

**PROPOSED CONSTRUCTION OF A NEW
SEWAGE TREATMENT PLANT AT CAPE POINT,
TABLE MOUNTAIN NATIONAL PARK**

SCOPING REPORT

Draft for Comment

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ACRONYMS

DEAT	Department of Environmental Affairs and Tourism
EAP	Environmental Assessment Practitioner
EIA	Environmental Impact Assessment
IAPs	Interested and Affected Parties
IEM	Integrated Environmental Management
NEMA	National Environmental Management Act
PPP	Public Participation Process
RoD	Record of Decision
WWTW	Wastewater Treatment Works

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SCOPING REPORT

DEAT REFERENCE NUMBER:

12/12/20/610/3/13

1. INTRODUCTION

1.1 Background and Terms of Reference

Cape Point is the most frequented tourist site in all of South Africa's national parks, having attracted 855 739 visitors in the 2007/2008 year with the figure having steadily grown at an average rate of approximately 2.5 % of the past years. This growth, coupled with the imminent FIFA 2010 Soccer World Cup, indicates that facilities and infrastructure at Cape Point need to be upgraded. SANParks proposes, as a key element of a wider infrastructure upgrading scheme for the Cape Point precinct, the installation of new sewage treatment plant to meet the demands of the growing numbers of visitors to the site. The proposed plant will be designed to treat approximately 20 000 m³ of effluent per month and therefore exceeds the threshold listed in the NEMA EIA Regulations as requiring environmental authorisation. Procedurally the National Environmental Management Act (NEMA), Act 107 of 1998 (as amended) EIA Regulations stipulate that a full Scoping and EIA process must be undertaken. SANParks has appointed Nick Steytler to undertake the full Scoping and EIA Process.

This Scoping Report serves the following purpose:

- Provides the background to the EIA (see **Chapter 1**);
- Provides the legal and administrative context for the EIA (see **Chapter 2**);
- Describes the site and the affected environment (see **Chapter 3**);
- Provides the motivation for and a description of the new sewage treatment plant that is being proposed (see **Chapter 4**);

- Describes the alternatives that are being considered in the EIA (see **Chapter 5**)
- Provides a record of the Public Participation Process (PPP), including a summary of the issues and concerns of Interested and Affected Parties (see **Chapter 6**);
- Describes areas of likely environmental impact and environmental issues that may require further investigation (see **Chapter 7**);
- Presents the Plan of Study for the Impact Assessment phase (see **Chapter 8**); and
- Presents the key findings of the Scoping Study and the presents the Way Forward (see **Chapter 9**)

1.2 Approach to the EIA Process

The approach to the Scoping Study has been guided by the applicable legislation ([Section 2](#)) and the principles of Integrated Environmental Management (IEM). The underlying principle of IEM is that environmental factors should be integrated into development proposals to ensure that critical environmental concerns are addressed upfront. The principles laid out in NEMA (Act No. 107 of 1998) are similar in intention to those of IEM. In accordance with the principles of IEM and NEMA, an open, transparent approach which encourages accountable decision-making has been adopted.

The underpinning principles of IEM require:

- Informed decision making and accountability for information on which decisions are made;
- A broad meaning to the term 'environment';
- An open participatory approach in the planning of proposals and consultation with Interested and Affected Parties (IAPs);
- 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.

The study has also been guided by the requirements of the EIA Regulations set out in terms of NEMA. The NEMA EIA Regulations provide for two different levels of EIA:

1. the Basic Assessment; and
2. the full Scoping and EIA.

As the proposed development triggers an activity listed in Government Notice 387 a full Scoping and EIA process must be undertaken. This consists of two main phases, the Scoping phase and the EIA phase, which are outlined in [Figure 1.3](#). This process is currently at the Scoping Phase. As indicated, the overall aim of the Scoping Phase is to determine those environmental issues and impacts associated with the proposed development that require further investigation in an EIA.

The EIA process that has been followed is depicted in [Figure 1.3](#).

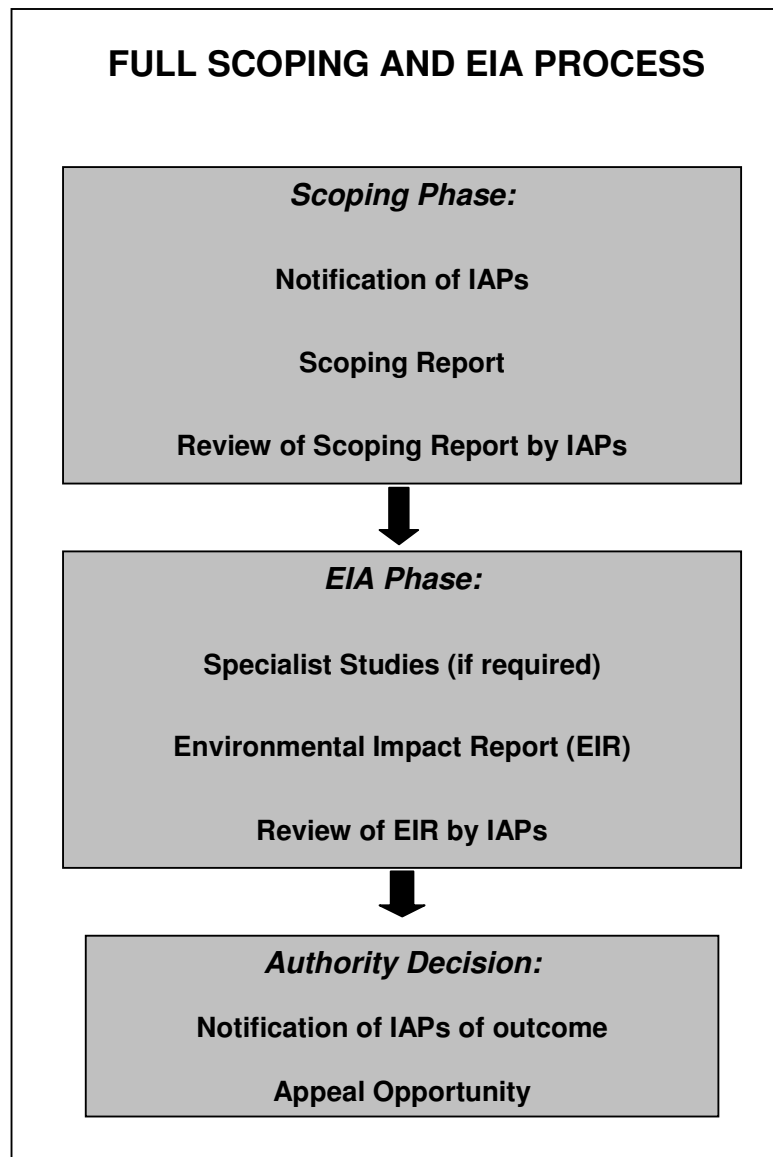


Figure 1.1: The full Scoping and EIA process

The Scoping Study was undertaken in accordance with Sections 28 and 29 in Government Notice R 385 and the applicable guidelines. The Scoping Study has been designed to meet the following objectives:

- Identify and consult with IAPs;
- Identify any issues and concerns associated with the proposed activity;
- Identify areas of likely impact and environmental issues (if any) that may require further investigation in an EIA and thereby define the ToR for the required specialist studies.

The activities undertaken to date in the Scoping Study are outlined in [Table 1.1](#).

Table 1.1: Activities undertaken during this Scoping Study

Activity	Objectives	Reference
Submission of EIA Application Form	<ul style="list-style-type: none"> • To initiate the EIA application process and to have a reference number appointed to the project • To provide the relevant authority (DEAT) with information concerning the applicant and the scope of the project • To confirm the procedural requirements of the relevant authority (DEAT) 	Annexure A
Application consultation with DEAT	<ul style="list-style-type: none"> • To familiarize the authority with the proposed site, surrounding area and the proposed development • To identify potentially significant issues and red flags 	Undertaken during Site Visit on 11 September 2008
Background information review	<ul style="list-style-type: none"> • To review applicable legislation and available information on the proposed project and the potentially affected environment 	Chapters 2, 3 and 4 of this report
Alternatives	<ul style="list-style-type: none"> • To describe the alternatives that are being considered in the EIA process 	Chapter 5
Public Consultation	<ul style="list-style-type: none"> • To identify IAPs, including individuals, interest groups and authorities who may be interested in or affected by the proposed project • To consult with IAPs to identify their issues and concerns regarding the proposed project 	Chapter 6 Annexure B
Scoping Report	<ul style="list-style-type: none"> • To record the issues and concerns raised by IAPs • To present the Plan of Study for the EIA phase including Terms of Reference for specialist studies (if required) • To present the findings of the Scoping phase for IAP 	Chapters 7, 8 and 9

Activity	Objectives	Reference
	scrutiny	

1.3 Assumptions and Limitations

The findings of the report are affected by the following:

- ◆ It has been assumed that information provided by other consultants and the proponent is accurate.
- ◆ Focus is on the new sewage treatment plant only as this is the only aspect of a wider tourism infrastructure and amenity upgrade that is being undertaken at Cape Point that triggers any requirement for EIA approval.

2. LEGAL AND ADMINISTRATIVE CONTEXT

2.1 Introduction

The key legislation which provides the regulatory framework for environmental management in South Africa is as follows:

- The Constitution of South Africa Act, 1996 (Act No. 108 of 1996);
- The National Environmental Management Act, 1998 (Act No. 107 of 1998);
- Environmental Impact Assessment Regulations, promulgated in terms of the National Environmental Management Act, 1998 (Act 107 of 1998);

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.

2.2 The Constitution of South Africa Act, 1996 (Act No.108 of 1996)

The Constitution is the supreme law of South Africa, against which all other laws are measured; any laws in conflict with it are therefore invalid. It protects certain fundamental rights which are, however, not absolute, and may be limited 'in terms of law of general application to the extent that the limitation is reasonable and justifiable in an open and democratic society based on human dignity, equality and freedom' (Section 36).

The Environmental Clause

One such fundamental right in Section 24 provides the basic framework for all environmental policy and legislation, and it states:

"Everyone has the right –

- a) to an environment that is not harmful to their health or well-being; and
- b) to have the environment protected, for the benefit of present and future generations, through reasonable legislative and other measures that –
 - i) prevent pollution and ecological degradation;
 - ii) promote conservation; and

- iii) secure ecologically sustainable development and use of natural resources while promoting justifiable economic and social development.”

It is however important to note that though an activity may be allowed in terms of an Act of Parliament or a permit issued under a statute, **it may still be declared unlawful if it is harmful to human health or well-being.**

Access to Information

Section 32 provides that everyone has the right of access to any information held by the State or another juristic person, and that is required for the exercise or protection of any rights.

Just Administrative Action

Section 33 of the Constitution entrenches the right to lawful, reasonable and procedurally fair administrative action, as well as written reasons for administrative actions that have adversely affected a person's rights.

Enforcement of Rights

In terms of Section 38, if any rights in the Bill of Rights have been infringed or threatened, a court may be approached for assistance by a person acting individually; on behalf of another who is incapacitated; on behalf of a group or class of persons; in the public's interest, or as an association in the interests of its members.

2.3 National Environmental Management Act, 1998 (Act No. 107 of 1998), as amended

The National Environmental Management Act (NEMA) provides the legislative framework for Integrated Environmental Management (IEM) in South Africa. Section 24 provides that all activities that may significantly affect the environment and require authorisation by law must be assessed prior to approval. NEMA also provides for co-operative environmental governance by establishing principles for decision-making on matters affecting the environment, institutions that will promote co-operative governance and procedures for co-ordinating environmental functions exercised by organs of the State and to provide for matters connected therewith. Section 2 of NEMA establishes a set of principles that apply to the activities of all organs of state that may significantly affect the environment.

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; and
- Responsibility for the environmental health and safety consequences of a policy, project, product or service exists throughout its life cycle.

These principles are taken into consideration when a government department exercises its powers, for example during the granting of permits and the enforcement of existing legislation or conditions of approval.

Section 28(1) of NEMA 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 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 impacts of the pollution.

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

2.4 EIA Regulations promulgated under the National Environmental Management Act, Act 107 of 1998, as amended (NEMA EIA Regulations, 2006)

New EIA Regulations were promulgated under Section 24 of NEMA and came into effect on 3 July 2006. These new EIA Regulations¹ list certain activities that are deemed to be potentially harmful to the environment, and thus require environmental authorisation before they commence. The new EIA Regulations prescribe two different authorisation processes, depending on the listed activities that a proposed development triggers. The two processes are as follows:

1. The Basic Assessment Process; and
2. The Scoping and EIA process.

Irrespective of which process applies, the Regulations make provision for the following:

- Public Participation must be undertaken at various stages during the assessment process;
- Assessments must be conducted by an Independent Environmental Assessment Practitioner (EAP);
- The authority delegated with deciding on environmental applications respond to applications and submissions within stipulated timeframes;
- Decisions taken by the authorities can be appealed by the proponent or any other interested and affected party (IAP).

For the proposed development there is an applicable listed activity that require that a full Scoping Study and EIA² be undertaken. The applicable activity is as follows:

1. *The construction of facilities or infrastructure, including associated structures or infrastructure, for –*
 - (p) *The treatment of effluent, waste water or sewage with an annual throughput of 15 000 cubic metres or more*

As the proposed development triggers an activity listed in Government Notice 387 an environmental application must be lodged with the National Department of Environmental Affairs and Tourism (DEAT) and full Scoping and EIA process must be undertaken.

The NEMA EIA Regulations also makes provision for appeal against any decision issued by the relevant authorities³. In terms of the Regulations, a notice of intent to appeal has to be lodged

¹ EIA Regulations, 2006 in terms of the National Environmental Management Act (No 107 of 1998)

² Activities listed in GN 387 are required to follow the procedures for a Scoping study and EIA as described in Sections 37-36 of the NEMA Regulations.

with the authority in writing within 10 days of the notification of the issue of the Record of Decision (RoD). The appeal must then be lodged within 30 days of the submission of the notice of intent to appeal.

Implications for SANParks

SANParks must first obtain environmental authorisation before commencing with the installation and commissioning of the new sewage treatment plant. To obtain the required environmental authorisation SANParks must comply with the requirements of the NEMA EIA Regulations and undertake a full Scoping and EIA process. SANParks must also commission the services of an Environmental Assessment Practitioner (EAP) to undertake the full Scoping and EIA process. SANParks has appointed Mr Nick Steytler as the EAP to undertake the full Scoping and EIA process in accordance with the NEMA EIA Regulations.

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

Water use is controlled by the National Water Act (NWA). The enforcing authority is the Department of Water Affairs and Forestry (DWAF). The NWA recognises that water is a scarce resource in South Africa and its provisions are aimed at achieving sustainable use of water for the benefit of all users. The provisions of the Act are thus aimed at discouraging pollution and waste of water resources.

Chapter 3 of the National Water Act focuses on protection of water resources. Pollution prevention is covered in Part 4 (Section 19) of this chapter of the Act. Any person, who owns, controls, occupies or uses land, is deemed responsible for taking measures to prevent pollution of water resources. If these measures are not taken, the responsible authority may do whatever is necessary to prevent the pollution or remedy its effects and to recover all reasonable costs from the responsible person. Non-compliance with this provision constitutes a criminal offence.

According to section 21 of the Act, "water use" includes the discharging of waste or water containing waste into a water resource via a pipe, canal, sewer, sea outfall or other conduit and disposing of waste in a manner that may detrimentally impact on a water resource. Section 22 stipulates the authorisation requirements for water use in terms of the Act.

Legal Requirements for SANParks

In terms of sections 21 and 22 SANParks may have to obtain a licence or general authorisation prior to commencing with the proposed operation of the sewage treatment plant, which entails the discharge of treated effluent into the environment via a system of conservancy tanks and

³ GN R 385

soak-aways, may be deemed a water use. The precise requirements will be determined in consultation with DWAF.

3. DESCRIPTION OF SITE, SURROUNDING LAND USE & THE POTENTIALLY AFFECTED ENVIRONMENT

3.1 Site Description

Cape Point is located within the Cape of Good Hope section of Table Mountain National Park (TMNP, see Figure 3.1). The proposed site for the new sewage treatment plant is immediately adjacent and to the west at the parking area that serves the restaurant, shops and funicular at Cape Point.



Figure 3.1: Location of the site

Most of the site comprises tarred paving which is bordered with natural stone finishes. Buildings within the Cape Point precinct include the following:

- A visitors Information Centre/TMNP staff office/concessionaire office combined into one building which is located to the north west of the parking area;
- A restaurant which is located to the north of the parking area (the roof of which is at the same level as the parking area);
- A small shop which is located to the east of the parking area; and

- Ablutions which are located to the south east of the parking area (the roof of which is also at the same level as the parking area).

All buildings are of a similar design with flat planted roofs and plastered with aggregate to minimize their visual intrusion in the landscape. A paved walkway extends to the south east which provides access to the funicular which transports tourists to viewing sites nearer the point and the site of the old lighthouse. Bordering the transformed zone is natural vegetation comprising mostly dense thicket vegetation. Photographs showing the nature of the site are included in [Figure 3.1](#).



Figure 3.2: Photographs showing the proposed site for the new sewage treatment plant

3.2 Surrounding Land Use

As the site is situated within TMNP the predominant land use is nature conservation. Being situated on the southernmost tip of the Cape Peninsula the site is virtually surrounded by the Atlantic Ocean. Beyond the boundary and to the north west of the Cape of Good Hope section of TMNP lie several privately-owned farms including the Cape Point Ostrich Farm which is a popular tourist attraction. The nearest human settlements to Cape Point are Simons Town, Red Hill Informal Settlement and Scarborough with Simons Town being the largest town. The Cape Town CBD is located at the northern-most extreme of the Cape Peninsula, some 50 km away.

3.3 Biophysical Environment

3.3.1 Geology

The geology of Cape Point is dominated by the Table Mountain Sandstones. The rock outcrops of the middle and upper cliffs in the vicinity of the site comprise horizontally bedded quartzitic sandstones and are further characterised by vertical joint patterns. These quartzitic layers overlie the lower, red weathering Graafwater Formation sandstones and shales, which are best represented along the “Rooikrantz” anglers path. These red shales and impure sandstones in turn overlie the Cape Granites which are only exposed at the water’s edge below the new light house and also for the offshore rocks known as Bellows and Anvil Rock.

3.3.2 Soils

The soils of the Point are typically Mispah form, characterised by a high percentage rock outcrop with shallow sandy soils on the quartzite. The soils of the limestone deposit are best classified as hardpan calcrete soils, with overlying unconsolidated windblown sands which blow over the saddle from the Dias Beach as a headland cut-off dune. While the Mispah soils are extremely acid the limestone soils are extremely basic. They have, however, one common aspect that they are both very poor in nutrients and create a harsh environment for plant growth. The implications are that given the poor soils, compounded by the harsh climate (wind), vegetation is not easily established after physical or other damage. A further aspect is that these soils have much in common with the laterite and calcrete of Australia and form an ideal habitat for alien vegetation such as Port Jackson and Rooikrantz, both of which are of Australian origin.

3.3.3 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).

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.

3.3.3 Hydrology and Geohydrology

There are no large rivers located in the vicinity of the site. The nearest stream and associated wetland are located in the Buffels Bay valley to the north west of the site (between Bordjiesrif and Buffels 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. 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 either toward the west or the east depending on which side of the watershed one is located.

3.3.4 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 Cape Point have resulted in the transformation of some areas, particularly as a result of paving of roads and the parking area. The areas around the existing facilities at Cape Point support mostly various thicket vegetation communities which are arguably the least sensitive of the communities present at Cape Point. More sensitive fynbos communities (including Mesic Mesotropical Proteoid Fynbos, which occur on the higher lying gentler slopes and Dune Asteraceous Fynbos) occur in the greater vicinity as does Coastal Scree (Asteraceous) Fynbos, which is known to occur on steeper scree slopes.

3.3.4 Fauna

The habitats in the vicinity of Cape Point generally belong to the generalized coastal communities that occur along the coast up to the Eastern Cape. As such they have a lower local endemism than the fynbos communities elsewhere in Cape Point.

3.3.6 Marine

Diversity of the marine flora and fauna in the Cape Point area is elevated by the presence of three distinct intertidal and subtidal habitat types – sandy beach and subtidal soft sediment

areas, rocky intertidal and subtidal reefs, and boulder beaches. However, biota present in the study area are not unique in the context of the False Bay coast and there are no species known to be unique to this stretch. Most components of the marine biota in the study area have a relatively high tolerance to disturbance.

3.4 Socio-Economic Environment

3.4.1 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.

3.4.3 Social context

Capetonians regard the Cape of Good Hope as a valuable amenity asset and have a long history of utilising the park, its amenities and resources. In more recent times and particularly since the park's proclamation as a National Park, the park has seen a dramatic increase in foreigners visiting the park. A Visitor Survey conducted over 1999/2000 revealed that 47% of all visitors to the Point are foreign tourists. 61% come from outside the Cape Metropolitan Area and can be classified as tourists (local and foreign), while 39% are local visitors from within the Cape Metropolitan Area. Monthly trends show that almost twice as many tourists visit Cape Point in the summer months than the winter months. The same survey revealed other interesting trends associated with the two fundamentally different user groups:

- Almost all foreign respondents visited the Point as a sightseeing destination, while just over half the local respondents (53%) stated sightseeing as a primary reason for their visit.
- The next most common activity for local visitors interviewed at Cape Point was picnicking and braaing (27% and 19% respectively), as opposed to foreign visitors who gave walking as their next most common reason for visiting (46%).
- Local visitors interviewed, visited for a wider range of reasons than their foreign counterparts. These included swimming, beach use, fishing, diving, identifying fauna and flora, boat use and education outings.

- Foreign visitors included cycling as an activity at Cape Point, which was note mentioned by local users (probably due to the fact that there is an operator marketing this activity for foreign tourists).

4. MOTIVATION FOR AND DESCRIPTION OF THE PROPOSED DEVELOPMENT

4.1 Motivation

Cape Point is the most frequented visitor site in all national parks in South Africa with annual visitor numbers in the 2007/2008 year being reported as 855 739 with this number rising steadily from year to year. Many visitors make use of the facilities at Cape Point which include the ablutions which generate significant volumes of sewage. Added to this is the operation of a restaurant which is very popular with visitors to Cape Point, which also generates significant volumes of liquid effluent. To date this effluent has been directed via a gravitational reticulation system to a system of conservancy tanks and soak-aways. This system is effective in treating effluent and disposing the treated liquid by-product ("treated effluent") at relatively low volumes. However when volumes of effluent generated increase then more "advanced" methods of effluent treatment and disposal become necessary and this is the case at Cape Point.

Based on visitor number projections, effluent estimates (see [Annexure C](#)) indicate that the capacity of the current system will be exceeded in the short-term and therefore an improved system is urgently required. The new proposed "package" sewage treatment plant has a proven track record, has capacity to treat greater volumes of effluent and has the ability to treat the effluent to meet the standard required by DWAF in permitting the disposal of the treated effluent in the environment (see [Section 4.2](#)). SANParks considers the "package" plant as the most appropriate means of treating effluent at Cape Point, particularly given the space constraints and sensitivity of the potentially affected environment.

4.2 Description of the Proposed Development

The proposed development will entail the construction of the new package treatment plant and associated infrastructure (vehicular access ramp for servicing, planted roof, etc) in an area of 20 X 20 m. The existing reticulation system and system of conservancy tanks and soak-aways will remain unchanged.

The proposed sewage treatment plant will be designed to treat approximately 20 000m³ of sewerage per annum with a maximum flow estimated at 44 Kl/day. The treatment process is the activated sludge method, common with many large sewage treatment works, with the exception that the various components of this system are contained within a package plant. In an activated sludge process settled sewage, mixed with fresh sludge that is reticulated from the secondary clarifier, is introduced into an aeration tank. Compressed air is then injected into the mixture through porous diffusers located at the bottom of the tank. As it bubbles to the surface, the diffused air provides oxygen and a rapid mixing action. Under such oxygenated conditions,

microorganisms thrive; forming an active, healthy suspension of biological solids (mostly bacteria) called activated sludge. About six hours of detention is provided for in the aeration tank. This gives the microbes enough time to absorb dissolved organics from the sewage, thereby reducing the BOD. The mixture then flows from the aeration tank into the secondary clarifier, where activated sludge settles out by gravity. Clear water is skimmed from the surface of the clarifier, disinfected, and discharged as treated effluent. The sludge is pumped out from a hopper at the bottom of the tank. About 30 percent of the sludge is reticulated back into the aeration tank, where it is mixed with the primary effluent. This recirculation is a key feature of the activated sludge treatment process. The recycled microbes are well acclimated to the sewage environment and readily metabolize the organic materials in the primary effluent. The remaining 70 percent of the secondary sludge must be treated and disposed of in an acceptable manner. For all levels of effluent treatment, the last step prior to discharge of the treated effluent into the environment is disinfection. Disinfection will be accomplished by ultraviolet radiation, which can disinfect without leaving any residual contaminants in the effluent. The treated effluent from the plant will then be discharged directly into the existing system of conservancy tanks and soak-aways.

The specific standards that the proposed plant will treat the effluent to is provided in Table 4.1. The standard is compliant with the DWAF General Limit which is deemed suitable for disposal either via direct discharge into a watercourse or via irrigation.

Table 4.1: Effluent standards achieved by proposed plant

Contaminant (or similar)	Level
pH	6.0 to 8.0
COD	<75 mg/l
OA	<10 mg/l
Suspended Solids	<25 mg/l
Ammonia	<5 mg/l
Nitrate	<10 mg/l
Faecal coliform	<100 counts/100ml

Further details can be obtained on the internet via the website (www.fpending.co.za/wyatt.htm).

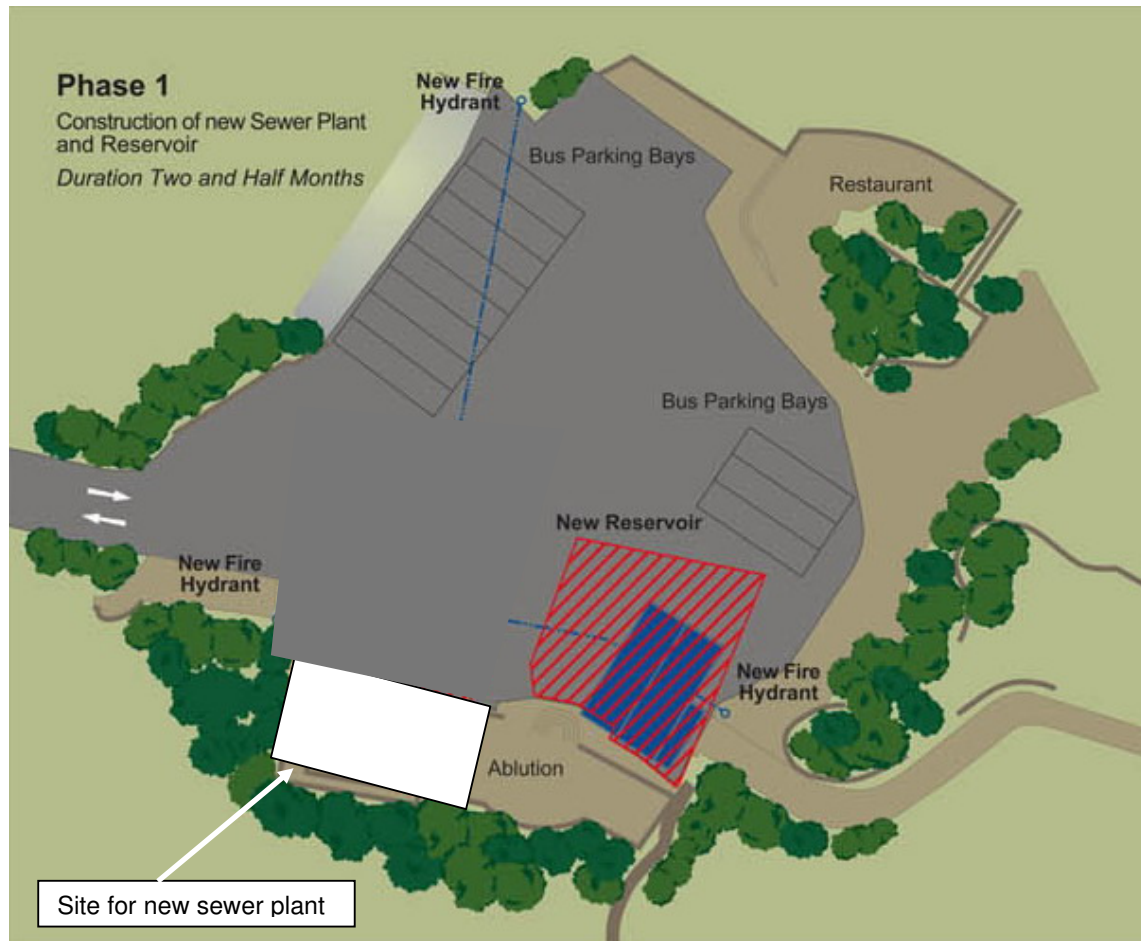


Figure 4.1: Site Plan showing the location of the proposed sewage plant

The proposed sewage treatment plant will be housed in a building of similar architectural style to the adjacent ablution with natural stone finishes and a flat planted roof that will be at the same level as the parking area (i.e. below ground level). Due to the steep fall of the site (see [Figure 3.1](#)) the southern portion of the building will be exposed. Also required is vehicular access to the plant for purposes of operational maintenance. A ramp will therefore be provided immediately adjacent and to the north of the proposed sewage plant housing. Engineering drawings showing the detailed design of the proposed sewage treatment plant are provided in [Figure 4.2](#).

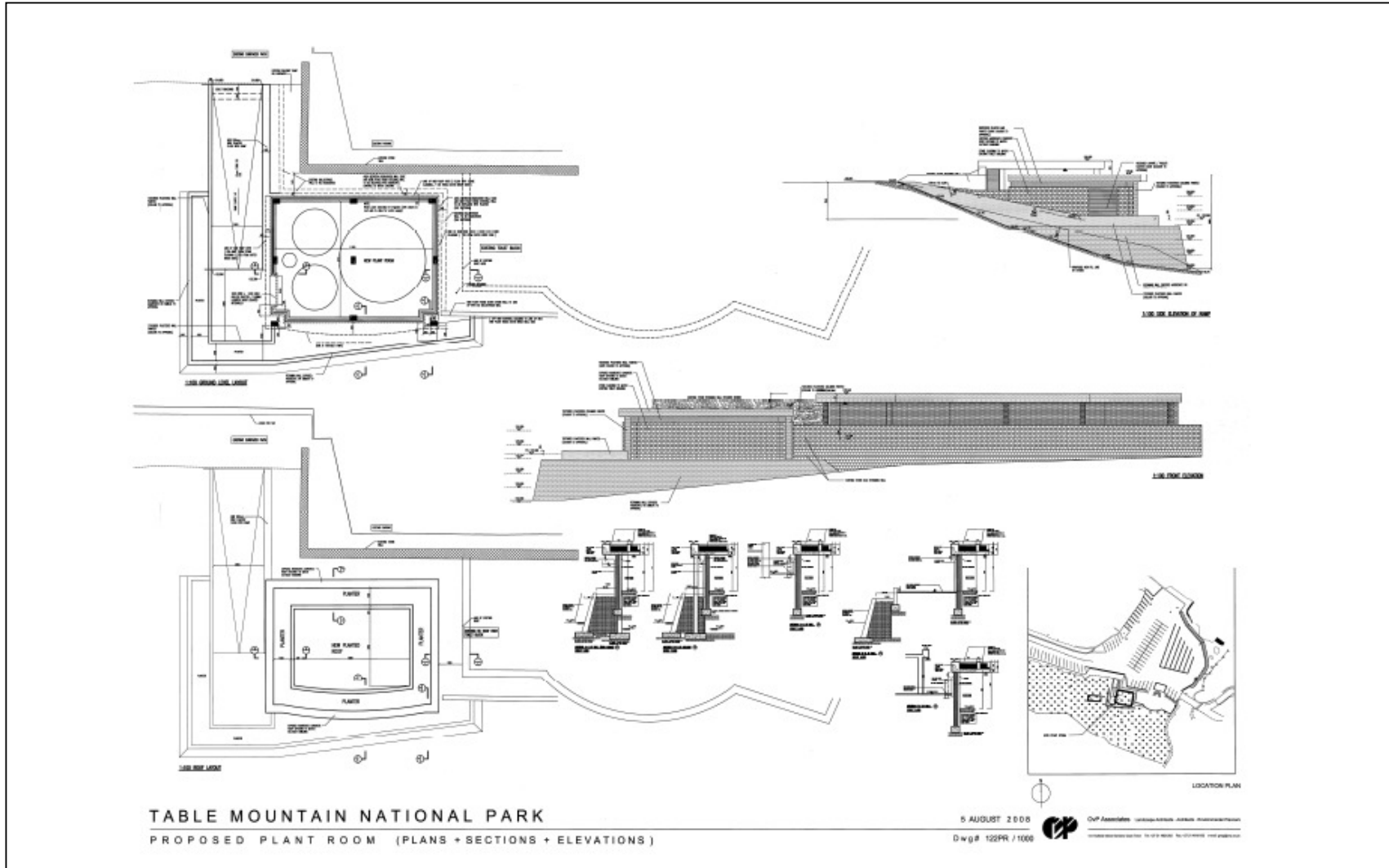


Figure 4.2: Engineering drawing showing the proposed layout and elevations

5. CONSIDERATION OF ALTERNATIVES

5.1 Introduction

In terms of the NEMA EIA Regulations (2006) the applicant is required to demonstrate that reasonable alternatives have been described and investigated in sufficient detail. In addition to the preferred alternative as described in Chapter 4, the following additional alternatives are being considered in this EIA:

- The **“No-Go”** or “leave as is” alternative;
- Connecting to the municipal sewerage reticulation system;
- Two site alternatives within the Cape Point precinct.

These are described in more detail in the following sections.

5.2 “No-Go” alternative

The “No-Go” or “No Development” alternative assumes that the current system of effluent treatment, the system of conservancy tanks and soak-aways, will remain in place. The assessment of the “No-Go” alternative is particularly informative as it demonstrates the merits of upgrading the effluent treatment system at Cape Point. In assessing the suite of potential impacts associated with the proposed development equal and due consideration will be given to the “No-Go” alternative (see [Section 8.5](#)).

5.3 Connecting to the Municipal Sewerage Reticulation System

A logical alternative to constructing a new sewage treatment plant is the option of connecting to the Municipal sewerage network. This will then allow the effluent generated at Cape Point to be treated at one of the City of Cape Town’s large Wastewater Treatment Works (WWTW). This option would necessitate the construction of a new sewerage pipeline from the Cape Point precinct to the nearest connection point in the Municipal reticulation, assumed to be at either Scarborough or Simon’s Town some 20 km away by road. As it is common practice to align services in road reserves one can assume that approximately 20 km of new pipeline would be required. Also, owing to local topographic conditions, gravitational feed would not be possible along the entire length of the pipeline therefore necessitating one or more pumpstations.

5.4 Site alternatives

In selecting the proposed site immediately west of the existing parking area, SANParks considered two additional alternative sites within the Cape Point precinct. These sites are depicted in Figure 5.1.

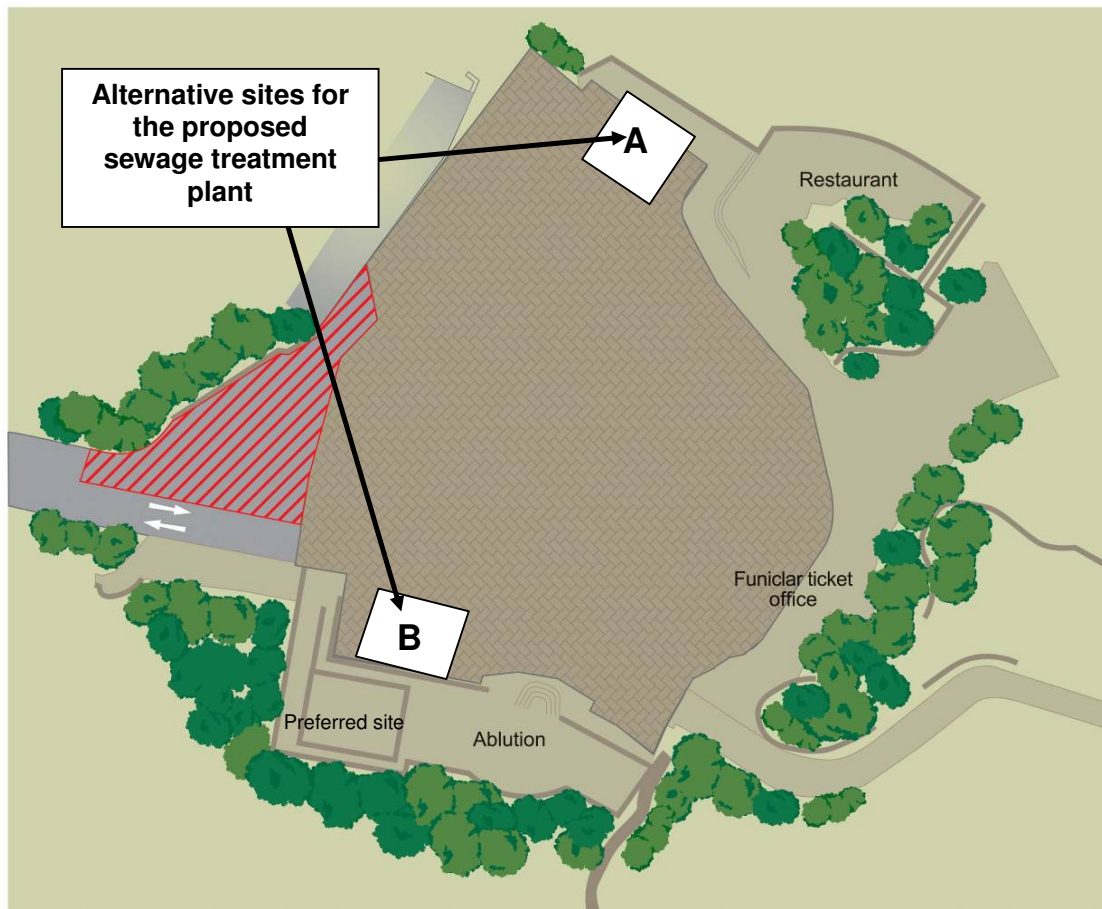


Figure 5.1: Alternative sites considered

The two alternative sites considered by SANParks are both located within the existing footprint of the parking area. This being the case both options would entail siting the proposed plant beneath the paved surface. Site alternative A, located in the northern extreme of the parking area, would necessitate a reconfiguration of the precinct's sewerage reticulation and would also require the relocation of the system of conservancy tanks and soak-aways from their current location approximately 100 m due south west of the parking area to a site to the north of the access road and

parking area (so as to allow treated effluent to feed by gravity). Site alternative B is located near the preferred site with the difference that it is at a slightly higher elevation and would be situated underneath the paved parking surface. Utilising this site would not require a major reconfiguration of the precinct's sewerage reticulation but effluent generated at the ablutions further to the south west would need to be pumped up to this point owing to the elevations. Site alternative A would also be situated beneath the paved parking surface.

5.5 Assessment of alternatives

Each of the alternatives described above will be assessed in detail in the EIA phase of the process, both in terms of potential environmental impacts and technical feasibility (see [Section 8.5](#)). A comparison of the alternatives will be provided with the most environmentally sustainable option being identified.

6. PUBLIC PARTICIPATION PROCESS (PPP)

6.1 Objectives of the PPP

The objectives of the PPP are to:

- Identify and inform IAPs about the full Scoping and EIA process currently being undertaken;
- Provide IAPs with the opportunity to identify key issues and concerns associated with the proposed development;
- Determine whether there are any key issues or potential impacts that need to be addressed in the EIA.

6.2 Approach

The PPP was undertaken in accordance with the requirements of the NEMA EIA regulations. The activities undertaken to canvas public opinion regarding the proposed development are summarised in [Table 2](#).

Table 6.1: Summary of activities undertaken during public consultation

Activity	Date
Advertisement of the process in the Regional and local press	15 September 2008
Placement of on-site notices	15 September 2008
Release of Scoping Report for comment Copies placed on SANParks website and a copy of the Executive Summary sent to all potential IAPs	15 September - 15 September 2008

The activities undertaken during the public consultation are outlined in more detail below.

6.2.1 Placement of Notification Advertisement

An advertisement announcing the EIA, the availability of the Scoping Report and inviting IAPs to register on the project database was placed in the “Cape Times”, “Die Burger” and “Cape Argus” regional newspapers and in the “False Bay Echo” on 15 September 2008. A copy of the advertisement is provided in [Annexure D](#).

6.2.3 Placement of On-site Notices

On-site notices were placed at the entrance to the Cape of Good Hope section of TMNP, at Buffelsfontein Tourist Information Centre and at the site for the duration of the combined notification / review period. In addition a notice was also placed at SANParks' offices at Westlake. The notice announced the EIA, the availability of the Scoping Report and invited IAPs to register on the project database. A copy of the on-site notice is provided in [Annexure E](#).

6.2.4 Release of Scoping Report for IAP review

The Scoping Report was compiled and released concurrently with the notification period. All potential IAPs including other operators located at Cape Point, the Park Forum and key organs of state were sent Executive Summaries of the Scoping Report which included notification of the availability of the report on the SANParks official website for review purposes for a period of 30 days, i.e. until 15 October 2008. For the list of potential IAPs refer to [Annexure B](#).

6.3 Issues and concerns raised by IAPs

IAPs have been asked to submit written comment on or before 15 October 2008. All comment received will be responded to and recorded in a Comments and Responses Report which will be included in the Final Scoping Report that will be submitted to DEAT. As a result the comment will be considered by DEAT in deciding whether or not to accept the Scoping Report and the Plan of Study for Scoping.

7. POTENTIAL ENVIRONMENTAL IMPACTS

The following potentially significant impacts associated with the proposed construction of the sewage treatment plant have been identified by the EAP and project team:

- Construction phase impacts:
 - Flora and Fauna impacts;
 - Heritage impacts; and
 - Nuisance impacts (including noise, dust and traffic congestion).

- Operational phase impacts:
 - Soil and groundwater contamination; and
 - Visual impacts.

- Closure and decommissioning phase impacts:
 - Soil and groundwater contamination; and
 - Nuisance impacts (including noise, dust and traffic congestion).

These are addressed in detail in the following sections.

7.1. Construction phase impacts

Construction activities in sensitive environments need to be carefully managed or they may lead to significant environmental impacts. Immediately abutting the parking area and restaurant complex at Cape Point is pristine indigenous vegetation. The Point is also known as being a site of heritage significance. Construction activities, particularly site clearing and excavations, can lead to damage and/or destruction of flora and displace fauna. Stone-age artefacts could be unearthed and damaged. Also associated with construction sites are nuisance impacts such as noise and dust. Given the high number of tourists visiting Cape Point and their high sensitivity (as tourists) these potential nuisance impacts would have to be well-managed. A comprehensive Environmental Management Plan (EMP) which focuses on managing construction phase-related impacts should suffice in managing the potential construction phase impacts.

7.2 Operational phase impacts

Two potentially significant impacts have been identified as being associated with the operational phase. These are as follows:

- Soil and groundwater impacts; and
- Visual impacts.

Soil and groundwater contamination is typically associated with the disposal of treated effluent via soak-away systems. This system of treated effluent disposal has been used at Cape Point since the first ablutions came into operation. The efficacy of the soak-away system is however only as effective as the method of treatment associated with it and until now this has only involved a simple system typically associated with the combination of the conservancy tank and the soak-away which is regarded as effective for relatively low volumes of effluent and is deployed at numerous lodges and accommodation facilities in protected areas throughout South Africa. The ongoing use of the system at Cape Point, given the number of visitors, would eventually become ineffective thereby resulting soil and groundwater contamination. The proposed installation of a new sewage treatment plant designed on the basis of the activated sludge treatment process would be far more effective and would produce a higher quality treated effluent that could still be discharged into the environment via the soak-away system. In this way the proposed development can be regarded as generating a positive impact.

The potential visual impact associated with the proposed development is arguably the most significant impact that could arise. This is primarily due to a number of factors including the following:

- The high sensitivity of the viewers, most of whom are foreign tourists who are visiting the area for sight-seeing purposes;
- The high visual sensitivity of the receiving visual landscape which is a national park characterised by open spaces of pristine vegetation and unspoilt rock formations; and
- The visual exposure of the site, particularly since it is located on the uppermost part of the striking rock formations of Cape Point.

Given the above a detailed assessment of the potential visual impact associated with the proposed development will be undertaken in the EIA phase utilising the relevant methodology as described in Chapter 8.

7.3 Closure and decommissioning phase impacts

Closure and decommissioning impacts are likely to be similar to the construction phase impacts and therefore should also be satisfactorily accommodated in the EMP. Note that the proposed plant should provide sufficient capacity for a number of years in the future and should the capacity be exceeded then it can be upgraded to well beyond its current capacity. It is therefore highly unlikely that the system will be decommissioned and closed in the foreseeable future.

7.4 Detailed specialist investigation

EIA processes make use of detailed specialist investigations to assess potentially significant impacts of development proposals and identify effective and practicable mitigation measures. Specialist studies are typically warranted under the following conditions:

- When the potential impact is potentially of such severity that specialist input is required to determine its effective mitigation;
- When the EAP does not have the relevant expertise to undertake a meaningful assessment of the potential impact; and/or
- When new primary research is required to provide a better understanding of the nature, extent and intensity of the potential impact.

The potentially significant construction phase-related impacts, such as impacts on heritage resources and nuisance impacts arising as a result of construction activities, are readily mitigable through the formulation and implementation of an Environmental Management Plan (EMP). The EMP will also be presented for IAP review in the EIA phase, in accordance with the requirements of the new EIA Regulations.

Regarding the project's potential operational phase impacts on soil and groundwater, the impacts are likely to be positive (i.e. an improvement on the current situation), therefore no specialist study is warranted. The potentially significant visual impact associated with the new structure will be assessed by the EAP in detail in the EIA phase.

Decommission and closure-related impacts, although potentially significant can also be satisfactorily mitigated through the implementation of the EMP.

As such the EAP is of the opinion that no specialist studies are warranted. Further detail regarding the EIA phase is provided in the Plan of Study for the EIA (see [Section 8](#)).

8. PLAN OF STUDY FOR EIA

8.1 Introduction

The new EIA Regulations require that the Plan of Study for EIA is included in the Scoping Report and is made available for IAP review. This section outlines the proposed process for the EIA phase and sets out the Terms of Reference (ToR) for specialist studies (if any) that will be undertaken during the EIA phase to assess potentially significant environmental impacts. This is presented for IAP review and ultimately for consideration by the relevant authority in approving the proposed EIA phase and its ToR.

8.2 Description of the proposed EIA phase

The proposed process for the EIA phase will only take place in a single phase as no specialist studies are deemed necessary. As such the EIA phase will effectively comprise the preparation of the EIR and its review by IAPs. In this only phase the following will be undertaken:

- Identification and assessment of environmental impacts based on the results of the specialist studies. This will entail an assessment of the duration, extent, probability and intensity of the impacts to assess their significance;
- Identification of mitigation measures and recommendations for environmental management of the proposed project;
- Collation and drafting of the above information into an Environmental Impact Report (EIR);
- Compilation of an EMP based on the recommended mitigation measures;
- Circulation of the draft EIR (incorporating the EMP) for a 30 day comment period among registered IAPs only;
- Compilation of an EIA phase Comments & Responses Report;
- Submission of documentation to DEAT (EIR, EMP, Comments & Responses Report, etc) for a decision⁴; and
- Notification of DEAT Record of Decision (RoD) and appeal process.

8.4 Assessment of Impacts

The significance of the project's impacts will be assessed and rated based on the methodology⁵ and rating criteria outlined in this section.

⁴ If as a result of the public participation process the documentation released for public review has to be substantially revised then additional public participation activities may be required.

⁵ Note that the author wishes to acknowledge SRK Consulting who developed this methodology.

The **significance** of an impact is defined as a combination of the **consequence** of the impact occurring and the **probability** that the impact will occur. The criteria used to determine impact consequence are presented in [Table 8.1](#) below.

Table 8.1: Criteria used to determine the Consequence of the

(a) Rating	(a) Definition of Rating	(a) Score
(a) A. Extent – the area over which the impact will be experienced		
(a) None	(a)	(b) 0
(a) Local	(b) Confined to project or study area or part thereof (e.g. site)	(c) 1
(a) Regional	(c) The region, which may be defined in various ways, e.g. cadastral, catchment, topographic	(d) 2
(a) (Inter) national	(d) Nationally or beyond	(e) 3
(a) B. Intensity – the magnitude of the impact in relation to the sensitivity of the receiving environment		
(a) None	(a)	(f) 0
(a) Low	(b) Natural and/or social functions and processes are negligibly altered	(g) 1
(a) Medium	(c) Natural and/or social functions and processes continue albeit in a modified way	(h) 2
(a) High	(d) Natural and/or social functions or processes are severely altered	(i) 3
(a) C. Duration – the time frame for which the impact will be experienced		
(a) None	(a)	(j) 0
(a) Short-term	(b) Up to 2 years	(k) 1
(a) Medium-term	(c) 2 to 15 years	(l) 2
(a) Long-term	(d) More than 15 years	(m) 3

The combined score of these three criteria corresponds to a **Consequence Rating**, as set out in [Table 8.2](#):

Table 8.2: Method used to determine the Consequence Score

Combined Score (A+B+C)	0 – 2	3 – 4	5	6	7	8 – 9
Consequence Rating	Not significant	Very low	Low	Medium	High	Very high

Once the consequence is derived, the probability of the impact occurring will be considered, using the probability classifications presented in [Table 8.3](#).

Table 8.3: Probability Classification

Probability of impact – the likelihood of the impact occurring	
Improbable	< 40% chance of occurring
Probable	40% - 70% chance of occurring
Highly probable	> 70% - 90% chance of occurring
Definite	> 90% chance of occurring

The overall **significance** of impacts will be determined by considering consequence and probability using the rating system prescribed in [Table 8.4](#).

Table 8.4: Impact Significance Ratings

Significance Rating	Consequence		Probability
Insignificant	Very Low	&	Improbable
	Very Low	&	Possible
Very Low	Very Low	&	Probable
	Very Low	&	Definite
	Low	&	Improbable
	Low	&	Possible
Low	Low	&	Probable
	Low	&	Definite
	Medium	&	Improbable
	Medium	&	Possible
Medium	Medium	&	Probable
	Medium	&	Definite
	High	&	Improbable
	High	&	Possible
High	High	&	Probable
	High	&	Definite
	Very High	&	Improbable
	Very High	&	Possible
Very High	Very High	&	Probable
	Very High	&	Definite

Finally the impacts will also be considered in terms of their status (positive or negative impact) and the confidence in the ascribed impact significance rating. The prescribed system for considering impacts status and confidence (in assessment) is laid out in [Table 8.5](#).

Table 8.5: Impact status and confidence classification

Status of impact	
Indication whether the impact is adverse (negative) or beneficial (positive).	+ ve (positive – a 'benefit')
	– ve (negative – a 'cost')
	Neutral
Confidence of assessment	
The degree of confidence in predictions based on available information, judgment of the EAP and/or specialist knowledge.	Low
	Medium
	High

The impact significance rating should be considered by DEAT in their decision-making process based on the implications of ratings described below:

- **Insignificant:** the potential impact is negligible and **will not** have an influence on the decision regarding the proposed activity/development.
- **Very Low:** the potential impact **should not** have any meaningful influence on the decision regarding the proposed activity/development.
- **Low:** the potential impact **may 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.
- **Very High:** The proposed activity should **only** be approved under special circumstances.

In the EIA practicable mitigation measures will be recommended and impacts rated in the prescribed way both without and with the assumed effective implementation of mitigation measures. Mitigation measures are either:

- **Essential:** must be implemented and are non negotiable; and
- **Optional:** must be shown to have been considered and sound reasons provided by the proponent if not implemented.
- Based on the results of the impact assessment, specialists are required to indicate:
 - Whether the proposed development alternatives are environmentally suitable or unsuitable in terms of the respective impacts assessed by the relevant specialist; and
 - The environmentally preferred alternative.

8.5 Comparison of alternatives

Each alternative will be assessed in a similar level of detail using the methodology described above. Thereafter a comparison of the environmental acceptability (i.e. whether the impacts are

acceptable or not) of the various alternatives will be undertaken with the environmentally preferred alternative being indicated. This will include a brief synopsis motivating the choice of preferred alternative. A comparison between the “no development” alternative and the proposed development alternatives will form part of this analysis.

8.6 Public Participation and Authority Review

The activities and provisional timetable for the EIA phase and its public participation component are summarised in Table 8.6. The EIA Phase of the project will take approximately 3 months to complete. The competent authority will be engaged with at several stages as reflected in the shaded rows of the table below.

Table 8.6: EIA Phase Public Participation Activities and Timetable

(a) Task	(a) Start	(a) Finish
(a) SCOPING PHASE (will be completed)	(b) September 08	(b) end October 08
(a) Submission and Approval of Scoping Report and Plan of Study	(c) early November 08	(c) Mid December 2008
(a) EIA PHASE	(d) Mid Dec 08	(d) March 09
(a) Draft EIR	(e) mid Dec 2008	(e) mid Jan 2009
(a) Release EIR to public	(f) Mid Jan 2009	
(a) Public Comment Period	(g) ±15 Jan 2009	(f) ±15 Feb 2009
(a) Submission of EIR to DEAT	(h) Early March 2009	
(a) Record of Decision by DEAT	(i) Late June 2009 (assuming DEAT takes 105 days)	

9. KEY FINDINGS & WAY FORWARD

8.1 Key Findings

In order to apply for authorisation in terms of the NEMA EIA for the proposed construction of a new sewage treatment plant at Cape Point, a Scoping study has been undertaken. This Scoping study is in compliance with the procedural requirements as stipulated in the NEMA EIA Regulations. This Scoping Study has considered a range of reasonable alternatives and contemplated the potential impacts which may require detailed assessment associated with / or arise as a consequence of the proposed activity.

The objectives of the study were to:

- Identify stakeholders and inform them of the proposed activity, 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 areas of likely impact and environmental issues that may require further investigation in an EIA; and
- Develop the terms of reference for specialist studies (if any) to be undertaken in the impact assessment phase.

The key findings of the EIA are as follows:

- Based on forecasts which show the number of visitors to Cape Point increasing, SANParks has identified a need to upgrade the sewage treatment capacity at Cape Point.
- The current system is inappropriate for the projected volumes of sewage that will be generated in the near future and therefore a new package sewage treatment plant is proposed.
- The plant, operating according to the activated sludge treatment process, will treat effluent to meet the standards required in terms of the National Water Act (Act 36 of 1998) that are considered acceptable for discharging treated effluent into water courses and via irrigation.
- The site for the new plant will form part of the parking area and restaurant complex a Cape Point which is previously disturbed. The area surrounding the site is environmentally sensitive.
- Several alternatives have been considered including:
 - Not commencing with the proposed upgrade;
 - Connecting to the municipal sewerage network;
 - Two alternative sites both within the parking and restaurant complex.

- The proposed development may generate a suite of potentially significant environmental impacts. These are associated with the construction, operational and decommissioning and closure phases of the proposed activity.
- All the construction phase-related impacts can be effectively mitigated through the effective implementation of a construction phase EMP.
- Owing to the improved quality of treated effluent that will continue to be discharged in the same manner as at present, the likelihood of contamination of soils and groundwater in the vicinity of the soak-away system will be significantly reduced. Therefore the only potentially detrimental operational phase impact is the potential visual impact associated with the structure that will house the new sewage plant. This will be assessed in detail in the EIA phase.
- Potential impacts associated with the decommissioning and closure phase, should this ever occur, will also be addressed in the EMP.

8.2 Way Forward

The Executive Summary of the Scoping Report has been sent to all the potential IAPs as listed in [Annexure B](#). The Executive Summary notifies registered IAPs of the availability of the Scoping Report on the SANParks website. It also informs IAPs of the opportunity to register on the project database and to submit comments. Should IAPs either register and/or submit comment within the combined registration and comment period then they will be registered on the database and will be engaged further in the EIA process. Failure to register and/or submit comment by 25 October 2008 will result in the IAP being omitted from any further involvement.

Written requests for registration and/or comment must be submitted on or before **25 October 2008** to:

Mr Nick Steytler

Nick Steytler EAP

PO Box 22761

Scarborough, 7974

Fax 021 – 783 4565

email: nicksteytler@telkomsa.net

Should additional issues and concerns be raised that are not adequately reflected and/or addressed in the Scoping Report then the report may have to be revised and re-issued for IAP review. Should this occur then a further opportunity for IAPs to engage in the Scoping process may be provided. If not, the report along with the comments received by IAPs, will be submitted to DEAT for a decision regarding whether or not to accept the Scoping Report and the Plan of Study for EIA. Should DEAT accept the Scoping Report and Plan of Study for EIA then the EIA process will move into the second phase, the Impact Assessment phase, in accordance with the Plan of Study for EIA.

Upon request, electronic copies of the documentation can be emailed to IAPs (free of charge) and hard copies of the Scoping Report can also be mailed at a cost of R300 (incl VAT). Note costs are merely to cover the time and expenses associated with producing additional copies.



Nick Steytler

MSc (Cons. Biology); Pr Sci Nat; Certified EAP

Annexure A:
DEAT EIA Application Form

APPLICATION FORM

1. BACKGROUND INFORMATION

Project applicant:	South African National Parks		
Trading name (if any):	N/A		
Contact person:	Antoniet van Wyk		
Physical address:	643 Leyds Street, Muckleneuk, PRETORIA		
Postal address:	P O Box 787, PRETORIA		
Postal code:	0001	Cell:	082 905 4644
Telephone:	012 - 426 5126	Fax:	012 - 426 5446
E-mail:	antonetv@sanparks.org		

Environmental Assessment Practitioner:	Nick Steytler		
Contact person:	Nick Steytler		
Postal address:	P O Box 22781, Scarborough		
Postal code:	7874	Cell:	082 322 4074
Telephone:	021 - 783 4565	Fax:	021 - 783 4565
E-mail:	Nicksteytler@telkom.net		
Professional affiliation(s) (if any)	EAPSA 0085/05 PR Sci Nat (SA) 40029/02		

Landowner:	South African National Parks		
Contact person:	Antoniet van Wyk		
Postal address:	P O Box 787, PRETORIA		
Postal code:	0001	Cell:	082 905 4644
Telephone:	012 - 426 5126	Fax:	012 - 426 5446
E-mail:	antonetv@sanparks.org		

In instances where there is more than one landowner, please attach a list of landowners with their contact details to this application.

Local authority in whose jurisdiction the proposed activity will fall:	City of Cape Town		
Contact person:	Mr Tomalin		
Postal address:	P O Box 16548, Cape Town		
Postal code:	8000	Cell:	
Telephone:	021 487 2200	Fax:	021 487 2578
E-mail:	Peter.tomalin@capetown.gov.za		

In instances where there is more than one local authority involved, please attach a list of local authorities with their contact details to this application.

Project title:	Proposed construction of a sewage treatment plant at Cape Point, Table Mountain National Park
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Property description:	Table Mountain National Park (Farm name, portion etc.) Where a large number of properties are involved (e.g. linear activities), please attach a full list to this application.
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Town(s) or district(s):	Cape Town
Physical address:	Cape Point

In instances where there is more than one town or district involved, please attach a list of towns or districts to this application.

Current land-use zoning:	National Park
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In instances where there is more than one current land-use zoning, please attach a list of current land use zonings that also indicate which portions each use pertains to, to this application.

Is a change of land-use or a consent use application required?
Must a building plan be submitted to the local authority?

YES	NO
YES	NO

Locality map:

A locality map must be attached to the back of this document, as Appendix A. The scale of the locality map must be at least 1:50 000. The scale must be indicated on the map. The map must indicate the following:

- an accurate indication of the project site position as well as the positions of the alternative sites, if any;
- road access from all major roads in the area;
- road names or numbers of all major roads as well as the roads that provide access to the site(s);
- all roads within a 1km radius of the site or alternative sites; and
- a north arrow

APPLICATION FORM

Owners consent: In line with the requirements of the EIA regulations, letters of consent of all landowners or a detailed explanation by the applicant explaining why consent is not possible must be attached to the back of this document as Appendix B.

2. Activities applied for

An application may be made for more than one listed or specified activity that, together, make up one development proposal. All the listed activities that make up this application must be listed.

Indicate the number and date of the relevant notice:	Activity No (s) (in terms of the relevant or notice) :	Describe each listed activity:
Government Notice R 387	1 (p)	The construction of facilities or infrastructure, including associated structure or infrastructure, for – (p) The treatment of effluent, waste water or sewage with an annual throughput capacity of 15,000 cubic metres or more

Please note that any authorisation that may result out of this application will only cover activities applied for. Omissions may render any authorisation that is based on incomplete information to be nil and void.

3. Type of application

3.1 Application for Basic Assessment

Is this an application for conducting a basic assessment (as defined in the regulations)?

YES	NO
YES	NO

If, YES, is a basic assessment report attached?

If, NO, please indicate when the basic assessment report will be submitted:

3.2 Application for Scoping and Environmental Impact Assessment (EIA)

Is this an application for Scoping and EIA (as defined in the regulations)?

YES	NO
YES	NO

If, YES, is a Scoping Report and Plan of Study for EIA attached?

If, NO, please indicate when the Scoping Report and Plan of Study for EIA will be submitted:

The scoping report and/or the plan of study for EIA will be submitted after consultation with the competent authority:

YES	NO
-----	----

A consultation with the competent authority is hereby requested:

YES	NO
-----	----

APPLICATION FORM

4. Declarations

4.1 The independent Environmental Assessment Practitioner

I, NICK STEYTLER, declare under oath that I –

- act as the independent environmental practitioner in this application ;
- do not have and will not have any financial interest in the undertaking of the activity, other than remuneration for work performed in terms of the Environmental Impact Assessment Regulations, 2005;
- have and will not have no vested interest in the proposed activity proceeding;
- have no, and will not engage in, conflicting interests in the undertaking of the activity;
- undertake to disclose, to the competent authority, any material information that have or may have the potential to influence the decision of the competent authority or the objectivity of any report, plan or document required in terms of the Environmental Impact Assessment Regulations, 2005;
- will ensure that information containing all relevant facts in respect of the application is distributed or made available to interested and affected parties and the public and that participation by interested and affected parties is facilitated in such a manner that all interested and affected parties will be provided with a reasonable opportunity to participate and to provide comments on documents that are produced to support the application;
- will ensure that the comments of all interested and affected parties are considered and recorded in reports that are submitted to the competent authority in respect of the application, provided that comments that are made by interested and affected parties in respect of a final report that will be submitted to the competent authority may be attached to the report without further amendment to the report;
- will keep a register of all interested and affected parties that participated in a public participation process; and
- will provide the competent authority with access to all information at my disposal regarding the application, whether such information is favourable to the applicant or not.

Signature of the environmental practitioner:

T/A NICK STEYTLER

Name of company:

16-09-08

Date:

Signature of the Commissioner of Oaths:

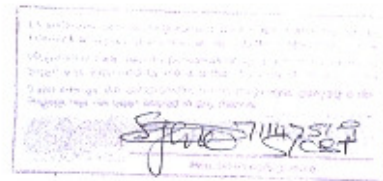
2008-09-16

Date:

SKONSTABLE

Designation:

Official stamp (below)



APPLICATION FORM

4.2 The Applicant

I, Paul Daphne, declare under oath that I -

- Am, or represent, the applicant in this application;
- appointed the environmental assessment practitioner as indicated under point 4.1 above to act as the independent environmental assessment practitioner for this application;
- will provide the environmental assessment practitioner and the competent authority with access to all information at my disposal that is relevant to the application;
- will be responsible for the costs incurred in complying with the Environmental Impact Assessment Regulations, 2005, including but not limited to -
 - costs incurred in connection with the appointment of the environmental assessment practitioner or any person contracted by the environmental assessment practitioner;
 - costs incurred in respect of the undertaking of any process required in terms of the regulations;
 - costs in respect of any fee prescribed by the Minister or MEC in respect of the regulations;
 - costs in respect of specialist reviews, if the competent authority decides to recover costs; and
 - the provision of security to ensure compliance with conditions attached to an environmental authorisation, should it be required by the competent authority.
- will ensure that the environmental assessment practitioner is competent to comply with the requirements of these regulations;
- am responsible for complying with the conditions of any environmental authorisation issued by the competent authority;
- hereby indemnify, the government of the Republic, the competent authority and all its officers, agents and employees, from any liability arising out of the content of any report, any procedure or any action for which the applicant or environmental assessment practitioner is responsible in terms of these regulations; and
- will not hold the competent authority responsible for any costs that may be incurred by the applicant in proceeding with an activity prior to an appeal being decided in terms of these regulations.



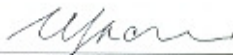
Signature of the applicant:

South African National Parks

Name of company

2008-09-01

Date:



Signature of the Commissioner of Oaths:

2008-09-01

Date:

Manager: Legal Services

Designation:

Official stamp (below):

MARINDA VAN GRAAN
MANAGER LEGAL SERVICES
SOUTH AFRICAN NATIONAL PARKS
Tel 012 426-5000 Fax 012 343-0155
PO BOX 787 PRETORIA 0001

Annexure B:
List of Potential IAPs

List of Interested and Affected Parties

Name	Organisation
Augustine Morkel	TMNP Park Forum
Harry Hawkins	Concor
Wilna Kloppers	DWAF
Washiela Anthony	DEA&DP
Robbin Poggenpoel	NPA
Bhawoodien Parker	Weather SA

Annexure C:
Projections of effluent volumes at Cape Point

CALCULATION OF SEWER GENERATED AT CAPE POINT

Visitors to Cape Point

MONTH	1998/99	1999/00	2000/01	2001/02	2002/03	2003/04	2004/05	2005/06	2006/07	2007/08
April	74,882	67,009	58,245	55,754	55,664	60,668	73,784	55,894	70,042	71,568
May	40,052	36,318	34,864	36,158	39,253	45,862	42,138	41,063	41,707	44,191
June	27,360	32,963	28,230	32,444	31,877	29,340	28,964	30,819	33,684	33,000
July	33,777	28,469	29,418	28,625	30,681	34,220	41,454	44,205	43,033	50,369
August	49,103	44,248	37,012	39,542	41,266	55,944	52,129	53,298	54,575	60,981
September	47,956	37,244	51,941	48,448	59,776	50,762	54,660	56,434	63,433	63,092
October	66,657	52,794	53,522	54,007	65,831	87,228	77,553	77,146	78,933	78,759
November	82,589	84,133	60,842	58,406	74,544	80,974	86,690	82,298	90,954	74,433
December	80,534	103,864	83,602	84,886	100,698	79,676	104,910	97,135	108,391	111,293
January	107,026	70,068	80,472	91,279	100,705	121,253	93,235	92,356	93,130	89,835
February	71,158	68,274	59,892	68,489	63,823	71,445	78,100	74,841	84,693	85,025
March	84,600	77,909	67,593	84,804	75,566	80,325	87,029	73,899	78,914	93,193
Visitors / year	765,694	703,293	645,633	682,842	739,684	797,697	820,646	779,388	841,489	855,739

In- or decrease / from prev. year	-	-8.1%	-8.2%	5.8%	8.3%	7.8%	2.9%	-5.0%	8.0%	1.7%
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PERSONS / DAY FOR EACH MONTH

April	2,496	2,234	1,942	1,858	1,855	2,022	2,459	1,863	2,335	2,386
May	1,292	1,172	1,125	1,166	1,266	1,479	1,359	1,325	1,345	1,426
June	912	1,099	941	1,081	1,063	978	965	1,027	1,123	1,100
July	1,090	918	949	923	990	1,104	1,337	1,426	1,388	1,625
August	1,584	1,427	1,194	1,276	1,331	1,805	1,682	1,719	1,760	1,967
September	1,599	1,241	1,731	1,615	1,993	1,692	1,822	1,881	2,114	2,103
October	2,150	1,703	1,727	1,742	2,124	2,814	2,502	2,489	2,546	2,541
November	2,753	2,804	2,028	1,947	2,485	2,699	2,890	2,743	3,032	2,481
December	2,598	3,350	2,697	2,738	3,248	2,570	3,384	3,133	3,496	3,590
January	3,452	2,260	2,596	2,944	3,249	3,911	3,008	2,979	3,004	2,898
February	2,541	2,438	2,139	2,446	2,279	2,552	2,789	2,673	3,025	3,037
March	2,729	2,513	2,180	2,736	2,438	2,591	2,807	2,384	2,546	3,006
Max visitors /day	3,452	3,350	2,697	2,944	3,249	3,911	3,384	3,133	3,496	3,590
Min visitors / day	912	918	941	923	990	978	965	1,027	1,123	1,100

ASSUMPTION

% of visitors entering the Cape Point Entrance Gate to visit the POINT :	95%
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WASTE WATER GENERATED / PERSON

Description	No.	Litre	Total
Flushing of toilet	2	10	20
Washing of hands	2	0.25	0.5
Food and other	1	1.5	1.5
Total (litre) :			22

WASTE WATER GENERATED (m ³)										
PERIOD	1998/99	1999/00	2000/01	2001/02	2002/03	2003/04	2004/05	2005/06	2006/07	2007/08
1 TOTAL / YEAR										
Visitors to visit the Point = 95%	727,409	668,128	613,351	648,700	702,700	757,812	779,614	740,419	799,415	812,952
m ³ / year	16,003.0	14,698.8	13,493.7	14,271.4	15,459.4	16,671.9	17,151.5	16,289.2	17,587.1	17,884.9
2 DAILY TOTAL - Based on MONTHLY daily visitors (averages)										
Average visitors / day	2,098	1,927	1,769	1,871	2,027	2,185	2,248	2,135	2,305	2,344
m ³ / day	46.2	42.4	38.9	41.2	44.6	48.1	49.5	47.0	50.7	51.6
3 DAILY TOTAL - Based on MAXIMUM DAILY visitors / month (averages)										
m ³ / day	76.0	73.7	59.3	64.8	71.5	86.1	74.5	68.9	76.9	79.0

PROJECTED FIGURES FOR THE NEXT 10 YEARS										
PROJECTED INCREASE OF VISITORS :				2.5%						
PERIOD :	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Yr 8	Yr 9	Yr 10
Visitors / year :	877,132	899,061	921,537	944,576	968,190	992,395	1,017,205	1,042,635	1,068,701	1,095,418
4 TOTAL / YEAR - Based on projected growth										
Persons to visit the Point (95%)	833,276	854,108	875,460	897,347	919,781	942,775	966,345	990,503	1,015,266	1,040,647
m ³ / year	18,332	18,790	19,260	19,742	20,235	20,741	21,260	21,791	22,336	22,894
5 DAILY TOTAL - Based on projected growth										
Persons / day	2,403	2,463	2,525	2,588	2,653	2,719	2,787	2,857	2,928	3,001
m ³ / day	52.9	54.2	55.5	56.9	58.4	59.8	61.3	62.8	64.4	66.0

Figures above is based on averages and does not reflect maximum daily visitors visiting the "Point"..

**Annexure D:
Newspaper Advert**

PUBLIC PARTICIPATION PROCESS

DEAT REF NO.: 12/12/20/610/3/13

Proposed construction of a new sewage treatment plant at Cape Point, Table Mountain National Park



Notice is hereby given of a public participation process in terms of the NEMA Environmental Impact Assessment (EIA) Regulations 2006.

South African National Parks (SANParks), as part of a bulk infrastructure upgrading project, proposes to install a new sewage treatment plant at Cape Point. The proposed development includes an activity listed in terms of the NEMA EIA Regulations and a **full Scoping and EIA process** will therefore be undertaken for this aspect of the proposed development. The relevant activities listed in GN No. R. 386 are as follows:

1. *The construction of facilities or infrastructure, including associated structures or infrastructure, for p. the treatment of effluent, wastewater or sewage with an annual throughput capacity of 15 000 cubic metres or more;*

Please be informed that a Draft Scoping Report (incorporating the Plan of Study for EIA) is currently available for review on the SANParks official website www.sanparks.org

If you or your organisation require further information, would like to participate in the process and be notified of opportunities to provide comment on the Draft Scoping Report, please ensure that you register and/or submit comment, in writing, with **Nick Steytler** at **Fax: 021-783 4565, Tel: 082-322 4074** or **nicksteytler@telkomsa.net** on or before **25 October 2008**.

**Annexure E:
On-site Notice**

**NEMA FULL SCOPING AND EIA PROCESS:
NOTICE OF PUBLIC PARTICIPATION PROCESS**

**Proposed construction of a new sewage treatment plant at
Cape Point, Table Mountain National Park**

DEAT REFERENCE NO.: 12/12/20/610/3/13

Notice is hereby given of a public participation process in terms of the NEMA Environmental Impact Assessment (EIA) Regulations 2006:

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 - q. the treatment of effluent, wastewater or sewage with an annual throughput capacity of 15 000 cubic metres or more;;*

Please be informed that a Draft Scoping Report (incorporating the Plan of Study for EIA) is currently available for review on the SANParks official website www.sanpark.org

If you or your organisation require further information, would like to participate in the process and be notified of opportunities to provide comment on the Draft Scoping Report, please ensure that you register and/or submit comment, in writing, with **Nick Steytler** at **Fax: 021-783 4565, Tel: 082-783 4565** or nicksteytler@telkomsa.net on or before **25 October 2008**.



REPORT DISTRIBUTION RECORD

Project: Cape Point Sewer

Project Number: CAP 001

Report: Scoping Report –draft for comment

Name	Organisation	Copy	Date	Approved by
A. Van Wyk	SANParks	1	25 September 2008	N. Steytler
N. Steytler	Nick Steytler EAP	2	25 September 2008	N. Steytler

Copy Number	1
Authorised by:	N. Steytler