



SANPARKS

**Proposed Development of an Environmental Experiential Centre at
Bordjiesrif, Table Mountain National Park**

DRAFT SCOPING REPORT

Report No. 305967/6

May 2004

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By:

Belinda Breetzke

Kate Steyn (Johnson)

Reviewed by:

Chris Dalgliesh

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Steffen, Robertson and Kirsten (South Africa) (Pty) Ltd
4th Floor Douglas Murray House
Rua Vasco Da Gama
8001 Foreshore
South Africa
Registration Number: 1995.012890.07

P O Box 6824
Roggebaai
8012
South Africa
Tel: +27 21 409 2400
Fax: +27 21 425 4648

Executive Summary

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Abbreviations

CPNP	Cape Peninsula National Park (now Table Mountain National Park)
DEAT	Department of Environmental Affairs and Tourism
DEA&DP	Department of Environmental and Cultural Affairs and Sport
DSR	Draft Scoping Report
DWAF	Department of Water Affairs and Forestry
EIA	Environmental Impact Assessment
EIR	Environmental Impact Report
EMP	Environmental Management Plan
FSR	Final Scoping Report
HWC	Heritage Western Cape
IEM	Integrated Environmental Management
NEMA	The National Environmental Management Act 106 of 1998
NHRA	National Heritage Resources Act 25 of 1999
PPP	Public Participation Process
SAHRA	South African Heritage Resources Agency
SANParks	South African National Parks
SRK	SRK Consulting
TMNP	Table Mountain National Park
WESSA	Wildlife and Environment Society of South Africa

Glossary

Blackwater	Effluent or sewage from toilets, with a high nutrient and bacterial content
Effluent	Water containing waste e.g. sewage from toilets, shower water etc.
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 and cultural aspects
Environmental Impact Assessment	A study of the environmental consequences of a proposed course of action.
Greywater	Effluent or washwater excluding water and waste from toilets. It includes shower, bath and basin water as well as kitchen washwater.
Midden	An accumulation of food remains and artefacts resulting from human settlement
Padrao	A stone cross about 2m tall and weighing about 500 kg, these were placed by Portuguese explorers at places where they made landfall.
Scoping	A procedure to consult with stakeholders to determine issues and concerns and for determining the extent of and approach to an EIA, used to the focus the EIA
Scoping Report	A written report describing the issues identified to date for inclusion in an EIA

**Proposed Development of an Environmental Experiential Centre at Bordjiesrif,
Table Mountain National Park**

1 INTRODUCTION

1.1 Background

South African National Parks (SANParks) is proposing to establish an environmental ‘experiential’ facility in the Table Mountain National Park (TMNP), which until recently was named the Cape Peninsula National Park (CPNP). SANParks and TMNP’s primary objective is to expose the park to a greater number of children, especially those who would not otherwise have the opportunity. SANParks’ philosophy for introducing people to National Parks and the environment is to move away from formal ‘education’ and focus on the ‘fun’ and ‘experience’ elements of the learning opportunity.

Bordjiesrif was first identified as a suitable site for educational facilities in a Management and Development Plan prepared for the Cape of Good Hope Nature Reserve in 1990. Subsequently, in 2001, TMNP (then CPNP) produced a spatial plan for the park, known as the Conservation Development Framework (CDF). This included an internal review of existing education facilities within TMNP, including the Homestead (Buffelsfontein Visitor Centre), Goldfields Education Centre, Skaife Education Centre and Bordjiesrif and it was determined that Bordjiesrif was the most appropriate site for an Environmental Experiential Centre within the park. The location of Bordjiesrif is indicated in [Figure 1.1](#).

Figure 1.1: Location Plan of Bordjiesrif

1.2 Project History

SANParks first formally proposed the establishment of an Environmental Experiential Centre at Bordjiesrif in May 2002. At the same time, it was decided that Buffels Bay Recreational Area should be upgraded to accommodate users of the picnic facilities at Bordjiesrif. SRK Consulting (SRK) was appointed by SANParks to manage and co-ordinate an integrated planning process and to undertake the required Environmental Impact Assessment (EIA) and public consultation process for both Bordjiesrif and Buffels Bay.

The study commenced with the compilation of a Site Analysis Report. This report identified opportunities and constraints for the development and upgrading of the Bordjiesrif and Buffels Bay areas. A number of specialist studies were undertaken to inform the analysis, including geotechnical, vegetation, archaeological and visual assessments. The Site Analysis Report was released for public review and comments received were used to inform the next phase of the project, which entailed the preparation of design guidelines for both areas.

Then, in March 2003, SANParks requested that the professional team put the project on hold while internal decisions were made regarding the project and the Park's environmental education policy and strategy. During this review process, TMNP conducted an internal re-evaluation of the proposed project. While it was agreed that Bordjiesrif should be upgraded and preferably used for educational purposes, the appropriate intensity of use of the site was the topic of some discussion. Three conceptual proposals (around the central theme of environmental education) and the 'no-go' alternative were discussed and it was agreed that these should be evaluated as viable alternatives in an EIA process. Furthermore, it was agreed that the applications for the Bordjiesrif and Buffels Bay projects should be separated, as these no longer required the same level of assessment.

Consequently, a new Application and Scoping Checklist for Bordjiesrif was submitted to the Department of Environmental Affairs and Development Planning (DEA&DP) on 09 February 2004. In addition, a revised Plan of Study for Scoping was also submitted to DEA&DP on 09 February 2004 ([Appendix A](#)).

SRK is also currently managing a *separate* EIA process for the proposed upgrading of the Buffels Bay Recreational Area.

1.3 Legal Requirements

There are a number of regulatory requirements at local, provincial and national level to which SANParks' proposed facilities will have to conform. A brief summary of the Acts which are relevant to this study are outlined below.

Note that other legislative requirements may pertain to the proposed development, but identification and interpretation of these is beyond the brief of this study. As such, the list provided below is not intended to be definitive or exhaustive and serves to highlight key environmental legislation and obligations only.

1.3.1 The Environment Conservation Act (Act No. 73 of 1989)

The Environment Conservation Act (Act No. 73 of 1989) makes provision for the identification and assessment of activities that are potentially detrimental to the environment and which require authorisation from the relevant authorities based on the findings of an environmental assessment. Activities identified in the EIA Regulations¹ include:

1. The construction, erection or upgrading of –
 - (e) marinas, harbours and all structures below the high water mark of the sea
 - (m) public and private resorts and associated infrastructure.

The environmental assessment process stipulated in the EIA Regulations is divided into a number of phases. Initially a Scoping Study, including public consultation, is completed to determine whether there are any significant environmental issues associated with the proposed activity. Should the findings of the Scoping Study indicate that there are no significant issues that require detailed assessment or that the issues identified can be effectively managed and the authorities are of the opinion that sufficient information has been provided, a Record of Decision (RoD) will be issued by the relevant authority. However, should the Scoping Study indicate that there are potentially significant environmental impacts associated with the proposed activity and the authorities require more information, they will request that a full EIA be undertaken.

The Environment Conservation Act also makes provision for appeal against any decision issued by the relevant authorities². In terms of the Regulations, appeals have to be lodged with the national Minister of Environmental Affairs, in writing, within thirty days of the issue of the Record of

¹ G.N. No. R1182, September 1997. Promulgated in terms of Section 21 of the Environment Conservation Act 73 of 1989.

² Section 35(3)

Decision. In terms of the EIA Regulations, the provincial authority must refer the application to the national Department of Environmental Affairs and Tourism (DEAT) if the proposed activity takes place within an area of national importance, such as a National Park. DEAT may delegate decision-making authority back to the provincial authorities.

Legal requirements for SANParks

The upgrading of existing resort facilities and associated infrastructure constitutes a listed activity in terms of the Environment Conservation Act. SANParks is consequently obligated in terms of Sections 21, 22 and 26 of the Act to conform to the EIA Regulations. SANParks have appointed SRK Consulting as independent consultants to manage the EIA process. As the sites are situated in a National Park, the application was referred to national DEAT, who have delegated authority back to the provincial department, the Department of Environmental Affairs and Development Planning (DEA&DP).

1.3.2 National Environmental Management Act (Act No. 108 of 1998)

The National Environmental Management Act (NEMA, Act No. 108 of 1998) establishes a set of principles, which all authorities (organs of State) have to consider when exercising their powers, for example during the granting of permits. These include the following:

- Development must be sustainable;
- Pollution must be avoided or minimised and remedied;
- Waste must be avoided or minimised, reused or recycled;
- Negative impacts must be minimised;
- Responsibility for the environmental consequences of a policy, project, product or service applies throughout its life cycle.

Section 24 of the Act states that all activities that may significantly affect the environment and require authorisation by law must be assessed prior to approval. The Act goes on to list the requirements for assessment:

- The environment likely to be affected by the activity and viable alternatives;
- Cumulative effects and their potential significance;
- Mitigation measures including the “no go” option.

Section 28(1) states that “every person who causes, has caused or may cause significant pollution or degradation of the environment must take reasonable measures to prevent such pollution or degradation from occurring, continuing or recurring”. If such degradation/pollution cannot be

prevented, then appropriate measures must be taken to minimise or rectify such pollution. These measures may include:

- Assessing the impact on the environment;
- Informing and educating employees about the environmental risks of their work and ways of minimising these risks;
- Ceasing, modifying or controlling actions which cause pollution/degradation;
- Containing pollutants or preventing movement of pollutants;
- Eliminating the source of pollution; and
- Remedying the effects of the pollution.

The authorities may direct an industry to rectify or remedy a potential or actual problem. If such a directive is not complied with, the authorities may undertake the work and recover the costs from the responsible party.

Legal Requirements for SANParks

SANParks has a responsibility to ensure that the proposed activity and the EIA process conform to the principles of NEMA. SANParks is obliged to take actions to prevent pollution or degradation of the environment in terms of Section 28 of NEMA.

1.3.3 The National Heritage Resources Act (Act No. 25 of 1999)

The protection and management of South Africa's heritage resources are controlled by the National Heritage Resources Act (Act No. 25 of 1999). The enforcing authority for this act is the South African National Heritage Resources Agency (SAHRA). In the Western Cape, SAHRA have delegated this authority to Heritage Western Cape (HWC).

In terms of the Act, historically important features such as graves, trees, archaeology and fossil beds are protected. Similarly, culturally significant symbols, spaces and landscapes are also afforded protection. In terms of Section 38 of the National Heritage Resources Act, SAHRA and/or HWC can call for a Heritage Impact Assessment (HIA) where certain categories of development are proposed. The Act also makes provision for the assessment of heritage impacts as part of an EIA process and indicates that if such an assessment is deemed adequate, a separate HIA is not required.

Legal Requirements for SANParks

According to the National Heritage Resources Act (Section 38(8)), such an assessment has to meet the requirements of the relevant heritage authority. With SAHRA no longer having jurisdiction over provincial and local heritage sites, HWC will be consulted to determine whether heritage-related requirements have been met.

1.3.4 The National Water Act, 1998 (Act No. 36 of 1998)

Water use is controlled by the National Water Act (Act No. 36 of 1998). The enforcing authority is the Department of Water Affairs and Forestry (DWA). The National Water Act recognises that water is a scarce resource in South Africa and its provisions are aimed at achieving sustainable use of water to the benefit of all users. The provisions of the Act are thus aimed at discouraging pollution and waste of water resources.

In terms of the Act, a land user, owner or occupier of land where an activity occurs that causes or has the potential to cause pollution of a water resource, has a duty to prevent pollution from occurring³. Non-compliance with this provision constitutes a criminal offence.

Water use has been specifically defined in the Act and can be broadly summarised as the abstraction, consumption and discharge of water⁴. Use of water includes:

- The discharge of water containing waste into a water resource;
- The disposal of water containing waste from an industrial process in any manner; and
- Impeding or diverting the flow of water in watercourse⁵.

The use of water, as described above, requires a license unless a General Authorisation is issued. A General Authorisation⁶ has been issued for the discharge of water containing waste into a water resource providing it:

- It conforms to a required standard;
- The volume is less than 2000m³/day; and
- The discharge is registered with DWA.

³ Section 19

⁴ Section 21

⁵ Section 21 (f), (h) and (c)

⁶ GNR 20526 8 October 1999, General Authorisations in Terms of Section 39 of the National Water Act 36 of 1998, Schedule 3.

Legal Requirements for SANParks

The proposed development would produce less than 2000m³/day of waste water. As such, the provisions of the General Authorisation apply but the proposed discharge would need to be registered with DWAF. The waste water would have to comply with the General Authorisation in terms of section 39 of the National Water Act, Section 21 (e).

1.3.5 Sea-Shore Act (Act No. 21 of 1935)

The Sea-Shore Act (Act No. 21 of 1935) is administered by national DEAT. Most of the provisions of the Sea-Shore Act, however, have been assigned to the coastal provinces, including the section empowering the letting of the sea and sea-shore.

The sea-shore is defined by the Act as: “the water and the land between the low-water mark (LWM) and the high-water mark (HWM).” Alienation of the sea and sea-shore area is prohibited by the Act, but it does stipulate a number of activities for which the area may be leased by the Minister (Premier of the coastal province).

An important proviso qualifies these various items by stipulating “...that in the opinion of the Minister such letting either is in the interests of the general public or will not seriously affect the general public’s enjoyment of the sea and sea-shore.”

Legal Requirements for SANParks:

According to the ‘Review of the legal framework applicable to the development of an integrated environmental management system for the CPNP and the CPPNE’ by Cliff Dekker Fuller Moore Inc. (2000), SANParks are excluded from the scope of the Sea-Shore Act in terms of the National Parks Act (Act No. 57 of 1976): “...the act’s scope of operation is excluded from the CPNP in terms of the National Parks Act...” (2000:88).

1.3.6 National Forests Act (Act No. 84 of 1998)

The purpose of the National Forests Act (Act No. 84 of 1998) is primarily to promote the sustainable use of forests (whether indigenous or plantation forests) to the benefit of all South Africans. Of particular relevance is the protection of indigenous trees and natural forests as set out in Chapter 3: Special Measures to Protect Forests and Trees.

According to the act no person may cut, disturb, damage or destroy any indigenous living tree, or remove or receive any such tree from, a natural forest or protected forest areas except in terms of a license issued by the Minister. The act also gives power to the Minister to declare any single tree, group of trees, woodland or certain tree species as protected.

Legal requirements for SANParks

The site contains some indigenous trees including the protected Milkwood (*Sideroxylon inerme*). SANParks may not cut, disturb, damage or destroy any Milkwood trees without first obtaining a license to do so from the Minister of Environmental Affairs.

1.4 Approach

The general approach to this study has been guided the principles of Integrated Environmental Management (IEM). In accordance with the Integrated Environmental Management Guidelines (DEAT, 1992), an open, transparent approach, which encourages accountable decision-making, has been adopted. The twelve underpinning principles of IEM require:

- informed decision making;
- accountability for information on which decisions are made;
- a broad interpretation of the term “environment”;
- an open participatory approach in the planning of proposals;
- consultation with interested and affected parties;
- due consideration of alternative options;
- an attempt to mitigate negative impacts and enhance positive impacts of proposals;
- an attempt to ensure that the social costs of development proposals are outweighed by the social benefits;
- democratic regard for individual rights and obligations;
- compliance with these principles during all stages of the planning, implementation and decommissioning of proposals; and
- the opportunity for public and specialist input in the decision-making process.

In accordance with these principles, an additional ‘integrated planning’ phase was conducted prior to the commencement of the formal EIA.

The study has also been guided by the requirements of the EIA Regulations set out in terms of the Environment Conservation Act (Act No. 73 of 1989) and NEMA (Act No 107 of 1998). The EIA Regulations, which are more specific in their focus, define the specific approach to the EIA process. As indicated, the EIA process consists of two phases, which are outlined in [Figure 1.2](#). Currently, Scoping is being undertaken. The overall aim of the Scoping Phase is to determine whether there are environmental issues and impacts associated with proposed development that require further investigation in an EIA.

Figure 1.2: The EIA Process

More specifically, the objectives of the Scoping Phase for this EIA are to:

- Identify any additional stakeholders (besides those already registered) and inform all stakeholders of the proposed activity, new alternatives and the EIA process;
- Provide stakeholders with the opportunity to participate effectively in the process and identify any issues and concerns associated with the proposed activity;
- Identify any additional alternatives and screen out unsuitable alternatives;
- Identify any additional potential impacts and environmental issues that may require further investigation in an EIA;
- Ensure that the issues and concerns of stakeholders are accurately recorded and reflected in the Scoping Report and taken forward into the EIA.

The activities undertaken during Scoping to date are outlined in Table 1.1 below.

Table 1.1: Scoping Phase Activities

TASK	OBJECTIVES
Submit Application and Scoping Checklist and Plan of Study for Scoping	To inform the authorities of the proposed Scoping process and gain their input on the proposed process.
Advertise (re)commencement of EIA process	To notify Interested and Affected Parties (IAPs) of the commencement of the EIA process.
Distribute Project Update Pamphlet	To re-establish contact with existing IAPs and to provide them with some background information and explanation regarding the status of the application.
Compile Draft Scoping Report (DSR)	To provide a description of the proposed activity, alternatives and the affected environment, as well as a description of potential environmental issues
Release DSR for public comment	To provide stakeholders with the opportunity to review the draft report and comment.
Public Information Sharing Session	To present the findings of the DSR to IAPs and provide an opportunity for questions and discussion.
Final Scoping Report	To record all issues and concerns raised, collate these comments in the final report that will be submitted to DEA&DP for decision-making and make recommendations regarding the requirements for an EIA.

Note that comments submitted in terms of the previous (joint Bordjiesrif and Buffels Bay) proposal will be incorporated into the current respective EIA process.

1.5 Assumptions and Limitations

This report assumes that:

- Information provided by specialists and the proponent is accurate;
- The public was consulted during the preparation of the Conservation Development Framework which informed the selection of the Bordjiesrif site; and
- SANParks' internal evaluation of sites and existing facilities was valid.

1.6 Structure of Report

This report describes the proposed project and its context, details the public participation process followed, presents the results of the Scoping Study and makes recommendations for an Environmental Impact Assessment (EIA).

Chapter 1: Introduction

Provides an introduction to the proposed project, briefly describes some of the legal requirements, and outlines the approach to the study.

Chapter 2: Project Motivation and Site Selection

This chapter provides the motivation for the project, which includes a brief overview of the relevant planning informants at various levels. It also describes the SANParks site identification process.

Chapter 3: Description of the Project Alternatives

Provides an overview the proposed activity and describes the alternatives being considered.

Chapter 4: Description of the Affected Environment

Briefly describes the biophysical and socio-economic aspects of the receiving environment.

Chapter 5: Public Consultation

Details the approach followed for the public consultation process and summarises all the issues and concerns raised by stakeholders to date.

Chapter 6: Identification of Impacts and Requirements of the EIA

Summarises the environmental issues/ potential impacts associated with the proposed facility. Identifies the specialist studies that are required as part of the recommended EIA and proposes the preliminary scope of work for these studies.

Chapter 7: Findings and Recommendations

Concludes the Scoping Study, makes recommendations for the EIA and outlines the way forward.

2 PROJECT MOTIVATION AND SITE SELECTION

This chapter provides the motivation for the project, which includes a brief overview of the relevant planning informants at various levels. It also describes the SANParks site identification process within TMNP.

2.1 Planning and Policy context at National, Provincial and Local level

It is critical that educational initiatives and facilities provided by SANParks are appropriate and relevant to the broader goals of the city, province and country. To this end, national, provincial and regional policies and needs are examined here.

2.1.1 National Policy

The Department of Education introduced the National Environmental Education Programme (NEEP) in June 2000. Through this programme the Department of Education has committed itself to placing a strong emphasis on environmental education in South Africa. The vision embodied in the NEEP is “to provide an integrated education framework for environmental enhancement and sustainable development through co-operative governance”. SANParks acknowledges its role and responsibility in terms of this policy.

2.1.2 Provincial Context

Due to the TMNP’s proximity to a large proportion of the provincial population, it is regarded by SANParks as the most suitable Western Cape national park to accommodate environmental education facilities for the province.

An internal SANParks workshop was held in 2002, in which 13 possible sites (not all of which are located in national parks) for development of a **central education facility** were identified in the province. The potential sites that were evaluated included:

- Apostle Battery
- Bordjiesrif Recreational Area
- De Hoop (Cape Nature Conservation)
- Geelbek (West Coast National Park)
- Gold Fields Cape of Good Hope
- Karoo (Karoo National Park)
- Mooimaak
- Orange Kloof
- Porterschool/Tokai
- Signal Hill
- Soetwater
- Sunbird
- Van Riebeeck Park

During the workshop, participants also identified criteria against which to evaluate the potential sites and ranked the criteria according to their importance. Each site was then evaluated using these criteria. The criteria are listed below from most to least important (as determined through the workshop process):

1. **Quality of place.** This was considered a primary criterion with consideration of remoteness of the site and scenic value;
2. **Access to natural resources.** The site would need to be within walking distance (~800m) of a variety of natural resources and habitats;
3. **Culturally accepted.** The site had to be as 'acultural' as possible without being dominated by a certain character which could be offensive to certain groups;
4. **Physically accessible.** The site should be accessible via existing roads;
5. **Access to support facilities.** The site should be within walking distance of recreational and education facilities;
6. **Infrastructure availability.** Infrastructure such as water should be able to be provided without significant negative environmental impacts;
7. **Access to cultural resources.** The site should preferably be sited in close proximity to post and pre-colonial sites;
8. **Does not have "greenfield" status.** No Greenfield planning will be undertaken in the TMNP so the site had to have some existing infrastructure and accompanying disturbance;
9. **Site capacity.** The site was required to accommodate up to 50 people;
10. **Safety on site.** The site should preferably be sited away from potentially dangerous elements such as cliffs or strong ocean currents; and
11. **Security of site.** Access to the site by other people should be restricted.

Bordjiesrif and **Geelbek** were ranked as the most suitable sites according to these criteria. Bordjiesrif was finally selected as the most appropriate site for development of a central education facility for the following reasons:

- It is situated within TMNP, which is in close proximity to the majority of the province's population;
- It was considered to have a high 'quality of place';
- It is within walking range of wide variety of habitats, include a marine environment;
- It is culturally acceptable and has in the past been used by various sectors of the community;
- It has access to educational/interpretive facilities;
- It is reasonably weather friendly; and
- The existing developed area is underutilised and unsightly and facilities are duplicated at Buffels Bay.

A copy of the internal evaluation report is provided in Appendix B.

2.1.3 Metropolitan Context

In the metropolitan context, the City of Cape Town (CoCT) has committed itself to supporting and promoting appropriate environmental education and awareness, especially in the context of the number of learners with limited access to environmental educational facilities. TMNP is uniquely placed in terms of its location within the city, and TMNP's Integrated Environmental Management System (IEMS) emphasises the importance of the Park providing benefits to its neighbours and, in particular, disadvantaged communities.

2.2 Site Identification Process within the TMNP

According to SANParks, the TMNP has recently strengthened its environmental education capacity and is actively promoting building its obligation in this regard. Although Silvermine serves as an overnight facility, it is envisaged that a second facility will be required within the medium term, i.e. 3 - 5 year period. It is thus considered appropriate to proceed with identifying such a site and plan facilities.

Various alternative sites for the proposed TMNP Environmental Experiential Centre were considered during an internal evaluation. This evaluation was informed by other broader planning initiatives already undertaken for the TMNP, most importantly the Cape of Good Hope Nature Reserve Development and Management Plan (1990) and the more recent Conservation Development Framework (2001).

2.2.1 Cape of Good Hope Nature Reserve: Development and Management Plan

This study was commissioned by the Western Cape Regional Services Council in 1990. The planning process included a number of workshops and discussions with various specialists, reserve staff and other interest groups. The plan was adopted by CoCT, who then requested that it be implemented when the Reserve was incorporated into the TMNP.

The Management Plan outlines the roles of the Reserve and a number of planning principles. Four key roles for the Reserve were identified. The first three were based on the wilderness concept, and included:

- Wild species refuge;
- Wilderness landscape; and
- Wilderness education and recreation.

The fourth role emphasised the societal value of the Reserve and identified the area as being of interest to many groups. Communication of the unique and fascinating natural and cultural history of the area, through a variety of education and recreational experiences, is still considered an important role of the Reserve (now part of the TMNP).

The Management Plan also included a detailed site analysis of various sites within the park and proposed the development of an environmental education centre at Bordjiesrif.

2.2.2 The Conservation Development Framework (CDF)

The CDF (2001) for the TMNP sets out a clear spatial framework to guide and co-ordinate conservation development and recreational activities in and around the Park. The CDF is based on the TMNP's 'Integrated Management System: Management Policy' and was prepared in accordance with Strategic Environmental Assessment (SEA) guidelines. Opportunities and constraints were assessed and suitable areas for upgrading visitor facilities were identified. A public participation process was undertaken in the preparation of the CDF.

The CDF identifies various 'use zones' within the Park e.g. remote zones, quiet zones, low intensity and high intensity leisure zones. The Bordjiesrif area is designated as a '*low intensity leisure zone*', surrounded by a '*Quiet Zone*' (see Figure 2.1). Low intensity leisure zones are the well-patronised areas of the TMNP that provide accessible, safe, natural areas designated for leisure and recreational activities. Whilst they are primarily modified landscapes, the key management objective is to facilitate a spectrum of leisure and recreation activities that are in keeping with the biophysical, cultural and scenic attributes of their context. Due to the fact that they are already disturbed (as is the case at Bordjiesrif), these areas are intended to provide 'focus areas' for activities in order to reduce the pressure on the more sensitive "*Quiet*" and "*Remote*" zones.

'*Visitor sites*' within the Park have also been classified according to their primary role, their characteristics and the number of visitors. The Bordjiesrif site, as classified in the CDF, is a '*Mixed Leisure Use*' site. Mixed-use sites have no definite role and can serve a variety of purposes including education, accommodation, refreshment and leisure. Mixed use sites are sites that have "...potential to enhance their current role, existing facilities should be rehabilitated and upgraded and investigations carried out into possible new facilities that enrich the visitor's experience and enhance the sites carrying capacity" (2001: 43).

2.3 Conclusion

Within this planning and policy context, at a variety of levels, Bordjiesrif repeatedly emerges as the most appropriate site within the province for the development of the proposed environmental facility. On this basis, SANParks has strongly motivated that past and present planning supports the development of an environmental experiential facility at Bordjiesrif.

Figure 2.1: Bordjiesrif Zoning in the CDF

3 PROJECT DESCRIPTION AND ALTERNATIVES

Various options for the type of educational facility and the location of the facility existed. However, a specific need to provide a facility that will cater for school children, focus on experiential learning and demonstrate environmental lifestyle alternatives (such as energy efficient architecture, alternative energy sources etc.) was identified. The project alternatives have been informed by these requirements and are described in the following chapter.

3.1 Project Description

A range of different environmental education facilities are being considered for the Environmental Experiential Centre at the Bordjiesrif site. The basic concept informing all of the proposed alternatives is to realise the potential of the site's inherent natural amenity, wind-shelter and visual seclusion, promote a wilderness experience and at the same time provide environmental education.

All facilities proposed are intended to provide an informal and 'fun' learning environment, as opposed to the more formal lecture-style learning environment provided in other facilities. The Homestead (Buffelsfontein Visitors Centre) in the Cape of Good Hope section of TMNP has been upgraded to provide lecture and interpretive facilities. If supportive/complementary facilities are provided at Bordjiesrif, these will be in walking distance of the Buffelsfontein Centre. In the short term, the area and buildings at Bordjiesrif will continue to be utilised for day environmental education activities.

All of the proposed alternatives will accommodate educational groups of up to 60 people. At this stage, no specific designs have been produced for the proposed alternatives. However, some initial conceptual layouts have been sketched for the permanent overnight alternative (see section 3.3) and some broad design principles have been formulated based on the SANParks' 'Touch the Earth Lightly' development philosophy. These principles focus on minimising the intrusion and impact on the environment. One of the design principles is that only existing disturbed areas will be used for the new development.

The preferred alternative will replace the Skaife Education Centre, which is too small, and the Goldfields Education Centre, which was originally built as an army barracks⁷. Additionally, the proposed project provides the opportunity for the removal and upgrade of inappropriate existing

⁷ The Goldfields Centre was closed before TMNP took over its management and is regarded as unsuitable for the proposed facility as it is visually intrusive, some distance from education sites, water and power provision are problematic and there is limited access to play areas. TMNP is reconsidering the use of this centre for hiking trail accommodation.

structures. Included in these are the poorly-sited asphalt parking areas at Bordjiesrif, which could be removed. The tidal pool reportedly does not flush frequently and the possibilities for upgrading this structure will be investigated.

3.2 Site Analysis within the Bordjiesrif Precinct

In the preliminary stages of the EIA, SRK in conjunction with the project team, undertook an analysis of the Bordjiesrif site. During the Site Analysis, four potential ‘sites’ for the location of the proposed facilities were identified at Bordjiesrif (Figure 3.1). These sites were located in clearings or open areas amongst indigenous vegetation. The Site Analysis was undertaken to determine which of the sites was most suitable for development.

At the time the study was undertaken, *only* alternative layouts for a permanent overnight facility were being considered. However, while the scope of alternatives now being considered for Bordjiesrif has been expanded, the findings of the Site Analysis Report are still valid because the footprint associated with the use alternatives is largely the same, even if facilities would be occupied for differing periods.

A number of specialist studies were undertaken to inform the analysis, including geotechnical, vegetation, archaeological and visual assessments. The conclusions of Site Analysis Report with regard to Bordjiesrif indicated that:

- Site 1 and the portions of Site 4 above the high water mark were regarded as most suitable for development.
- Site 1A and 1B were suited for very limited development.
- Sites 1 and 4 have a good amenity value, are largely visually screened, have suitable founding conditions and good potential for wind shelter.
- Sites 2 and 3 were not regarded as very suitable for development and have lower amenity value than sites 1 and 4.

Based on these findings, all of the proposed alternatives will be located within the area comprised of Sites 1 and 4. This area is situated around the tidal pool and extends a short distance to north-west and south-east of the tidal pool (see Figure 3.1). Although the size and scale of the facilities proposed for each alternative will differ, they will all be located within the same footprint area (namely Sites 1 and 4).

The EIA process will assess the “worst case” scenario and assume that the footprint area for all of the proposed alternatives is the area made up of Sites 1 and 4.

Figure 3.1: Alternative Sites

A full copy of the Site Analysis Report, which provides details regarding the assessment of the four sites, is provided in [Appendix C](#).

3.3 Proposed Alternatives

In terms of both the EIA Regulations⁸ and NEMA, the applicant is required to demonstrate that alternatives have been described and investigated in sufficient detail. SANParks and TMNP have already been through a rigorous process of considering alternative locations for the proposed environmental experiential centre as described in Chapter 2 and Section 3.2 above. The EIA process will therefore consider the following alternatives:

- **Alternative use facilities:** day visitor facilities, temporary overnight facilities and permanent overnight facilities will be considered;
- **Alternative services:** various options for providing services for the facilities will be considered; and
- **The no-go alternative:** the above alternatives will be assessed in relation to the project No-Go alternative.

3.4 Alternative Use Facilities

3.4.1 Alternative One: Day Visitor Facilities

This alternative would accommodate groups of up to 60 children. Visiting / operational hours would be restricted to the operation times of the Park (during the daytime only). The existing parking areas would be removed and rehabilitated and the tidal pool upgraded if required. Additional, natural landscaping and planting would be implemented. New facilities that would be provided include:

- Two ablution blocks (8 toilets and 4 hand basins in total);
- A communal centre including a multi-functional space for indoor lessons in inclement weather and the storage of educational equipment (in movable lock-up cupboards);
- A basic food preparation area / kitchen (only for washing up and heating of food); and
- A new parking area at the helipad.

⁸ Regulation 6 (1) (d) GN No. R1183, dated 5 September 1997

3.4.2 Alternative Two: Temporary overnight facilities

This alternative would accommodate groups of up to 60 children. Overnight accommodation would be provided in the form semi-permanent shelters or tents. SANParks requires that there be one teacher or adult for every five children, if the children are in Grade 3 or lower, and one teacher or adult for every ten children, if the children are in Grade 4 or above.

For the semi-permanent or tented facility the old parking areas would be removed and rehabilitated and the tidal pool upgraded if required. Additional, natural landscaping and planting would be implemented. The new facilities that would be provided include:

- Two ablution blocks (10 toilets, 10 showers and eight hand basins in total);
- A communal centre including a multi-functional space for indoor lessons in inclement weather and storage of educational equipment (in movable lock-up cupboards);
- A kitchen as part of the communal centre, with lock up storage facilities for food;
- Campsites to accommodate about 13 - 21 tents (4 – 6 children per tent and 2 – 4 teachers per tent);
- A storage room for the storage of camping equipment and bags;
- An enclosed/ secure refuse storage area;
- An overnight facility for a ranger or TMNP official; and
- A new parking area.

3.4.3 Alternative Three: permanent overnight facilities:

This alternative would also accommodate groups of up to 60 children. Overnight accommodation would be provided in the form cluster rooms or housing. As for the other alternatives, SANParks requires that there be one teacher or adult for every five children if the children are in Grade 3 or lower, and one teacher or adult for every ten children, if the children are in Grade 4 or above.

For the permanent overnight facility the old parking areas would be removed and rehabilitated and the tidal pool upgraded if required. Additional, natural landscaping and planting would be implemented. The new facilities that would be provided include:

- Four ablution blocks (10 toilets, 10 showers and 8 hand basins in total);
- Five alcoves / rooms housing either four or eight children (if bunkbeds are provided);
- Two cluster rooms housing six or twelve children (if bunkbeds are provided);
- A communal centre including a multi-functional space for indoor lessons in inclement weather and the storage of educational equipment (in movable lock-up cupboards);

- A kitchen as part of the communal centre, with lock up storage facilities for food;
- An enclosed/ secure refuse storage area;
- An overnight facility for a ranger or TMNP official; and
- A new parking area.

3.5 Alternative Services

For all the above alternatives, the provision of services will aim to emphasise the environmental education theme of the site. Possible concepts for the provision of services are as follows:

3.5.1 Water

In addition to rainwater, water will be supplied via an existing pipeline. For Alternatives Two and Three (temporary and permanent overnight facilities), an additional (underground) water tank will be installed near the existing helipad to provide a reserve water supply during peak use times. Water saving measures will be investigated as part of the final design.

3.5.2 Greywater and Sewage

Alternatives being considered for the treatment of greywater and sewage include the provision of a 'package plant', a bio-filter, a conservancy tank or the use of composting toilets and a wetland.

3.5.2.1 A 'package plant'

A 'package plant' for the treatment of greywater and sewage would only be considered for Alternatives Two and Three (i.e. if there are overnight facilities).

3.5.2.2 A bio-filter

Biological filtration provides a reliable and simple unit process for sewage treatment. A biological filter comprises of a granular medium, usually crushed stone or rock but may also be plastic material in various shapes, over which sewage effluent is spread and through which it percolates. Slime containing a large number of organisms forms on the surface of the medium. As the sewage flows over this slime, a series of complex bio-chemical reactions take place by which organic material is removed from the sewage. Treated effluent is then discharged into a wetland/seep system. As for the package plant, a biofilter would only be considered for Alternatives Two and Three.

Table 3.1 provides a breakdown of the advantages and disadvantages of a biofilter system.

Table 3.1: Advantages and Disadvantages of a Bio-filter

Advantages	Disadvantages
<ul style="list-style-type: none"> • Reliable and simple unit process for treatment. • Low maintenance cost. • It can be buried and so fences are not required for protection and there is no visual impact. • It is a sealed unit and can be installed in any soil type. • Wastewater quality objectives can be specified. • The anoxic reactor has the ability to remove nitrogen. • It can be designed to specific requirements and environmental constraints. 	<ul style="list-style-type: none"> • It has a high initial installation cost. • Installation and operation requires skilled labour and operator.

3.5.2.3 Conservancy tank

A conservancy tank is a watertight receptacle for all sewage and wastewater. The capacity of the tank would depend on the volumes of effluent being generated on the site. The conservancy tank would be emptied by “honeysuckers” as required and the wastewater discharged at a suitable treatment facility or sewer main leading to such a facility.

3.5.2.4 Septic Tank/Soakaway

A soakaway system could be used with wastewater percolating to groundwater and then to the sea. This is more likely to be an alternative suited to Alternative One, i.e. day visitor facility.

3.5.2.5 Composting toilets and wetland

If composting toilets are utilised for sewage, no blackwater will be generated on site and greywater could be treated by wetland filtration. The composting toilets would be serviced by a contractor and waste disposed off at an appropriately licensed facility. The remaining greywater effluent would dissipate gradually through evaporation and uptake by the wetland.

Wetland systems can be utilised for the secondary treatment of wastewater. The process involves allowing the effluent to flow through a series of shallow dams/ponds in which aquatic vegetation is established. The plants growing under these submerged conditions cause aerobic conditions that increase the oxygen concentration in the wastewater. This then facilitates a complex combination of biological, physical and chemical reactions between the plants, the substrate and the microbial community, resulting in the purification of wastewater. The advantages and disadvantages of using wetlands in treating wastewater are presented in [Table 3.2](#).

Table 3.2: Advantages and Disadvantages of an Artificial Wetland

Advantages	Disadvantages
<ul style="list-style-type: none"> • Low installation cost. • Can be constructed by relatively untrained personnel under supervision. • They are robust and are able to withstand a wide range of operating conditions. • They are environmentally and aesthetically acceptable. 	<ul style="list-style-type: none"> • They require large areas of land and are therefore not effective in treating large volumes of wastewater. • High maintenance costs. • They are potential mosquito breeding grounds. • No wastewater quality objectives can be specified, therefore no accountability can be provided. • If not well-managed wetlands can be relatively inefficient in removing nutrients. • Hazardous to human health.

All greywater (water from basins, showers, sinks) will pass through a grease trap prior to being pumped via a small pipeline to an existing wetland seep located immediately east of the site. This wetland is suitable for treatment of the small volumes (less than 12m³/day). (Several other alternatives, including the creation of a wetland near the helipad or the pumping of greywater to an existing wetland at Buffels Bay were investigated, but were determined to be unfeasible during the preliminary design).

3.5.3 Energy

The site has an existing electrical supply. However, alternative sources of power from natural sources such as wind and solar energy will be investigated as complementary sources of energy, primarily for the educational value that can be derived from such installations. Such installations would be used as secondary or 'back up' power sources, for example for water heating or for the charging of batteries to supply power for emergency lighting.

3.6 The No-Go Alternative

In this scenario no development would occur at Bordjiesrif and the site would continue to operate as it is. Currently, school groups are using the existing facilities and the buildings are generally maintained. For the No-Go alternative, existing facilities (including the parking areas and tidal pool) would be left as they are and would not be removed or substantially changed or upgraded/rehabilitated.

4 DESCRIPTION OF THE AFFECTED ENVIRONMENT

Bordjiesrif is located within the Cape of Good Hope Section of the TMNP. The site has a long history of use by various groups, particularly in the 20th and late 19th Century. A description of the affected environment and history of the site is provided below.

This description is based, in part, on the specialist studies that were undertaken for the Site Analysis Report.

4.1 Biophysical Environment

4.1.1 Geotechnical

A thick deposit of recent windblown (aeolian) sand covers much of the site above the high-water mark. The aeolian sand forms an extensive sand dune system, which has largely been stabilised by vegetation. These deposits are generally greater than 3.5 m thick and consist of fine to medium sand.

Rock outcrops at Bordjiesrif are limited to quartzitic sandstone bedrock within the intertidal zone. Recent limestone (calcareous sandstone) cliffs are located up slope and to the north west of the site.

4.1.2 Climate

The climate of the area is characterised by a maritime Mediterranean climate with dry summers and cool winters. Based on data from the Cape Point lighthouse, mean annual temperatures are below 16°C, with the mean minimum for the coldest month approximately 8°C and the mean maximum in summer is approximately 26°C.

The Cape Point stretch of the coastline is renowned for its exposure to wind. It is situated within a high velocity zone, with a mean wind velocity of 35 km/h. The wind dominates from the southerly quadrants (SW-S-SE), with 58% of the prevailing wind blowing from this direction and 27% from the northerly quadrants (NW-N-NE). Bordjiesrif is generally more sheltered than most sections of Cape Point.

The mean annual rainfall for the area is about 500mm, which places the area in the semi-arid climate zone. An estimated 74% of the rain falls within the winter months (April to September).

Humidity is high in winter, ranging from between 74% to 83% at the coolest times of the day. However, the generally low temperatures in winter mean that the humidity values do not pose any problems for human comfort.

4.1.3 Hydrology and Geohydrology

There are no large rivers located in the vicinity of the site. A stream and associated wetland are located in the Buffels Bay valley to the south of the site (between Bordjiesrif and Buffels Bay). A small drainage line and associated seep are located on the northern end of the Bordjiesrif site beyond the existing toilet block.

Based on the general geology of the area, two different types of aquifer systems are present:

- A Sandy Primary Aquifer formed by aeolian deposits.
- A Secondary Aquifer formed by fissures and cracks in the Table Mountain Group (TMG) Sandstone which were caused by faulting, jointing and fracturing.

Groundwater quality is generally good and flow is toward the south-east i.e. towards False Bay. Due to the rough mountainous terrain in the area, groundwater is generally limited to the foothills. A large number of springs occur from fractures and joints following rainy periods.

4.1.4 Vegetation

The Cape of Good Hope section of the TMNP supports a high number of rare and/or endangered floral species and is an area of botanical importance in the region. Existing facilities at Bordjiesrif have resulted in transformation of large areas of the site, particularly by paving of roads and parking areas and the establishment of lawns, comprising a mixture of indigenous coastal grasses interspersed with kikuyu. Woody aliens are now very rare on the site, having been cleared about ten years ago, but occasional seedlings of *Acacia cyclops* (rooikrans) are still visible

The areas around the facilities support a diverse array of plant communities, some of which are of high conservation value. Of significance are the dense thickets of mature Milkwoods (*Sideroxylon inerme*). This tree is a protected species, requiring a permit from the authorities prior to any pruning or cutting. Milkwoods are relatively widespread along the coast of South Africa, but their conservation value at the is high as they occur in relatively few places on the Peninsula. They are moderately resistant to disturbance although excessive trampling of soil leaf litter under the trees is likely to have a detrimental effect in the long term.

Vegetation of the site was mapped during site analysis. The fifteen identified plant communities or areas, listed below and mapped in Figure 4.1, are a mixture of disturbed (indicated in italics) and undisturbed areas:

- Coastal pioneer community on alkaline sands
- Coastal dwarf thicket
- Mixed thicket with sand olive
- Mature milkwood thicket
- Limestone outcrop flora
- Natural grassy areas
- Grassy fringe
- Coastal fringe
- Seepage areas
- *Lawns*
- *Transitional areas*
- *Disturbed areas*
- *Clearing in mixed bush (only 50% coverage but believed to have been part of the sand olive thicket community)*

4.2 Socio-Economic Environment

4.2.1 Cultural and historical significance

A number of shell middens and other historical sites are located in the vicinity of Bordjiesrif. A shell midden was identified in the vicinity of the access road to the parking area. The midden has been cut through by the access road and partially impacted on by the construction of the nearby Defence Force building (now removed). Although disturbed, the midden is regarded as sensitive and is protected by the National Heritage Resources Act (NHRA). The midden is likely to be stratified and requires protection.

The nearby Buffels Bay area, just south of Bordjiesrif, was heavily utilised in the past by prehistoric people and colonists. The following resources have been identified there:

- The remains of a lime kiln with a replica of a *Padrao* commemorating the landing of Diaz;
- A tidal fish trap and potential tidal fish trap;
- A largely undisturbed shell midden directly west of the trailer parking area;
- A large disturbed midden, which is more dispersed and impacted with a small track running through it but still conservation worthy;
- A heavily impacted midden in between the parking area and the road to the tidal pool.

The location and sensitivity of the various remains are indicated in [Figure 4.2](#). All these sites are protected in terms of the NHRA.

Figure 4.1: Plant Communities at Bordjiesrif

Figure 4.2: Location of Heritage Resources

4.2.2 Recent History

The Cape of Good Hope section of the TMNP has a rich heritage and long history of human activity. The area has particular historical significance as it is believed to have been the first point on the Cape Peninsula reached by the European explorer, Bartholomew Diaz in 1497.

Before, during and shortly after the advent of European settlement, the area was also consistently inhabited by Late Stone-Age (LSA) hunters. Parts of Cape Point were designated a hunting area in the late 18th Century, whilst other families in the area undertook small-scale, informal farming activities. A number of formal land grants were made in the early 19th Century.

Activities in the area around Buffels Bay and Bordjiesrif included lime quarrying. Lime kilns are found at Black Rocks just north of the site. The area was extensively disturbed in the 19th Century due to these activities. Prior to the proclamation of the reserve, Bordjiesrif was a degraded area littered with quarrying waste and intersected by wagon tracks. The area has rehabilitated to the extent that its past is not immediately evident.

During the early half of the 20th Century, Bordjiesrif was made relatively inaccessible by dense thickets of alien *Acacia* species. Nevertheless the area was popular with fishermen who travelled along the coast from Buffels Bay.

4.2.3 Social context

Prior to the scrapping of the Separate Amenities Act, Bordjiesrif was reserved for the use of the coloured community. The site is heavily utilised on key public holidays such as Easter, Family Day (26 December) and 'Tweede Nuwe Jaar' (02 January). More general use of the area appears to have declined in the last ten years. Potential reasons include the increase in gate fees since the early 1990's (although the Go Green Card annual season ticket has been introduced with the intention of making access more affordable for locals who use the park on a regular basis), the prohibition of bus access to the sites and the scrapping of the Separate Amenities Act, enabling increased access to beach facilities closer to all Capetonians.

4.3 Existing facilities

The site is already disturbed in many places and existing infrastructure includes:

- A large asphalt parking area, portions of which are below the high water mark (2m contour);
- Braai sites, including inappropriately located sites directly on the rocky shore;
- A toilet block and associated septic tank;
- Terraced lawns;
- A tidal pool;
- A recently renovated building on the parking area utilised for meetings and school groups;
- A derelict helicopter landing area located on the slopes above the parking area;
- An access road,
- Dias Navigational Cross; and
- A look out point located on the slopes above the site.

Former naval buildings in the area have been demolished. Water is supplied in a 75mm / 50mm pipeline from a reservoir located at Buffelsfontein Visitors Centre.

5 PUBLIC CONSULTATION

5.1 Introduction

The Public Participation Process (PPP) forms a key component of the EIA process and has resulted in the identification of a number of issues. Public consultation for the proposed Bordjiesrif Environmental Experiential Centre has occurred in two phases:

Phase 1: Public consultation regarding the previously proposed *overnight* education facility at Bordjiesrif, combined with the proposed upgrading of Buffels Bay. The issues raised during this phase have been carried forward into this new EIA process, since many of the issues raised are still relevant.

Phase 2: Public consultation regarding the new use alternatives, which include the 'no-go' alternative, a facility for day-visitors only, a temporary or semi-permanent overnight facility and a permanent overnight facility. The upgrade at Buffels Bay and the Environmental Experiential Centre at Bordjiesrif are now being handled as two independent projects and separate public participation processes are being conducted for each project.

The objectives of the PPP are outlined below, followed by a summary of the approach and issues raised to date.

5.2 Objectives and Approach

The overall aim of the consultation process is to ensure that all stakeholders have adequate opportunity to provide input into the process. More specifically the objectives of public consultation are to:

- Identify stakeholders and inform them about the proposed development of the Bordjiesrif Environmental Experiential Centre;
- Provide stakeholders with the opportunity to identify issues and concerns associated with the proposed project; and
- Identify mitigation and management options to address potential environmental issues.

5.2.1 Public Participation Activities

Activities undertaken in the consultation process to date are summarised in [Table 5.1](#).

Table 5.1: Activities undertaken during the Scoping Study

PHASE ONE: OVERNIGHT FACILITY AT BORDJESRIF AND UPGRADE OF BUFFELS BAY	
Activity	Date
Identification of key stakeholders (Appendix D)	August 2002
Advertisement of the commencement of the study in Die Burger, The Saturday Argus, The Sunday Argus and The Sunday Times (Appendix E)	17-18 August 2002
Circulation of Background Information Document (BID) and information letter to all stakeholders (Appendix F)	20 August 2002
Submission of the Plan of Study for Scoping to DEA&DP	04 September 2002
Meeting with Helicopter operators	09 September 2002
Meeting with key NGOs and community based groups	16 September 2002
Placement of five onsite notices at different locations within the Cape of Good Hope section of the TMNP	October 2002
Meeting with DEA&DP	14 November 2002
Advertisement of the release of the Site Analysis Report in The Saturday Argus, The Sunday Argus and The False Bay Echo (Appendix E)	30 November – 05 December 2002
Release of Site Analysis Report for comment period (Appendix C)	02 December 2002 – 14 January 2003
Distribution of an Educators' Survey	08 January – 17 February 2003
PHASE TWO: FOR NEW PROPOSAL AT BORDJESRIF	
Activity	Date
Submit Revised Plan of Study for Scoping (Appendix A)	09 February 2004
Distribution of Project Update Document to all stakeholders (also indicating that the Bordjiesrif and Buffels Bay projects will be dealt with separately) (Appendix F).	10 February 2004
Advertisement in the False Bay Echo (Appendix E)	12 February 2004
Finalise Draft Scoping Report (DSR)	4 May 2004
Draft Scoping Report Comment Period	4 May – 7 June 2004
Public Information Sharing Session	25 May 2004
Submit Final Scoping Report to DEA&DP	14 June 2004

5.2.1.1 Project Update Document

The Project Update Document ([Appendix E](#)) was distributed to IAPs on 10 February 2004 in order to:

- Notify IAPs about the revised application, particularly with reference to the separation of the Buffels Bay application;
- Communicate information regarding the proposed scoping process to IAPs;
- Communicate information regarding the proposed project;
- Afford IAPs the opportunity to comment on the above; and
- Notify IAPs about further opportunities to be involved in the process.

All comments received from stakeholders have been included in the issues tables below and copies of all comments received are included in [Appendix G and I](#).

5.2.1.2 Advertisement

Extensive advertising was conducted in the first phase of public consultation ([Appendix F](#)), which included:

- Newspaper advertisements announcing the commencement of the EIA process and inviting stakeholders to register were placed in The Saturday Argus and Die Burger (provincial newspapers) on 17 August 2002, as well as The Sunday Argus (provincial newspaper) and The Sunday Times (national newspaper) on 18 August 2002.
- The release of the Site Analysis Report for comment was advertised in The Saturday Argus and The Sunday Argus on 30 November 2002 and 01 December 2002 respectively, as well as The False Bay Echo (local newspaper) on 05 December 2002.
- Five A2 / A3 onsite notices informing stakeholders of the EIA process and inviting stakeholders to register with SRK Consulting were placed at different locations within the Cape of Good Hope section of TMNP on 08 October 2002.

Through this phase, a database of over 300 registered stakeholders had been established. In the second phase of public consultation it was therefore agreed that only local advertisement in the False Bay Echo was required. Additionally, registered stakeholders were sent a copy of the Project Update Document (see section 5.2.1.1 above).

5.2.1.3 Plan of Study for Scoping

SRK prepared and submitted a Revised Plan of Study for Scoping (POSS) which outlined SRK's anticipated approach to the Scoping Study. The POSS was submitted to DEA&DP on 09 February 2004 ([Annexure B](#)).

5.2.1.4 Draft Scoping Report

The Executive Summary of the Draft Scoping Report will be circulated to all stakeholders on 4 May 2004. Full copies of the report will be placed at the following venues:

- Simon's Town Library;
- Kommetjie Library;

- Buffelsfontein Information Centre;
- SRK's offices; and
- SANPark's Westlake office.

The report will also be available on the TMNP website: <http://www.tmnp.co.za>

Stakeholders will be provided with a three-week comment period. Comments received will be incorporated into the Final Scoping Report. Comments received from stakeholders to date are included in [Appendix G and I](#).

5.2.1.5 Public Information Sharing Session

A Public Information Sharing Session will be held on the **25 May 2004 at 18h00** at the **SANParks Offices; Shop 1A, Ground Floor, Westlake Square, Corner Steenberg Road and Westlake Drive, Westlake**. All IAPs are invited to attend. The purpose of the meeting will be to present the results of the scoping phase to stakeholders and provide an opportunity for questions and comments.

5.3 Issues and Concerns Raised by Stakeholders

Stakeholders have raised a number of issues and concerns as well as provided a number of suggestions. The issues and comments are summarised in [Table 5.2 and 5.3](#) below. The comments have been separated into two Tables:

- comments received for the Bordjiesrif and Buffels Bay project from 2002 – 2003 ([Table 5.2](#)); and
- comments received since the re-commencement of the process in 2004 (after the release of the Project Update Document) ([Table 5.3](#)).

Table 5.2: Issues raised by Stakeholders for Bordjiesrif and Buffels Bay (2002 – 2003)

Issue Group	Issues	Response
Management	<ul style="list-style-type: none"> • Long term sustainability of the education centre • Need for a dedicated plan or environmental education strategy for the CPNP • Nature and source of funding including sponsorship of school groups • Budget and funding for use of centre required • Management of education courses: • Supervision of learners • Capacity of teachers • Need for appointed and qualified personnel to run courses • Conflicting use between educational groups and ‘tourists’, including conversion to overnight accommodation 	<p>A business plan will be drawn up and presented to potential funders once more clarity is gained regarding the preferred alternative for the site.</p> <p>SANParks will be drawing up a strategy and management plan for the education centre to address issues around the management of courses.</p> <p>SANParks have an environmental education team which has recently completed a strategic planning process in which they set goals and objectives for the environmental education in the TMNP.</p> <p>Use of the centre is intended for school children and educational courses. The centre is being designed as such.</p>
Need for facility	<ul style="list-style-type: none"> • Need for an entirely new facility • Suitability and future of Goldfields. 	<p>See Section 2 for project motivation. The new centre will form part of a network of environmental educational facilities across the Peninsula.</p> <p>Goldfields is no longer used as an educational facility. Reasons for the unsuitability of Goldfields as cited include:</p> <ul style="list-style-type: none"> • Visually intrusive • Distance from education sites (habitats) • Buildings require considerable maintenance and water provision is problematic • Occupants are barricaded behind fences after hours and have no access to play areas <p>Alternative uses for Goldfields are being considered by TMNP including use as an overnight hiking facility.</p>
Alternatives	<ul style="list-style-type: none"> • Exclusion of other sites from consideration e.g. Sunbird • Inclusion of the “no-development” option as an alternative 	<p>Alternatives have been re-evaluated and the EIA process will now include evaluation of the “no-go” alternative</p>
Process	<ul style="list-style-type: none"> • Extent of consultation regarding closure of other centres • Consultation with schools and educators regarding needs 	<p>See Chapter 2 and Chapter 5.</p> <p>A survey was sent out to educational groups regarding their needs for an education facility. See Appendix I.</p>

Issue Group	Issues	Response
Buildings and site layout	<ul style="list-style-type: none"> • Scope and nature of ‘upgrading’ of Buffels Bay • Use of existing footprints • Opposition to kiosks at Buffels Bay or Bordjiesrif • Nature of service provision e.g. electricity, wastewater treatment • Address cross cultural needs • Safety of learners on site 	<p>See Chapter 3 for description of proposed upgrades and facilities</p> <p>Existing footprints have been utilised.</p> <p>Safety of learners will be addressed through a management plan.</p>
Social	<ul style="list-style-type: none"> • Loss of public facilities at Bordjiesrif • Access to Bordjiesrif by walkers following construction of the centre • Increased pressure on Buffels Bay • Loss of landing facility for helicopter operators 	<p>Users of Bordjiesrif will need to be accommodated at Buffels Bay. Buffels Bay will be renovated to accommodate increased users.</p> <p>Public access through the Bordjiesrif has been provided in the form of a coastal trail.</p> <p>Helicopter operators were offered the use of Platboom as a landing site on a trial basis.</p>
Aesthetic	<ul style="list-style-type: none"> • Impact on the sense of place of Bordjiesrif and Buffels Bay 	To be assessed in EIA.
Biological	<ul style="list-style-type: none"> • Impacts of noise and people on fauna at night and early morning • Impact on baboons due to potentially increased food availability particularly with children • Impact of learners and facilities on fragile environment at Bordjiesrif • Marine impacts should also be addressed 	To be assessed in EIA.
Other	<ul style="list-style-type: none"> • Disagreement with demarcation of sites as low intensity leisure zones in the Conservation Development Framework 	<p>The CDF, which went through a consultation process and has been approved by SANParks, designates Bordjiesrif as a <i>mixed use leisure visitor site</i> situated within a low intensity zone. The CDF has been approved by the SANParks Board and endorsed by the City of Cape Town</p>
Development of park	<ul style="list-style-type: none"> • Concern was expressed regarding continued development within the CPNP and the impacts on the area 	<p>Many of the ‘developments’ within the CPNP are required to deal with increasing visitor numbers to the area and degraded underutilised existing infrastructure and facilities.</p> <p>Development within the Park is being undertaken in the context of the CDF.</p>

Table 5.3: Issues and Comments Raised by Stakeholders for Bordjiesrif (2004)

Issue Group	Issues / Comments	By Whom	Response
Management	Concern regarding management of the facility - are concessionaires envisaged?	Eileen Weinronk	Concessionaires will not manage the site. However schools, other organisations and volunteers may be involved in the management of the educational facility.
	Privatisation of the facilities leads to profit consideration superseding environmental and social consideration. Absolute guarantees of accessibility to all have to be made.	Patrick Dowling	One of TMNP's objectives is to ensure that the educational facilities be accessible to all – especially to children from disadvantaged areas. This is qualified in the Management Policy and CDF, and adequate equivalent facilities will be available to the public at Buffels Bay. Currently, social, environmental and educational groups may access the Cape of Good Hope section at reduced rates or for no charge depending on circumstances.
	Access should not be restricted; it is a Park for ALL.	Eileen Weinronk	The management of the facility will depend on scale of the facility (i.e. what alternative is preferred). Management options include: <ul style="list-style-type: none"> – Management by TMNP; – Co-management between a contractor and TMNP; or – Management contracted out (not the same as a concession).
	Query as to the reasons for the projects being put on hold in March 2003.	Donald Stechman	TMNP were considering alternative options for the site and deciding on how to proceed with the EIA process (which alternatives should be evaluated in this process). The Park has also broadened its environmental education capacity and so any development of Bordjiesrif should be in line with the environmental education policy and strategy. Additionally during this time it was decided to separate the Bordjiesrif and Buffels Bay projects, as it was realised that the upgrading at Buffels Bay was required regardless of the outcome at Bordjiesrif.
	Groups of 50 children are too large and are unlikely to be adequately controlled.	Karen Preston	Currently groups of 60 children are accommodated in environmental education facilities with adequate control. The number is dictated by transport efficiency. (It is likely that up to 60 children would be accommodated at the site as a bus takes 60 children and schools are therefore required to pay for 60 children regardless of how many children they take.) Additionally it is felt that 60 children can be divided into 2 groups of 30 which is a good size to manage easily. The Park will also ensure that there are sufficient adults and teachers to supervise the children (1 – 2 teachers per 10 children depending on the age of the children.) This issue will be addressed further as an operational issue.

Issue Group	Issues / Comments	By Whom	Response
Process	The Dept Education should be involved and asked for comment / provide input.	Eileen Weinronk	Comment noted.
	Issues raised by the Peninsula Mountain Forum appear to have been ignored, These included: <ul style="list-style-type: none"> - Drafting a Policy on Over night facilities in the Park - The relationship between the CPNP environmental education strategy and that of other organisations. - Drafting a business plan for the environmental education centre 	Andy Gubb	These issues will not be lost. SANParks / TMNP have taken a few steps back to enable the EIA process to consider a broader range of alternatives at a more conceptual level. Once a preferred alternative becomes clear during the EIA process, the appropriate plans and policies can be drawn up. Additionally TMNP social ecologists are working closely with educational bodies to ensure TMNP strategies are in line with other educational organisations in the Western Cape.
	Concern regarding the interpretation of the CDF zones. Disagreement regarding the use zones and visitor sites in terms of the CDF. WESSA interpret the CDF to mean that new uses with new facilities require new processes in terms of the CDF. Therefore it is unacceptable that evaluation of the CDF is outside the scope of the EIA.	Eileen Weinronk Andy Gubb	See section 2.3.2 TMNP have considered this issue and believe that their interpretation of the use zone is correct. To determine the appropriate use of existing sites, the CDF only requires that more detailed local area/precinct planning be undertaken within the provisions of the CDF. This is what the current Bordjiesrif EIA is addressing.
	Agreement that the Bordjiesrif and Buffels Bay projects should be dealt with separately.	J.B. Mcdermid	Comment noted.
	The EIA process is flawed as the consultants are being paid by the developer and so are biased.	Juliet Bass	SRK Consulting has been employed as independent consultants. Payment is not dependant on the findings or outcomes of the EIA process. SRK has and will continue to do everything in its power to ensure all comments and information are accurately recorded and passed on to the authorities, who are responsible for making a decision regarding the project.
Alternatives	The “no development” option must be assessed in the process not just noted.	Andy Gubb	Agreed. See Chapter 3.
	Specialist studies must assess the “no development” option.	Andy Gubb	Agreed See Chapter 6.
	Other venues such as the Sunbird centre and Silvermine should be investigated.	Andy Gubb	Other venues have been considered (see Chapter 2).
Buildings and Facilities	The idea of a semi-permanent campsite allows flexibility and has been successful at Soetwater.	Terry Corr	Comment noted.
	Opposition to overnight facilities at Bordjiesrif	Mrs Smidt Karen Preston	Comments noted.

Issue Group	Issues / Comments	By Whom	Response
	The SANParks philosophy of “Touch the Earth Lightly” is a smokescreen or stratagem to get the project approved. SANParks developments and proposals at the Boulders have been contrary to their Development Framework (e.g. they have built a cement wall rather than a sandstone wall as in the document etc.) It is therefore believed that the same thing will happen though out the CPNP.	Donald Stechman	SANParks have gone to considerable effort to gather input from various stakeholders and appoint relevant specialists to ensure that the principles of “Touch the Earth Lightly” will be applied to the proposed design and layout of the facility at Bordjiesrif. Designs have not yet been finalised and depend on the outcome of the EIA.
	Objection to the temporary overnight facilities due to the strong winds and the baboons.	J.B. Mcdermid	Comment noted.
Fauna	The baboon issue requires a specialist study. It is important that specialists be experts in their fields and have working knowledge of the park.	Rosemary Barker	Agreed. See Chapter 6.
	Baboons in the area are a problem especially if the preparation and storage of food occurs (children will also be frightened by the baboons).	Karen Preston Mrs Smidt	Agreed. See Chapter 6.
Statements of support for proposal	The Friends of the Cape of Good Hope are strongly in favour of educational programmes for school groups.	Karen Preston	Comment noted.
	These are critically important projects and are supported wholeheartedly by the Marine Environmental Education Trust. The CPNP and SANParks are commended for persisting with these projects and trying to balance education and tourism.	Terry Corr	Comment noted
	The Pensioners Hiking Club think that CPNP / SANParks are doing very well so far and hope for two well-appointed spots for relaxation and fun.	Mrs Smidt	Comment noted.
Other	The destruction of the “wilderness” and sense of place.	Karen Preston	Impact on the environment (loss of habitat) and sense of place will be addressed in EIA. See Chapter 6.
	Request for information regarding the educational programmes to be offered and the tender process for service providers and contractors to manage the facilities.	Candy Hall	Educational programmes have not been finalised at this stage. The type of facility preferred will only become clearer during the EIA process. It has not yet been decided if the facility will be managed by contractors or internally by TMNP (this will largely depend on the preferred alternative). The trend in SANParks is to train teachers to be able to run their own programmes on condition that they submit their programme before they arrive and it gets approved by SANParks.
	It is sacrilege to do anything at the site besides rehabilitation. SANParks and other conservation bodies should be conserving these areas.	Juliet Bass	The site has already been substantially transformed. Any new development would be restricted to already degraded areas and the surrounding areas would be rehabilitated. The motivation for the

Issue Group	Issues / Comments	By Whom	Response
	The beauty of Bordjiesrif (currently unspoilt) will be ruined not only for the so called privileged but also for the disadvantaged who have never seen the coast as it is.	Anne Tilbury	development is to allow children who would not otherwise have the opportunity to experience wilderness areas in a manner that is sensitive to the environment. In the long run, environmental education is seen as one of the best ways to combat the destruction of natural ecosystems.

Additionally the following suggestions were received from stakeholders (in 2004):

- A day centre should be established at Bordjiesrif with accommodation provided elsewhere either:
 - Outside of the fenced park on the other side of the Simonstown / Scarborough Road or
 - At Klaas Jagersberg
- A bus should be provided to transport the children.
- Only small groups of children should be allowed at the site – 1 adult to 10 children.
- A properly constructed path should be made between Bordjiesrif and the Homestead.
- The tidal pool should be kept.
- The Bordjiesrif centre should be linked to the Buffelsfontein Centre.
- The ablution facilities should be retained and solar showers installed.
- Instead of erecting a permanent office at the site, SANParks should use a small mobile office that can be moved around to where it is needed most at the time.
- The lecture room (shed) must blend in with the environment.
- Toilets and water should be provided (or upgraded).

5.4 Conclusion

A number of issues, concerns and suggestions regarding the proposed project were raised by stakeholders in both phases of the public consultation. Some of the concerns raised in the first phase have been used to redefine the EIA process, such as the inclusion of the “no-go” alternative and the consideration of a day visitor’s centre.

The key issues raised by stakeholders in both phases, to date, can be summarised as follows:

- Development of Management Policy and business plan
- Planning Process
- Examination of Alternatives
- Visual impacts
- Botanical impacts
- Faunal impacts
- Impacts on marine environment
- Restricted Access

With regard to the issues raised above, some are not related to impacts *per se* or can be addressed through the implementation of an appropriate environmental education strategy and an operational

management plan for the proposed Environmental Experiential Centre. These issues have been addressed as such in [Table 5.2](#) and [Table 5.3](#) above.

6 IDENTIFICATION OF IMPACTS AND REQUIREMENTS FOR THE EIA

The following Chapter provides a description of the requirements for the EIA and impact rating methodology that will be adopted. It also briefly outlines the terms of reference for the specialist studies that are proposed for the EIA phase.

6.1 Introduction

A number of specialist studies are required in the EIA in order to investigate the potential environmental impacts associated with the proposed Environmental Experiential Centre at Bordjiesrif. These impacts have been identified based on:

- The Site Analysis Report ([Appendix C](#))
- The legal requirements (Chapter 1);
- The nature and scale of the proposed activity (Chapter 3);
- The nature of the greater receiving environment (Chapter 4);
- The issues raised in the Public Participation Process (Chapter 5); and
- SRK's expertise.

The key issues raised by stakeholders are summarised in Chapter 5 above. Those impacts, which have been identified by stakeholders or through the specialist studies, that relate to impacts (as opposed to management and process issues) include:

- Botanical impacts;
- Heritage impacts;
- Visual impacts;
- Social impacts;
- Faunal impacts; and
- Marine impacts.

6.2 Specialist Impact Assessments

A number of specialist studies have already been undertaken during the Site Analysis process. These studies helped to identify potential impacts early on in the process and have informed the proposed alternatives. The specialist studies already undertaken include:

- Botanical sensitivity analysis;
- Heritage sensitivity analysis;
- Visual precedent study; and
- Geotechnical assessment.

Additionally it is proposed that the following specialist impact assessments be undertaken for the EIA:

- Faunal Impact Assessment; and
- Marine Impact Assessment.

Draft Terms of Reference for the two outstanding specialist studies are provided in [Section 6.3](#) below.

Social impacts will also be addressed in the EIA, but it is not believed that a specialist study is warranted. In addition, a brief technical investigation into the flushing of the tidal pool and potential solutions to this problem will be undertaken during the EIA phase. This investigation is not a specialist impact assessment for the EIA.

6.3 Terms of Reference for Specialist Studies

6.3.1 Terms of Reference for Faunal Impact Assessment

- Describe the existing environment, in terms of faunal species present at or utilising the site and surrounds (at the appropriate scale, preferably in a regional context), with a focus on sensitive species, or species that may be affected by the proposed facilities;
- Assess and rate the potential impacts of each proposed alternative on the fauna in the area. The following potential impacts should be considered (if appropriate), in addition to any other impacts identified by the specialist:
 - The impacts of the baboon / human interaction
 - The impacts on nocturnal animals
 - The impacts on grazers
- Recommend mitigation measures or management actions to reduce impacts and enhance benefits;
- Indicate the environmental acceptability of each alternative;
- Indicate which is the environmentally preferred alternative; and
- Additional terms of reference as recommended by the specialist, based on professional expertise and experience.

6.3.2 Terms of Reference for Marine Impact Assessment

- Describe the existing marine environment, at the appropriate scale (preferably in a regional context);
- Conduct a site visit with the project team engineer to inspect the tidal pool and work closely with him to identify options for improving the functioning of the pool;
- Briefly describe any relevant marine legislative and permitting requirements that apply to the site (e.g. authorisation required for the construction and alteration of structures below the high water mark)
- Make recommendations as to how the local marine environment (including the tidal pool if appropriate) could be maximised for educational purposes;
- Assess the potential impacts of each proposed alternative on the marine environment, including an assessment of impacts associated with possible structural modifications to the tidal pool;
- Recommend mitigation measures to reduce impacts and enhance benefits;
- Indicate the environmental acceptability of each alternative;
- Indicate which is the environmentally preferred alternative; and
- Additional terms of reference as recommended by the relevant specialist, based on professional expertise and experience.

6.4 Impact Rating Methodology

The assessment of impacts will be based on the professional judgement of the specialists, fieldwork and desktop analysis. Potential impacts (positive and negative) of the project will be evaluated according to the criteria in [Table 6.1](#) below:

Table 6.1: Criteria used to determine significance ratings

Criterion	Description
Spatial extent	The extent of impact describes the region in which the impact will be experienced: <ul style="list-style-type: none"> • Site specific • Local (< 2km from site) • Regional (within 30km of the site) • National
Intensity or Magnitude of impact	The intensity describes the magnitude or size of the impact: <ul style="list-style-type: none"> • High: Natural and/or social functions and/or processes are severely altered • Medium: Natural and/or social functions and/or processes are notably altered

	<ul style="list-style-type: none"> • Low: Natural and/or social functions and/or processes are negligibly altered
Duration	<p>The duration is the time frame in which the impact will be experienced:</p> <ul style="list-style-type: none"> • Temporary (<1 year) • Short term (1 to 6 years) • Medium term (6 to 15 years) • Long term (15 - 30 years) • Permanent
Probability	<p>The probability of the impact occurring:</p> <ul style="list-style-type: none"> • Improbable (little or no chance of occurring) • Probable (< 50% chance of occurring) • Highly probable (50% - 90% chance of occurring) • Definite (>90% chance of occurring)

Based on a synthesis of the above criteria, the specialists will be required to rate the potential impacts as follows:

- **Not significant:** the potential impact is negligible and **will not** have an influence on the decision regarding the proposed activity/development.
- **Low:** the potential impact **should not** have any meaningful influence on the decision regarding the proposed activity/development.
- **Medium:** the potential impact **should** influence the decision regarding the proposed activity/development.
- **High:** the potential impact **will** affect the decision regarding the proposed activity/development.

Specialists will be required to recommend practical mitigation measures and to rate impacts in the prescribed way both before and after effective implementation of mitigation measures. Where relevant, cumulative impacts will be addressed.

7 FINDINGS AND RECOMMENDATIONS

7.1 Principal Findings

SANParks and the TMNP have identified Bordjiesrif as a suitable site for the development of an Environmental Experiential Centre. Originally, the intention was to develop an overnight facility and a substantial amount of work and public consultation was undertaken regarding this proposal. However, based on comments received from the public and within SANParks, a decision was made to include a broader range of alternatives for assessment in the EIA process. The EIA process was therefore restarted and this Scoping Study was undertaken as part of this process in terms of the EIA Regulations promulgated in terms of the Environment Conservation Act 73 of 1989.

The objectives of the study were to:

- Identify any issues and concerns associated with the proposed establishment and operation of the education facility; and
- Identify areas of likely impact and environmental issues that may require further investigation in an EIA.

During the Scoping Study, stakeholders identified a number of issues and concerns. In addition a number of potential impacts, associated with the proposed development, were identified. These were primarily identified through the baseline specialist studies that were done for the Site Analysis Report.

The key findings of the Scoping Study are as follows:

- SANParks are committed to exposing the wider community and particularly children to National Parks.
- TMNP was selected as one of the most appropriate Parks in which to expose children to a Parks experience in the Western Cape.
- Bordjiesrif emerged as a highly suitable site for the establishment an Environmental Experiential Centre in TMNP at a number of levels of planning.
- The Centre may comprise:
 - a day visitors' Environmental Experiential Centre;
 - a semi-permanent overnight Environmental Experiential Centre; or
 - a permanent overnight Environmental Experiential Centre at Bordjiesrif.
- The environment at Bordjiesrif has been impacted to some extent by previous developments.

- Most stakeholders are not opposed to the establishment of an environmental education facility at the proposed site, but some are concerned about an overnight facility and the management of the facility. Additionally some stakeholders have expressed reservations about the background planning to the project.
- The proposed development may result in the following potential key environmental impacts:
 - Botanical impacts;
 - Heritage impacts;
 - Visual impacts;
 - Social impacts;
 - Faunal impacts; and
 - Marine impacts.

7.2 Recommendations

Based on the findings of the Scoping Study it is recommended that an EIA should be undertaken to further investigate the potential impacts associated with the proposed establishment of Environmental Experiential Centre at the Bordjiesrif site. The EIA should include the specialist investigations recommended in Section 6.

7.3 The Way Forward

This DSR will be released for a 40 day review period. The Executive Summary of the DSR will be circulated to all IAPs registered on SRK's database on 4 May 2004. Full copies of the report will be placed at the following venues:

- Simon's Town Library;
- Kommetjie Library;
- Buffelsfontein Information Centre;
- SRK's offices; and
- Westlake, TMNP

The full report will also be available on TMNP's website: <http://www.tmnp.co.za>

Upon request, full hard copies of the DSR can also be mailed to stakeholders at a cost of R150 (incl. VAT) and / or a copy (excluding maps, diagrams and annexures) can be emailed free of charge. A CD can also be prepared and mailed at a cost of R60.

IAPs are also invited to attend a Public Information Sharing Session, which will be held on **25 May 2004**, where the information in the Draft Scoping Report will be presented and discussed. Details are as follows:

Venue : SANParks Offices,
Shop A1, Ground Floor
Westlake Square
Corner Steenberg Road and Westlake Drive
Westlake

Date : 25 May 2004

Time : 18h00

Written comments on the DSR should be submitted by **10h00 on 07 June 2004** to:

Belinda Breetzke

SRK Consulting
PO Box 6824
Roggebaai
8012

Fax: 021 - 4254648
Tel: 021 - 4092400
Email: bbreetzke@srk.co.za

All comments received will be included in the Final Scoping Report, which will be submitted to DEA&DP with a Plan of Study for EIA for their approval. Issues and concerns identified in the Scoping Study will assist in focussing the EIA and will be used to refine the Terms of Reference for specialist investigations, and the public is therefore urged to submit their comments.

Belinda Breetzke
Environmental Consultant

Kate Steyn
Senior Environmental Scientist

SRK Consulting

Appendix A

Revised Plan of Study for Scoping

Appendix B

SANParks' Internal Evaluation of Alternative Sites

Appendix C

Site Analysis Report

Appendix D

List of Stakeholders

Appendix E

Advertisements

Appendix F

Background Information Document (2002)

Project Update Document (2004)

Appendix G

Comments Received 2002 - 2003

Appendix H

Comments Received 2004

Appendix I

Educators Survey

SRK Consulting (South Africa) (Pty) Ltd

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