

TOWN PLANNING & PROPERTIES

PO BOX 1598 SWAKOPMUND , NAMIBIA +264 81 122 4661 🕿 +264 81 122 4661 😒 andrew@vdwtp.com 📾

Title	ENVIRONMENTAL MANAGEMENT PLAN: Subdivision,			
	Rezoning and Consolidation of Erf 189 and Rem/Erf 172			
	Henties Bay Ext. No. 1.			
Scope of Work	Environmental Clearance: Subdivision of Erf 189, Henties			
	Bay, Ext. No. 1, into Portion A and Remainder; rezoning of			
	proposed Portion A from Single Residential to General			
	Business; and consolidation of proposed Portion A with			
	Rem/Erf 172 Henties Bay Ext. No. 1 into Consolidated Erf "X".			
Proponent	Sarel Jacobus Burger Oberholzer Contact Person: Mr. A van der Westhuizen Tel: +264 81 122 4661			
	PO Box: 31685, Windhoek, Namibia			
	Email: marinavw15@gmail.com			
EAP	Andrew van der Westhuizen			
Author of Report	Andrew van der Westhuizen			
Date	5 May 2025			
Signature of EAP	Yours Faithfully, A R VAN DER WESTHUIZEN			

Contents Page

1. INTRODUCTION	3
2. CURRENT SITUATION	4
2.1. Locality and Plot size	4
2.2. Ownership and Current Status	4
2.3. Zoning	5
3. INTENTION OF PROPONENT	6
3.1. Proposed Subdivision of Erf 189, Hentiesbaai Extension No. 1, into Portion A and Remainder	7
3.2. Rezoning of proposed Portion A from Single Residential to General Business	8
3.3. Consolidation of Proposed Portion A with Rem/172, Hentiesbaai Extension No. 1	10
4. RESPONSIBILITIES OF DIFFERENT ROLE-PLAYERS	11
4.1. The Developer/Proponent (Sarel Jacobus Burger Oberholzer)	11
4.2. The Proponents Representative	11
4.3. Environmental Control Officer	12
4.4. The Contractor & Sub-contractor/s	12
4.5. Environmental Assessment Practitioner	13
5. ENVIRONMENTAL AWARENESS TRAINING	13
6. APPLICABLE LEGISLATION	13
6.1. The Environmental Management Act of 2007	13
6.2. The Urban and Regional Planning Act of 2018	14
6.3. Henties Bay Town Planning Scheme No. 17	14
7. PROJECT PHASES AND MANAGEMENT REQUIREMENTS / ACTIONS	15
7.1. Planning and Design Phase of Project	15
7.2. Construction Phase	
7.3. Maintenance and Operation Phase of Project	20
8. CONCLUSION	22

1. INTRODUCTION

This Environmental Management Plan (EMP) aims to reduce and mitigate the risks, both environmentally and socially, concerned with the future extension of the existing boundary wall.

The EMP for this project will be a standard Management Plan as the only impact identified is the effect that would emanate from the future extension of the boundary wall. Although the impact is very insignificant there are still potential negative impacts that could lead to greater concern.

As per the Scoping Report, the intentions of the client will have very little to no impact on the surrounding area as all work performed will be done on paper. It is the intentions to merely rectifying erf boundaries and zonings to correspond to the current situation.

The rezoning of a property from residential to business, it is seen as a listed activity it is needed to perform a Scoping procedure and report that ultimately leads to the compilation of the Environmental Management Plan (EMP). This EMP is a product of the scoping report compiled after the analysis of the site and completion of the statutory processes involved and the public participation process.

Although the projected impact of the Proponents intentions is of a very low to none in nature there is always a control measure needed to maintain the balance. This EMP can be used by the Proponent as a guideline in the event of renovations and additions within a three-year period.

As with all Environmental Impact Assessment processes, the Environmental Management Plan is the most important document to effectively mitigate any potential or foreseen negative impacts on the natural and urban fabric. It is the intention of this EMP to mitigate the identified potential impacts that may result from this project. It is thus imperative that be implemented from the start of the project and the monitoring actions to be implemented during the Planning and Design Phase, Construction Phase and Operation and Maintenance Phase.

To follow is an overview of the project in terms of the current status, proposed intentions, responsibilities of role players, applicable laws and the management requirements / actions to be implemented by the Proponent.

The Scoping report is not always available to the various role players and as such it is imperative to give an overview of the most important aspects that is applicable to the site and the everyday operation of the site. It is the aim of this EMP to give a broad-based overview to the end-user to ensure that all role players are properly informed of all the aspects of the site itself and the intended scope of work related to the Proponents intentions.

2. CURRENT SITUTION

2.1. Locality and Plot Size

Both the Rem/172 and Erf 189, Henties Bay, are located in the Business area of Henties Bay. Rem/172 has its entrance situated along Jakkalsputz Road being the main road of Henties Bay while Erf 189 is situated behind Rem/172 and having its front access from Flamink Street. Proposed Portion "A" can be found at the **Coordinates: -22.07'03''S, 14.16'59''E**.



2.2. Ownership and Current Status

According to the Deed of Transfer Nr. T 7158 / 2016, ownership of the Remaining Extent of Erf 172, Henties Bay, Ext No. 1 vests with Anna- Maria Loots and according to Deed of Transfer T 1798 / 1973 Erf 189, Henties Bay, Ext No. 1, currently vests with Gertrude Yvonne Eagleton.

Currently Erf 189 is used for residential purposes while Rem/Erf 172 is currently accommodation the Myl 50 Pub and Grill Restaurant. The restaurant has been in operation for many years from the premises as both properties at one stage belonged to the Eagleton family, hence the encroachment. Currently Mrs. Eagleton resides on Erf 189 in a normal residential home.

2.3. Zoning

2.3.1. Erf 189, Henties Bay, Ext. No. 1

The Current Zoning of Erf 189, Henties Bay Ext. No. 1 is Singel Residential with a density of 1:600m². The Land Use Table below, from the Henties Bay Town Planning Scheme, clearly indicated the allowable uses, both primary and consent use, as follows:

		1	2	3	4	5
	HATCH	ZONE	MAP REFERENCE	PRIMARY USE (Purposes for which land may be used)	land may be used with	OWNER CONSENT (Consent granted to owner of property in terms of Clause 7)
С		Residential	Yellow fill	Dwelling unit/s (also see Table E).	Place of worship, Place of instruction, Hotel pension (also see Table E), Heritage consent, Bed and breakfast, Guest house, Day care centre, Backpackers hotel.	Resident Occupation, Shebeen, Home Based Shop

Table B: Land Use Table

2.3.2. Rem/Erf 172, Henties Bay, Ext. No. 1

Rem/Erf 172, Henties Bay, Ext. No. 1, is zoned a general business and allows for a wider range of primary and consent uses of higher intensity than compared to the Singel residential zoning of Erf 189, Henties Bay. As previously indicated, the property is currently occupied and used as a bar and restaurant. This use has already been in existence for more than 20 years.

Table B: La	nd Use Table
-------------	--------------

		1	2	3	4	5
	НАТСН	ZONE	MAP REFERENCE	PRIMARY USE (Purposes for which land may be used)	CONSENT USE (Purposes for which land may be used with consent from Council and subject to Clause 7)	OWNER CONSENT (Consent granted to owner of property in terms of Clause 7)
J		General Business	Blue fill	Shop, Business buildings, Parking garages, Hotels, Blocks of flats, Residential	Service industry, Service stations, Dry cleaners and launderettes, Place of assembly, Place of amusement,	None

	buildings, Office, Drive-in cafes, Hotel, Hotel pension, Boutique hotel, Driving school, Backpackers hotel, Bottle store, Convention centre, Bed and breakfast, Guest house, Self- catering accommodation establishment, Restaurant, Convention centre.	Gambling house, Institutional buildings, Funeral parlours and chapels, Warehouses, Place of worship, Car wash, Nursery, Hotel pensions, Shop house.	
--	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

The difference in zoning between the donating and receiving properties are the reason for the application to obtain an ECC. The rezoning of Single residential land to General Business is a listed activity in terms of the Environmental Management Act and thus requires a Scoping Report to be done and an Environmental Management Plan to be compiled.

3. INTENTIONS OF PROPONENT

As previously indicated in this document, the intentions of the Proponent stems from past building activities across two boundaries by the previous owner of Erf Rem/172, Henties Bay, Ext. No. 1. The previous owner is also still the owner of Erf 189, Henties Bay, Ext. No. 1, onto which the encroachment took place. The size of the area concerned is approximately 69m² and is situated on the rear boundaries of Erf 189 and of Rem/Erf 172. The area of concern is not visible to the public nor accessible to the public.

In order to rectify the past erroneous building activities, it is needed to Subdivision of Erf 189, Henties Bay, Ext. No. 1, into Portion A and Remainder. Once the Subdivision is complete it is necessary to rezone proposed Portion A from Single Residential to General Business. It is for this specific action that the ECC must be applied for as the rezoning of a residential property to business requires Environmental Clearance. After the approval of the rezoning, it is then necessary to consolidate proposed portion A with Rem/Erf 172 Henties Bay Ext. No. 1 into consolidated Erf "X".

Only after the Environment Clearance is obtained can the statutory Town Planning procedures for the specific actions be initiated and completed.

These processes are as follows:

3.1. Proposed Subdivision of Erf 189, Henties Bay Ext. No. 1 into Portion A and Remainder

Below is a table indicating the individual sizes of the proposed subdivision of Erf 189, Henties Bay Ext. No. 1 into Portion A and Remainder into Portion A and Remainder.

Portion Number	Zoning	Size in m ²
Portion A	Residential	69 m²
Rem/189	Residential	929 m²
Total		998 m²

The sudivision will effectively deal with the past encroachments of Rem/Erf 172 onto Erf 189 Henties Bay. As can be noted on the proposed subdivision plan below the portion of land concerend is situated at the back boundary of both the properties, as they share a common rear boundary, and will have no impact on the surrounding properties whatsoever.



Proposed Subdivision Plan

3.2. Rezoning of proposed Portion A from Single Residential to General Business.

After the Subdivision Portion A still has a zoning of Singel Residential and it is thus required to rezone proposed Portion A Single residential to General Business to effectively be able to consolidate the newly created Portion A with Rem/Erf 172, Henties Bay.

It is for this exact reason of rezoning from Residential to General Business why it is necessary to apply for Environmental Clearance as it is a listed activity in terms of the Environmental Management Act.



Current Zoning: Single Residential



Proposed Zoning: General Business

3.3. Consolidation of proposed Portion A with Rem/Erf 172, Hentiesbaai.

Once the rezoning has been approved proposed Portion A from Residential to General Business has been approved the Consolidation of Portion A with Rem/Erf 172, into Consolidated Erf "X" can proceed and be approved. The plan below clearly indicated the new erf boundaries for the respective erven. Once the consolidation has been approved will the issue surrounding the encroachment be resolved.



Consolidation Plan: Consolidation of proposed Portion A with Rem/Erf 172, Hentiesbaai

The Consolidation of proposed Portion A with Rem/Erf 172, Hentiesbaai Ext. No. 1 into Consolidated Erf "X" will be as follows:

Portion Number	Zoning	Size in m ²
Portion A	General Business	69 m²
Rem/Erf 172	General Business	892 m²
Consolidated Erf "X"	General Business	961 m²

4. RESPONSIBILITIES OF DIFFERENT ROLE-PLAYERS

Sarel Jacobus Burger Oberholzer (Proponent/Developer) is ultimately responsible for the implementation of the EMP. The Proponent may delegate this responsibility at any time, as they deem necessary, from construction, operation and maintenance before handover of infrastructure. The implementation of this EMP requires the involvement of several key individuals, each fulfilling a different but vital role to ensure sound environmental management during each phase of these developments. The following positions and their respective responsibilities are outlined below:

4.1. The Developer/Proponent (Sarel Jacobus Burger Oberholzer)

Responsible for the implementation of the final EMP document, as approved by the Environmental Commissioner, before the commencement of the Construction phase and to ensure that the proposed development complies with the Environmental Management Act's requirements and the Environmental Clearance given.

4.2. The Proponent's Representative

If the Proponent does not manage all aspects of the planning & design, construction, and operation & maintenance phase activities, referred to in this EMP, they should assign this responsibility to a suitably qualified individual to oversee the activities. The Proponent may decide to assign the role of a Proponents Representative to one person for all phases. Alternatively, the Proponent may decide to assign a separate PR for each developmental phase of the project.

During the Planning & Design (tender preparation) Phase, the Representative will have the following responsibilities regarding the implementation of this EMP:

- Ensuring that the necessary legal authorizations have been obtained.
- Developing, managing, implementation of, and maintaining all Development Guidelines.
- To ensure the contractor signs the EMP before the commencement of the development.
- Ensure that the management requirements inform the planning and design of the relevant infrastructure developments (i.e., that these requirements are considered during the Planning and Design Phase, not as an afterthought); and
- Ensure that the management requirements inform the preparation of tender documents for the construction of the relevant infrastructure developments.

During the Construction, Operation and Maintenance Phases the Proponent Representative shall assist the Environmental Control Officer where necessary and will have the following responsibilities regarding the implementation of this EMP:

- Ensuring that the necessary legal authorizations and permits have been obtained by the Contractor.
- Assisting the Contractor in finding environmentally responsible solutions to problems with input from the Environmental Officer where necessary.

- Management and monitoring of individuals and/or equipment on-site in terms of compliance with the EMP.
- Issuing fines for the transgression of site rules and penalties for contravention of the EMP; and
- Providing input into the Environmental Officers ongoing internal review of the EMP. This review report should be submitted every month to the Proponent.

4.3. Environmental Control Officer

The Environmental Control Officer should be a competent person appointed by the Proponent. The Environmental Control Officer is the Developer's on-site representative primarily responsible for the monitoring and review of on-site environmental management and implementation of the EMP by the Contractor. If no Environmental Control Officer is appointed then all duties will fall upon the Proponent.

Responsibility:

- Assisting the Proponents Representative in ensuring that the necessary legal authorizations have been obtained.
- Management and facilitation of communication between the Proponents Representative, Proponent, the Contractor, and I&APs about this EMP and matters incidental thereto.
- Conduct monthly site inspections of all construction and/or infrastructure maintenance areas about compliance with this EMP.
- Monitor and verify adherence to the EMP (audit the implementation of the EMP) and verify that environmental impacts are kept to a minimum.
- Taking appropriate action if the specifications of the EMP are not adhered to.
- Assisting the Contractor in finding environmentally responsible solutions to problems.
- Advising on the removal of person(s) and/or equipment not complying with the provisions of the EMP in consultation with the Proponents Representative.
- Recommending the issuing of fines for transgressions of site rules and penalties for contraventions of the EMP; and
- Undertaking an annual review of the EMP and recommending additions and/or changes to the document.

4.4. The Contractor & Sub-contractor/s

It is envisaged that various contractors might be appointed at various times for various tasks throughout the life cycle (construction through to operation & maintenance phase) of this project. To ensure sound environmental management, the relevant sections of this EMP should be included in all contracts of work outsourced thus legally binding all appointed contractors and sub-contractors.

Responsibility:

- To comply with the Environmental Authorization and undertake construction activities in an environmentally sensitive manner and rehabilitation of the site.
- To undertake good housekeeping practices during the duration of the project.
- To ensure that adequate environmental awareness training takes place in the employees' language of choice.
- Report any environmental concerns noticed on and around the primary site of concern to the Proponent's Representative and/or Environmental Officer.

4.5. The Environmental Assessment Practitioner

The Environmental Assessment Practitioner is responsible to conduct the required Environmental Application which includes compiling an EMP for the proposed development. The EMP is to be submitted with the scoping EA report as supporting documents to the application for an ECC to the Environmental Commissioner of the Ministry of Environment and Tourism. This EMP will be used by Contractors and Engineers as well as the Proponent in guiding them during the construction and operation of the townships to ensure that the impacts on the environment are limited or avoided altogether.

5. ENVIRONMENTAL AWARENESS TRAINING

All contractors should ensure that adequate environmental awareness training of senior site personnel takes place and that all construction workers and new employees receive an induction presentation on the importance and implications of the EMP before the work commencing. The presentation should be conducted by the ECO, in the employees' language of choice.

6. APPLICABLE LEGISLATION

As with any formal application to the Local Authority, Ministry of Urban and Rural Development and Ministry of Environment and Tourism is imperative to follow the correct procedures. Each of these institutions have a set of requirements that have to be fulfilled in order to accomplish the desired result in terms of an application.

The legislative document that had to be taken into consideration while performing the exercise of apply for Environmental clearance were the following:

6.1. The Environmental Management Act of 2007

The Environmental Management Act specifically deals with the requirements for Environmental applications. It's objective is to: "To promote the sustainable management of the environment and the use of natural resources by establishing principles for decision making on matters affecting the environment; to establish the Sustainable Development Advisory Council; to provide for the appointment of the Environmental Commissioner and environmental officers; to provide for a process of assessment and control of activities which may have significant effects

on the environment; and to provide for incidental matters".

6.2. The Urban and Regional Planning Act of 2018

The Urban and Regional Planning Act deals with the spatial development of land within Namibia and provides the framework for spatial development. The aim of the Act is to: "consolidate the laws relating to urban and regional planning; to provide for a legal framework for spatial planning in Namibia; to provide for principles and standards of spatial planning; to establish the urban and regional planning board; to decentralize certain matters relating to spatial planning; to provide for the preparation, approval and review of the national spatial development framework, regional structure plans and urban structure plans; to provide for the preparation, approval, review and amendment of zoning schemes; to provide for the establishment of townships; to provide for the alteration of boundaries of approved townships, to provide for the subdivision and consolidation of land; to provide for the alteration, suspension and deletion of conditions relating to land; and to provide for incidental matters".

6.3. The Henties Bay Town Planning Scheme No. 17

"The general purpose of the Scheme is the coordinated and harmonious development of the area of Swakopmund including where necessary the redevelopment of any part thereof which has already been subdivided and built upon, in such a way as will most effectively tend to promote health, safety, order, amenity, convenience and general welfare as well as efficiency and economy and conservation of the existing character of the town, in the process of such development".

7. PROJECT PHASES AND MANAGEMENT REQUIREMENTS / ACTIONS

The following will clearly define the responsibilities in terms of requirements and actions, of each role player involved during the respective phases of the project. It should however be noted that verry little to no construction is expected to place on the premises. The only construction envisaged is the possible extension of the boundary wall, in terms of height. The EMP will be focused on the possible future construction of the boundary wall as the main objective of this exercise is to have the necessary paperwork amended and have it corresponded with the actual existing situation on ground.

7.1. Planning and Design Phase of Project

During the planning and design phase of the project the following Management Requirements / Actions should be attended to by the Proponent and Management Team.

Feature	Management Requirements/Actions
Applications and Approvals	 Obtain all the relevant approvals from the relevant Authorities. These include the following: Environmental Clearance Certificate (MEFT) Council Approval for intentions Ministerial Approval for intentions (MURD) Obtain Approved Diagrams (Surveyor Generals Office) Transfer new Erven to clients (Deeds Office)
Channels of Communication	 Clear channels of communication to be established between the various role player. The various role-players should be clearly identified.
General observation	 The management team be responsible the ensure compliance with the EMP.
Flora and Fauna (Biodiversity)	No Fauna or Flora present on the site (Already constructed)
Interested and Affected Parties	 Communication with I & AP's Provide accurate information to all parties to ensure transparency.

7.2. Construction Phase

During the Construction Phase the following Management Requirements / Actions should be attended to by the Proponent, Environmental Officer and Contractor:

Feature/Activity	Type of Impact	Management Requirements / Actions	Responsible Entity
Storage of Building Materials	Injury, loss of life, visual and soil contamination	 All building materials to be property stored on site in a safe manner. All material be clearly demarcated with demarcation tape. 	Contractor
Building rubble	Visual impact and topsoil contamination	 Proper onsite disposal facility (skip). Regular site cleanup 	Contractor
Vehicular Movement	Social Impact and safety	 Intended disruption of local traffic flow to be well planned and kept to a minimum. A suitable person/s be appointed to manage traffic flow. Access and egress point/s be clearly demarcated and defined. Traffic Department of Henties Bay Municipality to be consulted. 	Proponent and Contractor
Noise	Nuisance and health impact	 Work hours should be restricted to between normal working hours being 08h00 to 17h00. The use of power tools and heavy machinery should be limited and only be used when required in order to limit the noise pollution. Proper planning in order to minimise time on site. Appropriate PPE to be worn at all times. 	Proponent and Contractor

Dust	Nuisance and health impacts	 used on gravel roads with the heaviest vehicle movement especially during dry and windy conditions. The use of waterless dust suppression means. Cover all stockpiles with plastic to minimise windblown dust. Dust protection masks should be provided to workers 	Proponent and Contractor
Improper disposal of bulk solid waste and management	Visual impact, soil contamination, Environmental Impact	 Identify approved dumping sites in accordance with the rules and regulation of the Henties Bay Municipality. No Illegal dumping to be tolerated. Onsite facilities to be made available for safe storage of solids and waste. 	Environmental Officer Contractor
Ablution facilities	Non-compliance with Health and Safety Regulations / unhygienic site conditions	 Portable toilets (i.e. easily transportable) should be available at every construction site. Separate toilets should be available for men and women and should clearly be indicated as such. Waste generated from the ablution facilities only to be disposed of at suitable Municipal sites. 	Environmental Officer Contractor

General waste	Visual impact and soil contamination	 The construction site should be kept tidy and neat at all times. No waste may be buried or burned on the site. No waste may remain on site after the completion of the project. 	Proponent, Environmental Officer Contractor
Road safety	Injury or loss of life	 Clear and Proper demarcation of road to be used by construction vehicles. Notify Municipality if and when any obstruction the main access road is foreseen. Work with Traffic Department of Henties Bay to minimise risks to general public 	Contractor
Safety around work sites	Injury or loss of life	 Excavations and trenches should be left open for the shortest time possible. Clearly Demarcate excavated areas and sand piles with demarcation tape to avoid injury. 	Contractor
General health and safety	Injury or loss of life	 All workers should have access to the relevant personal protective equipment (PPE). No workers should be allowed to drink alcohol during work hours. 	Contractor
Fauna and Flora	Environmental Impact	 Preserve as much of the biodiversity as possible. Do not remove any Fauna and/or flora from the area Keep all activities site specific to avoid overspill to surrounding area. 	Proponent, Environmental Control Officer, Contractor
Daily Visual	Visual and Social	 Weekly site inspections to be 	Proponent,

inspection	Impact	done to ensure compliance with the EMP. • Amend EMP where necessary.	Environmental Officer and Contractor
Environmental Awareness training	Lack of EMP awareness and the implications thereof	• All contractors appointed for maintenance work on the respective streets must ensure that all personnel are aware of necessary health, safety and environmental considerations applicable to their respective work.	Environmental Control Officer and

7.3. Maintenance and Operation Phase of Project

During the maintenance and operation phase of the project the proponent and appointed contractor of the time should perform the following Management Requirements / Actions.

Feature	Impact	Management Requirements / Actions	Responsible Entity
Environmental Awareness training	Lack of EMP awareness and the implications thereof	 All contractors appointed for maintenance work on the respective streets must ensure that all personnel are aware of necessary health, safety and environmental considerations applicable to their respective work. 	Proponent, Environmental Control Officer and Contractor
Social Impact	Impact on daily lives of surrounding residents and businesses	 All work to be performed should be preplanned in order to limit the impact on the surrounding area. Construction times be limited to working hours. 	Proponent, Environmental Control Officer and Contractor
Dust	Health Impacts and Nuisance	 Should dust levels become significant dust suppression techniques should be applied. Waterless dust suppression means should be utilised within areas experiencing water scarcity. 	Contractor
Noise	Nuisance and health impact	• Work hours should be restricted to	Proponent and Contractor

		 between normal working hours being 08h00 to 17h00. The use of power tools and heavy machinery should be limited and only be used when required in order to limit the noise pollution. Proper planning in order to minimise time on site. Appropriate PPE to be worn at all times. 	
General Cleanliness	Visual & Social Impact	 Regular check-ups to see whether the site is and socially acceptable manner. 	Environmental Control Officer and Proponent
Visual apparency of Structures	Visual & Social Impact	 Periodic renovation and painting of structures and walls. 	Proponent
General Health and Safety	Health Impacts, injury and loss of life	 All employees and contractors to have PPE available Morning Safety talks to be held. 	Proponent, Environmental Control Officer and Contractor

Any redevelopment/further development that might result from the maintenance phase and/or new intentions by the Proponent, then the Management Actions/Requirements indicated under the Construction Phase shall be applicable.

8. CONCLUSION

It is our opinion that if this EMP is incorporated and used as a guideline in the awareness training and day to day activities on site it will as a matter of fact serve its purpose in terms of mitigating and limiting potential negative impact.

The situation on ground is already been in existence for many years and subsequently used as part of the business establishment in the process. We see the statutory procedures as necessary in order to bring the cadastral information in line with the present situation as experienced n ground.

This EMP is seen as fitting for the envisaged potential extension of the Boundary Wall in the near future of within the 3-year period as per the ECC. The EMP should be made available to all the different role-players involved on the project and should form the basis of the planning and design phase to ensure compliance throughout the project.

Although the intentions of the Proponent will not have any significant impact the natural environment or existing urban structure it is of utmost importance to effectively implement the EMP and amend when and as needed. This will effectively help to addresses potential impacts and positively respond to the greater purpose of environmental and urban management and protection.