The requirement of an EIA to examine both the "Need and Desirability" of the project as a whole *and* the detailed design of the proposal means either that:

- the EIA starts at the very early stages of the project and goes through to the detailed planning of the proposal, or
- the EIA is done at a stage in the process when the proposal is sufficiently detailed to identify specific impacts (see the IEM flow diagram, Figure 1).

In the former case the EIA cannot be considered as a separate procedure but must rather be built into the planning process. In the latter case, the EIA is a separate procedure that is performed to assess individual projects. The IEM Guidelines describe EIA in both ways (see also Lawrence (1994), p. 5 for discussion).

Related to this point is the question of the scope of alternatives that should be required for consideration by proponents. An example is Saldanha Steel Mill. An issue under debate is whether Saldanha should be an industrial or recreational area. The question has been asked whether it is the project proponent who should actually be responsible for eliciting a

“vision” for an area, in this case, whether it should be a recreational or industrial area or whether the proponent should only be required to consider alternatives that relate to project layout, siting and design. Authorities requesting EIAs do often not seem to take into account that private proponents are constrained in the range of alternatives that they can consider (see Bacow (1982) for discussion).

The role of IEM is to integrate environmental considerations into the planning process. The Guidelines, however, define the roles of scoping and review in terms of their relevance to the assessment and not to the planning process itself. The result is that much effort goes into the EIA document rather than concentrating on how information should be fed into and used in the planning process. This situation creates the perception among many project proponents that scoping is aimed at informing the assessment and not their planning process. The draft regulations on EIA Reports, promulgated in terms of the Environment Conservation Act, 1989 (Act No. 73 of 1989) reinforce this perception by requiring that a comprehensive environmental impact report should contain: “a record of public participation which shall include...the establishment of a procedure by which the I&APs were afforded the opportunity to participate at all stages of the *Comprehensive Environmental Impact Report*” (italics mine).

Chapter 7

Conclusion

7. Conclusion

The aim of this thesis was to examine how the planning process followed by the Natal Parks Board affected the role that the Preliminary Environmental Assessment could contribute to this process and to examine the role public participation played in the planning of the proposed development.

There is a lack of consensus on the aims of public participation. Several sources were used to clarify what were aims of public participation were in the Natal Parks Board's planning process: the *Statement of Intent* (Appendix 6), *Opportunities for Integrated Conservation and Development in KwaZulu-Natal* (Natal Parks Board, 1994a), the *Neighbour Relations Policy* (Natal Parks Board, 1992b) and personal communications with the Natal Parks Board. From these sources the following aims were identified as being the aims of public participation in the planning process of the proposed development:

- to allow public participation in development planning and decision making,
- to ensure an opportunity for all I&APs to raise concerns and issues which would serve to focus the EIA of the proposed development site at Cathedral Peak, and
- to identify how an eco-tourism development at Cathedral Peak could catalyse rural development in the area (spin-offs) and contribute to empowerment and capacity building.

The thesis analysed the process in terms of the effectiveness of public participation in meeting these aims. For a number of reasons it must be concluded that these aims were not met.

Public participation by its very name implies a shift in power away from the traditional decision makers to the public. Participation is not possible if there is no power shift. The later the participation, the less real decision making power people will have to influence the project direction. In the case of the proposed development at Cathedral Peak the public was involved too little too late.

It became apparent during scoping that different I&APs had different reasons for wanting to participate in the planning process. Urban interest groups were interested in

participating in formulating the proposal on a conceptual level. Rural communities were more interested in participating during construction and implementation by interacting with the development in some way. The effectiveness of public participation in respect of urban and rural interest groups must, therefore, be separately considered.

Participation of Rural Communities

The scoping stage was the first time in the planning process that rural neighbouring communities were approached. Since decisions to locate the proposed development at Cathedral Peak had been made and the detailed design of the camp had already been completed, the community had been excluded from this phase of planning and were presented with a *fait accompli*.

Scoping revealed that the main interest shown in the development by rural communities was to participate in the construction and implementation phases of the development. However, there were no negotiating structures in the community. Participatory development requires a high degree of community organisation and well developed communication and facilitation channels. With no representative organisations or structures in the community, the Masters Group communicated through meetings and house-to-house surveys. Although this method allowed many issues to be raised, and the concerns of a representative group of the local population to be recorded, interpretation of the input obtained had unfortunately to be done *outside* the communities by the Masters Group. This input was presented to the Natal Parks Board as recommendations on how the participation of local communities could lead to empowerment and capacity building. If the aim is to empower these communities it will be necessary to work with the communities to develop the ideas into strategies.

The Natal Parks Board has recognised the need for negotiating forums in its neighbour relations policy which states that "participation in reserve management and planning through creating neighbour liaison forums" should be encouraged. The Neighbour Relations Policy assigns the responsibility for facilitating the formation of neighbour liaison forums to the Natal Parks Board. Without such structures the neighbouring communities will not be in a position to participate in the construction and implementation phases of the development. If eco-tourism development is to act as a catalyst for rural development, the involvement of rural communities is essential. Participation can only be meaningful when the community have the relevant structures in place. The success or failure of involving the rural communities at Cathedral Peak in the proposed development cannot be judged

yet. It has only just begun. The Natal Parks Board possesses all the power in defining the terms of the relationship. Participation will only grow if the Natal Parks Board fosters it.

Participation of Urban Interest Groups

Capacity building and empowerment were not necessarily the reasons behind the participation of urban interest groups. The type of knowledge that these interest groups could and wanted to contribute to the planning process were, however, also affected by the approach that the Natal Parks Board took to the planning of the proposed development.

Analysis of the process followed by the Natal Parks Board found that a “fast-slow” or technocratic approach to planning had been followed. The fast-slow approach was characterised by the fact that

- specialist or “expert” input dominated the planning phase,
- the project proposal presented to the public for comment had been planned to a considerable level of detail, presenting the public with a situation perceived by most as a *fait accompli*,
- the approval stage (the current stage of the project) was time consuming compared to the planning phase. The environmental assessment of the proposed development will be followed by public and expert review of the assessment before a final decision on whether to go ahead is taken.
- Urban interest groups were not able to contribute to the planning of the development and nor to identify how the proposed eco-tourism venture could catalyse rural development. They were able to contribute to focusing the assessment on the issues of concern.

The effect of the fast-slow approach to planning was that the Environmental Impact was seen as little more than an attempt to justify and confer validity on a development proposal which had not been evaluated or subjected to public scrutiny during the planning process. Town and Regional Planning and nature conservation organisations objected to the process followed by the Natal Parks Board and questioned the EIA as a valid basis for decision making. This illustrates the point that public participation in the report itself is seen as irrelevant by interested parties if the report cannot influence the planning process.

The fact that the Natal Parks Board's policy on public participation was not clearly defined meant that the participation exercise conducted by the Masters Group during the environmental assessment was regarded with suspicion in the community and that the role of the community in further planning of the proposed development was unclear. The process of consultation with rural communities on how participation could occur in the implementation and construction phases of the development was initiated by the Masters Group as consultants for the Natal Parks Board. It is important that the Natal Parks Board should recognise its responsibility in carrying forward this participation process and developing it. The task of achieving meaningful public participation and of informing the public is enormous in this area. It is recognised that the Natal Parks Board can achieve only limited empowerment and capacity building given that its first hand priorities are conservation. However, as Davion (1995) writes: "In view of the difference in power between the park authorities and the local people, the burden of demonstrating trustworthiness, or a real commitment to change in historical confrontational attitudes, will fall primarily on the park authority".

Different interest groups do not have the same access to information. As long as there is no defined policy on public participation, in terms of which all I&APs are actively informed and their input facilitated, privileged groups will continue to influence the planning process and decision making to a greater extent than disadvantaged communities. Generally disadvantaged communities are unable to exert any influence at all. The aims of the IEM Procedure and the Reconstruction and Development Programme are to promote economic development that contributes to empowerment and capacity building. Public participation must be recognised as an essential mechanism to achieve these goals.

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Appendix 1

**Initial letter to the Natal Parks Board requesting potential
Environmental Impact Assessment Project**

UNIVERSITY OF CAPE TOWN



Department of Environmental and
Geographical Science

University of Cape Town · Private Bag · Rondebosch 7700 · South Africa
Telephone: (021) 650-2873/4 · Telex: 5-22208
Fax: (021) 650-3791

Dear **TREVOR HERBY**
FAX: (0331) 471173

Seven month Masters group project in Environmental Impact Assessment

and Management: 14 November 1994 to 25 June 1995

I am writing to ask if you would be interested in commissioning an environmental impact assessment to be undertaken by our second year Masters students under supervision of a senior consultant(s) from the Environmental Evaluation Unit (EEU), the Department's consulting group.

The aim of the project is to enhance the students academic and professional ability through practical experience in environmental impact assessment and management. The benefit to your organisation of such an arrangement would be a study which aims to satisfy professional standards but would cost less than a purely professional contract. There are 12 students in this year's Master's class, from a range of disciplinary backgrounds, including zoology, geomorphology, chemistry, landscape architecture, civil engineering, law, economics, and the social sciences. They will be working on the project from 14 November 1994 to 25 June 1995, on a full-time basis.

By the time the Masters students start on the project they will have completed the course work component of the degree. During the first four months of the project, the Masters group work together in preparing a baseline information report on the topic of study. During the last three months, each student works under the guidance of a personal supervisor in analysing and evaluating the baseline information, and preparing an individual dissertation. Although these dissertations are based on the information collected by the group, they display individual differences which reflect the backgrounds and interests of each student.

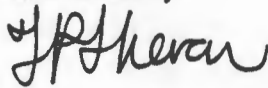
The 1995 study will be the fourth project which has been undertaken in this way. Organisations who have benefitted from this arrangement in past years were De Beers Namaqualand Mines (1992), Sir Alexander Gibb consultants, acting for the Lesotho Highlands Development Authority (1993), and the Cape Town City Council (1994). The baseline information report and the individual dissertations could be submitted to your organisation as was done for the 1994 project.

Alternatively, the EEU could be tasked to prepare a report which draws on and combines the students' work, as was done for the client in the 1992 project. In the 1993 project, the client used the baseline report with no further professional input. Financial arrangements with these clients differed each year, and would need to be negotiated for the 1995 project. It would be preferable if the EEU consultant's time was charged out at market related rates. The students' time would obviously not be charged for, although financial support for subsistence, travel and report production would be desirable.

I would be grateful if you would give this matter some thought. If you are interested in obtaining further information, I can be reached by telephone at 650 2786.

Alternatively you may leave a message with the departmental secretary, Mrs Helen King, at tel 650 2874, or the EEU receptionist, Mrs Sharon Adams, at 650 2866/7. Our fax number is 650 3791. I would be grateful if you would inform me of any potential projects before 7 November 1994.

Yours sincerely



I.P. Theron

pp.

Convener and Lecturer,
Master's Programme in Environmental Science

Appendix 2

Natal Parks Board's Mission Statement



NATAL PARKS BOARD

NATAL PARKS BOARD'S MISSION STATEMENT

The Natal Parks Board's vision is the long-term conservation of Natal's natural resources in such a manner that the people of Natal and of South Africa will benefit from and share in the diversity, economic value and opportunities for spiritual well-being and recreation which they offer.

The Natal Parks Board's mission is:

TO CONSERVE THE WILDLIFE RESOURCES OF NATAL AND THE ECOSYSTEMS AND PROCESSES UPON WHICH THEY DEPEND, AND TO ASSIST ALL OTHER PUBLIC AND PRIVATE GROUPS IN ENSURING THE WISE USE OF THE BIOSPHERE.

Where:

- to Conserve means to ensure the survival of indigenous fauna, flora and natural ecosystems, the promotion of public environmental awareness, and the provision of nature-orientated outdoor recreation;

- wise use signifies that which will maintain bio-

logical diversity and ensure sustainable utilisation of all resources;

- biosphere denotes that part of the Earth which sustains living organisms.

To achieve the above mission, the Board must:

- a) ensure that the diversity of life forms and biological processes in Natal are maintained, within a network of Board administered protected areas and other areas which contribute to nature conservation;
- b) prevent the man-induced extinction of any species indigenous to Natal;
- c) promote the utilisation of wildlife resources in Natal and exercise control in order to ensure that all forms of utilization are sustainable;
- d) promote awareness of the functioning and importance of the biosphere;
- e) provide public access to protected areas and appropriate services including opportunities for scientific study.
- f) support Natal's ecotourism industry by providing, on a self-funding basis, visitor facilities and experiences which are compatible with the Board's mission;
- g) conduct its activities effectively and efficiently through people dedicated to service and committed to nature conservation.

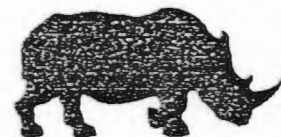
Appendix 3

Press releases by Natal Parks Board for the proposal to
develop a hutted camp at Cathedral Peak

NATAL PARKS BOARD • NATALSE PARKERAAD



P.O. BOX 662 PIETERMARITZBURG 3200
TELEPHONE (0331) 471961 FAX 473137
POSBUS 662 PIETERMARITZBURG 3200
TELEFOON (0331) 471961 FAX 473137



news release * nuusvystelling

NPB DEVELOPMENT IN THE NATAL DRAKENSBERG

EMBARGO: For immediate release

development one...

The Natal Parks Board intends to develop a 200-bed hutted camp at Cathedral Peak in the Natal Drakensberg Park and requests all interested and affected parties to contact the Chief Executive, Natal Parks Board, P.O.Box 662, Pietermaritzburg, 3200, for further details.

The site currently considered as being most suitable comprises a section known as the Tryme Shelf and a broad spur in the vicinity of the Park offices and research station.

In announcing its intention to conduct more detailed planning and an environmental impact assessment of the site at Cathedral Peak, the Board is committed to considering a wide range of opinion on the desirability of the development and its potential to contribute to local and regional economies.

In the past three years the Board has invested substantially in eco-tourism developments such as the new accommodation facilities of Ntshondwe Camp in Itala Game Reserve and the Hilltop Camp in the Hluhluwe-Umfolozzi Park. Both camps have won either local or international awards.

It is the Board's policy that all future developments in its parks have high development standards and that a range of accommodation opportunities is made available to as wide a spectrum of the public as possible.

Future developments will focus on the Greater St Lucia Wetland Park and the Natal Drakensberg Park where there is both demand and opportunity for the development of facilities.

The Cathedral Peak area was identified as having ideal development prospects as well as having good existing access and infrastructure.

There is also excellent opportunity for benefits to local communities along the approaches to the Park.

ends...

Appendix 4

Recommendations from the Cathedral Peak Preliminary Environmental Impact Assessment

Recommendations With Regard to the Proposed Development

- ◆ A community participation forum should be established to facilitate open communication between representatives of adjacent communities and the Natal Parks Board. This would be important if the long term goals of the Natal Parks Board Neighbour Relations Policy are to be achieved.
- ◆ Employment opportunities should be fairly distributed among local residents, following consultation with such groups.
- ◆ Particular attention should be paid to the needs of women with regard to job opportunities. Perhaps a task-orientated employment arrangement could be implemented to enable women with responsibilities at home to benefit during the construction phase of the proposed development. If tasks are identified it would be possible for women to fulfill one specific task and be paid, while still being able to fulfill traditional responsibilities. An example of this would be clearing of the development site. Traditionally male job descriptions should be reassessed, and where limits of physical strength are not constraints, women should be encouraged to develop new skills.
- ◆ Labour intensive construction practices should be a priority if the proposed development goes ahead. On the job training should be a strong factor in the awarding of tenders to construction companies and contracts should ensure that local labour is not exploited. This could be achieved through consultation with the relevant union.
- ◆ The use of local labour, where feasible, would reduce the costs of transport and accommodation during the construction phase, and simultaneously limit possible negative impacts of bringing outsiders into an established social structure. Local labour would also maximise the benefits of money entering and flowing through the community.
- ◆ As suggested by residents of eMhlwazini, Natal Parks Board, together with local residents, should assess the viability of co-operation between the two groups to cater for the needs of the proposed camp. Where feasible, projects identified should be established to fulfill this need. Examples given were the community vegetable garden, a chicken production farm and a herbal chemist at the entrance to the Park (perhaps in combination with the planned craft market).

- ◆ Further community-managed projects, aimed at capacity building could be explored. These might include the production of sheets and other linen for the proposed camp made by the women in the local sewing group, and the running of a local day-care facility which parents might use if they wanted time on their own, away from their children. A facility of this nature would introduce urban and rural children to each other, and could be used as a feature in marketing the proposed development.
- ◆ The cultural resources of adjacent rural communities should be explored, and projects instituted to increase their potential as tourist attractions/options. For example, local shebeens and eating-houses could broaden the scope of the Cathedral Peak experience into the rural setting, for those visitors wishing to experience something new.
- ◆ If the camp were to involve local communities in such concrete ways as suggested above, the overall image of the camp, as a unique experience combining the naturalness of Cathedral Peak with the wholesomeness of fresh community-garden vegetables and rural experience, could be marketed both locally and internationally.
- ◆ Detailed research should be undertaken together with the community to assess levels of skill within eMhlwazini, and point to aspects where training and capacity building could serve the needs of the proposed development in the short term, and the overall needs of the community in the longer term.
- ◆ The establishment of a hiking trail lasting four or five days through the amaNgwane tribal area should be assessed. This trail could be managed by members of the local community, and would not only give hikers the opportunity to hike in the Drakensberg, but also provide an opportunity for contact with the local residents. It would increase the range of recreational options available to visitors to the area. The precedent for such a trail is the *Anna-purna Conservation Areas Project* in the Himalayas. The proceeds from this hike are channeled into local social development programmes.
- ◆ Social development programmes identified by the community included the establishment of adult education programmes and assistance with upgrading the existing schools and the building of a secondary school in eMhlwazini. An assessment should be made of how Natal Parks Board could assist with the provision of such facilities, both financially and through skills and experience within the structures of Natal Parks Board.
- ◆ Communication between Natal Parks Board and the adjacent community needs to be improved so that local residents are aware of the function of Natal Parks Board and the reasons for protecting the land inside the Park. At present, a lack of understanding is contributing to the perception that the

park land is unproductive, and should be available to the community for grazing.

- ◆ The recreational facilities available within the Park should be more widely promoted within the local settlements. There is confusion surrounding the rights of the community to utilise the Park for recreation.
- ◆ Increased links should be forged between the staff of Natal Parks Board and the local schools. Teachers and parents have expressed the need for children to be exposed to the importance of the environment, and both formal and informal education opportunities could achieve this goal.

The potential for empowerment and capacity building as a result of these recommendations could make the proposed development in Cathedral Peak a prime example of a successful people and Parks interaction.

Appendix 5

Participian and results from meeting with urban interest
groups in Pietermaritzburg

Participlan

At the public meeting, the information available on the development proposal was presented to the participants, and a brief question session, aimed at clarifying any questions that participants had with regards to the development proposal, followed. Staff of the Natal Parks Board were present to answer questions directly related to Natal Parks Board matters. The meeting then went on to raise and record the main areas of concern of the participants.

To meet the needs of all participants to be “seen to be heard”, Participlan, a process of gathering written contributions and clustering them on boards, was used.

Participlan encourages proactive thinking by providing a period for individuals to generate ideas rather than the more conventional reactive thinking initiated when a verbal discussion occurs. This approach also aims to prevent domination of the agenda by one or two vocal people. By displaying all the ideas on boards, contentious issues, which may otherwise not be raised, can be raised without being seen to be connected to any particular participant. It is then easier to focus on the actual issue, rather than personal agendas. In addition, an immediate record of the progress of the discussion is made.

Use of the Participlan method in the meeting, did not allow issues to be attached to specific organisations. However, organisations were invited to provide further comments and feedback on the meeting. Thus there was the opportunity for organisations to register an official position.

To give a broad picture of the participants’ perceptions of the issues associated with the development, the following questions were posed:

- ◆ “What are any issues, concerns, questions that you may have concerning the development proposal?”,
- ◆ “What are any positive aspects that arise from this development, or any development at Cathedral Peak?”.

Using Participlan, these ideas were identified, grouped and displayed on boards.

Participants were then asked to indicate the issues that they considered to be of greatest concern, by placing any number of the 10 dots given to them on those issues.

— CONCERNS — ISSUES

LOCAL COMMUNITY CONCERNS

HAS THE DEVELOPER
BEEN INFORMED BY THE
CODE OF NPWS NEGOTIATION
RELATIONS POLICY?

DEPRIVING COMMUNITIES OF INCOME
POTENTIAL

LEGAL

Are there land
right/land use
claims?

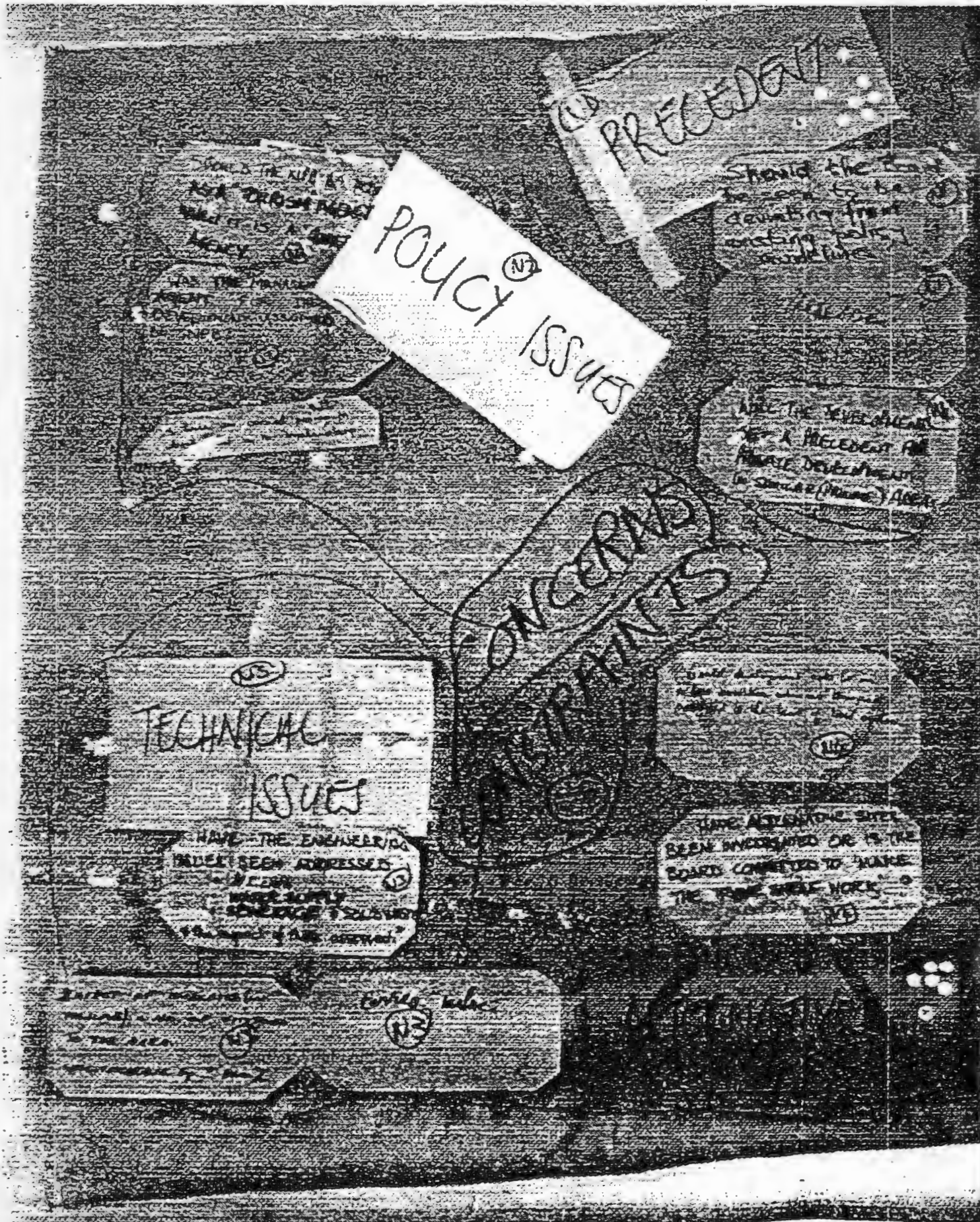
PROCESS

File

IS THE EIA PROCESS
ACCEPTABLE?

- EC: TERMS OF REFERENCE
- WHO SYNTHESIZES RESULTS?
- WHO CHECKS SPECIALISTS?
- WHO IS THE FACILITATOR OF REVIEW?

WHAT HAS BEEN THE
LEVEL OF LOCAL COMMUNITY
INPUT IN THE NATURE, LOCATION,
SIZE AND MANAGEMENT STRATEGY
OF THE PROPOSED DEVELOPMENT?



Does the development
and construction and
recreation options
for the area?
(NS)

Development
on a feeble
landslide (NS)

ROMANTIC OPPOSITION
TO REALITY (NS)

LEAVING GAPS IN
TOURIST INFRASTRUCTURE
if not develop (NS)

ZONATION (NS)

IS IT RIGHT FOR
NPB TO BE DEVELOPING
IN WILDERNESS ZONE
ANY BUFFER ZONES

Has the need
or desirability for
an upmarket 200 bed
camp been demonstrated? (NS)

PROVIDING FOR
proposed visitors
without attending to
existing users (NS)

WAS A DEVELOPMENT IN
OUTSIDE THE PROTECTED
AREAS CONSIDERED? (NS)

CONCEPT
CONCEPT

ECONOMICALLY
VIABLE
Should be done in
well for conservation (NS)

WHY THE NEED? (NS)

MINI D

Table 1 Issues raised at the interest group meeting in Pietermaritzburg, 6 February, 1995.

CONCERNS

The "rating" numbers serve to indicate the relative importance that participants attached to the issues raised. The numbers themselves have no significance.

LEGAL - rating 19

- Are there land right/ land use claims?

POLICY ISSUES - rating 17

- Should the Natal Parks Board be acting as a "tourism" agency, when it is a "conservation agency"? (Appendix 5 - mission statement)
- Was the management agent for the proposed development assumed to be Natal Parks Board?
- Is there an overall policy on development in the Drakensberg?

NEED AND DESIRABILITY - rating 15

- Has the need and desirability for an upmarket 200 bed camp been demonstrated?
- Was a development outside the protected area(s) considered?
- Why the need?
- Providing for proposed visitors without attending to existing visitors
- Economically viable?
- Shouldn't the funds be used for conservation?
- Is it nice to have or is it need to have?

LOCAL COMMUNITY CONCERNS - rating 15

- Has the development been informed by the objectives of Natal Parks Board's Neighbour Relations Policy?
- Depriving communities of income potential

Concerns...continued**PROCESS - rating 13**

- Is the Environmental Impact Assessment process acceptable, ie
 - terms of reference,
 - who synthesises the reports,
 - who chooses the specialists,
 - what is the function of review?
- What has been the level of local community input in the nature, location, size and management structure of the proposed development?

ZONATION - rating 12

- Development on/close to a landslide
- Does the development limit conservation and recreation options for the area?
- What zone does this site fall in eg landslide/ trail or conservation?
- Is it right for Natal Parks Board to be developing in wilderness zone/any buffer zones?

TECHNICAL ISSUES - rating 11

- Have the engineering issues been addressed:
 - access,
 - water supply,
 - sewerage and
 - solid waste
 Have the impacts of these been assessed?
- Impact of increased (in volume) number of visitors to the area (will increase by 100%)
- Environmental impact

PRECEDENT - rating 8

- Precedent
- Should the board be seen to be deviating from existing policy guidelines?
- Will the development set precedent for private development in similar (private) areas?

ALTERNATIVES - rating 6

- Could development not be in a less sensitive area and transport provided to the head of the trail system?
- Have alternative sites been investigated or is the board committed to "make the Tryme Shelf work"?

OPPORTUNITIES

FURTHERING SUSTAINABLE LIVING - rating 18

- Through meeting community needs socio-economic pressures which drive poaching, environmental degradation, etc could be reduced
- Development could be a focal point around which future cooperation between Natal Parks Board and local communities could catalyse.
- May provide a new focus for local living instead of unviable stock farming

CAPACITY BUILDING - rating 13

- Social interaction to create tourism culture
- Training as guides, building skills, cooks etc of high standard for local population

TOURISM ENHANCEMENT - rating 9

- Play part to make tourism the no. 1 industry in South Africa
- More tourists into the area
- Leaving gaps in tourism infrastructure if not developed

Better use of existing facilities and infrastructure

PROMOTING PRIVATE ENTERPRISE - rating 7

- Opportunity for "lease" to private enterprise, ie development

LEGAL RATIONALISATION/ REVISIT POLICIES - rating 4

- Rewrite policies

EMPLOYMENT OPPORTUNITIES - rating 3

- Income generation
- Local community income?
- Limited job opportunities /relative to population

ROMANTIC OPPOSITION TO REALITY - rating 2

- "Romantic" opposition to reality to oppose development

Appendix 6

**Natal Parks Board's Statement of Intent to develop a
hutted camp at Cathedral Peak**

STATEMENT OF INTENT TO DEVELOP A HUTTED CAMP AT CATHEDRAL PEAK

DEVELOPMENT BRIEF

1. INTRODUCTION

It is the intention of the Natal Parks Board to develop a 200 bed hutted camp at Cathedral Peak, in the Natal Drakensberg Park. In recognition of the Board's accountability to the public, in terms of Integrated Environmental Management Procedures (IEM), and in terms of the Board's declared policy on public consultation, the following press release has been prepared. The statement addresses the need and desirability of the proposed development at Cathedral Peak.

The Mission of the Natal Parks Board is:

TO CONSERVE THE WILDLIFE RESOURCES OF NATAL AND
THE ECOSYSTEMS AND PROCESSES UPON WHICH THEY
DEPEND, AND TO ASSIST ALL OTHER PUBLIC AND PRIVATE
GROUPS IN ENSURING THE WISE USE OF THE BIOSPHERE.

Ecotourism developments in Board-controlled areas are designed to ensure the sustainability of the natural resource on which they are based, while at the same time conferring benefits both locally, and in the regional and national economic context.

2. THE ROLE ECOTOURISM PLAYS WITHIN BOARD PROTECTED AREAS

While the Board acknowledges the intrinsic value of protected areas as natural systems set aside for the preservation of biodiversity and the conservation of natural resources, its vision encompasses the realisation that ecotourism development is a necessary and complementary activity in the provision and promotion of:

- * Public environmental awareness and education;
- * Public access to protected areas;
- * Appropriate services including opportunities for scientific study;
- * Economic value and opportunities for spiritual well-being.

The Board has adopted the term ecotourism to denote environmentally responsible tourism. True ecotourism is characterised by the following elements:

- Travel to relatively undisturbed and uncontaminated areas;
- The study, admiration and enjoyment of scenery, wild plants and animals, and cultural manifestations.
- The non-consumptive use of natural resources;

- The beneficiation of conservation resources, for the economic well-being of the region;
- Compatibility and complementarity with conservation objectives, e.g. those stated within the NPB mission statement.

In short, the Board promotes ecotourism as a valid and sustainable land-use in protected areas. This accords with the recently released policy framework encompassing "Tourism and the environment" adopted by SATOUR.

The Board is acutely aware that insensitively planned ecotourism is a source of destruction of natural resources. All development within protected areas carries risks. The Board has therefore adopted the approach that comprehensive planning and management of ecotourism developments is vital to minimise risks and enhance benefits. Board policy, in this regard, closely follows the principles and practice of Integrated Environmental Management (IEM) as recommended by the Department of Environment Affairs. Public participation in development planning and decision-making is acknowledged by the Board as an essential step in ensuring environmentally acceptable development.

The last three years have seen substantial investment in visitor facilities in Board areas, including the development of hutted camps in the Itala Game Reserve and Hluhluwe-Umfolozi Park. These, and other existing developments, e.g. Giant's Castle Hutted Camp, are evidence of the Board's will and capacity to provide environmentally sensitive opportunities for ecotourism. Future provision of visitor accommodation will focus on the Greater St Lucia Wetland Park and the Natal Drakensberg Park where there is both a demand for facilities, and excellent opportunities to supply such facilities.

3. THE NATAL DRAKENSBERG PARK

In a recent SATOUR survey of motivation for international tourism to South Africa, scenic beauty was ranked first, followed by climate and wildlife. The Natal Drakensberg is renowned for its scenic beauty, which is reflected in patterns of demand for accommodation in the Park, where bed occupancies of over 90% have been recorded for the Tendele and Giants Castle hutted camps. Such demand patterns indicate the preference of visitors for facilities which are located in close proximity to the grand splendour of the high berg. Apart from the sense of place which is engendered by the high environmental quality of the Park, visitors to Natal Parks Board facilities in the Park make use primarily of the opportunities provided by the natural surroundings. This should be contrasted with facilities-based recreation opportunities provided in many private-sector developments, which are not entirely dependent on their natural setting.

In considering the development potential of the Drakensberg, the Natal Parks Board is guided by the existing policy and zonation for the Natal Drakensberg, espoused over many years by the Natal Town and Regional Planning Commission. The Board is aware that it has both the responsibility and the opportunity to provide

appropriate developments within the Park, and recognises that the purpose of these developments is clearly different from those of private developers in the approaches to the Park.

The Board is aware of the potential threat that such demand for ecotourism facilities poses to the future ecological integrity of the Natal Drakensberg Park, as well as the need to ensure that ecotourism developments are financially viable. The Board in the process of preparing conservation/ecotourism development plan encompassing the entire Park and its approaches. At the core of the plan is a zonation policy which seeks to direct and manage visitor facilities and activities in appropriate nodes within the Park and within each node, in appropriate locations.

At the scale of the Natal Drakensberg range, it is recognised that the northern berg is a focal destination for visitors, and that current facilities are insufficient to meet this demand. Priority major development nodes have been identified in the northern berg. Attributes used in determining suitability for development include:

- Aesthetic/scenic quality
- Recreation opportunities
- Availability of services, terrain, microclimate
- Access quality
- Existing Board and private sector developments
- A sufficient buffer between development and the wilderness areas

Although certain developments have already taken place in nodes, and on private land adjacent to the Park, it is the Board's intention to ensure that future developments in the Park accord with the high development standards set by the Board, and that a wide range of accommodation opportunities and benefits are made available to as wide a spectrum of the public as possible.

4. CATHEDRAL PEAK NODE

Cathedral Peak was indicated by the selection process as one of the high priority areas for development. Apart from a basic campsite, there is no Board hutted accommodation within the Park at Cathedral Peak, and only one private sector development, the Cathedral Peak Hotel. In contrast, the Board has substantial existing development at Royal Natal National Park, and at Injasuti.

Cathedral Peak has, in addition, the following favourable attributes and opportunities:

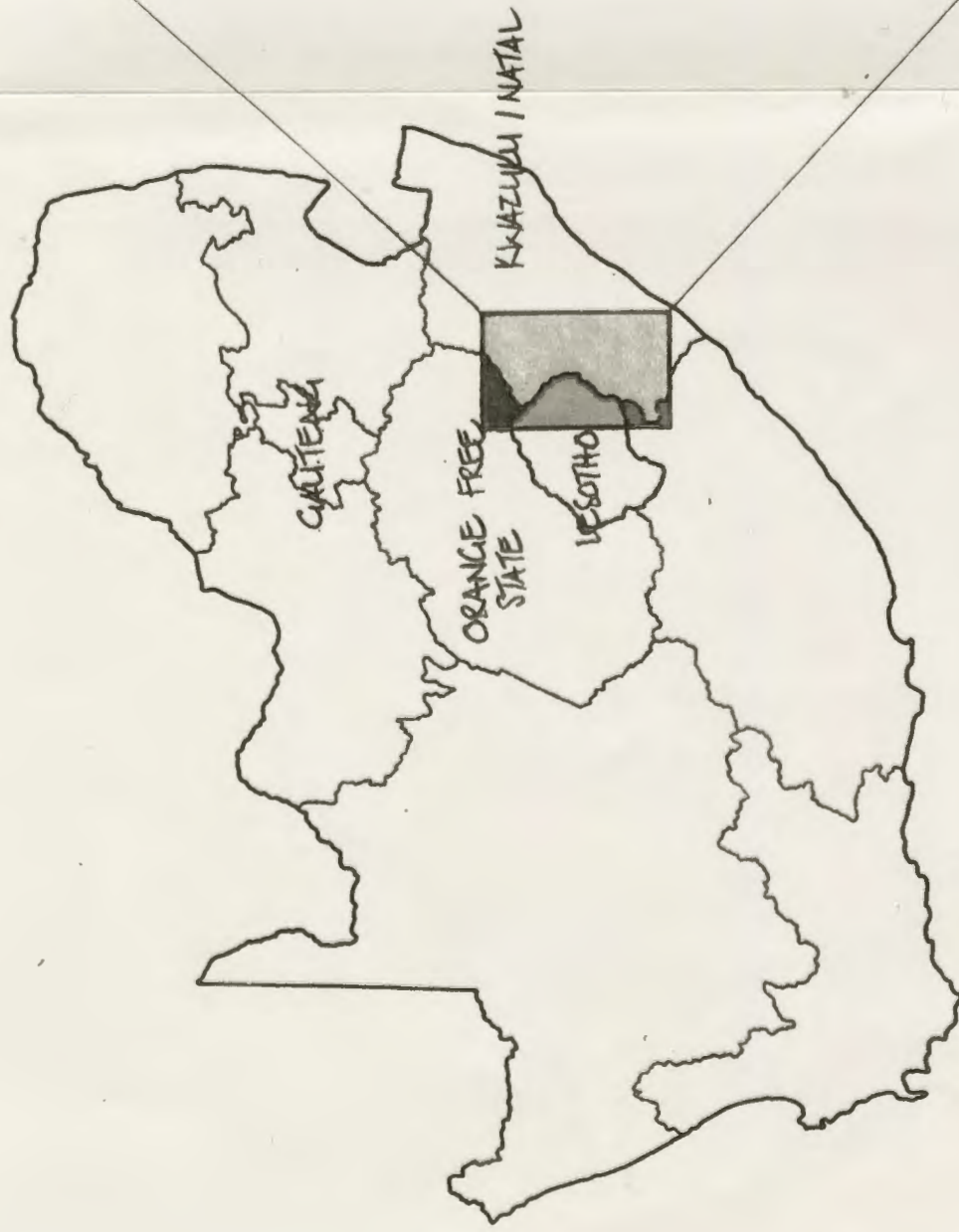
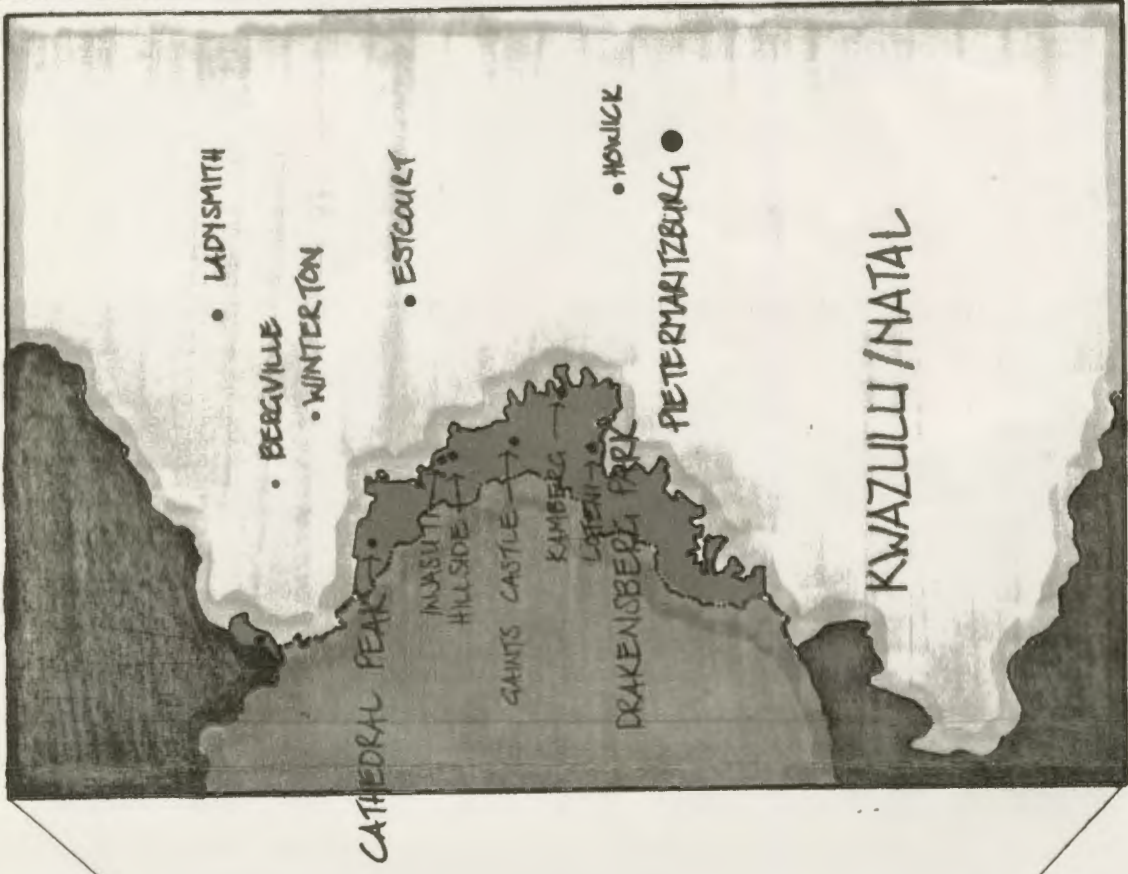
- * It is located in the popular northern berg and is readily accessible to the Johannesburg and Pretoria markets.
- * There is favourable access in the form of a tarred road.
- * There is sufficient water, and power and communications infrastructure exists.
- * There is excellent access to the spectrum of trails and walks available in the

area.

- * There is an opportunity to increase employment opportunities in this area of the Drakensberg, where impoverished communities exist.

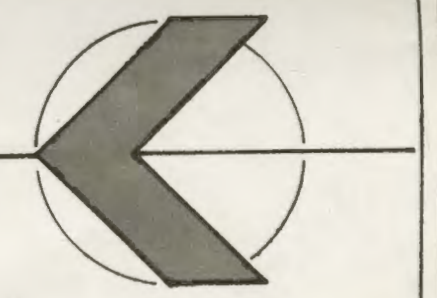
Cathedral Peak has consequently been identified for the development of a 200 bed hutted camp. An extensive site which includes the Tryme shelf and a broad spur in the vicinity of the existing Park headquarters and research station has been identified. Preliminary assessments have suggested its suitability for the type of project envisaged.

In announcing its intention to conduct more detailed planning and an environmental impact assessment of the proposed development site at Cathedral Peak, the Board commits itself to considering a wide range of opinion on the desirability, the viability and the potential of this development to contribute to the local and regional economy. At the same time it will ensure the strict protection of the biophysical resource on which the development is based.

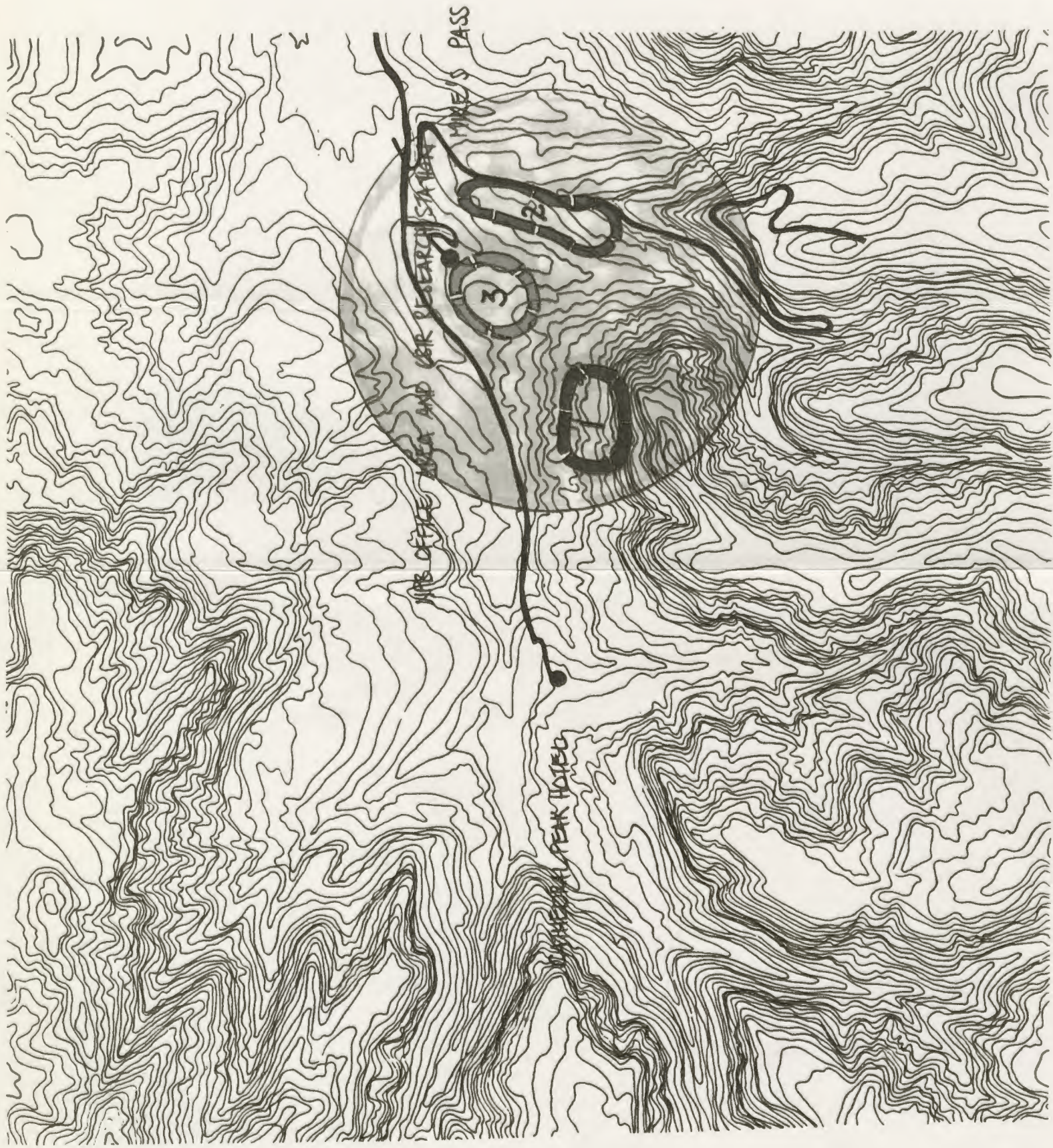


**MAP 1
NATIONAL AND
REGIONAL
CONTEXT**

UNIVERSITY OF CAPE TOWN
 DEPARTMENT OF ENVIRONMENTAL
 AND GEOGRAPHICAL SCIENCE
 TEL: (021) 650 2875/4
 FAX: (021) 650 3791
MASTERS GROUP



Cathedral Peak



LEGEND

- 1 TRIME HILL SITE
- 2 MIKE'S PASS SITE
- 3 PARK HEADQUARTERS SITE

**MAP 3
THREE SITES
SHORT-LISTED FOR
DEVELOPMENT**

UNIVERSITY OF CAPE TOWN
DEPARTMENT OF ENVIRONMENTAL
AND GEOGRAPHICAL SCIENCE
TEL: (021) 650 2873/4
FAX: (021) 650 3791



MASTERS GROUP

Cathedral Peak

