

**EXECUTIVE SUMMARY: FINAL SCOPING REPORT**

**PROPOSED UPGRADING OF BUFFELS BAY RECREATIONAL AREA,  
TABLE MOUNTAIN NATIONAL PARK**

**1 INTRODUCTION**

South African National Parks (SANParks) is proposing to upgrade the existing Buffels Bay Recreational Area. Buffels Bay has been utilised as a picnic and braai area for many years. Under the old Separate Amenities Act, Buffels Bay was used for picnicking by “white” communities and the nearby Bordjiesrif site for “non-white” communities. Since these laws were abolished, both sites continued to serve as picnic areas. SANParks is however of the opinion that two separate picnic sites in such close proximity are unnecessary. They want to upgrade and improve the facilities at Buffels Bay, which are currently poorly planned and unsightly. Simultaneously they are proposing to use Bordjiesrif for educational purposes (assessed in a separate application). The location of Buffels Bay is indicated in Figure 1.

SRK Consulting (SRK) has been appointed by SANParks to undertake the required Environmental Impact Assessment (EIA) process for the proposed upgrade of the Buffels Bay Recreational Area.

When SANParks first proposed the upgrading of the Buffels Bay Recreational Area in May 2002, it was intended to accommodate current users of the picnic facilities at Bordjiesrif. SRK was therefore appointed by SANParks to manage and co-ordinate an integrated planning process and to undertake the required EIA for both the Buffels Bay and Bordjiesrif projects.

The initial study commenced with the compilation of a Site Analysis Report. This report identified opportunities and constraints for the development and upgrading of the Buffels Bay and Bordjiesrif areas. A number of specialist studies were undertaken to inform the analysis, including: geotechnical, vegetation, archaeological and visual assessments.

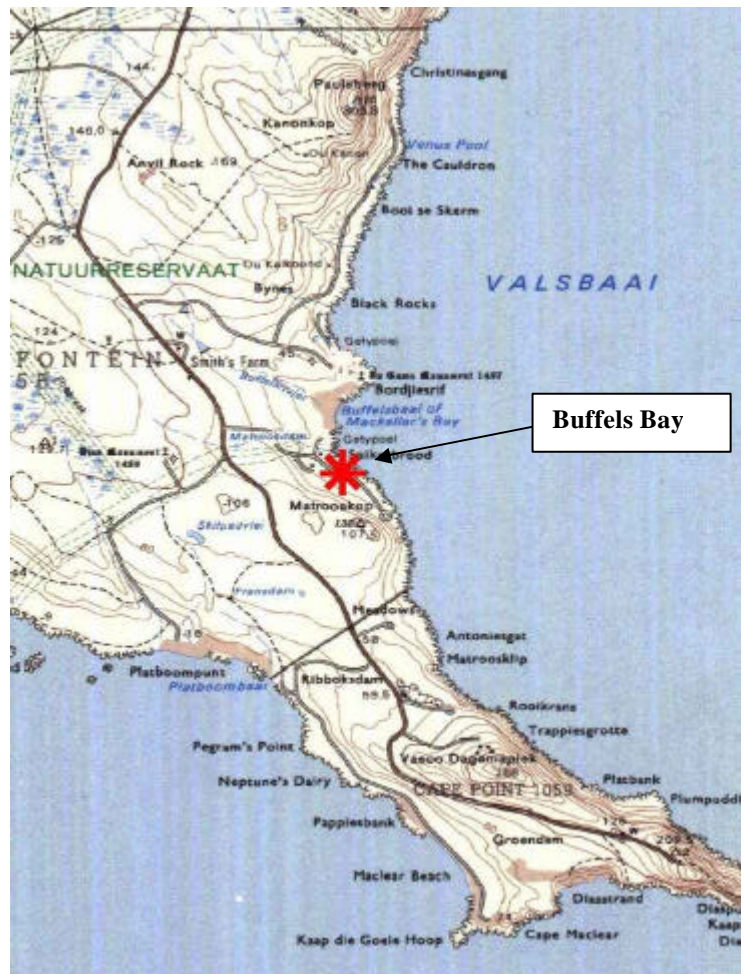
Then, in March 2003, SANParks requested that the professional team put the project on hold while internal decisions were made regarding the Bordjiesrif project. During this review process, it was agreed that the applications for the Buffels Bay and Bordjiesrif projects should be separated, as these no longer required the same level of assessment.

Consequently, a new Application and Scoping Checklist for Buffels Bay was submitted to the Department of Environmental Affairs and Development Planning (DEA&DP) on 23 April 2004.

**2 APPROACH**

The proposed development constitutes the following activities listed in terms of the EIA Regulations<sup>1</sup> namely:

- (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.



**Figure 1: Location Plan**

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

The EIA process stipulated in the Regulations is divided into a number of phases, the first of which is a Scoping Study. The Scoping Study was undertaken in accordance with the Plan of Study for Scoping submitted on the 23 April 2004 and accepted by DEA&DP on 24 May 2004. The Scoping Study was designed to meet the following objectives:

- Identify any additional stakeholders (besides those already registered) and inform all stakeholders of the proposed activity, new alternatives and the EIA process;
- Identify any issues and concerns associated with the proposed upgrade of the Buffels Bay Recreational Area;
- Produce a Scoping Report which will help DEA&DP to decide whether (and under what conditions) to authorise the project, and
- Identify areas of likely impact and environmental issues (if any) that may require further investigation in an EIA.

### 3 PROJECT DESCRIPTION

The proposed upgrade provides the opportunity to modernise facilities at Buffels Bay and remove existing, inappropriately sited facilities. The site will be upgraded, but not extended and portions of the existing footprint will be rehabilitated, thus reducing the overall footprint area.

New toilets and picnic facilities will be carefully sited and built in a style similar to the low stone walls that were used for the Cape Point upgrade. Three new toilet blocks will be provided with additional "porta-loos" being provided for special events. Picnic sites will be partly sunken to be less visually obtrusive and more sheltered from the wind. Berms and planting will provide additional shelter. The existing pre-fabricated toilets at the southern side of the site which use soakaways are a potential source of pollution and will be removed.

Indigenous vegetation will be re-established on portions of the site. The existing picnic sites located on the north western edge of the site in the vicinity of an existing cottage will be removed. The wetland located in the area will be rehabilitated where it has been grassed over, increasing biodiversity on this portion of the site.

Paths and circulation routes will be established through the site and raised boardwalks will be used to limit soil compaction, trampling and erosion in fragile areas. The gravel road on the northern end of the site will be closed to vehicles and reserved for pedestrian use only. The road to the southern side of the site would be re-routed, away from the coastline and stormsurge zone.

The site will continue to be managed by TMNP and access to the site will be controlled at the entrance gate to the Cape of Good Hope area.

*Note too that the Draft Scoping Report did not explicitly explain the facilities around the tidal pool, which will accommodate the toilet block and management facilities (e.g. small office and storage facilities). The area will also serve as tourists / activity meeting area. The Draft Scoping Report incorrectly indicated (in response to a question from an IAP) that the offices had been removed from the design. These facilities have been described in greater detail in this Final Report, but are **not expected to have any additional significant impact.***

### 4 ALTERNATIVES

In terms of both the EIA Regulations<sup>2</sup> and NEMA, the applicant is required to demonstrate that alternatives have been described and investigated in sufficient detail.

Given the fact that the proposal is for the upgrade of existing facilities rather than a new development, the EIA process will only consider the proposed upgrade and the no go alternatives.

### 5 AFFECTED ENVIRONMENT

Buffels Bay 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 thick deposit of recent windblown (aeolian) sand covers much of the site above the high-water mark and forms an extensive sand dune system, which has largely been stabilised by vegetation. Rock outcrops 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.

The quality of the groundwater is good and flows in a south-easterly direction, towards False Bay. A stream and associated wetland are located in the Buffels Bay valley (between Bordjiesrif and Buffels Bay). An existing wetland within the Buffels Bay area has been grassed over to form lawns. The existing toilet block is situated on this lawned area.

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.

<sup>2</sup> Regulation 6 (1) (d) GN No. R1183, dated 5 September 1997

Existing facilities at Buffels Bay have resulted in transformation of large areas of the site, 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*).

A number of shell middens and other historical sites are located in the vicinity of Buffels Bay. Buffels Bay and the surrounding area were 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; and
- A heavily impacted midden in between the parking area and the road to the tidal pool.

All these sites are protected in terms of the National Heritage Resources Act 25 of 1999 (NHRA).

## 6 PUBLIC PARTICIPATION PROCESS

Public consultation for the proposed Buffels Bay upgrade has occurred in two phases:

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

**Phase 2:** Public consultation only regarding the upgrade at Buffels Bay. (The Environmental Experiential Centre at Bordjiesrif is now being managed as an independent project.)

IAPs have raised a number of issues and concerns during the public participation process, which have been summarised into the following categories:

- **Process:** Concern that the interpretation of the zoning in the CDF is incorrect. Consideration must be taken of the no-go alternative.
- **Social Impacts:** Privatising the management of the site or giving it to concessionaires may impact on the accessibility of the site for use by everyone.
- **Visual Impacts:** The upgrading of the facilities may impact on the sense of place of the area. Buildings and facilities should be aesthetically pleasing and practical.

- **Faunal Impacts:** Opposition to the provision of a food kiosk because it will impact on the behaviour of the baboons. General concerns regarding management of baboons in the area.
- **Botanical Impacts:** Indigenous vegetation could be destroyed during the upgrade / construction.
- **Heritage Impacts:** A large number of historical sites and artefacts have been found in the area, these could be destroyed or damaged during construction.
- **Water and Soil Contamination Impacts:** Effluent from the ablation facilities is a potential source of pollution.

## 7 PRELIMINARY IMPACT ASSESSMENT

During Scoping, potential impacts, both positive and negative, have been identified. However, a preliminary assessment during Scoping indicates that some of these potential impacts will not result in actual impacts and are therefore not addressed in the Scoping Report. These insignificant or unrelated impacts are:

- **Social Impacts:** Upgrading of Buffels Bay should provide benefits for users and is a positive impact. A further insignificant positive impact is the very limited number of jobs which will be created during the construction phase.
- **Fauna Impacts:** Baboons in the entire Cape Point area are an ongoing problem that requires active management. While the baboon issue is recognised as a very important issue within the Park, the upgrading of Buffels Bay includes waste management strategies that will help improve current problems with the baboons. However increased use of the site may lead to an increase in the number of baboon/ human conflicts. Overall there will be a low negative impact.
- **Botanical Impacts:** The proposed upgrading of the Buffels Bay picnic area will be undertaken within the existing footprint of the disturbed area.
- **Water and Soil Contamination Impacts:** Increased volumes of effluent may impact on the surrounding environment. However, a combination of composting toilets, conservancy tanks and septic tanks (as appropriate) are proposed to deal with 'blackwater' or sewage and water from washbasins will be treated in soakaways. In addition, the existing pre-fabricated toilets at the southern side of the site will be removed. On balance there will be a low positive impact on soil and water quality.

Visual (or 'sense of place') and heritage impacts were identified as being potentially significant and were investigated in the Scoping study. The findings of the preliminary impact assessments (heritage and visual) indicated that the potential impacts would be relatively insignificant and/or beneficial, **assuming that the mitigation measures are effectively implemented** SRK Consulting is therefore of the opinion that there

are no potential impacts that require further assessment in an EIA.

## 8 FINDINGS AND RECOMMENDATIONS

### 8.1 Key Findings

The key findings of the Scoping Study are as follows:

- SANParks propose to upgrade the facilities at the Buffels Bay Recreational Area.
- If a separate proposal to re-develop the adjacent Bordjiesrif site is approved, this would reinforce the need to upgrade Buffels Bay;
- Most IAPs are not opposed in principle to the proposed upgrade the Buffels Bay Recreational Area. However, they have raised some concerns, relating to access to the site, the destruction of the sense of place and existing vegetation and the impact a kiosk would have on the baboons;
- The proposed upgrade may have the following potential key environmental impacts:
  - Limited socio-economic benefits;
  - Reduced botanical impacts;
  - Limited increased impact on baboons;
  - Improved soil and groundwater quality;
  - Improved visual quality of the site; and
  - Damage to heritage sites, especially during construction.
- The no-go alternative has fewer benefits and greater negative environmental impacts compared to the proposed upgrade alternative - if mitigation measures are implemented.

It is believed that sufficient information is available for a decision regarding the upgrade at Buffels Bay to be made.

### 8.2 Recommendations

If DEA&DP approves the proposed upgrade, a condition of approval should be that the recommendations and mitigation measures presented below are effectively implemented by SANParks.

The general recommendations are to:

- Commit to and effectively implement the mitigation measures listed in this report.
- Formulate and implement an Environmental Management Plan (EMP) for the construction phase of the project (if approved), incorporating:

- methods to mitigate environmental impacts during construction;
- assigned responsibilities for the implementation of the EMP;
- costs associated with the EMP;
- a specific heritage management component;
- Compile an operational management plan to ensure the appropriate mitigation measures are implemented once the upgrade is completed.

## 9 WAY FORWARD

Many of the issues and concerns identified during the scoping study have assisted in focusing the process. Based on comments received, the Final Scoping Report has been amended slightly, but is similar to the preceding draft.

The Final Scoping Report will be submitted to DEA&DP for their approval.

Although intended mainly as a report to assist DEA&DP, this report is also available at:

- Simon's Town Library;
- Fish Hoek Library; and
- Westlake, TMNP

The full report will also be available on TMNP's website: <http://www.tmnp.co.za> and the Executive Summary of the Final Scoping Report will be sent to all identified IAPs.

The report has been placed in these venues as a public record of the document (to be) used by DEA&DP in taking their decision, and is not intended to solicit further comment for the EIA process. However, if members of the public do have further comments or suggestions, these should be sent to:

Mr Michael Slayen  
**SANParks**, PO Box 37, Constantia, 7848  
 Tel: 021 701 8692  
 Email: [michaels@sanparks.org](mailto:michaels@sanparks.org)

Upon request, full hard copies of the FSR can also be mailed to stakeholders at a cost of R200 (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 R100.

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