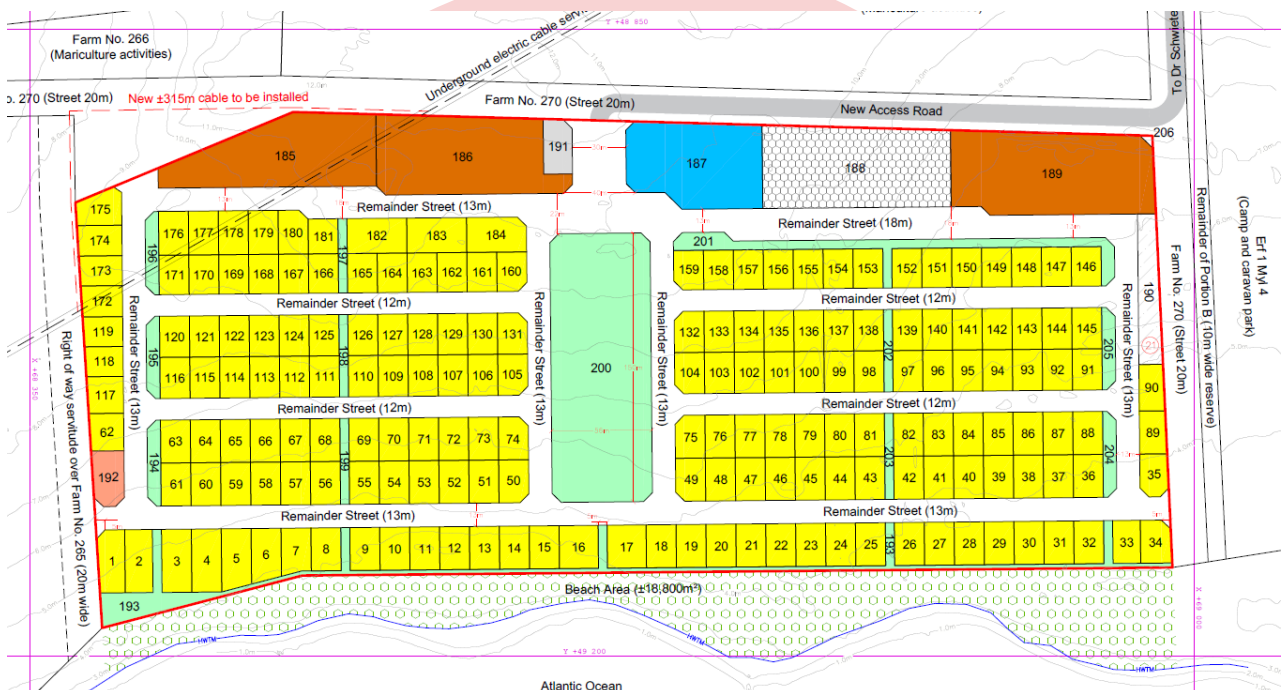


- PORTION 96 OF SWAKOPMUND TOWN AND TOWNLANDS NO.41: TOWNSHIP ESTABLISHMENT AND LAYOUT APPROVAL ON PORTION 96 COMPRISING OF 206 LAND PORTIONS AND THE REMAINDER (STREETS).

APP-006774



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Project title: Township establishment on Portion 96 of Swakopmund Town and Townlands No.41 to be known as Olive Park

Date: 16 February 2026

Reference: Olive Park

Report Status: Scoping Report
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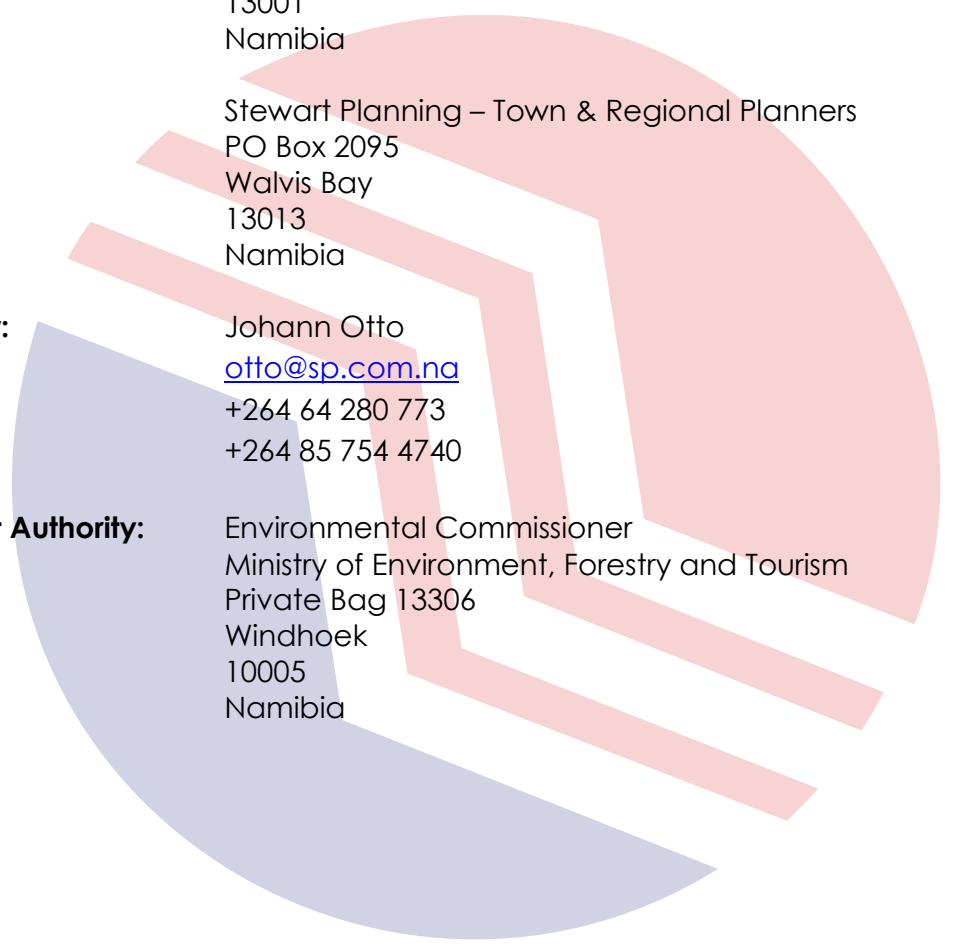


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Attachments

- Annexure A: Environmental Management Plan
- Annexure B: Screening Notice
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- Annexure D: CV of EAP
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- Annexure G: Proof of Consultation
- Annexure H: Local Authority Approval/Consent
- Annexure I: Public Feedback
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1. Non-Technical Summary

Namibia Oysters (Pty) Ltd (the proponent) owns Portion 96, a 15-ha property north of Mile 4 Caravan Park in Swakopmund, next to the Atlantic Ocean. The site was found unsuitable for aquaculture, so the proponent now plans to develop a retirement village called Olive Park.

The proposal is to establish a retirement-oriented township with 206 erven: 184 single residential, 3 general residential (apartments), 1 business erf (clinic/clubhouse), 1 institutional erf (frail-care centre), 1 parastatal erf (Erongo RED substation), 1 local authority erf (sewer pump), plus public open spaces and internal streets. The development targets people aged 55+ and includes facilities to support safe and comfortable senior living.

There is a growing demand for retirement housing in Namibia, with increasing numbers of people nearing retirement and limited existing options in Swakopmund. The site is attractive due to its quiet setting, proximity to the beach and salt pans, and good views.

Portion 96 lies directly east of a wide public beach that will remain accessible to all. The land slopes gently toward the ocean, giving most erven partial sea views. The naturally rocky shoreline provides effective protection against coastal erosion. The site contains old, unused oyster-farm buildings that will be removed. Vegetation is sparse, with no flora of conservation concern.

A full public consultation process was conducted through newspapers, gazette notices, site notices, and stakeholder letters. No objections were received, and feedback was generally positive.

The report identifies impacts during planning, construction, and operation. Positive impacts include improved access and monitoring of the public beach, removal of dilapidated oyster-farm structures, increased municipal revenue, and natural resilience against storm surges due to the rocky shoreline.

Negative impacts are mostly construction-related—noise, dust, waste, and worker-safety risks—and operational issues such as potential odours from the sewer pump station if poorly maintained, increased demand on utilities, and distance to some amenities. The Environmental Management Plan (EMP) includes mitigation measures such as dust control, proper waste handling, safe working practices, and maintenance requirements.

The rocky shoreline disperses wave energy and reduces erosion risk. Even during the extreme storm event of August 2024, the beach experienced minor waterlogging while Portion 96 remained completely dry.

The report concludes that Olive Park is environmentally acceptable and suitable for the site. All negative impacts can be effectively mitigated. It recommends that the Environmental Commissioner issue an Environmental Clearance Certificate for the township establishment on Portion 96.

2. Introduction

The purpose of this application is to obtain an Environmental Clearance Certificate in terms of the Environmental Management Act of 2007 for township establishment on Portion 96 Swakopmund Town and Townlands No.41 to be known as *Olive Park* and comprising of 208 land portions for Namibia Oysters (Pty) Ltd

3. Background

Portion 96 was bought from the Municipal Council of Swakopmund in 2006 to establish an oyster farm and was transferred in the name of Namibia Oysters (Pty) Ltd (the owner). The project was initially thought to be feasible and practical to implement, and significant investments have been made in providing the necessary infrastructure as indicated in Figure 1.



Figure 1: Historical image of the oyster farm ponds on Portion 96 dated May 2006 (Credit: Google Earth).

The owner realised that due to unfavourable environmental conditions, oysters were dying which resulted in huge financial losses. This is due to the frequent outbreaks of algal blooms (red tide) along the coast and directly opposite the site. Red tide causes low oxygen and hydrogen sulphide which is deadly for oysters.

An aquaculture expert from South Africa (Mr E. Hinrichsen of AquaEco) was appointed to investigate the problem and potential solutions. However, it was determined that the site and surrounding areas are not suitable for mariculture or aquaculture farming.

This has led the owner to consider alternative development options for Portion 96 such as establishing a residential township. Various township layouts were designed and considered and based on market demand for retirement living options at the coast, the owner/developer has decided to establish a retirement village.

The retirement village will be known as *Olive Park* which is a unique name to distinguish this township from Myl 4.

4. Terms of Reference

The following terms of reference set out the approach the proponent has undertaken the assessment in accordance with the Environmental Management Act of 2007 and the EIA Regulations:

Table 1: Zoning schedule of Olive Park on Portion 96.

ZONING	NO. OF ERVEN	TOTAL AREA	% OF TOTAL AREA
Single Residential	184	73,549 m ²	49.03
General Residential 1	3	13,165 m ²	8.78
General Business	1	3,384 m ²	2.26
Institutional	1	4,706 m ²	3.14
Special	1	999 m ²	0.67
Parastatal	1	482 m ²	0.32
Local Authority	1	519 m ²	0.35
Public Open Space	13	15,489 m ²	10.33
Street	1 & Remainder	37,707 m ²	25.14
TOTAL	206 & Remainder	150,000 m ²	100.00

The proposed development/land use for each zone is summarised as follows:

Number	Zoning	Proposed land use
• 184x Portions	Single Residential	Freehold title dwelling houses
• 3x Portions	General Residential 1	Sectional title apartments
• 1x Portion	General Business	Clinic, clubhouse, and apartments
• 1x Portion	Institutional	Frail care
• 1x Portion	Special	Sectional title garages
• 1x Portion	Parastatal	Electrical substation (Erongo RED)
• 1x Portion	Local Authority	Sewer pump station
• 13x Portions	Public Open Space	Park, landscaping, pedestrian links
• 1 Portion	Street	Corner splay
• Remainder	Street	Internal street access

The Single Residential erven will be zoned with a density of 1 dwelling unit per 300m² (a minimum erf size of 300m²) and the average erf size will be 400m², permitting a total of 184 houses to be developed for retirement purposes.

Project phases

The project will be split into three phases:

Phase 1: Planning: Includes site analysis, layout design, public consultation and obtaining statutory approvals in terms of the Urban and Regional Planning Act of 2018 and the Environmental Management Act of 2007. Includes land survey, design of engineering services, and registration of township at the Deeds Office.

Phase 2: Construction: Once statutory approvals are in place, the proponent will appoint a contractor to demolish the existing buildings and to dispose the waste at the municipal land fill site, setting up a construction camp, installation of underground services such as water, sewerage, and electrical lines, and construction of new streets. Buildings will also be built to house an electrical substation and sewer pump, and landscaping of open spaces will be undertaken. Once the land is serviced, the proponent will appoint an architect to prepare house design options, and architectural guidelines. Individual owners will appoint their contractors to build individual houses according to architectural guidelines. Other buildings such as a clinic, apartments, frail care centre will be built in support of a retirement village.

Phase 3: Operation: Once developed, the land will largely be occupied for residential purposes and be operated as a typical retirement village. Solid and liquid waste will be generated daily, and the development will generate vehicle trips. Residents will frequently

visit the central park or adjacent public beach for recreational activity. Routine maintenance will be undertaken from time to time.

Limitation of study area

Township development will be limited to the boundaries of Portion 96, but some of the construction and operational activity may extend beyond the boundaries such as the installation of services and roads, or residents visiting the adjacent public beach. Solid waste will be collected on a weekly basis, and will be disposed off-site at the municipal land fill site.

Project alternatives

Portion 96 was initially developed in 2006 as an oyster farm, but this project was not feasible due to frequent red tide outbreaks as explained under background on page 5 and is no longer in operation.

The proponent considered alternatives such as developing an upmarket residential township with large erf sizes. An EIA was done for this project, which was granted an Environmental Clearance Certificate in March 2023 (see Annexure J) which was retrieved from the Environmental Information Service website (www.the-eis.com). The previous township layout is indicated in Figure 3.

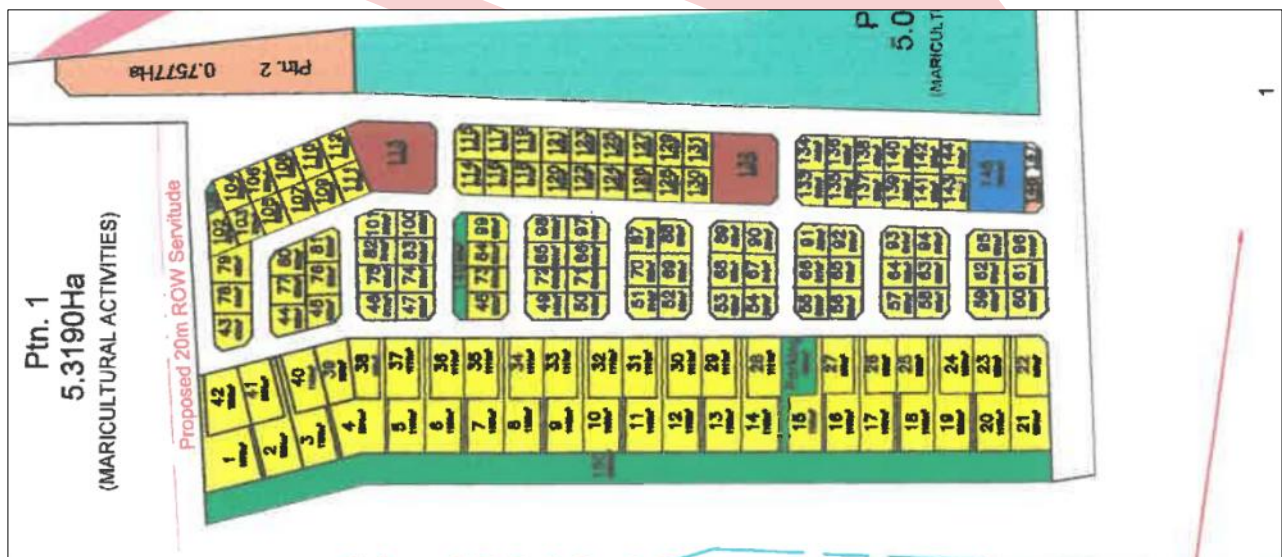


Figure 3: Previous residential township for Portion 96 from 2023 (Credit: VD Westhuizen Town Planning & Properties).

The previous township layout comprised of 150 erven, of which 141x would be Single Residential with erf sizes ranging from 500m² to 1600m², 2x General Residential erven, 1x General Business erf, 1x Local Authority erf, 1x Parastatal erf, Public Open Spaces, and Streets on a total land size of 15 hectares. This township was meant for any age group, young or old families.

Due to emerging demand for retirement living at the coast, the proponent reviewed and changed the project into a retirement village which a focus on senior living and called the project *Olive Park*. The township layout was also comprehensively reviewed to create smaller but more Single Residential erven, one large central park, and spaces for landscaping and pedestrian access, and other amenities such as a frail care centre, clinic, kitchen and dining hall which are ancillary and related to a retirement living.

Since then, no other project alternatives were proposed or identified for the site.

No-go alternative

This alternative implies that Portion 96 remains as one large erf with the existing oyster farm infrastructure that is dilapidated, and no longer in use. This alternative is not acceptable to the proponent and the public.

Layout alternatives

The *Olive Park* township layout was revised 17 times following input from the proponent, architect, and the Swakopmund Municipality. Overall, these were minor revisions to the layout to achieve feasibility and compliance with minimum town planning standards. To keep this report concise, the alternative layouts will not be assessed. The final township layout, as approved by the Swakopmund Council, is shown in Figure 2 on page 6.

Site alternatives

No site alternatives could be considered as the proponent is the registered owner of Portion 96.

6. Description of the receiving environment

The following section provides a description of Portion 96 (the site) and the surrounding environment in terms of its location, property information, and the physical environment which influences the design of the township layout.

Location

The site is situated north of the *Mile 4 Caravan Park*, south of the salt pans, along the ocean at coordinates: -22.621503, 14.522498.

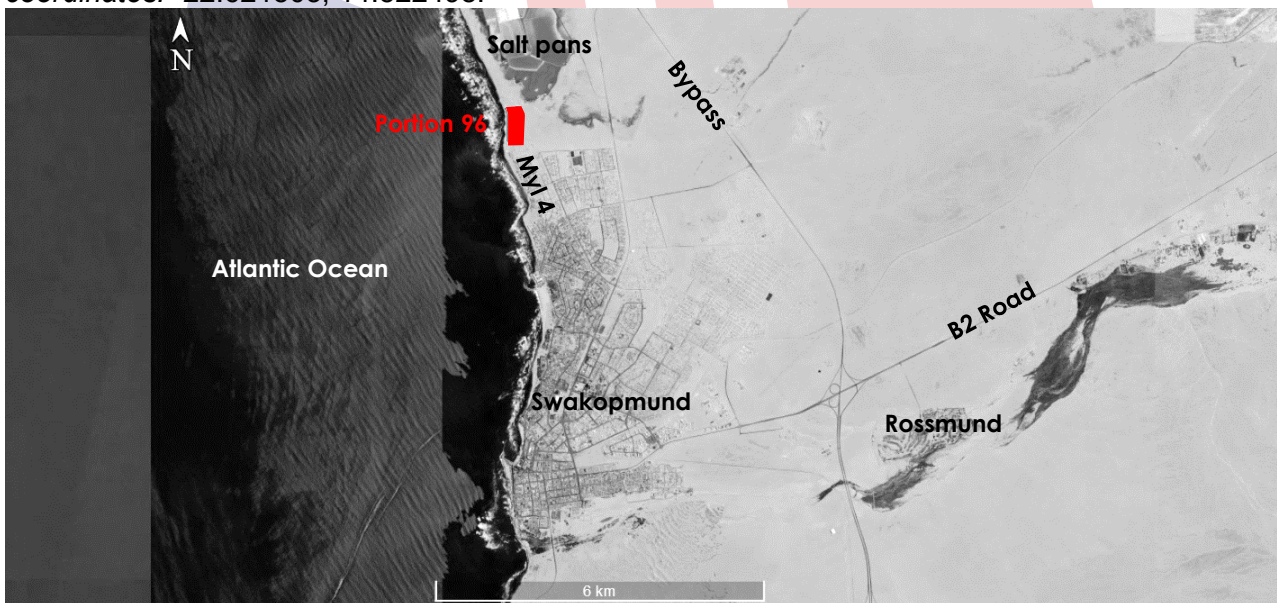


Figure 4: Portion 96 (red block) is located north of Myl 4, Swakopmund, Erongo Region, Namibia.

The site is situated close to existing amenities and services offered by Swakopmund and is thus suitable and desirable for urban expansion.

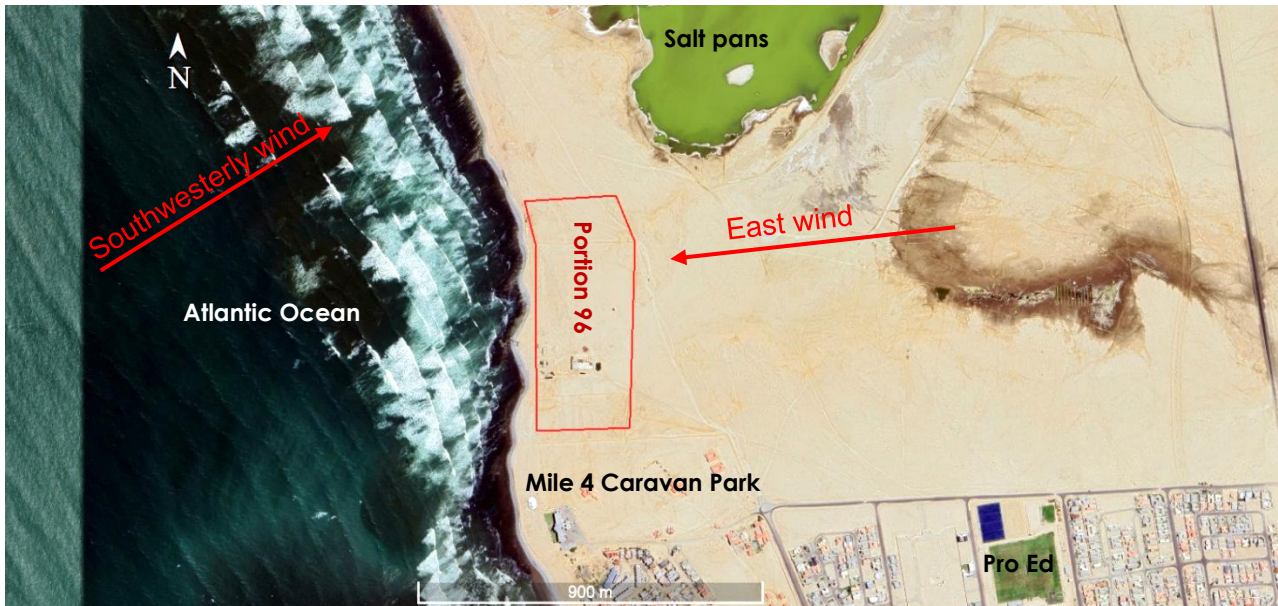


Figure 5: Locality of the site north of the Mile 4 Caravan Park and frequent wind directions.



Figure 6: Approximate cadastral boundaries of Portion 96 in red.

Surveyed boundaries and topography

Portion 96 measures exactly 15 hectares (150,000m²) in extent as surveyed vide Diagram No. A308/2007. The eastern border of Portion 96 has a height above mean sea level of 7 to 12 metres which slopes downwards to the western border at about 3.5 to 4 metres. The slope varies between 1:30 to 1:90.

Portion 96 has an irregular rectangular shape with an average length and width of $\pm 600\text{m} \times \pm 250\text{m}$. The longer side is aligned in a north-to-south direction and parallel to the Atlantic Ocean whereas the shorter boundaries are aligned in a west-to-east direction.

The surveyed boundaries, servitudes, and contours are indicated in Figure 7. The shoreline (the high-water tide mark in blue) is curved resulting in a public beach that varies in width between 15 to 60 metres up to the western boundary of Portion 96.

The title deed conditions will be reviewed, and new conditions will be registered against the subdivided land portions in accordance with the Urban and Regional Planning Act of 2018.

Land use and zoning

Portion 96 is currently zoned “Undetermined” in terms of Swakopmund Zoning Scheme No.12 (and draft Zoning Scheme No.71) but have been reserved for “abalone farming”. In terms of draft Zoning Scheme No. 71, surrounding block portions are provisionally zoned or reserved for “Aquaculture/Mariculture”, “Local Authority”, and “Special”. The beach is partially reserved “Undetermined” and “Nature Conservation area”.

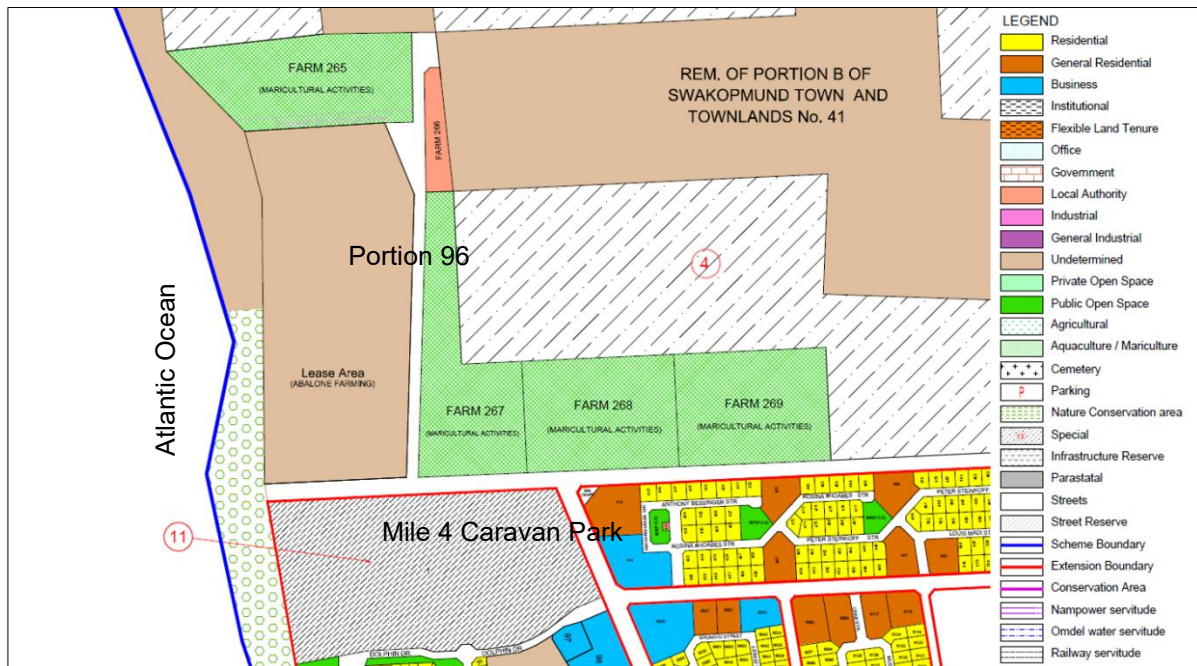


Figure 8: Zoning map of Portion 96 and surrounding properties (retrieved from Swakopmund Zoning Scheme No.71).

The current “Undetermined” zoning does not permit any primary use or building(s) without the written consent of the Council or unless the zoning is changed. In this case, township establishment will result in different zoning allocations to the land portions. The current zoning does not limit the potential for township establishment.

Physical environment

The site falls in a desert climate with little to no rainfall. Fresh water is sourced from non-perennial rivers which have a limited supply. Water is pumped via bulk pipelines to urban areas at the coast.

Water scarcity, together with the infertile topsoil, limits the creation of large open spaces and parks which are unsustainable. Smaller open spaces and gardens will be more suitable given the environmental limitations of the coast.

The site frequently experiences fog which cools down the ambient air temperature and provides essential moisture to adapted plants and insects. Temperatures are regulated by the cold Benguela current which makes living at the coast convenient as the temperature is not too cold or hot.

The site frequently experiences the south-westerly wind and on occasion strong bergwinds (east wind) as shown in Figure 5 on page 10. Building design and orientation play a crucial role in mitigating the inconvenience of wind.

Portion 96 was inspected on 29 February and 21 August 2024 and the following photos and observations were made of the physical environment:

Figure 9: The site is largely undeveloped and has good potential to be developed into a retirement village given the proximity to the Atlantic Ocean and potential for sea views. The site slope

downwards to the ocean so non-beachfront erven will have a partial sea view. The soil conditions are soft and suitable for urban development.



Figure 9: View of Portion 96 and the Atlantic Ocean.

Figure 10: The site has excellent views of the salt pans to the northeast, is situated well above the lower salt pans, and is unlikely to be flooded.



Figure 10: View of the lower salt pans to the northeast of Portion 96 and the sparsely vegetated terrain.

Figure 11: The site contain infrastructure which were previously used for the oyster farm project. These structures will be removed prior to township development, which will help improve the aesthetic qualities of the area.



Figure 11: Current infrastructure and buildings on Portion 96 that were previously used for the oyster farm project.

Figure 12: The site is sparsely vegetated with very few plants and no natural trees. No flora of any conservation value was observed on Portion 96.



Figure 12: Portion 96 is sparsely vegetated and contains no trees or plants that are of any conservation value.

Figure 13: The area north and south of Portion 96 is used by the public as parking spots and other recreational activities. Consequently, the area is slightly polluted. If *Olive Park* is developed, then undesirable and/or unlawful beach activities will better monitor by residents however the areas will remain open to the public.



Figure 13: Surrounding areas of Portion 96 are slightly polluted but will remain open to the public.

Figure 14: The site has a rocky shoreline which limits potential swimming or surfing activity but has the benefit of keeping the shoreline stable and less susceptible to shoreline erosion.



Figure 14: The beach has a rocky shoreline which provides natural protection from erosion (Date taken: 29 Feb 2024, 12h28).

Figure 15: The beach contains rocks which help dissipate wave energy and provide an extra layer of protection against erosion. No rocks should be removed to retain this natural protection.



Figure 15: The land is elevated above the ocean and the beach contains many rocks which help dissipate wave energy.

Figure 16: There is a wide public beach between the shoreline and Portion 96 which provides unrestricted pedestrian movement along the beach. This public beach will remain open to the public and for non-motorised traffic. The beach also provides large natural open space for recreational purposes.



Figure 16: Photo of a wide public beach situated between the shoreline (left) and the boundary of Portion 96 (fence on the right).

On 19 August 2024, Namibia experienced a super full moon¹ which created higher tides than usual and turbulent seas. The extremely rough seas caused significant infrastructure damage from Walvis Bay to Swakopmund as reported in the Namib Times². The site was inspected two days later (Figure 17) and minor portions of the beach were waterlogged, but no significant flooding or erosion was observed. Portion 96 was completely dry and unaffected.

¹ <https://moon.nasa.gov/news/197/super-blue-moons-your-questions-answered/>

² Page 2 of Namib Times dated 23 August 2024.



Figure 17: The extremely rough seas of 19 August flooded small portions of the beach but did not affect Portion 96 (Date taken: 21 August 2024 at 16h56).

The receiving environment has been considered and has influenced the design of *Olive Park* in the following manner:

- The layout should aim to maximise the potential views of the ocean and salt pans as natural assets.
- The long edge of residential erven to be north facing to maximise the number of receiving sunlight for gardens and solar panels. This will also maximise the number of erven facing the ocean.
- Buildings will be designed in such a way that outside areas and patios face away from the south-westerly and east winds.
- Due to the slope and difference in height, non-beachfront erven will have a partial sea view increasing the site's desirability for township establishment.
- The public beach is sufficient in width (15 - 60 metres) to allow free public access, which eliminates the need to create a wide greenbelt along beachfront erven.
- The extremely rough seas of 19 August did not cause any major flooding or erosion. The rocky shoreline provides natural protection against erosion and storm surges which eliminates the need to provide a wide beachfront greenbelt or building setback for protection. Increasing the natural ground level and/or building a retaining wall will provide sufficient protection for urban development.

7. Identification of Laws and Policies

Table 2 provides an overview of legislation and its application to the proposed project whereas Table 3 summarises relevant policies that apply to the project.

Table 2: Laws or legislation applicable to the project.

Law or Act	Provision or application	Authority
Namibian Constitution as amended in 1998, 2010, and 2014.	Article 95(l): The State shall actively promote and maintain the welfare of the people by promoting sustainable development.	National Government
Swakopmund Zoning Scheme	The use of land or the use of buildings in the proposed township need to comply with the zoning scheme provisions and restrictions as enforced by the Local Authority (LA). Portion 96 is currently zoned "Undetermined" which permits the establishment of a township with consent from the Swakopmund Council.	LA
Urban and Regional Planning Act of 2018	The establishment of a township will be implemented in accordance with Part 2 of Chapter 9 of this Act.	LA/MURD

Law or Act	Provision or application	Authority
Environmental Management Act, 2007 (Act No.7 of 2007) and EIA Regulations.	The Ministry of Environment, Forestry, and Tourism (MEFT) and the Urban and Regional Planning Board requires an ECC for township establishment.	MEFT
All relevant Local Authority Regulations	The project is subject to all relevant regulations (relating to health, building control etc) as required by the various departments of the Local Authority.	LA

Table 3: Policies or guidelines relevant to the project.

Policy	Provision or application	Authority
Swakopmund Structure Plan 2020-2040	Olive Park aligns with several components of the Structure Plan, though certain aspects do not fully comply. Nevertheless, the Structure Plan provides for a high degree of flexibility to accommodate evolving market conditions. The owner has demonstrated that Portion 96 is no longer financially sustainable for oyster farming. Based on the evidence presented, the site is more appropriately suited for redevelopment as a retirement village.	LA/MURD
Swakopmund Property Policy of 2012	Sets out how endowment fees are levied for township establishment by the Local Authority (LA) of Swakopmund.	LA
Swakopmund Strategic Plan of 2022 - 2026	Olive Park will aim to align with the strategic objectives of the Swakopmund Council to be a green and smart city with the implementation of renewable energy and sustainable development.	LA
Ministerial Town Planning Standards and Urban Design Guidelines	The proposed township needs to minimum requirements such as erf sizes, road widths, street access, and public open space.	MURD
Guidelines for Human Settlement Planning and Design (CSIR Redbook)	The proposed township needs to adhere to guidelines for human settlement planning and design.	CSIR
ALAN Panhandle Guidelines	The proposed township needs to meet minimum requirements for panhandles or right of way servitudes.	LA/MURD

8. Public Consultation

The application was advertised in accordance with the Urban and Regional Planning Act of 2018 and the Environmental Management Act of 2007.

A notice was placed in the Government Gazette on 1 July 2024, in the Namib Times and Namibian on 28 June and 5 July. Notices were on display at the site, near the Mile 4 Caravan Park turning circle, on the fence of Portion 96, and at the beach west of Portion 96 which were partially³ on display between 28 June and 30 July 2024. A notice was on display at the Swakopmund Municipality from 1 July to 30 July 2024.

Lastly, adjacent landowners and the Ministry of Fisheries, and Marine Resources were notified by registered post on 5 July 2024. NamWater and Erongo RED were notified by email on 5 July 2024 to provide their input on the proposed township establishment. The deadline for objections was 17:00, Tuesday, 30 July 2024. Proof of consultation is attached in Annexure G.

No written objections to the proposed township establishment were received from adjacent owners or members of the public by the deadline date.

³ The notice on the fence on Portion 96 went missing on 10 July and was replaced on 11 July 2024. However, the notice at the turning circle was on display from 28 June to 30 July 2024.

9. Need and Desirability of Project

The planning proposal is motivated by the growing need and demand for retirement living and frail care facilities in Swakopmund, and the desirability of the project to help meet this market demand.

Need and demand

The number of senior citizens have increased in Namibia and surrounding countries such as South Africa, and population demographics indicate that it will continue to increase for the next 20 to 50 years due to the broad youthful population. Many South Africans have business and/or family ties in Namibia and are likely to relocate to Namibia for their retirement.

In Namibia, the elderly population (aged 65+) experienced a notable increase from 108,490 individuals in 2011 to 139,106 in 2023, representing a 28% growth. Similarly, those near retirement (aged 50-64) saw a substantial increase from 150,187 individuals in 2011 to 249,382 individuals in 2023, reflecting a total increase of 66%. This historical growth is expected to continue over the next decade, as there are currently 291,967 individuals aged between 40-49.⁴

South Africa is experiencing similar patterns. In RSA, the elderly population grew by 45% from 2.77 million in 2011 to 4 million in 2022. The near retirement bracket (50-64) increased from 5.4 million in 2011 to 7.36 million in 2022, representing a total increase of 36%.⁵ Additionally, there are approximately 7.5 million individuals aged between 40-49 in South Africa, indicating a significant market that will be entering retirement in the next 15 years.

Individuals or couples who are near retirement will be looking to sell their large family home and relocate to a smaller house and garden. A location that is safe, well-maintained, and within walking distance of amenities such as restaurants, doctors, and clinics. A well-planned retirement village can provide all of these amenities in one place.

The Swakopmund Retirement Village (SRV) contains approximately 200 fully developed and/or occupied erven. As a result, the options for retirement housing and facilities are limited. This scarcity of available retirement options highlights the demand for retirement living in Swakopmund.

Due to these emerging trends, the owner has identified a strong market need and demand for a retirement village and related frail care facilities in Swakopmund.

Site desirability

Swakopmund continues to leave a positive impression on residents and visitors alike. Many people have chosen Swakopmund as their retirement destination due to town's desirable amenities and weather.

A lack of retirement options and frail care facilities can significantly increase costs. Providing additional facilities can help meet market demand, improve competitive costs, and benefit cost-conscious senior citizens.

The selected site for *Olive Park* is desirable as it is located in a quiet area north of Swakopmund and next to the Atlantic Ocean. Portion 96 is within walking distance to the beach, the salt pans, and the Sea Side Hotel. All of these factors will help contribute to a healthy and peaceful lifestyle.

The planned open spaces between erven will help improve accessibility to neighbours and the beach which promote social interactions and walking opportunities. Residents will enjoy a vibrant sense of community and remain active and young at heart.

Olive Park will provide security and personalised care for peace of mind. The retirement village will be designed to accommodate people aged 55 and older who are independent enough to live in their

⁴ Namibia Statistics Agency: Census data from 2011 and 2023.

⁵ Stats SA: Census data from 2011 and 2022.

own homes. A frail care facility will be provided for those who require assisted living care options. Exceptions can be made for individuals who are younger but need special care.

The age restriction will help make the township exclusive for senior citizens which is desirable as retirement housing options are already limited. Opening it to the whole market will defeat the objective of a retirement village. However, any person of legal age can buy a property, allowing younger generations to purchase property for their parents and/or future retirement.

In conclusion, the site is desirable for the development of a retirement village as the receiving environment will have a positive lifestyle impact on residents.

10. Identification of Potential Impacts

During the scoping exercise, potential impacts were identified which is linked to the proposed activity and/or a sensitive receptor. Potential impacts are grouped between three phases namely:

1. Planning Phase (Table 4 on page 19).
2. Construction Phase (see Table 5 on page 19).
3. Operational Phase (see Table 6 on page 20)

Table 4: Planning Phase: List of Potential Impacts Numbered P1 to P6.

IMPACT IDENTIFICATION: PLANNING PHASE			
No.	Activity	Receptor	Potential Impact
P1	Development of dwelling homes on Portion 96.	General public, beachgoers, fisherman.	Beach Access Positive: There is a 15-60m wide public beach between the Atlantic Ocean and proposed Olive Park which will remain open to the public for general access. Residents of Olive Park will also have direct access to the beach as well.
P2	Access to Olive Park.	Existing municipal road network.	Road Access Negative: Portion 96 does not have immediate access to the asphalt roads and is currently accessible by a gravel road, about 200 metres in length.
P3	Cold south-westerly winds Hot berg or east winds .	Dwelling units on Portion 96.	Wind Impacts Negative: Dwelling homes can be adversely affected by the cold south-westerly and the sandy east wind if not properly designed and orientated.
P4	Old oyster farm pump station, buildings, and rusting fence.	Portion 96 and surrounding environment.	Aesthetical Impacts Positive: Old structures will be removed prior to development to remove negative visual impacts.
P5	Notification of proposed township establishment.	General public and neighbouring properties.	Public Input Positive: General public or neighbours did not raise any objections or concerns to the proposed application. The proposed development received a positive public response.
P6	Payment of endowment fees, rates, and service charges.	Council Revenue.	Council Revenue Positive: Increase in Council revenue due to payment of endowment fees and increased tax base of the Council.

Table 5: Construction Phase: List of Potential Impacts Numbered C1 to C8.

IMPACT IDENTIFICATION: CONSTRUCTION PHASE			
No.	Activity	Receptor	Potential Impact
C1	Loud noise is generated from demolishing activity, construction, trucks, machinery, drilling and compactors.	Adjacent residents, Mile 4 Caravan Park, and construction workers.	Construction Noise Impacts Negative: Construction activity will generate noise and potentially disturb residents and can be harmful to persons working with heavy machinery and equipment without PPE.
C2	Improper disposal of construction waste and rubble.	Site, street and neighbourhood.	Solid Waste Management Negative: Generation of construction waste (tar, asphalt, cement, plastics, ceramics, bricks, and wood) can pollute the receiving environment.
C3	Accidental spillage of hazardous waste such as oil, paint, cement, or asphalt.	Site, street and neighbourhood.	Hazardous Waste Management Negative: Oil, paint, cement, and asphalt spillage can pollute the environment and be a health risk to construction workers and residents.

IMPACT IDENTIFICATION: CONSTRUCTION PHASE			
No.	Activity	Receptor	Potential Impact
C4	Excavation of Borrow Pits and/or Earthworks.	Site topography and soil properties.	Topsoil Management Positive: On-site soil properties are not suitable for construction and no borrow pits will be required. Earthworks will be required to increase height above sea-level on southwestern portion of Portion 96.
C5	Lack of ablution facilities, clean drinking water, warning signs and safety training.	Construction workers and visitors from the public.	Health and Safety Impacts Negative: Lack of sanitation and clean drinking water can create a health risk. Lack of first aid training and awareness of potential injuries can create a safety risk.
C6	Generation of dust particles from construction activity.	Construction workers and adjacent residents, Mile 4 Caravan Park.	Dust Impacts Negative: Generation of dust can negatively impact the health and safety of workers and adjacent neighbours.
C7	Labour disputes, proper wages, gender discrimination, and unsafe working environments.	Construction workers especially female workers.	Socio-economic Impacts Negative: Lack of proper compensation and/or unsafe working sites, and unfair gender recruitment, can be harmful to the well-being and health of employees.
C8	Removal of shrubs during construction activity.	Portion 96.	Removal of Shrubs Positive: No trees or shrubs of any conservation value was observed on-site.

Table 6: Operational Phase: List of Potential Impacts Numbered O1 to O7.

IMPACT IDENTIFICATION: OPERATIONAL PHASE			
No.	Activity	Receptor	Potential Impact
O1	Occupation of houses.	Portion 96 and surrounding environment.	Operational Noise Impacts Positive: The current use will not change or expected to create objectional noise to surrounding land uses.
O2	Operation of sewer pump station	Nearby Olive Park residents.	Sewer Pump Station Negative: The sewer pump station may emit odours during flooding which could negatively affected nearby residents and create a health issue.
O3	Occupation and use of developed properties.	Swakopmund Municipality.	Increased Tax Base Positive: The creation of rateable properties will increase Council Revenue.
O4	Shoreline erosion Storm surges Sea-level rise.	Rocky shoreline and site topography. Developed properties.	Coastal Hazards Positive: The rocky shoreline provides natural protection against storm surges and shoreline erosion, which can help protect urban development from coastal hazards.
O5	Increase in water and electrical usage and sewerage.	Bulk service network.	Services Impact Negative: Additional load and demand on municipal and electrical services.
O6	Location of Portion 96 on outskirts of town.	Olive Park Residents	Distance to Amenities Negative: Residents will be located far from services and other amenities, and emergency services.
O7	Proposed development of a desalination plant (HDF Energy) north of Portion 96.	Portion 96 and surrounding environment.	Desalination Plant Positive: The desalination plant may create a visual impact but is not expected to generate objectional noise or create a nuisance for a retirement village.

11. Impact Assessment

The following section will contain a description and assessment of the significance of any effects, including cumulative effects, that may occur due to the activities.

Methodology

The assessment of impacts is based on methods published in Namibia and South Africa (Directorate of Environmental Affairs, 2008: 42; DEAT, 2002). Each identified impact is evaluated systematically in terms of its magnitude and extent in area, the duration and frequency of occurrence, the reversibility on the environment, and the acceptability from interested and affected parties. The average grading is then multiplied by the probability of and direction to determine a final numerical value.

This value determines the significance which ranges from highly negative (-3) to highly positive (+3) as indicated on the following scale:

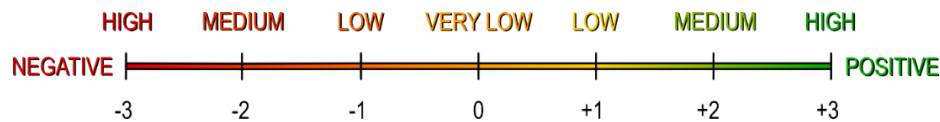


Table 7 provides a definition and overview of each significance level and Table 8 is a summary of the criteria used, their definition and grading scale.

Table 7: Definition of each significance level.

SIGNIFICANCE LEVEL	DEFINITION	GRADE
-VERY LOW or +VERY LOW	Impacts that affect a tiny area or population and hardly modify the environment. Biological and socio-economic aspects continue to function normally. Positive or negative effects are trivial and non-existent, and no mitigation is required.	±0
-LOW or +LOW	Impacts that affect a small area or population and slightly modify the environment. Biological and socio-economic aspects continue to function sustainably without mitigation. Positive and negative effects are minor and almost unnoticeable. Mitigation is cost-efficient and easy to implement.	±1
-MEDIUM or +MEDIUM	Impacts affect a larger area or population and modify the environment to some extent. Biological and socio-economic aspects continue to function sustainably with mitigation. Positive and negative effects are noticeable and important. Mitigation is costly but can be implemented.	±2
-HIGH or +HIGH	Impacts that affect a wide area or population and heavily modify the environment. Biological and socio-economic aspects continue to function on an unsustainable basis for negative impacts. Both positive and negative impacts are major and apparent. Mitigation is expensive and sometimes impossible to implement.	±3

Table 8: Summary of criteria, definition and grading.

CRITERION	DEFINITION	GRADE
MAGNITUDE	Magnitude defines the scale and ability of an impact to cause a change in the environment which is measured from a very low (0) to a very high (5) scale of change.	
Very Low	The impact has little to no change in the size or value of an environmental feature.	1
Low	The impact has a small change in the size or value of an environmental feature.	2
Moderate	The impact has a moderate and noticeable change on the environment.	3
High	The impact has a large and noteworthy change in the size or value of an environmental feature.	4
Very High	The impact has a major and significant change in the size or value of an environmental feature.	5
EXTENT	Extent defines the ability of an impact to affect a certain geographic area which can range from on-site (1) to an international (5) level.	
On-site	The impact is limited to the boundaries of the project site within a 50-meter radius.	1
Local	The impact affects the local surrounding environment within a 500-meter radius.	2
Urban	The impact affects the wide urban area within a 5 km radius	3
Regional	The impact is extensive and felt on a regional or national scale within the borders of the country.	4
International	The impact is widespread, cross-border cutting, and felt on an international level.	5
DURATION	Duration specifies how long an impact and effect will endure which can last from very short (1) to very long (5) duration.	
Very Short	The impact can last less than a day or week.	1
Short	The impact can last a few months or less than a year or during the construction phase only.	2
Medium	The impact can last between 1 to 10 years or during the operational phase only.	3
Long	The impact can last more than 10 years and close to the end of the operational phase.	4
Very Long	The impact can last from up to 100 years or more and beyond the decommissioning phase.	5
FREQUENCY	Frequency defines how many times an impact will occur over time which can range from a very low (1) to a very high (5) rate of occurrence.	
Very Low	The impact occurs only once or has a very low number of occurrences over the project life cycle.	1
Low	The impact occurs infrequently or has a low number of occurrences in a year.	2
Medium	The impact occurs occasionally or has a medium number of occurrences in a month.	3
High	The impact occurs often or has a high number of occurrences in a few days or a week.	4
Very High	The impact occurs frequently with a very high number of occurrences in an hour or day.	5
REVERSIBILITY	Reversibility is the ability of the receiving environment to restore itself with or without human intervention and is measured from a low (1) to high cost (5).	
Low Cost	The impact has a high rate of reversibility or the environmental health will restore itself to its natural state at a fast rate with little to no cost.	1
Medium Cost	The impact has a medium rate of reversibility or the environmental health can be restored to its natural state but with human intervention at a reasonable rate and cost.	3
High Cost	The impact has a low rate of reversibility (if not irreversible) or the environmental health can be restored to its natural state at a slow rate but it will be difficult or expensive to rehabilitate.	5

CRITERION	DEFINITION	GRADE
ACCEPTABILITY	Acceptability shows the level of tolerance from the public which can range from being acceptable (1) to unacceptable (5) depending on the response received from interested and affected parties.	
Acceptable	The impact is acceptable when no objections or concerns have been noted during public participation and/or the impact does not pose a potential risk to public health and safety.	1
Manageable	The impact is manageable when a small number of objections or concerns have been noted during public participation and/or the impact has a small potential risk to public health and safety.	3
Unacceptable	The impact is unacceptable when many objections or concerns have been noted during public participation and/or the impact poses a major potential risk to public health and safety.	5
PROBABILITY	Probability is the likelihood of a potential impact happening as predicted which can range from a very low (0%) to a very high (100%) chance of occurring. The probability is multiplied by the average grading.	
Very Low	The impact will not occur with a probability of 0%.	0%
Low	The impact is unlikely to occur with a low probability of say $\pm 25\%$.	25%
Medium	The impact is expected to occur with a medium probability of say $\pm 50\%$.	50%
High	The impact is likely to occur with a high probability of say $\pm 75\%$.	75%
Very High	The impact will occur with a probability of 100%.	100%
DIRECTION	Direction determines whether an impact will have a positive (+) or a negative (-) impact on the environment and is multiplied by the average grading to determine whether the impact is beneficial or not.	
Positive	Positive impacts have beneficial, useful, and desirable effects on the receiving environment.	(+)
Negative	Negative impacts have adverse, costly and undesirable effects on the receiving environment.	(-)



Assessment of potential impacts

The identified impacts are evaluated according to their magnitude, extent, duration, frequency, reversibility and acceptability to obtain an average grading. This grading is multiplied by the probability and direction to calculate the final grading and significance level before mitigation measures are implemented.

Table 9 lists the planning impacts numbered P1 to P6 (see Table 4 on page 19) and their associated evaluation and determination of significance before any mitigation.

Table 9: Planning phase and assessment of potential impacts before mitigation.

IMPACT ASSESSMENT BEFORE MITIGATION: PLANNING PHASE											
Impact No.	Magnitude	Extent	Duration	Frequency	Reversibility	Acceptability	Average grading	Probability	Direction	Final grading before mitigation	Significance level before mitigation
P1	Moderate 3	Urban 3	Long 4	Very High 5	Low Cost 1	Acceptable 1	2.83	Very High 100%	Positive (+)	+2.8	+HIGH
P2	Low 2	Local 2	Short 2	High 4	Medium Cost 3	Acceptable 1	2.33	Very High 100%	Negative (-)	-2.3	-MEDIUM
P3	Moderate 3	On-site 1	Long 4	High 4	Medium Cost 3	Acceptable 1	2.67	Very High 100%	Negative (-)	-2.6	-HIGH
P4	Moderate 3	On-site 1	Long 4	Very Low 1	Medium Cost 3	Acceptable 1	2.17	Very High 100%	Positive (+)	+2.2	+MEDIUM
P5	Moderate 3	Urban 3	Short 2	Medium 3	Low Cost 1	Acceptable 1	2.17	Very High 100%	Positive (+)	+2.2	+MEDIUM
P6	High 4	Urban 3	Medium 3	Medium 3	Low Cost 1	Acceptable 1	2.5	High 75%	Positive (+)	+1.9	+MEDIUM

The planning phase has 4 positive and 2 negative impacts, ranging from medium to high. This is because the proposed township is compatible with the surrounding land uses, beach access will remain open to the public, the application received positive public input, and it will help increase Council revenue.

Table 10 lists construction-related impacts numbered C1 to C8 (see Table 5 on page 19) and their associated evaluation and significance level before mitigation.

Table 10: Construction phase and assessment of potential impacts before mitigation.

IMPACT ASSESSMENT BEFORE MITIGATION: CONSTRUCTION PHASE											
Impact No.	Magnitude	Extent	Duration	Frequency	Reversibility	Acceptability	Average grading	Probability	Direction	Final grading before mitigation	Significance level before mitigation
C1	Moderate 3	Local 2	Short 2	High 4	High Cost 5	Acceptable 1	2.83	High 75%	Negative (-)	-2.1	-MEDIUM
C2	High 4	On-site 1	Short 2	High 4	Medium Cost 3	Manageable 3	2.83	High 75%	Negative (-)	-2.1	-MEDIUM
C3	High 4	On-site 1	Short 2	Medium 3	Medium Cost 3	Manageable 3	2.67	High 75%	Negative (-)	-2.0	-MEDIUM
C4	Low 2	Local 2	Short 2	Low 1	Low Cost 1	Acceptable 1	1.50	Very High 100%	Positive (+)	+1.5	+MEDIUM
C5	Moderate 3	Local 2	Short 2	High 4	Medium Cost 3	Manageable 3	2.83	Medium 50%	Negative (-)	-1.4	-LOW
C6	Moderate 3	On-site 1	Short 2	High 4	High Cost 5	Manageable 3	3.00	Very High 100%	Negative (-)	-3.0	-HIGH
C7	Very High 5	Urban 3	Short 2	Very Low 1	Medium Cost 3	Manageable 3	2.83	Medium 50%	Negative (-)	-1.4	-LOW
C8	Moderate 3	On-site 1	Long 3	Very Low 1	Low Cost 1	Acceptable 1	1.67	Very High 100%	Positive (+)	+1.7	+MEDIUM

The construction phase has 6 negative impacts and 2 positives. The negative impacts are largely related construction noise, solid and hazardous waste management, health and safety, dust impacts, and socio-economic impacts from fair labour practices. Dust impact was rated high and requires mitigation during construction. Positive impacts is the topsoil which do not require borrow pits as most construction sand will be procured from reputable suppliers, and the site does not contain any trees or shrubs which has any conservation value.

Table 11 lists operational-related impacts numbered O1 to O7 (see Table 8 on page 21) and their associated evaluation and significance level.

Table 11: Operational phase and assessment of potential impacts before mitigation

IMPACT ASSESSMENT BEFORE MITIGATION: OPERATIONAL PHASE											
Impact No.	Magnitude	Extent	Duration	Frequency	Reversibility	Acceptability	Average grading	Probability	Direction	Final grading before mitigation	Significance level before mitigation
O1	Low 2	Local 2	Long 4	Low 2	Low Cost 1	Acceptable 1	2.00	Medium 50%	Positive (+)	+1.0	+LOW
O2	High 4	On-Site 1	Very Short 1	Low 2	Medium Cost 3	Manageable 3	2.33	Very High 100%	Negative (-)	-2.3	-MEDIUM
O3	Low 2	Urban 3	Long 4	Medium 3	Medium Cost 3	Acceptable 1	2.67	Very High 100%	Positive (+)	+2.7	+HIGH
O4	High 4	On-Site 1	Very Long 5	Very Low 1	Medium Cost 3	Manageable 3	2.83	High 75%	Positive (+)	+2.1	+MEDIUM
O5	Low 2	Urban 3	Long 4	Medium 3	Medium Cost 3	Acceptable 1	2.67	High 75%	Negative (-)	-2.0	-MEDIUM
O6	Low 2	Urban 3	Medium 3	High 4	Low Cost 1	Acceptable 1	2.33	High 75%	Negative (-)	-1.75	-MEDIUM
O7	Moderate 3	Local 2	Long 4	Low 2	Low Cost 1	Manageable 3	2.5	High 75%	Positive (+)	+1.9	+MEDIUM

The operational phase has 4 positive and 3 negative impacts. Positive impacts is the increased tax base for the Swakopmund Council, the rocky shoreline which offers natural protection against coastal hazards, the proposed retirement village is not expected to create objectional noise to neighbours, and the proposed desalination plant is not expected create objectional noise either as was confirmed during public consultation. Negative impacts include the sewer pump station which may generate odours to nearby residents if not properly maintained, the added load and demand on municipal and electrical services, and the far distance to amenities and services.

12. Environmental Management Plan

Please refer to Annexure A for the Environmental Management Plan (EMP) and recommended mitigations for each potential impact. All negative impacts could be successfully mitigated if certain measures are implemented from a high/medium to a low level, and in some cases positive impacts could be enhanced.

13. Conclusion

The following provides a summary of the report:

1. Namibia Oysters (Pty) Ltd is the registered owner of a 15-hectare plot situated north of the *Mile 4 Caravan Park* which is known as Portion 96 of Swakopmund Town and Townlands No.41.
2. Portion 96 was bought from the Municipal Council of Swakopmund (the Council) in 2006 to establish an oyster farm. However, oysters often died due to outbreaks of algal blooms (red tide) rendering the project a complete loss. An aquaculture expert was consulted to find possible mitigations, however, the expert confirmed that no feasible mitigations could be implemented and that the selected site is not suitable for any type of maricultural farming activity.
3. To recoup from the financial loss of the oyster farm investment, the owner has identified a need to develop a residential township. In particular, there is a growing demand for retirement living in Swakopmund, therefore, the intention is to establish an up-market retirement village which will be known as *Olive Park*.
4. The owner has appointed Stewart Planning to obtain statutory approval to establish a new township on Portion 96 in terms of the Urban and Regional Planning Act, 2018 (Act No. 5 of 2018) and to obtain an Environmental Clearance Certificate in terms of the Environmental Management Act of 2007.
5. Portion 96 is considered a desirable location next to the ocean, in a quiet area, and has fantastic views of the salt pans. The soil conditions and topography are suitable for township establishment, and the rocky shoreline provides excellent protection against coastal hazards.
6. The proposed township is in accordance with some policies and plans of the Swakopmund Structure Plan and some cases, it is not. Whatever the case may be, the Structure Plan does allow for a "high degree of flexibility" to respond to changing market demands.
7. A township layout has been prepared which is based on the site development plan and urban design from the appointed architect which is attached under Annexure C or as shown in Figure 2 on page 6 of this report. The township will comprise 206 land portions of which 184 will be residential, 3 will be general residential, 1 general business erf, 1 institutional erf, 1 special erf for sectional garages, 1 parastatal erf for Erongo RED, 1 local authority erf for a pump station, and the rest as streets and public open spaces.
8. The township layout plan will be fully compliant with policies and laws such as the *Ministerial Town Planning Standards and Urban Design Guidelines of 2013*, *Guidelines for Human Settlement Planning (CSIR Red Book)*, *ALAN Panhandle Guidelines*, the *Swakopmund Zoning Scheme*, and the *Urban and Regional Planning Act of 2018*.
9. Potential impacts of shoreline erosion, storm surges, services, traffic, access, wind, socio-economic impacts, aesthetical impacts, and the proposed desalination plant north of Portion 96 have been considered. The proponent will implement suitable measures to mitigate negative impacts.

10. The planning application was advertised between 28 June and 30 July 2024 and received positive comments from the public. No written objections or concerns to the proposed township have been received by the deadline date.
11. The Environmental Commissioner has previously issued an Environmental Clearance Certificate (ECC) for township establishment on Portion 96 in 2023 (see Annexure J) for an older layout. The township layout and development proposal has changed which warrants a new application for an ECC.
12. The Swakopmund Council recommended the township establishment application and township layout for Portion 96 for approval at their meeting held on 27 February 2025 (see Annexure H). The township name "Olive Park" was also recommended for approval.
13. In conclusion, the establishment of a township on Portion 96 is considered needed and desirable and can be recommended for approval subject to conditions as provided on the following page.




14. Recommendation

Based on the findings of this report, it is concluded that the proposed township establishment is environmentally acceptable and can be supported from an environmental perspective. It is therefore recommended that an Environmental Clearance Certificate be issued for township establishment on Portion 96 of Swakopmund Town and Townlands No.41, subject to the implementation of the EMP throughout all phases of the project. The following wording is recommended:

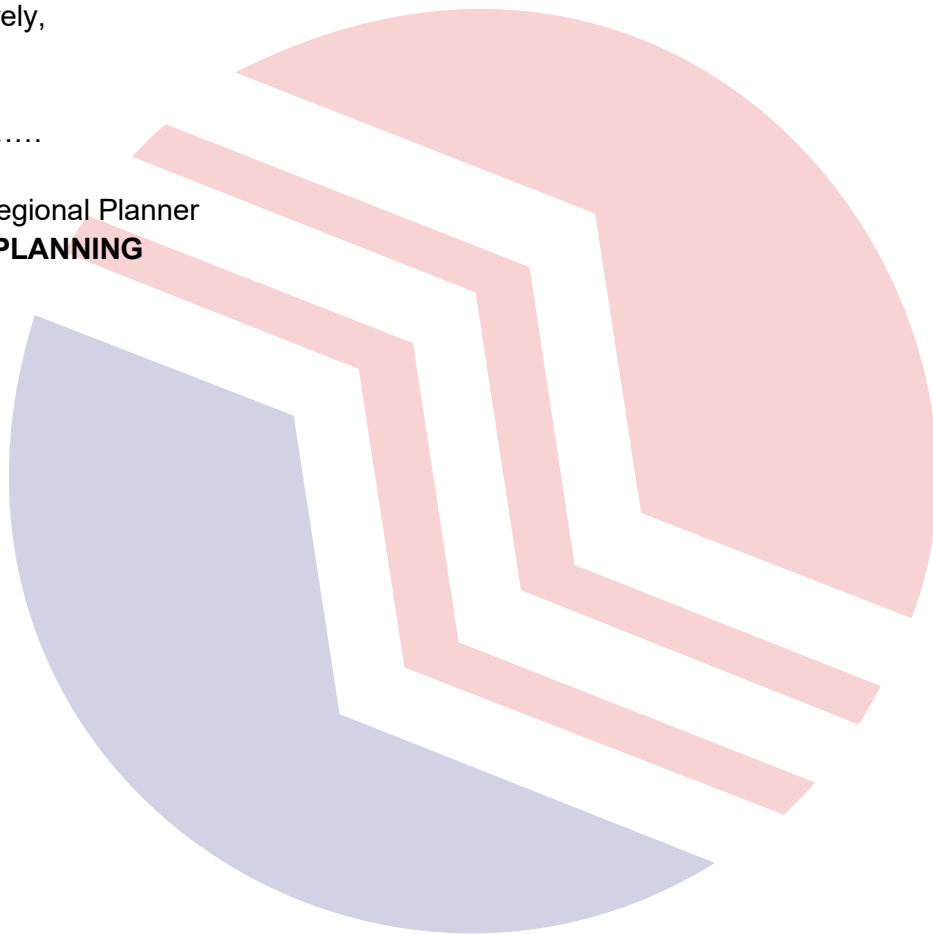
That an Environmental Clearance Certificate be issued to Namibia Oysters (Pty) Ltd for township establishment on Portion 96 of Swakopmund Town and Townlands No.41 to be known as Olive Park comprising of 208 land portions.

Yours sincerely,



Johann Otto
Town and Regional Planner

STEWART PLANNING



15. References

Crawford, A.B. 1973. Impact analysis using differentially weighted evaluation criteria. In Cochrane, J.L. and Zeleny, M. (Eds.), Multiple Criteria Decision-Making. Columbia: University of South Carolina Press.

CSIR. 2005. Guidelines for Human Settlement Planning and Design. Volume 1 and 2. CSIR Building and Construction Technology. CSIR, Pretoria.

DEAT. 2002. Impact Significance, Integrated Environmental Management. Information Series 5. Pretoria: Department of Environmental Affairs and Tourism.

Directorate of Environmental Affairs. 2008. Procedures and Guidelines for Environmental Impact Assessment (EIA) and Environmental Management Plans (EMP). Windhoek: Directorate of Environmental Affairs, Ministry of Environment and Tourism.

Namibia. 1990. Namibian Constitution, as amended.

Namibia. 2007. Environmental Management Act of 2007.

Namibia. 2009. Policy for the levy of betterment fees and to agree on betterment fee levels between Local Authorities and the Ministry. Ministry of Regional and Local Government, Housing and Rural Development.

Namibia. 2018. Urban and Regional Planning Act of 2018.

SM (Swakopmund Municipality). 2020. Swakopmund Structure Plan 2020-2040.

SM. 2002. Swakopmund Zoning Scheme, as amended.

SM. 2012. Swakopmund Property Policy of 2012.

SM. 2022. Swakopmund Strategic Plan of 2022 to 2026.