



SWIB
TRADING CC

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ENVIRONMENTAL SCOPING REPORT

APPLICATION FOR ENVIRONMENTAL CLEARANCE:

- SUBDIVISION OF ERF 3568 (POS), ONDANGWA EXTENSION 16 INTO PORTION A AND REMAINDER;
- PERMANENT CLOSURE OF PROPOSED PORTION A OF ERF 3568 (POS), ONDANGWA EXTENSION 16 AS A "PUBLIC OPEN SPACE" AND SUBSEQUENT REZONING TO "BUSINESS" WITH A BULK OF 1.0; AND
- CONSENT TO COMMENCE WITH THE CONSTRUCTION OF FLATS WHILE THE TOWN PLANNING APPLICATION IS BEING PROCESSED.

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1 APPOINTMENT

SWIB Trading CC – Town and Regional Planners has been appointed to prepare and submit this Environmental Clearance application for the proposed subdivision, closure of public open space and rezoning of a portion of Erf 3568 (POS), Ondangwa Extension 16, on behalf of the prospective developer Mr. Antonio Amutenya.

The proposed development is located within Ondangwa Extension 16, within the Town and Townlands of Ondangwa No. 882. The application involves the following planning approvals:

- **SUBDIVISION OF ERF 3568 (POS), ONDANGWA EXTENSION 16, TO CREATE PORTION A AND THE REMAINDER OF ERF 3568;**
- **CLOSURE OF PORTION A OF ERF 3568 AS PUBLIC OPEN SPACE;**
- **REZONING OF PORTION A OF ERF 3568 FROM “PUBLIC OPEN SPACE” TO “BUSINESS” WITH A BULK OF 1.0.**

The Environmental Screening Report has been prepared in support of the proposed subdivision, closure and rezoning application and the intended development of nine (9) residential flats on the property.

The relevant documentation is included in support of this application to the Ministry of Environment, Forestry and Tourism (MEFT), submitted to the Environmental Commissioner in accordance with the Environmental Management Act, 2007 (Act No. 7 of 2007).

Supporting documentation and relevant plans are attached as appendices to this report.

2 INTORODCTION AND BACKGROUND

2.1 HISTORICAL DEVELOPMENT AND URBAN CONTEXT

Erf 3568 (POS) in Ondangwa Extension 16 forms part of a neighbourhood that has undergone substantial urban growth and transformation over the years. Ondangwa Extension 16 developed as part of the formal township expansion initiatives undertaken by the Ondangwa Town Council to accommodate increasing urbanization and demand for residential, institutional and business land uses within the town.

The surrounding area today reflects a mixed-use urban environment characterized by residential, business, civic, institutional and community land uses that support the social and economic activities of Ondangwa residents.

The subject property, Erf 3568 (POS), measures approximately 1.8159 hectares and is currently zoned “Public Open Space” in accordance with the Ondangwa Town Planning Scheme and the Conditions of Establishment of Ondangwa Extension 16. The property is currently vacant and portions of the site are informally used for the dumping of garden

refuse and construction rubble by surrounding residents, resulting in underutilization of the land.

This application is informed by the allocation of Portion A of Erf 3568 to Mr. Antonio Amunyela for the purpose of establishing residential flats on the property. The proposed development aims to contribute toward addressing the increasing housing demand and accommodation shortage currently experienced within Ondangwa.

The proposed development will provide nine (9) residential flats that will contribute toward the provision of urban accommodation within the town. Ondangwa continues to experience population growth and increased housing demand associated with urbanization, economic activity and inward migration from surrounding rural settlements.

To facilitate this development, a portion of Erf 3568 measuring approximately 930m² must be formally subdivided to create Portion A, while the remainder of the erf will remain as Public Open Space under municipal ownership. Following subdivision, Portion A will be permanently closed as Public Open Space and rezoned to "Business" with a bulk factor of 1.0 in order to legally accommodate the proposed block of flats in accordance with the Ondangwa Zoning Scheme No. 8.

The proposed land use change therefore involves the subdivision of Erf 3568, the closure of Portion A as Public Open Space, and the rezoning of Portion A to "Business" to allow for the proposed development.

Furthermore, this Environmental Screening Report has been prepared in accordance with the Environmental Management Act, 2007 (Act No. 7 of 2007). The Act requires that potential environmental impacts associated with listed activities be assessed prior to implementation of development projects.

The purpose of this report is therefore to evaluate the environmental implications associated with the proposed subdivision, closure of public open space and rezoning of Portion A of Erf 3568 and to ensure that the proposed development is implemented in an environmentally responsible and sustainable manner.

2.2 IMPERATIVES FOR THE PROPOSED DEVELOPMENT

The proposal to subdivide Portion A of Erf 3568 (POS), Ondangwa Extension 16, close the newly created portion as Public Open Space and rezone it from "Public Open Space" to "Business" is informed by several planning, social and economic considerations.

2.2.1 OPTIMIZATION OF PUBLIC LAND USE

The proposed subdivision and rezoning aim to promote more efficient utilization of municipal land within an already developed urban area. While public open spaces are important components of urban planning, certain portions may remain underutilized due to location, accessibility or functionality.

The allocation and development of Portion A of Erf 3568 represent an opportunity to optimize municipal land resources while retaining the majority of the property as Public Open Space.

By subdividing a relatively small portion of the erf measuring approximately 930m² and retaining the remainder as Public Open Space, the proposal ensures continued communal benefit while also accommodating development that addresses urban housing needs.

2.2.2 PROVISION OF HOUSING

The proposed development is intended to establish nine residential flats that will contribute toward addressing the growing housing demand within Ondangwa.

The town is currently experiencing a significant housing backlog and increasing demand for urban accommodation. The development of flats will provide additional housing opportunities within a strategically located and serviced urban environment.

The development will contribute positively toward improving residential accommodation options within Ondangwa Extension 16 and surrounding areas.

2.2.3 CONTRIBUTION TO LOCAL ECONOMIC DEVELOPMENT

The proposed development will contribute to local economic development through construction-related employment opportunities and increased investment within the town.

During both the construction and operational phases, the development will generate economic activity through procurement of building materials, professional services and labor.

Furthermore, the development will contribute toward municipal revenue generation through rates, taxes and service payments.

2.2.4 COMPATIBILITY WITH EXISTING URBAN INFRASTRUCTURE

The site is located within an already developed township area that is serviced by existing municipal infrastructure including roads, portable water supply, sewer reticulation and electricity.

Access to the property is provided via Bishop Leonard Auala Street, which forms part of the existing road network serving Ondangwa Extension 16.

The proposed flats are compatible with the surrounding mixed-use urban environment and are unlikely to place excessive pressure on municipal services.

2.3 SITE CONTEXTUAL ANALYSIS

The subject property, Erf 3568 (POS) located in Ondangwa Extension 16, forms part of the established urban area of Ondangwa within the Town and Townlands of Ondangwa No. 882. The erf is currently zoned "Public Open Space" and is situated within a mixed-use neighbourhood that includes residential, business, institutional, civic and local authority land uses.

Erf 3568 measures approximately **1.8159 hectares** in extent and is currently undeveloped. The property forms part of the planned public open space network within the township. The proposed development will only affect a small portion of the erf measuring approximately 930m², which will be subdivided to create Portion A, while the remainder of the property will remain as Public Open Space under the ownership of the Ondangwa Town Council.

The property benefits from its location within a fully serviced urban environment where municipal infrastructure such as road access, potable water supply, sewer reticulation and electricity services are already available. Access to the property is provided via Bishop Leonard Auala Street, which forms part of the existing road network serving Ondangwa Extension 16. The surrounding area is generally well developed and forms part of the town's established urban settlement pattern.

From a spatial planning perspective, the site is located within an area that has gradually experienced increased urban activity and residential development demand as Ondangwa continues to expand. Its proximity to surrounding residential neighbourhoods, business erven, institutional uses and civic facilities makes the location suitable for higher-density residential accommodation such as flats, which will contribute toward addressing the growing housing demand within the town.

The surrounding area is characterized by a mixture of zoning categories including General Residential, Business, Institutional, Civic and Single Residential erven. Nearby general residential erven such as Erven 9823, 9824, 3555, 3554, 3409 and 3469 support higher-density residential developments, while nearby business erven including Erven 3556, 3557 and 3558 accommodate commercial activities and services. Institutional and civic erven within the vicinity further contribute to the mixed-use urban character of the area.

In terms of environmental characteristics, the property is located within a fully transformed urban environment, with no known environmentally sensitive habitats, protected vegetation, or conservation areas present on the site. The terrain is generally flat, which is typical of the broader Oshana landscape, and is considered suitable for urban development activities.

Soil conditions within the area generally consist of sandy soils typical of northern Namibia, which are commonly suitable for standard building construction subject to appropriate foundation design and engineering considerations. No known contamination or environmentally hazardous land uses have been recorded on the property.

For this reason, this Environmental Screening Report has been prepared to support an application for an Environmental Clearance Certificate (ECC). The report identifies potential environmental impacts associated with the subdivision, closure of Public Open Space, rezoning and construction of residential flats, and outlines mitigation measures to ensure that the development is implemented in an environmentally responsible manner.

The application is hereby submitted to the Ministry of Environment, Forestry and Tourism (MEFT) through the Office of the Environmental Commissioner for review and consideration in accordance with the Environmental Management Act.

3.2 IMPACT MANAGEMENT PROCESS

Although the proposed development is located within an existing urban environment and is expected to have limited environmental impacts, a set of environmental management measures will be implemented to minimize potential impacts during both the construction and operational phases. These measures are designed to ensure that the development is compatible with surrounding residential, business and community uses, while maintaining environmental and public health standards.

Water Management

- Proper design and implementation of drainage systems to manage stormwater and runoff from the site.
- Connection of wastewater from the proposed flats to the municipal sewer system, ensuring no contamination of surrounding properties.
- Efficient water use practices during both construction and operational phases.

Waste Management

- Collection, segregation and safe disposal of all solid waste generated during construction.
- Implementation of proper waste management practices during occupation and operation of the residential flats to prevent littering and environmental contamination.

Noise and Dust Control

- Limiting construction activities to reasonable daytime hours to minimize disturbance to nearby residents.
- Use of dust suppression methods during construction, including water spraying and covering of exposed soil.
- Proper management of construction equipment and machinery to minimize unnecessary noise generation.

Traffic and Safety

- Provision of adequate onsite parking in accordance with Ondangwa Town Council requirements.
- Safe vehicle access to Portion A of Erf 3568 via Bishop Leonard Auala Street.
- Implementation of traffic management measures during construction to ensure safe movement of vehicles and pedestrians.

Community and Operational Considerations

- Scheduling construction deliveries and activities to minimize disruption to the surrounding neighbourhood.
- Regular maintenance of the residential development and associated infrastructure to ensure proper hygiene, safety and environmental standards.
- Compliance with all municipal building regulations and service requirements.

These mitigation measures will help ensure that the proposed residential flats integrate responsibly within the surrounding mixed-use urban environment, supporting urban housing provision and socio-economic development while minimizing potential negative environmental impacts.

4 PURPOSE OF THE REPORT

This Environmental Screening Report has been prepared in accordance with the **Environmental Management Act, 2007 (Act No. 7 of 2007)** and the associated **Environmental Impact Assessment Regulations of 2012 (Government Notice No. 30 of 2012)**. The report serves as a formal submission to the **Ministry of Environment, Forestry and Tourism** for the purpose of obtaining an **Environmental Clearance Certificate (ECC)** for the proposed subdivision, closure of public open space, rezoning and development of Portion A of Erf 3568 (POS), Ondangwa Extension 16.

The main objectives of this report are to:

1. Facilitate Regulatory Review

Provide comprehensive information to enable the Environmental Commissioner to determine whether the proposed development requires further environmental assessment or may proceed with an Environmental Clearance Certificate.

2. Assess Potential Environmental Impacts

Identify and evaluate potential environmental impacts associated with the proposed subdivision, closure of Public Open Space, rezoning and the establishment of nine (9) residential flats on Portion A of Erf 3568.

3. Recommend Mitigation Measures

Propose practical environmental management measures to minimize or prevent potential impacts during both the construction and operational phases of the development.

4. Support Sustainable Urban Development

Ensure that the proposed development is implemented in a manner that is environmentally responsible, socially beneficial, and compatible with the surrounding urban and residential environment.

5. Promote Urban Housing Development

Demonstrate how the development contributes positively to the social and economic well-being of the local community through the provision of additional urban housing opportunities, in alignment with the broader urban planning objectives of the Ondangwa Town Council and the continued growth and development of Ondangwa Extension 16.

5 LEGISLATION

The following table provides the legislative framework within which the applicant should be viewed:

STATUTE	PROVISIONS	PROJECT IMPLICATIONS
<p>THE CONSTITUTION OF THE REPUBLIC OF NAMIBIA, 1990:</p>	<p>The state shall actively promote and maintain the welfare of the people by adopting, inter-alia, policies aimed at the following:</p> <p>(i) <i>management of ecosystems, essential ecological processes and biological diversity of Namibia and utilisation of living natural resources on a sustainable basis for the benefit of all.</i></p>	<p>Ensure that the ecological integrity of the ecosystems of the area is protected.</p>
<p>ENVIRONMENTAL MANAGEMENT:</p>	<p>Environmental Management Act No. 7 of 2007:</p> <p>EIA Regulation (EIAR) GN 57/2007 (GG 3212):</p> <p>Prescribes the procedures to be followed for authorisation of the project (i.e. Environmental clearance certificate).</p> <p>In terms of Section 10.1(b), 10.2(a), for environmental clearance for the construction of a public road,</p> <p>In terms of Section 8.8, 8.10 and 8.11, for construction and other activities in watercourses within flood lines, the reclamation of land from below or above the high-water and the alteration of natural</p>	<p>Evaluate if the alignment of the street will impact on the social and natural environment.</p> <p>Determine if the risk of flooding of the erven is at acceptable levels.</p> <p>Determine if proposed limited infill would impact the function of the watercourse or cause flooding elsewhere.</p>

	<p>wetlands are listed activities.</p> <p>Prescribes the procedures to be followed for authorisation of the project (i.e. Environmental clearance certificate).</p>	
<p>WATER AND RESOURCES MANAGEMENT:</p>	<p><i>The Water Act No. 54 of 1956 and Water Resources and Management Act No. 27 of 2007 Section 92:</i></p> <p>Section 92 (1), A person may not engage in any construction work or other activity that causes, or is likely to cause, the natural flow conditions of water in to or from a watercourse to be modified, unless the Minister has granted prior written approval for the work or activity to be carried out.</p> <p>Section 100 (e) consult with the regional council or local authority in determining the geographic extent of flood plain areas in its region or local authority, as the case may be, and assist any such councils in regulating the development and use of land within floodplain areas</p> <p>Section 100 (f) prescribe measures for control and management of storm and flood risk within local authority areas.</p>	<p>Assess the potential risk that the planned activities may have on both the watercourses and floodplains on the one hand and future occupants of the land on the other.</p>

	<p>Section 101 (b) development on the banks of any wetland or dam; and</p> <p>Section 101 (c) the removal of rocks, sand or gravel or any other material from a watercourse.</p>	
<p>THE PUBLIC HEALTH AND HEALTH AND SAFETY REGULATIONS:</p>	<p><i>The Public Health Act 36 of 1919 as amended and the Health and Safety Regulations:</i></p> <p>These acts control the existence nuisances such as litter that can cause a threat to the environment and public health.</p>	<p>Prevent activities which can have an impact on the health and safety of the public.</p>

<p>POLLUTION CONTROL AND WASTE MANAGEMENT BILL:</p>	<p><i>Pollution Control and Waste Management Bill:</i></p> <p>This bill aims to promote sustainable development and to prevent and regulate the discharge of pollutants into the environment.</p>	<p>Asses the not of the intervention causing the discharge of pollution into the environment.</p>
<p>LABOUR:</p>	<p><i>Labour Act. 11 of 2007:</i></p> <p>This bill aims to protect workers and their environment which they work in.</p>	<p>Ensure the protection of workers' rights and safety in Namibia.</p>
<p>NORTHERN REGION. FLOOD RISK MANAGEMENT PLAN:</p>	<p><i>Northern Region. Flood Risk Management Plan: Flood Risk Management Plan of 2011</i></p> <p>The Management Plan provides control measures for future planning within the northern regions.</p>	<p>Asses to what extent the proposed intervention complies with the provision of the plan.</p>
<p>FORESTRY:</p>	<p><i>Forest Act. 12 of 2001</i></p> <p>Protected tree species and any vegetation within 100m from a watercourse may not be removed without a permit from the Ministry of Agriculture, Water and Forestry.</p>	<p>Ensure that existing trees are protected.</p>

6 METHODOLOGY

The following methodologies were employed to compile this Environmental Screening Report for the subdivision, closure, rezoning, and proposed community-oriented development on Erf 3568, Ondangwa Extension 16. The methodology ensures that all environmental, social, and infrastructural considerations have been adequately assessed in line with the Environmental Management Act, 2007 (Act No. 7 of 2007) and Environmental Impact Assessment Regulations of 2012 (Government Notice No. 30 of 2012).

6.1 TOPOGRAPHY AND SITE INFORMATION

Topographical and site information was collected from both secondary sources and direct site observations:

- Secondary data sources: Existing municipal maps, Ondangwa Town Council property records, and the Ondangwa Local Spatial Development Framework (2020).
- Site inspections: Conducted on multiple occasions in 2025 and 2026 to verify the existing site conditions, boundaries, land use, access, and adjacent public open space.

Site Characteristics:

- Erf 3568 measures approximately 1.8159 ha with the area of interest for subdivision (Erf "A", approximately 930 m²) located on the northern portion of the erf.
- The property is currently undeveloped and forms part of the Public Open Space network within Ondangwa Extension 16.
- The terrain within the proposed subdivision area is generally flat and underlain by sandy soils typical of the Oshana Region, which are considered suitable for standard urban development and building construction.
- Existing drainage patterns and surrounding municipal stormwater systems were assessed to ensure that the proposed development will not negatively affect surface runoff or neighbouring properties.

6.2 SOCIAL RECEIVING ENVIRONMENT

The social context of the site was assessed using municipal records, observations, and community engagement:

- **Population dynamics:** Ondangwa Extension 16 forms part of a growing urban neighbourhood characterized by residential, institutional, and business-related activities.
- **Existing land uses:** Observations confirmed surrounding land uses including residential erven, public open spaces, educational and institutional facilities, and small-scale business activities.
- **Community engagement:** Informal consultations with neighbouring residents and stakeholders identified the need for additional early childhood development facilities and indicated support for the proposed daycare centre development.

These findings informed the assessment of potential social impacts associated with the proposed subdivision, rezoning, and development, including improved access to childcare facilities, local employment opportunities, and enhanced community services.

6.3 NATURAL RECEIVING ENVIRONMENT

Ecological and environmental data were collected through site observations and secondary sources:

- **Climate and ecological context:** Data from *Atlas of Namibia* (Mendelsohn, 2002).
- **Vegetation and wetlands:** On-site surveys confirmed that **the subdivided portion of Erf 3568 is dry and free from wetland or flood-prone areas**. The central portion of the erf contains small wetlands, but these are outside the development footprint.
- **Biodiversity:** Secondary sources included:
 - Namibia Biodiversity Database (NBD, 2013)
 - Tree Atlas of Namibia (Curtis & Mannheimer, 2005)
 - Southern African Bird Atlas (Harrison et al., 1997)
 - Global Biodiversity Information Facility (GBIF, 2012)

No environmentally sensitive habitats, protected species, or flood risk affect the portion of the erf proposed for subdivision and development. Vegetation in the development area is minimal and previously disturbed, ensuring low ecological sensitivity.

6.4 SITE VISITS

Multiple site inspections were undertaken to verify conditions and inform planning and environmental decisions:

- **Frequency:** Site visits occurred periodically between 2025 and 2026.
- **Focus:** Observed topography, stormwater flow, vegetation, access routes, and existing neighboring developments. Special attention was paid to the POS area allocated to the applicant.
- **Layout design:** A development layout for Erf 3568/A and the remainder of Erf 3568 was prepared in line with Ondangwa Town Council standards and the "Red Book" guidelines, ensuring proper integration with adjacent structures, stormwater management, and the proposed daycare center and ancillary business uses.



Figure 2: Site Visit 25 November 2025

7 DESCRIPTION OF THE SITE

This section provides a planning and environmental description of Erf 3568, Ondangwa Extension 16, with emphasis on the portion being subdivided (Erf 3568/A). It includes the urban context, existing land use, infrastructure, topography, and relevant environmental features.

7.1 SETTING THE URBAN CONTEXT

Erf 3568 is located in Ondangwa Extension 16 within the Oshana Region, Registration Division "B", and forms part of the established urban structure of Ondangwa. The property is registered as Public Open Space (POS) and is currently owned by the Ondangwa Town Council and allocated to the applicant for development purposes.

The erf measures approximately **1.8159 ha ($\pm 18,159 \text{ m}^2$)** in extent and is currently largely undeveloped. The proposed development involves the subdivision of a portion measuring **$\pm 930 \text{ m}^2$ (Portion A)**, while the remainder of the erf will remain as Public Open Space under municipal ownership.

The surrounding neighbourhood, commonly referred to as Extension 16, is characterized by a mix of land uses and zoning categories:

- **General Residential:** Erven 9823, 9824, 3555, 3554, 3409 and 3469 supporting higher-density residential developments, indicating the neighborhood's capacity to absorb diverse housing types.
- **Business:** Erven 3556, 3557 and 3558 accommodate commercial activities and services, adding economic vibrancy to the area.

- **Institutional:** Erven 3561, 3448 and 3311 hosting public or semi-public uses, such as schools, healthcare facilities, or churches, enhancing community support and public services.
- **Civic and Public:** Erven 3570, 3573, 3567, 3566 and 3565 are designated for service substations, and any other local authority need.
- **single residential:** Erven 3390, 3400, 3401, 3402, 3389 etc which contribute to the residential character of the neighborhood. These erven typically support single-family dwellings with the intent of fostering a suburban living environment.



FIGURE 3: ZONING OF THE SURROUNDING AREA

Erf 3568 forms part of Ondangwa Extension 16, a neighbourhood that has evolved from structured township establishment into a mixed-use urban environment. The area reflects a combination of planned urban development and organically developed land use patterns influenced by historical settlement dynamics.

The proposed development on Portion A aligns with the surrounding urban structure and supports ongoing densification and service provision objectives within Ondangwa Extension 16. The introduction of residential flats and associated business use is consistent with existing land use trends in the area and contributes to the efficient utilisation of municipal land.

The subdivision and rezoning of Portion A therefore represents a planned urban infill intervention that supports housing delivery, economic activity, and sustainable urban growth within the town.



Figure 4: Surrounding Developments Within the Immediate Surroundings of Erf 5194/A, Ondangwa Ext. 16.

The broader Extension 16 area reflects the urban growth patterns of Ondangwa, where informal settlement origins have progressively evolved into structured township developments, while maintaining elements of organic mixed-use activity along key streets. This transitional urban character informs the proposed subdivision and development of Portion A of Erf 3568, allowing for the establishment of residential flats and complementary business use in alignment with existing neighbourhood dynamics and increasing urban densification within the area.

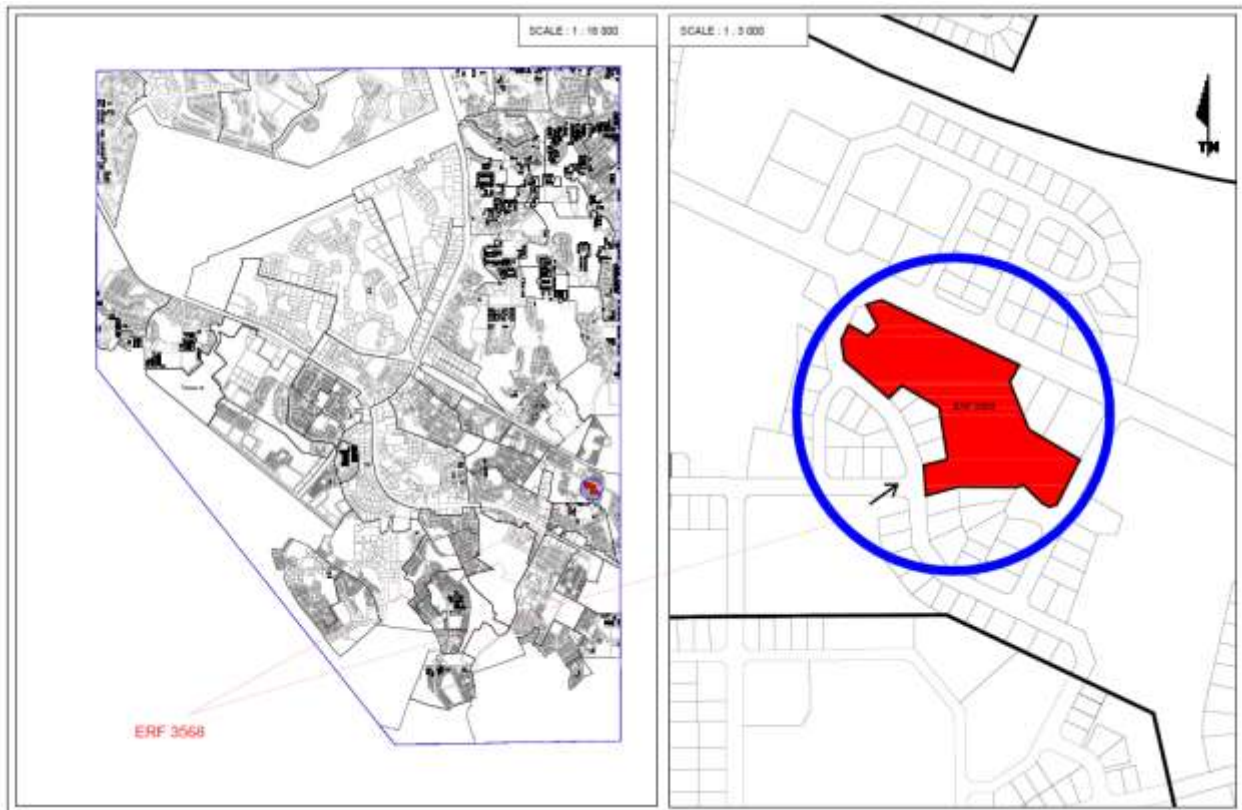


Figure 5: Locality of Erf 3568 within the Ondangwa Townlands

ERF NUMBER	LAND USE	ERF SIZE(m ²)
3568/A	Public Open Space	930

7.2 EXISTING STATUS AND LAND USE ON SITE

Currently, Portion A of Erf 3568 is a dry portion of the larger Erf 3568 and is vacant, with no existing permanent structures on site. The area is presently utilised in an informal manner, including dumping of garden refuse and construction rubble by adjacent properties, indicating underutilisation of the Public Open Space.

The remainder of Erf 3568 contains minor wetland pockets within its central portion, which are not affected by the proposed subdivision. These wetland areas will remain within the Public Open Space portion under the ownership of the Ondangwa Town Council.

The surrounding neighbourhood exhibits a mixed-use urban character comprising single residential erven, general residential developments, business activities, institutional uses, and civic functions. This reflects the broader urban development pattern of Ondangwa Extension 16, where formal township planning coexists with organically developed land use activities.

The proposed subdivision of Portion A (± 930 m²) is intended to enable the development of **residential flats (9 units)** with complementary **business use**, thereby formalising land use on an underutilised portion of municipal land. This will contribute to increased land efficiency, urban densification, and local socio-economic development in accordance with prevailing urban growth trends in the area.





Figure 6: Current Land Use On Erf 3568, Ondangwa Extension 16.

7.3 ACCESS, SERVICES AND INFRASTRUCTURE

The property benefits from full access to existing municipal services, including:

- **Water:** Portable water supply is provided by Ondangwa Town Council through the existing municipal reticulation network servicing Extension 16.
- **Sewerage:** The site is connected to the municipal sewer network; however, minor upgrades and connection adjustments may be required to accommodate the proposed development of residential flats and business use.
- **Electricity:** Electricity is supplied by NORED via existing low-voltage infrastructure within the area. Any required upgrades or service connections will be undertaken in accordance with Council requirements and at the applicant's cost.
- **Road access:** Direct access to Portion A of Erf 3568 is obtained via **Bishop Leonard Auala Street**, which forms part of the established road network within Ondangwa Extension 16. No additional access roads are required for the proposed development.

The site is therefore considered fully serviced and well integrated into the existing municipal infrastructure framework, supporting the proposed intensification of land use.

7.4 TOPOGRAPHY

7.4.1 REGIONAL GEOMORPHOLOGICAL CONTEXT

Portion A of Erf 3568 ($\pm 930 \text{ m}^2$) is located within the central sector of the Cuvelai–Etosha Basin, which forms part of the broader Oshana drainage system in northern Namibia. The regional landscape is characterised by very gentle slopes, sandy loam soils, and seasonal surface water flow conditions typical of the Ondangwa area.

The Cuvelai–Etosha Basin extends from southern Angola into northern Namibia and narrows significantly in the Ondangwa area, where it forms a relatively flat urbanised corridor. Within this system, the subject site is located on a dry and stable portion of land suitable for urban development.

Although Erf 3568 contains minor wetland depressions within its central area, these are spatially separate from Portion A and will not be affected by the proposed development. Portion A remains dry, slightly elevated relative to the wetland areas, and therefore suitable for construction activities.

The regional geomorphological characteristics of the Ondangwa sector are summarised as follows

Comparative Basin Characteristics – Ondangwa Sector

Feature	Cuvelai Delta	Ondangwa Sector
Width	130 km	8–12 km
Gradient	0.02%	0.05–0.1%
Soil Type	Alluvial clays	Sandy loams
Flood Duration	3–5 months	1–3 months

Topographic Zones in Ondangwa Sector

Zone	Elevation (m AMSL)	Flood Risk	Key Characteristics
Northern	938–940	High (1:5 yr)	Clay soils, reed-dominated vegetation
Central	940–942	Moderate (1:10 yr)	Sandy loams, seasonal wetlands
Southern	942–945	Low	Laterite gravels, stable for development

Hydrological Considerations

- Interconnected Oshanas with gentle gradients (0.02–0.1%).

Flood Mitigation Measures

Public Open Space and Landscaping

- Retention of existing natural vegetation where applicable within the remaining POS area
- Use of landscaped open areas to assist with localised stormwater attenuation
- Preservation of natural drainage pathways where applicable

Engineered Solutions

- Finished floor levels of all structures to be raised above known flood influence levels where applicable
- Stormwater drainage systems to be designed to safely convey runoff to existing municipal infrastructure
- Use of swales and controlled surface drainage to prevent ponding within developed areas

Historical Performance

- Available flood records and site observations confirm that the Portion A area remains dry during seasonal inundation events, supporting its suitability for urban development.
- Existing drainage patterns naturally direct runoff towards surrounding open areas and municipal stormwater systems without impacting the central wetland portion of Erf 3568.
- No evidence of historical flooding affecting the proposed development footprint was identified.

The combination of stable sandy soils, flat terrain, and low flood susceptibility confirms that Portion A of Erf 3568 is suitable for the proposed subdivision, rezoning, and development of residential flats and business use, provided that standard stormwater management measures are implemented

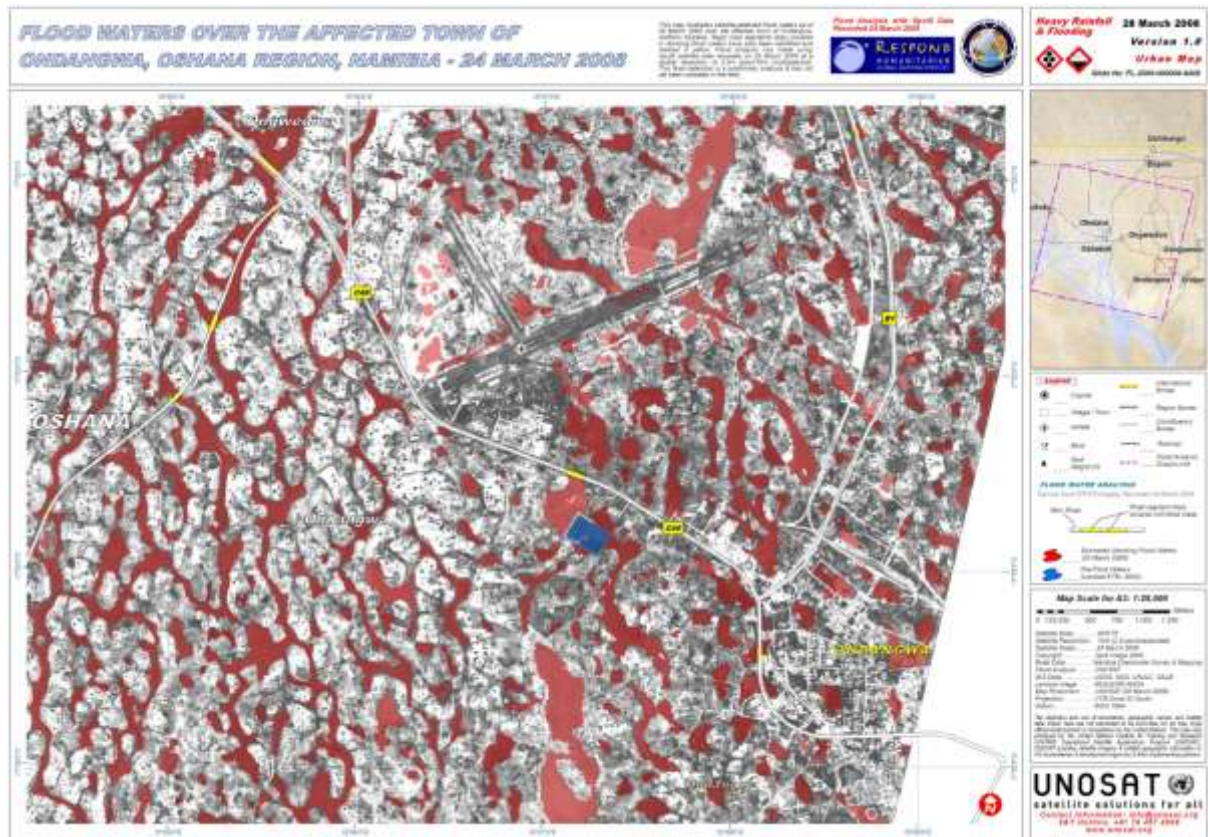


Figure 8: Ondangwa 2008 Flood study

7.5 THE NATURAL ENVIRONMENT

7.5.1 Climatic Conditions

Erf 3568/A experiences a semi-arid climate, typical of the Cuvelai Basin in northern Namibia, characterized by distinct wet and dry seasons:

Parameter	Jan–Apr	May–Sep	Oct–Dec	Source
Temperature	24–34°C	17–28°C	22–32°C	Namibia Meteorological Service
Rainfall	85% of annual	<1%	14%	Mendelsohn 2002
Wind Speed	8–10 km/h	3–5 km/h	5–7 km/h	Oshana Regional Council

Key Observations:

- Annual rainfall averages 300–400 mm, mostly falling between January and April.
- Evaporation rates are approximately 7 times higher than precipitation annually.
- Prevailing ENE winds bring moisture from Angola during the rainy season.

7.5.2 Habitat Characteristics

The site exhibits three modified habitat types due to historical land use and urban development pressures:

1. Anthropogenic Grassland (15%)

- Dominated by disturbance-tolerant grasses (*Eragrostis* spp.).
- Moderate grazing pressure (~2.7 LSU/ha).
- One camelthorn tree which is not protected.

2. Seasonal Wetlands (5%)

- Ephemeral oshanas supporting *Cyperus* spp.
- Flood duration: 2–4 months annually.
- Important habitat for migratory birds.

3. Residential Footprint (15%)

- Existing Single Residential Structure.

Conservation Status:

- No sensitive ecosystems remain within the site.

7.5.3 Hydrological Systems

- Influenced by the Cuvelai drainage network and seasonal flooding from Angolan highlands.
- Shallow groundwater at <5 m depth, annually recharged.
- one small oshanas borders the site about 100m away.

Water Quality (2023 Testing):

- pH: 6.8–7.2
- TDS: 320–450 mg/L

7.5.4 Protected Areas Status

- **Erf 3568/A** lies outside national parks, conservancies, and proclaimed heritage sites.
- No critical biodiversity areas or ecologically sensitive zones are affected by the proposed subdivision and development (MET Screening 2023).
- The portion being subdivided is a dry area, separate from the central wetland on Erf 3568, further minimizing potential ecological impacts.

7.5.6 Environmental Sensitivity Assessment

- Low Sensitivity Areas (5%): Suitable for development with standard mitigation measures.

Recommendation:

- Development may proceed under EMA Sections 33–34.
- Implementation of the attached Environmental Management Plan (Annexure 7) will mitigate residual impacts.
- All measures align with Namibia's NDP5 environmental targets.

7.5.7 Summary of Potential Environmental Sensitivities and Impact

- Screening identified no significant biodiversity or ecological issues that require further investigation.
- The proposed development, comprising a carwash and residential flats, is compatible with regional ecological conditions.
- Development can proceed without the need for full-scale Environmental Impact Assessment, provided recommended mitigation measures are implemented.

8 DESCRIPTION OF THE RECEIVING ENVIRONMENT

8.1 THE SOCIO-ECONOMIC ENVIRONMENT

Erf 3568/A is situated within Ondangwa Extension 16, a well-established residential area experiencing ongoing urbanization pressures. Ondangwa functions as the commercial and administrative hub of the Oshana Region, providing services and economic opportunities to the surrounding rural hinterlands.

Key Demographic Trends (2025):

Indicator	Ondangwa Constituenc	Oshana Region	National
Annual Population Grow	2.1%	1.2%	1.4%
Urbanization Level	48%	45%	33%
Dependency Ratio	41%	38%	45%

- The town has seen a steady increase in urban population, with the Ondangwa Extension 16 area reflecting densification and growing demand for both residential and commercial services.
- Household sizes average 4.1 persons, with 53% female-headed households, higher than the national average.
- Youth population under 15 years constitutes 38%, indicating a significant demand for education, housing, and future employment.

8.2 ECONOMIC LANDSCAPE

The local economy reflects the interplay of formal employment, informal sector growth, and service-oriented livelihoods:

1. Labor Market Shifts

- Formal employment stands at 58%, slightly above the regional average of 55%.
- Informal sector participation is around 27%, including small-scale retail, informal repairs, and service activities.
- Youth unemployment among 15–35-year-olds remains high at **34%** (NSA 2022).

2. Income Sources

- Wage employment: 47%
- Agricultural and home-based activities: 18%

- Social grants: 12%

3. Poverty Indicators

- Approximately 30% of households are below the national poverty line.
- Gini coefficient in Oshana is 0.58, slightly below the national 0.59, indicating persistent income inequality.

8.3 SOCIAL INFRASTRUCTURE

Service provision in Ondangwa Extension 16 reflects improvements relative to broader regional trends:

Service	Ondangwa Extension 16	Oshana Region	National
Piped Water Access	100%	88%	80%
Electricity Connections	95%	59%	32%
Improved Sanitation	100%	50%	49%
Healthcare Access	99% within 10 km	89%	80%
Adult Literacy	89%	85%	89%
Learner-Teacher Ratio	32:1 (primary)	35:1	40:1

- Access to services has improved over the past decade, but demand continues to outpace supply, particularly for electricity and sanitation.
- Educational and healthcare facilities are available within 1–3 km, supporting future residential expansion.

8.4 DEVELOPMENT CHALLENGES

8.4.1 Housing Pressures:

- Average household size exceeds 4 persons.
- Growing demand for medium-density housing and affordable serviced erven.

8.4.2 Health and Education:

- Local facilities manage a higher patient-to-doctor ratio (1:850) than the national average but remain stretched.
- Primary and secondary schools face moderate overcrowding with learner-teacher ratios of 32:1.

8.4.3 Economic Opportunities:

- Limited formal employment drives residents toward informal sector livelihoods.
- There is a need for mixed-use developments to generate local employment and support small businesses.

8.5 SUMMARY OF SOCIO-ECONOMIC CHARACTERISTICS

The socio-economic profile of Ondangwa Extension 16 highlights the following key points for the proposed development:

1. Population Dynamics

- Steady growth, with 32,200 residents projected in 2025.
- Urban population concentration of 48%, above national average.

2. Household Structure

- 53% female-headed households.
- Average household size: 4.1 persons.
- Youth-dominated population: 38% under 15 years.

3. Employment and Income

- 58% formal employment; 27% informal sector participation.
- Wage employment remains the main income source (47%), followed by social grants and small-scale agriculture.

4. Service Access

- Water: 92%
- Electricity: 67%
- Sanitation: 58%
- Healthcare access: 99% within 10 km

5. Education

- Adult literacy: 89%
- Primary school learner-teacher ratio: 32:1

Conclusion:

Erf 3568/A (Proposed Portion A), measuring approximately **930 m²**, is located within a rapidly urbanising and socio-economically active environment in Ondangwa Extension 16. The area reflects a well-established **mixed-use urban character**, with surrounding residential, business, institutional, civic, and public land uses supporting diverse development opportunities.

The proposed subdivision, permanent closure of the portion as Public Open Space, and rezoning to **“Business” with a bulk of 1.0** are consistent with the evolving urban structure of Extension 16, where formal planning has emerged from an originally organic settlement pattern. The location's accessibility via **Bishop Leonard Auala Street**, together with existing municipal services, further supports its suitability for intensified urban development.

The intended development of **approximately nine (9) flats**, together with potential ancillary uses permitted under the Business zoning, responds directly to the **ongoing housing demand in Ondangwa** and supports efficient land utilisation within an already

serviced urban area. This contributes to addressing the local housing backlog while promoting compact and integrated urban growth.

Overall, the proposed development optimises an underutilised portion of municipal land without compromising environmental integrity or surrounding land uses. It strengthens the socio-economic function of Extension 16 by promoting residential densification, small-scale economic activity, and sustainable urban consolidation in line with the broader planning objectives of the Ondangwa Town Council.

9 DEVELOPMENT INTENTION

The primary intention of the proposed development is to **optimize the use of Portion A of Erf 3568 ($\pm 930 \text{ m}^2$)** through its subdivision, permanent closure as Public Open Space, and subsequent rezoning to **“Business” with a bulk of 1.0**, in line with the evolving urban structure of Ondangwa Extension 16.

The development seeks to introduce a **medium-density residential component of approximately nine (9) flats**, together with potential ancillary uses permitted under the Business zoning category. This responds directly to the growing demand for housing within Ondangwa and promotes more efficient land use within an already serviced urban environment.

In addition, the proposal aligns with the mixed-use character of Extension 16, where residential, business, institutional, and community uses coexist. The development therefore aims to contribute to **urban consolidation, housing delivery, and small-scale economic activity**, while making productive use of underutilized municipal land without compromising surrounding land use compatibility or service infrastructure capacity.

9.1 Subdivision of Erf 3568, Ondangwa Extension 16

In accordance with Council Resolution **CR129/2025**, the applicant proposes the formal subdivision of **Erf 3568 ($\pm 18,159 \text{ m}^2 / 1.8159 \text{ ha}$)** located in Ondangwa Extension 16 into two portions, namely **Portion A ($\pm 930 \text{ m}^2$)** and the **Remainder of Erf 3568 ($\pm 17,229 \text{ m}^2$)**.

The subdivision is required to formally excise the allocated portion for permanent closure, rezoning, and subsequent development, while ensuring that the remainder of the erf continues to function as Public Open Space under the ownership of the Ondangwa Town Council.

The subdivision layout is illustrated in **Figure 9** and summarised in the table below:

Current Erf

Erf Number	Zoning	Size
3568	Public Open Space	$\pm 18,159 \text{ m}^2$ (1.8159 ha)

Proposed Subdivision

Erf Number	Zoning	Size
Portion A	Public Open Space	±930 m ²
Remainder of Erf 3568	Public Open Space	±17,229 m ²



FIGURE 9: SUBDIVISION MAP

9.2 Rezoning and Closure of Public Open Space of Erf A, Ondangwa Extension 16

The purpose of the proposed rezoning is to enable the development of approximately **nine (9) residential flats**, responding to the increasing housing demand within Ondangwa Extension 16 and promoting efficient utilisation of serviced urban land.

Following the subdivision and **permanent closure of Portion A of Erf 3568 as Public Open Space** in terms of the Local Authorities Act, 1992 (Act No. 23 of 1992), it is proposed that Portion A be rezoned from **“Public Open Space” to “Business” with a bulk of 1.0**, in accordance with Section 105 of the Urban and Regional Planning Act, 2018 (Act No. 5 of 2018).

The Business zoning permits residential flats as a primary use, thereby making the proposed development legally compliant and appropriate within the surrounding mixed-use urban environment.

The proposed zoning changes are summarised in the table below:

Erf Number	± Area (m ²)	Current Zoning	Proposed Zoning
Portion A (3568)	±930 m ²	Public Open Space	Business (Bulk 1.0)

The proposed subdivision, closure, and rezoning are illustrated in **Figure 10: Rezoning Plan for Erf 3568, Ondangwa Extension 16**.



FIGURE 10: REZONING PLAN FOR ERF 3568, ONDANGWA EXTENSION 16

9.3 SUMMARY OF POTENTIAL IMPACTS

The proposed development of **Portion A of Erf 3568 (±930 m²)** carries a combination of positive socio-economic impacts and limited, manageable environmental impacts due to its small footprint and location within a well-established urban environment.

Key Benefits:

- **Housing delivery and urban densification:** The development of approximately **nine (9) residential flats** contributes directly to addressing Ondangwa's housing backlog and promotes efficient use of serviced urban land.

- **Economic stimulation:** The construction phase will generate temporary employment opportunities, while the operational phase will support long-term rental income and associated local economic activity.
- **Optimisation of municipal land:** The rezoning of underutilised Public Open Space to Business ensures more productive use of centrally located urban land without compromising the remainder of the erf.
- **Urban integration:** The development aligns with the mixed-use character of Extension 16, reinforcing compact urban growth and reducing pressure for outward expansion.

Potential Impacts:

- **Vegetation disturbance:** Minimal vegetation removal may occur on the dry portion of the site; however, the area is already disturbed and does not contain sensitive habitats or wetlands.
- **Construction-related dust and noise:** Temporary impacts may occur during construction activities but will be limited in scale due to the small site footprint.
- **Traffic increase:** A slight increase in local traffic may occur along Bishop Leonard Auala Street and adjacent internal streets due to residential use.
- **Stormwater runoff:** If not properly managed, minor changes in surface runoff could occur, but the site's dry conditions and flat terrain reduce overall risk.
- **Occupational health and safety risks:** Construction activities require compliance with standard safety regulations to protect workers and surrounding users.

All potential impacts are considered low to moderate in significance and can be effectively mitigated through implementation of the Environmental Management Plan (EMP).

9.4 LAYOUT STRATEGIES

The layout for **Portion A of Erf 3568 (±930 m²)** has been designed to ensure efficient land utilisation while responding to the physical, infrastructural, and spatial characteristics of Ondangwa Extension 16.

Key planning considerations include:

- **Site verification and suitability:** The layout was informed by field assessments confirming that Portion A is located on the **dry southern section of Erf 3568**, outside the central wetland area.
- **Urban integration:** The design aligns with surrounding mixed-use developments, including residential, business, and institutional land uses within Extension 16.
- **Access and connectivity:** Vehicular and pedestrian access is provided via **Bishop Leonard Auala Street**, linking the site to the broader urban road network.
- **Efficient land use:** The compact layout supports a **medium-density residential typology (flats)** consistent with Business zoning provisions, ensuring optimal use of limited urban land.

- **Service integration:** The layout connects seamlessly to existing municipal water, sewer, electricity, and stormwater infrastructure.

9.4.1 LAYOUT STRATEGIES DEALING WITH POSITIVE ENVIRONMENTAL IMPACTS

- **Efficient land utilisation:** The development converts underutilised Public Open Space into productive urban land without encroaching on environmentally sensitive areas.
- **Infrastructure optimisation:** Full use of existing municipal services reduces the need for new infrastructure expansion and promotes resource efficiency.
- **Urban consolidation:** The project supports compact city development by increasing residential density within an already serviced area.
- **Protection of sensitive areas:** The central wetland portion of Erf 3568 remains unaffected, preserving natural drainage functions and ecological balance.
- **Reduced urban sprawl:** By accommodating housing within the existing urban footprint, the development reduces pressure for outward expansion.

9.5 RESIDUAL PROJECT IMPACTS

9.5.1 RESIDUAL SOCIAL IMPACTS

- The development introduces **approximately nine (9) residential units**, improving housing availability within Ondangwa Extension 16.
- No existing households or occupied structures are displaced, resulting in **no direct social disruption**.
- Long-term benefits include improved housing supply, increased urban density, and enhanced utilisation of serviced land.
- The project contributes positively to the socio-economic profile of the area through local rental opportunities and associated economic activity.

9.5.2 RESIDUAL ENVIRONMENTAL IMPACT

- **Vegetation loss:** Minimal and confined to previously disturbed areas; no protected species or sensitive habitats are affected.
- **Construction impacts:** Temporary dust, noise, and minor traffic disruptions will occur but are short-term and manageable.
- **Stormwater impacts:** Given the flat terrain and dry site conditions, impacts are negligible with proper drainage design.
- **Waste generation:** Construction and operational waste will be managed in accordance with municipal regulations, ensuring no long-term contamination.
- **Health and safety:** Residual risks are low and will be controlled through adherence to occupational health and safety standards.

Overall, the residual environmental impacts of the proposed development are **low, localised, and manageable**, while the socio-economic benefits are considered

significant and long-term, reinforcing the suitability of the project within the urban framework of Ondangwa Extension 16.

10 SUMMARY AND APPLICATION

10.1 SUMMARY OF POTENTIAL PROJECT IMPACTS, AVOIDANCE MEASURES AND RESIDUAL IMPACTS

POTENTIAL IMPACT:	MEASURES:			RESIDUAL IMPACTS:
	AVOIDANCE:	MITIGATION:	ENHANCEMENT:	
<i>Stimulate local economic development and create employment opportunities:</i>			<p>New business erf will satisfy smaller business investor needs.</p> <p>Businesses will render service within the formal economy, employ staff, pay rates and taxes and spend money all within the same economy.</p> <p>Emphasis must be placed on the requirement and employment of local people.</p>	<i>Long-Term Positive Impact</i>
<i>Providing serviced residential erven:</i>			<p>The project will lead to a formal and permanent occupation of land, the security of tenure, access to capital and partaking in the economy, and ultimately to wealth creation in the operational phase.</p>	<i>Long-Term Positive Impact</i>

POTENTIAL IMPACT:	MEASURES:			RESIDUAL IMPACT:
	AVOIDANCE:	MITIGATION:	ENHANCEMENT:	
<p>Stimulate the health and wellness:</p>			<p>THE DEVELOPMENT:</p> <p>Provide for flood safe residential erven.</p> <p>Provide for flood-safe water connection.</p> <p>Provide that all services will be on the higher road reserve.</p> <p>Provide for a closed system sewer system, which will prevent pollution during flooding.</p> <p>Provide access to public open space.</p> <p>Provide for pedestrian infrastructure.</p> <p>Provide for business opportunities and is accessible to job opportunities</p>	<p>Long-Term Positive Impact</p>

			The development is also situated within walking distance from the town schools and health facilities within Oshakati	
Potential removal of existing trees:	Removal of existing trees	Trees will be accommodated within: <ul style="list-style-type: none"> - Individual erven. - The road alignment, reserve and - Public open space. 		Short-Term Impact <i>Not all the existing trees can be accommodated in the new layout.</i>

POTENTIAL IMPACT:	MEASURES:			RESIDUAL IMPACTS:
	AVOIDANCE:	MITIGATION:	ENHANCEMENT:	

<p>Potential dust and noise on the construction site:</p>	<p>Avoided potential dust and noise</p>	<p>Dust:</p> <ul style="list-style-type: none"> No removal of vegetation or soil on the site except where necessary during the construction phase. <p>Noise:</p> <ul style="list-style-type: none"> Noise will be restricted between 07h00 and 18h00 		<p>Moderate potential dust and noise on the construction site.</p> <p><i>Not all the dust and noise can be prevented</i></p>
<p>Potential in an increase in traffic during construction phase:</p>	<p>Uncontrolled increase in traffic during construction phase.</p>	<p>Traffic during the construction phase will be restricted between 07h00 and 18h00</p>		<p>Short-Term Potential traffic increase during the construction phase.</p>
<p>Health and Safety of construction workers</p>		<p>Proper construction practices and safety procedures need to be applied.</p>		<p>Medium health and safety impact on workers</p>

POTENTIAL IMPACT:	MEASURES:			RESIDUAL IMPACTS:
	AVOIDANCE:	MITIGATION:	ENHANCEMENT:	
The Potential impact on the wetland area:	Avoid interfering with the hydrodynamics	STRUCTURAL MEASURES: The layout stays clear of natural water line.		Moderate risk of an impact on the

	<p>c of the wetland/flood-plain.</p>	<p>Hydrological infrastructure will be used to prevent interference with the natural water flow.</p> <p>The sewer system will consist of a closed gravity system, which will pump the sewer to the town's evaporation ponds.</p> <p>NON-STRUCTURAL MEASURE: Areas lower than 941m contour will be zoning as public open space.</p>		<p>Wetland area</p> <p>The two businesses even will be filled-in, and the water channel will be formalised.</p>
<p>Potential Flooding:</p>		<p>NON-STRUCTURAL MEASURE:</p> <p>Use the natural water flow line and accommodated the topography of the land.</p> <p>STRUCTURAL MEASURES:</p> <p>Make use of culverts and bridges through roads.</p> <p>Erven will be filled-in to prevent flooding, and water channel will be formalised.</p>		<p>Low risk related flooding development</p> <p>Not all impacts be prevented.</p>

11 SUMMARY AND APPLICATION

SWIB Trading CC, as the appointed Town Planning authority, hereby submits an application for an Environmental Clearance Certificate (ECC) for the development of Erf 3568/A, a portion of Erf 3568, located in Ondangwa Extension 16 within the Ondangwa Local Authority Area, Oshana Region.

The portion proposed for development, **Portion A of Erf 3568 ($\pm 930 \text{ m}^2$)**, forms part of the larger Erf 3568 ($\pm 18,159 \text{ m}^2$) and is situated on the **dry northern section of the erf**, outside the central wetland area. The site is currently vacant, with minimal vegetation and no environmentally sensitive habitats or flood-prone conditions, making it suitable for urban development.

The proposed development entails the **subdivision, permanent closure of Portion A as Public Open Space, rezoning to "Business" with a bulk of 1.0, and the construction of approximately nine (9) residential flats**, together with ancillary uses permitted under the Business zoning category. The development is intended to address the increasing demand for housing within Ondangwa while promoting efficient utilisation of serviced urban land within a mixed-use urban environment.

This application is submitted in accordance with the **Environmental Management Act, 2007 (Act No. 7 of 2007)** and the **Environmental Impact Assessment Regulations of 2012 (Government Notice No. 30 of 2012)**. The listed activities triggered by the proposal include:

- **Activity 1(a):** Construction of buildings and associated infrastructure
- **Activity 5.1(b):** Rezoning and subdivision of land

An Environmental Clearance Certificate is therefore required to:

- Authorise and regularise the proposed **land use change from Public Open Space to Business;**
- Ensure compliance with national environmental and planning legislation;
- Confirm that identified impacts such as dust, noise, minor traffic increases, stormwater runoff, and occupational health and safety risks are appropriately mitigated through the Environmental Management Plan (EMP); and
- Document stakeholder engagement and public participation undertaken in support of the application.

In conclusion, the proposed development represents an **efficient and sustainable use of underutilised municipal land**, contributing to urban densification, housing provision, and local economic activity. The project is fully compatible with the surrounding mixed-use character of Ondangwa Extension 16 and can be implemented with **low and manageable environmental impacts** under the recommended mitigation measures.

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