

# Environmental Scoping Report for the:

## Subdivision Of the Remainder of Portion B of the Lüderitz Town and Townlands No. 11 Into Portions A, B and Remainder, Rezoning of Portion B from 'Undetermined' to 'Street' (Street Creation), Lüderitz, Karas Region

**APP-007371**



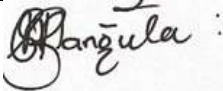

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**November 2025**

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## Executive Summary

### Introduction

Lüderitz Town Council, hereinafter referred to as the proponent intends to undertake the following activities:

- **Subdivision of the Remainder of Portion B of the Lüderitz Town and Townlands No. 11 into Portion A, Portion B and Remainder of Portion B of the Lüderitz Town And Townlands No. 11.**
- **Rezoning the Proposed Portion A from ‘Undetermined’ to ‘Residential 2’ with a Density of 1:150.**
- **Rezoning of the Proposed Portion B from ‘Undetermined’ to ‘Street’.**
- **Alteration of the Boundaries of Lüderitz Proper to Include Portion A and B.**

The development aforementioned triggers listed activities in terms of the Environmental Management Act (No. 7 of 2007) and Environmental Impact Assessment Regulations (Government Notice No. 30 of 2012). Based on the above backdrop, the proponent appointed Kamau Town Planning and Development Specialists to undertake an independent Environmental Assessment (EA) so as to obtain an Environmental Clearance Certificate (ECC) for the above activities. The competent authority identifies is the Ministry of Environment, Forestry and Tourism: Department of Environmental Affairs and Forestry.

### Project Description

The owners of the proposed subdivided Portions A and B intend to rezone Portion A to ‘Residential 2’ and Portion B to ‘Street’, and to alter the boundaries of Lüderitz Proper to include the proposed subdivided Portions A and B. The primary purpose of this application is to enable the creation of a street on the proposed Portion B, as the proposed Portion A currently does not have access to a formal street.

Rocky Bay Investment CC, who were allocated Portion A as per the Council resolution attached under Annexure D, will be required to construct a new street on Portion B at their own cost in order to provide the necessary access to Portion A for the intended development of workers’ accommodation. The proposed Portion B is 10m wide, in line with the Town Planning Standards and Urban Design Guidelines for Principal Layout Plans, allowing for vehicular movement, pedestrian access, and the installation of services within the street reserve.

The creation of the street on Portion B is therefore essential to ensure that the proposed Portion A can be accessed and developed in accordance with the Lüderitz Zoning Scheme. Furthermore, the proposed street will not only benefit the owners of Portion A but will also benefit the owners of Portions 689 and 690, Lüderitz Proper, as they currently do not have access to a registered street.

In addition, the application includes the rezoning of Portion A to ‘Residential 2’ to allow for the construction of workers’ accommodation; however, the establishment of the street on Portion B remains the key component of the application, as it

facilitates access, service provision, and compliance with planning requirements necessary for development.

### Public Participation

Communication with Interested and Affected parties (I&APs) concerning the development proposal was established through the following avenues:

- A Background Information Document (BID) containing the descriptive information about the proposed activities was compiled and sent out to all identified and registered I&APs via email on and to adjacent landowners via registered mail on **28 August 2025**
- Notices were placed in the *Confidente* and *New Era* newspapers on the following dates:
  - *Confidente* – 29 August 2025 and 05 September 2025
  - *New Era* – 29 August 2025 and 05 September 2025briefly explaining the activity and its locality, equally inviting members of the public to register as I&APs and
- A notice was fixed at the project site as well as the notice board of the Lüderitz Municipality.

Public consultation was carried out as per the Environmental Management Act's EIA Regulations. After the initial notification, the I&APs were given two weeks to submit their comments on the project (until **09 October 2025**). The comment period remained open until the final scoping report was submitted to MEFT.

The Draft Scoping Report was circulated from **10 October 2025 – 27 October 2025** for the public's review and for them to provide their comments.

### **Conclusions and Recommendations**

Based on the impact assessment findings presented in **Table 11**, no high-significance negative impacts are anticipated from the proposed street creation. All identified potential impacts were rated as Low (negative) prior to mitigation.

With the application of the mitigation and enhancement measures outlined in Chapter 7 and detailed further in the Environmental Management Plan (EMP), the significance of these impacts is expected to be reduced to Low (negative).

It is therefore recommended that the proposed street creation be authorised, subject to the implementation of the mitigation measures provided in this report and the EMP. Should the project be approved, it is further recommended that adherence to the EMP form part of the conditions of the Environmental Clearance Certificate.

## Table of Contents

<b>1. INTRODUCTION</b>	<b>1</b>
<b>1.1 Project Background</b>	<b>1</b>
<b>1.2 Project Location</b>	<b>2</b>
<b>1.3 Land Use</b>	<b>2</b>
<b>1.4 Ownership</b>	<b>2</b>
<b>1.5 Terms of Reference and Scope of Project</b>	<b>3</b>
<b>1.6 Assumptions and Limitations</b>	<b>3</b>
<b>1.7 Content of Environmental Assessment Report</b>	<b>4</b>
<b>2. Legal Framework</b>	<b>7</b>
<b>2.1 Administrative, Legal and Policy Requirements</b>	<b>7</b>
2.1.1 The Namibian Constitution	7
2.1.2 The Environmental Management Act (No. 7 of 2007)	7
2.1.3 Draft Procedures and Guidelines for conducting EIAs and compiling EMPs (2008)	8
2.1.4 Lüderitz Zoning Scheme	9
<b>2.2 Other Laws, Acts, Regulations and Policies</b>	<b>11</b>
<b>3. Environmental Baseline Description</b>	<b>16</b>
<b>3.1 Social Environment</b>	<b>16</b>
3.1.1 Socio- Economic Context	16
3.1.2 Archaeological and Heritage Context	17
<b>3.2 Bio- Physical Environment</b>	<b>18</b>
3.2.1 Climate	18
3.2.2 Biodiversity and Vegetation	20
3.2.3 Hydrology and Hydrogeology	21
<b>4. Project Description</b>	<b>23</b>
<b>4.1 Project Components</b>	<b>23</b>
<b>4.2 Alternatives</b>	<b>23</b>
4.2.1 No- Go Alternative	23
<b>4.3 The Proposed Development</b>	<b>23</b>
4.3.1 Engineering Services	26
4.3.2 Access Provision	26
<b>5. Public Participation Process</b>	<b>26</b>

<b>5.1 Public Participation Requirements</b>	<b>26</b>
5.1.1 Environmental Assessment Phase 2	26
<b>6. Assessment Methodology</b>	<b>27</b>
<b>6.1 Mitigation Measures</b>	<b>29</b>
<b>7. Assessment Of Potential Impacts and Possible Mitigation Measures</b>	<b>30</b>
<b>7.1 Introduction</b>	<b>30</b>
<b>7.2 Construction Phase Impacts on the Biophysical Environment</b>	<b>30</b>
7.2.1 Flora and Fauna Impacts (Biodiversity)	30
7.2.2 Surface and Groundwater Impacts	30
7.2.3 Dust and Emission Impacts	30
7.2.4 Soil Erosion Impacts	31
<b>7.3 Construction Phase Impacts on the Socio-Economic Environment</b>	<b>31</b>
7.3.1 Heritage Impacts	31
7.3.2 Health, Safety, and Security Impacts	31
7.3.3 Traffic Impacts	31
7.3.4 Noise Impacts	31
7.3.5 Municipal Services	31
7.3.6 Storage and Handling of Hazardous Substances	31
<b>7.4 Operational Phase Impacts</b>	<b>31</b>
7.4.1 Impacts on the Surrounding Area	31
7.4.2 Visual Impacts	32
7.4.3 Traffic Impacts	32
7.4.4 Social and Economic Impacts	32
<b>7.5 Cumulative Impacts</b>	<b>32</b>
<b>7.6 Environmental Management Plan</b>	<b>32</b>
<b>7.7 Summary of Potential Impacts</b>	<b>32</b>
<b>7.8 Potential Impacts</b>	<b>33</b>
<b>8. Conclusion and Recommendation</b>	<b>35</b>
<b>8.1 Assumptions and Conclusions</b>	<b>35</b>
<b>9. References</b>	<b>36</b>

## **List of Figures**

Figure 1: Locality of the proposed portions.....	3
Figure 2: Current and Proposed Zoning .....	10
Figure 3: EIA flow Diagram .....	16
Figure 4: Annual average temperature (Acacia Project E1, n.d.) .....	19
Figure 5: Average annual Rainfall (Acacia Project E1, n.d.) .....	20
Figure 6: Groundwater basins and hydrogeological regions in Namibia (Ministry of Agriculture Water and Rural Development, 2011).....	21

## **List of Tables**

Table 1: List of triggered activities identified in the EIA Regulations .....	1
Table 2: Contents of the Scoping / Environmental Assessment Report .....	4
Table 3: Other applicable National Laws .....	11
Table 4: Statistics of the Lüderitz Constituency and //Kharas Region .....	17
Table 5: Recommended size for the proposed Portion A.....	24
Table 6: Extract from Table B of the Lüderitz Zoning Scheme .....	25
Table 7: Portion Size, Current and Proposed Zoning, and Land Use .....	25
Table 8: Bulk, Coverage and Parking Calculations .....	25
Table 9: Table of Public Participation Activities .....	26
Table 10: Impact Assessment Criteria .....	27
Table 11: Summary of the significance of the potential impacts .....	33

## **List of Acronyms**

<b>BID</b>	Background Information Document
<b>DEA</b>	Department of Environmental Affairs
<b>DESR</b>	Draft Environmental Scoping Report
<b>ECC</b>	Environmental Clearance Certificate
<b>EIA</b>	Environmental Impact Assessment
<b>EMA</b>	Environmental Management Act
<b>EMP</b>	Environmental Management Plan
<b>I&amp;APs</b>	Interested and Affected Parties
<b>Kamau TPDS</b>	Kamau Town Planning and Development Specialist
<b>MEFT</b>	Ministry of Environment, Forestry and Tourism
<b>PPP</b>	Public Participation Process

# 1. INTRODUCTION

## 1.1 Project Background

Lüderitz Town Council, hereinafter referred to as the proponent intends to undertake the following activities:

- **Subdivision of the Remainder of Portion B of the Lüderitz Town and Townlands No. 11 into Portion A, Portion B and Remainder of Portion B of the Lüderitz Town And Townlands No. 11.**
- **Rezoning the Proposed Portion A from ‘Undetermined’ to ‘Residential 2’ with a Density of 1:150.**
- **Rezoning of the Proposed Portion B from ‘Undetermined’ to ‘Street’.**
- **Alteration of the Boundaries of Lüderitz Proper to Include Portion A and B.**

The development aforementioned triggers listed activities in terms of the Environmental Management Act (No. 7 of 2007) and Environmental Impact Assessment Regulations (Government Notice No. 30 of 2012). As per the Environmental Management Act (No. 7 of 2007) and Environmental Impact Assessment Regulations (Government Notice No. 30 of 2012), the following listed activities in **Table 1** were triggered by the proposed project:

**Table 1: List of triggered activities identified in the EIA Regulations**

<b>Activity description and No(s):</b>	<b>Description of relevant Activity</b>	<b>The portion of the development as per the project description that relates to the applicable listed activity</b>
Activity 10.1 (b) Infrastructure	The construction of public roads (The proposed project includes the construction of roads)	The proposed project includes the construction of roads.
Activity 10.2 (a) Infrastructure	The route determination of roads and design of associated physical infrastructure where – it is a public road;	The proposed project includes the route determination of roads.

The aforementioned activities will be discussed further in Chapter 4. The proponent, Lüderitz Town, appointed Kamau Town Planning and Development Specialist to conduct an Environmental Impact Assessment and develop an Environmental Management Plan to obtain an Environmental Clearance Certificate Subdivision Of the Remainder of Portion B of the Lüderitz Town and Townlands No. 11 Into Portions A, B and Remainder, Rezoning of Portion B from ‘Undetermined’ to ‘Street’ (Street Creation), Lüderitz, Karas Region.

The process was undertaken as per the terms of the gazetted Namibian Government

Notice No. 30 of the Environmental Impact Assessment Regulations (herein referred to as EIA Regulations) and the Environmental Management Act (No. 7 of 2007) (herein referred to as EMA). The EIA intends to investigate any potential significant bio-physical and socio- economic impacts associated with the proposed rezoning. Additionally, the EIA also provided opportunity for the public and key stakeholders to furnish any comments, thereby participating in the process.

## **1.2 Project Location**

The Remainder of Portion B of the Lüderitz Town and Townlands No. 11 is located within the Lüderitz Local Authority area, in the //Karas Region. The property falls within the proclaimed townlands of Lüderitz and is situated in proximity to the existing urban area, as illustrated in Figure 1 below. The exact extent of the property will be determined through the subdivision into Portion A, Portion B, and the Remainder of Portion B of the Lüderitz Town and Townlands No. 11.

## **1.3 Land Use**

Currently, the Remainder of Portion B of the Lüderitz Town and Townlands No. 11 is zoned “*Undetermined*” in terms of the applicable zoning scheme, as illustrated in Figure 2. At present, the land is largely undeveloped and not formally designated for specific urban land uses. The proposed development seeks to introduce residential activities and supporting infrastructure on the site, in line with the planned subdivision and rezoning. The rezoning of Portion A to “*Residential 2*” with a density of 1:150 will allow for structured residential development, while the designation of Portion B as “*Street*” will provide the necessary access and circulation within the development area. This will facilitate orderly urban growth and improve land use within Lüderitz.

## **1.4 Ownership**

The subject portions fall under the remaining extent of Portion B of the Lüderitz Town and Townlands No. 11, under the ownership of the Lüderitz Town Council held under the Certificate of Registered Title T2655/1981. No development restrictions, such as servitudes, have been registered over the subject portions in the CRT.

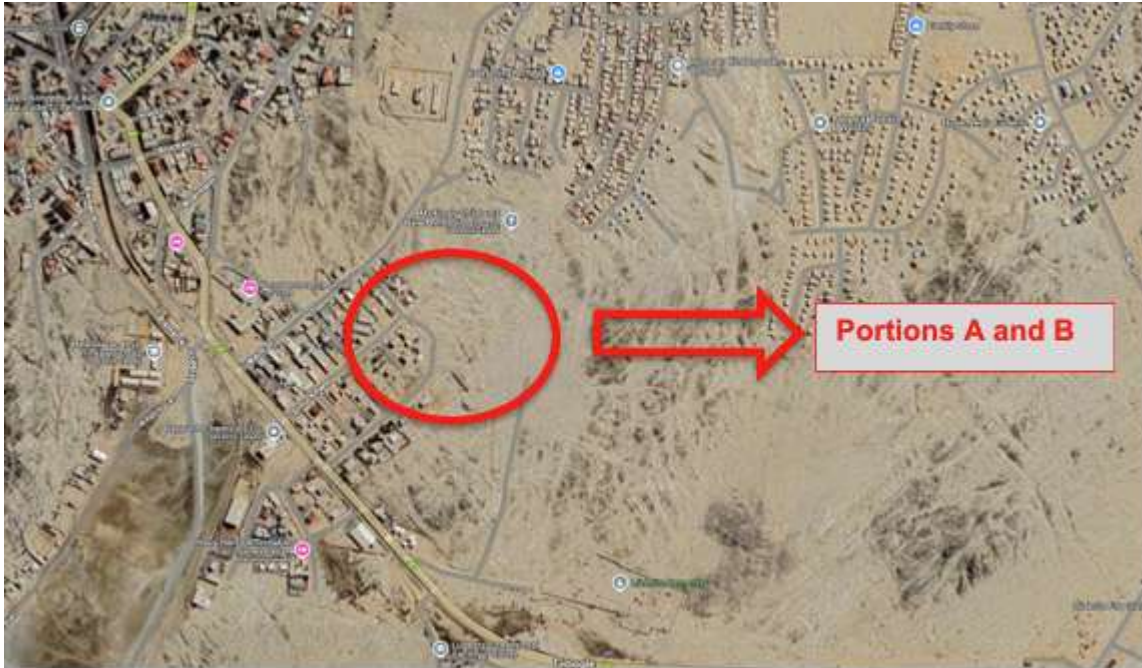


Figure 1: Locality of the proposed portions

## 1.5 Terms of Reference and Scope of Project

To implement the proposed project, an Environmental Impact Assessment and Environmental Clearance are required. For the purposes of this project, the scope is therefore limited to conducting an environmental impact assessment and applying for an Environmental Clearance Certificate, for the activities indicated in section 1.1:

- **Subdivision of the Remainder of Portion B of the Lüderitz Town and Townlands No. 11 into Portion A, Portion B and Remainder of Portion B of the Lüderitz Town and Townlands No. 11.**
- **Rezoning the proposed Portion A from 'Undetermined' to 'Residential 2' with a density of 1:150.**
- **Rezoning of the proposed Portion B from 'Undetermined' to 'Street'.**
- **Alteration of the Boundaries of Lüderitz Proper to include Portion A and B.**

## 1.6 Assumptions and Limitations

In undertaking this investigation and compiling the Environmental Scoping Report, the following assumptions and limitations apply:

- It is assumed that the information provided by the proponent is accurate, complete, and includes all relevant details necessary for this assessment. Any omissions or inaccuracies may influence the findings of this report.
- This assessment is limited to the proposed street creation, as a part of the formalization exercise. No physical development or construction activities are proposed as part of this application.
- Only the proposed street creation and the 'no-go' option were considered in

this assessment. While various layout alternatives were initially explored by the proponent in relation to the terrain and existing planning framework, the selected zoning aligns best with regulatory requirements.

- The unique character and spatial planning framework of Arandis were taken into consideration to ensure compatibility with the broader municipal development strategy.

## 1.7 Content of Environmental Assessment Report

Section 8 of the EIA Regulations, as published in the Government Gazette, outlines the specific requirements that must be addressed in a Scoping or Environmental Assessment Report. **Table 2** below provides an excerpt from the Environmental Management Act (EMA), summarizing the necessary report components and guiding the reader to the corresponding sections within this document.

**Table 2: Contents of the Scoping / Environmental Assessment Report**

Section	Description	Section/Annexure
8 (a)	The curriculum vitae of the EAPs who prepared the report	Attached as supporting Document
8 (b)	A description of the proposed activity	Chapter 4
8 (c)	A description of the site on which the activity is to be undertaken and the location of the activity on the site	
8 (d)	A description of the environment that may be affected by the proposed activity and the manner in which the geographical, physical, biological, social, economic and cultural aspects of the environment may be affected by the proposed listed activity	
8 (e)	An identification of laws and guidelines that have been considered in the preparation of the scoping report	Chapter 2
8 (f)	Details of the public consultation process conducted in terms of regulation 7 (1) in connection with the application, including:	Chapter 5
	(i) the steps that were taken to notify potentially interested and affected parties of the	

Section	Description	Section/Annexure
	proposed application	
	(ii) proof that notice boards, advertisements and notices notifying potentially interested and affected parties of the proposed application have been displayed, placed or given;	Attached as supporting Document
	a list of all persons, organisations and organs of state that were registered in terms of regulation 22 as interested and affected parties in relation to the application;	Attached as supporting Document
	(iv) a summary of the issues raised by interested and affected parties, the date of receipt of and the response of the EAP to those issues;	
8 (g)	A description of the need and desirability of the proposed listed activity and any identified alternatives to the proposed activity that are feasible and reasonable, including the advantages and disadvantages that the proposed activity or alternatives have on the environment and on the community that may be affected by the activity;	Chapter 4
8 (h)	A description and assessment of the significance of any significant effects, including cumulative effects, that may occur as a result of the undertaking of the activity or identified alternatives or as a result of any construction, erection or decommissioning associated with the undertaking of the proposed listed activity;	Chapter 7

<b>Section</b>	<b>Description</b>	<b>Section/Annexure</b>
8 (i)	terms of reference for the detailed assessment;	NB: Includes assessment of impacts
8 (j)	An environmental management plan	Attached as supporting Document

## 2. Legal Framework

### 2.1 Administrative, Legal and Policy Requirements

To ensure environmental protection and promote sustainable development, all projects, plans, programs, and policies that may have potential environmental impacts are subject to an Environmental Impact Assessment (EIA) as required by Namibian legislation. In the case of the proposed subdivision and rezoning of remainder portion B Townland 11, Lüderitz, the following administrative, legal, and policy requirements are applicable:

- The Namibian Constitution – Provides the overarching legal framework for environmental protection and sustainable land use.
- The Environmental Management Act (No. 7 of 2007) – Establishes the legal basis for conducting EIAs and ensuring environmentally responsible decision-making.
- Draft Procedures and Guidelines for conducting EIAs and compiling EMPs (2008) – The EA process should incorporate the aspects outlined in the guidelines.
- The Lüderitz Zoning Scheme – Governs land use and zoning regulations within Lüderitz, ensuring alignment with municipal planning frameworks.
- Other Relevant Laws, Acts, Regulations, and Policies – Including any additional national and local legislation applicable to land use planning and environmental management.

#### 2.1.1 The Namibian Constitution

Article 95 of Namibia's constitution provides that:

*“The State shall actively promote and maintain the welfare of the people by adopting, inter alia, policies aimed at the following:*

*Management of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of living natural resources on a sustainable basis for the benefit of all Namibians, both present and future; in particular, the Government shall provide measures against the dumping or recycling of foreign nuclear and toxic waste on Namibian territory.”*

This article recommends that a relatively high level of environmental protection is called for in respect of pollution control and waste management.

#### 2.1.2 The Environmental Management Act (No. 7 of 2007)

The Environmental Impact Assessment (EIA) Regulations (GN 30 in GG 4878 of 6 February 2012), enacted under the Environmental Management Act (No. 7 of 2007), require that an Environmental Impact Assessment and an Environmental Management Plan (EMP) be undertaken for certain listed activities before an Environmental Clearance Certificate can be issued. For the street creation, the following listed

activities apply:

a) Activity 10.1 (b) Infrastructure

The construction of public roads (The proposed project includes the construction of roads)

b) Activity 10.2 (a) Infrastructure

The route determination of roads and design of associated physical infrastructure where – it is a public road (The proposed project includes the route determination of roads).

Due to there being physical development (construction of a street) proposed as part of this development, the assessment must consider potential cumulative impacts, including changes in land- use intensity, traffic patterns, and service demand. Public consultation remains a key requirement of the process.

### **Key Environmental Management Principles**

The Act, along with its regulations and guidelines, integrates the following sustainability principles that must be considered in environmental decision-making:

#### Cradle to Grave Responsibility

Ensures that those responsible for initiating activities with potential environmental impacts remain accountable for managing those impacts throughout the activity's lifecycle.

#### Precautionary Principle

If there is uncertainty regarding the potential effects of a land-use change, a cautious approach must be adopted to prevent unintended negative consequences.

#### Polluter Pays Principle

Any party responsible for generating environmental impacts, such as increased waste or emissions resulting from land-use changes, should bear the full costs of mitigation and management.

#### Public Participation and Access to Information

The public must have the opportunity to engage in the decision-making process and access relevant environmental information regarding the rezoning.

#### *2.1.3 Draft Procedures and Guidelines for conducting EIAs and compiling EMPs (2008)*

Part 1, Stage 8 of the guidelines states that if a proposal is likely to affect people, certain guidelines should be considered by the proponent in the scoping process.

### 2.1.4 Lüderitz Zoning Scheme

The area to which this Scheme applies is the area as indicated on the scheme maps. The general purpose of the Scheme is the co-ordinated and harmonious development of the area of Lüderitz including where necessary the redevelopment of any part thereof which has already been subdivided and build upon, in such a way as will most effectively tend to promote health, safety, order, amenity, convenience and general welfare as well as efficiency and economy and conservation of the existing character of the town, in the process of such development.

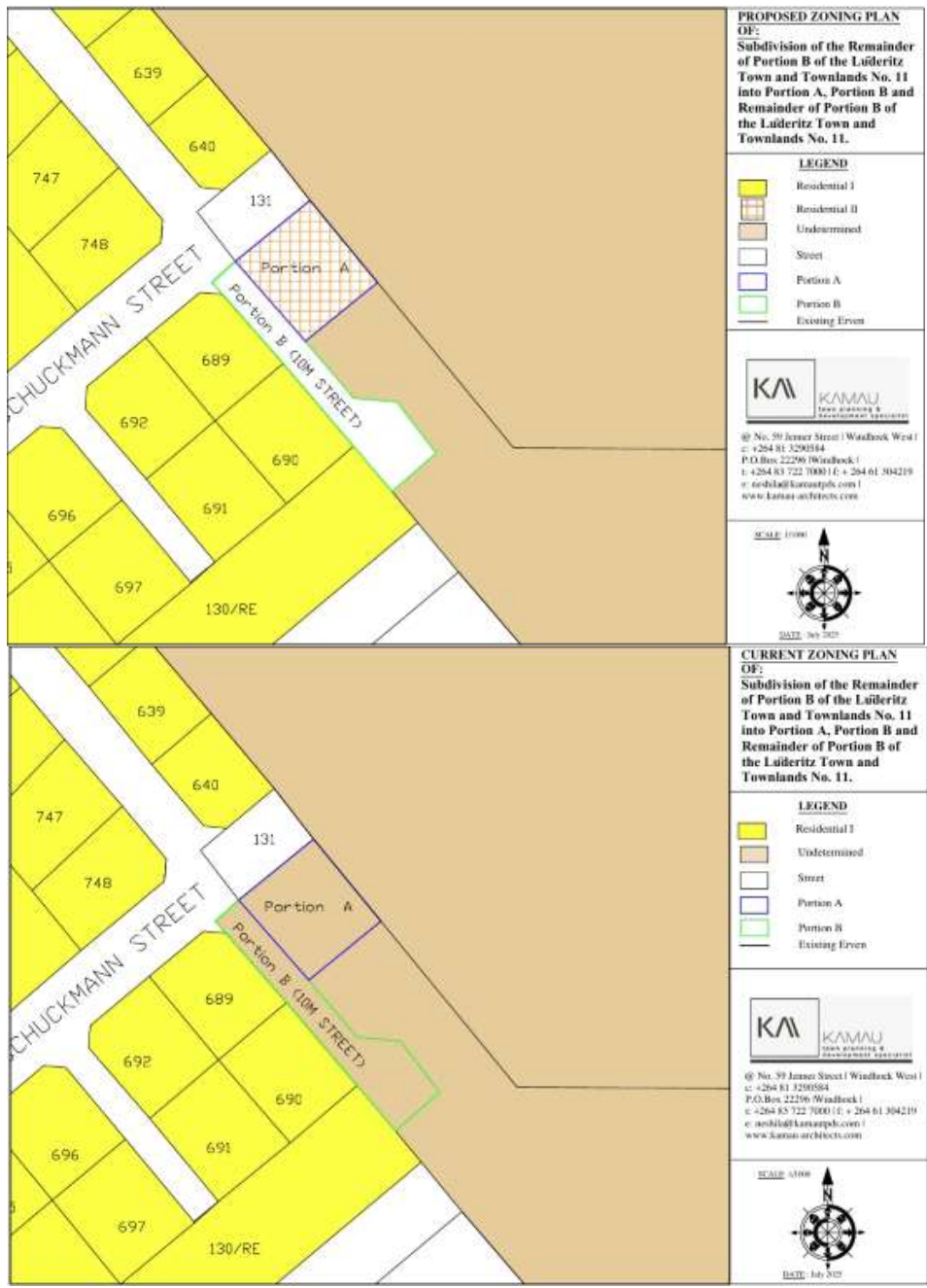
The Proponent appointed Kamau Town Planning and Development Specialists to attend to the town planning procedures to subdivide and rezone the Remainder of Portion B of the Lüderitz Town and Townlands No. 11. An application was submitted to Council for evaluation and approval. Once Council's approval has been obtained, an application will be submitted to the Urban and Regional Planning Board for the final approval of the proposed development. The final approval of the proposed development is subject to obtaining environmental clearance.

Kamau Town Planning and Development Specialist, on behalf of the proponent, Lüderitz Town Council has applied in terms of the stipulations of the Urban and Regional Planning Act, 2018 (Act No. 5 of 2018) and in terms of the Lüderitz Zoning Scheme, to the Lüderitz Town Council for:

- **Subdivision of the Remainder of Portion B of the Lüderitz Town and Townlands No. 11 into Portion A, Portion B and Remainder of Portion B of the Lüderitz Town And Townlands No. 11.**
- **Rezoning the Proposed Portion A from 'Undetermined' to 'Residential 2' with a Density of 1:150.**
- **Rezoning of the Proposed Portion B from 'Undetermined' to 'Street'.**
- **Alteration of the Boundaries of Lüderitz Proper to Include Portion A and B.**

#### **CONCLUSION AND IMPACT**

The subdividing and rezoning of the Remainder of Portion B of the Lüderitz Town and Townlands No. 11 to "*Street*" is a logical and sustainable progression for Lüderitz Proper. It aligns with the surrounding land-use patterns, promotes orderly urban development, and enhances service accessibility, while potential impacts, such as increased traffic and service demand, can be mitigated through proper urban management and infrastructure planning. Given the area's residential character, the rezoning is not expected to result in significant negative environmental or socio-economic effects.



**Figure 2: Current and Proposed Zoning**

**CONCLUSION AND IMPACT**

The proposed subdivision and rezoning have been assessed in accordance with the Lüderitz Town Planning Scheme and the Local Authorities Act. The rezoning aligns with the provisions of the scheme and is not expected to have any adverse impacts on the surrounding environment. The finalization of the rezoning process remains subject to the issuance of an Environmental Clearance Certificate (ECC).

## 2.2 Other Laws, Acts, Regulations and Policies

Below is a list of other laws, acts, regulations and policies listed which have also been considered during the Environmental Assessment.

**Table 3: Other applicable National Laws**

Legislation	Relevant Provisions	Relevance to Project
Convention on Biological Diversity (1992)	Article 1 lists the conservation of biological diversity amongst the objectives of the convention.	The project should consider the impact it will have on the biodiversity of the area.
Draft Procedures and Guidelines for conducting EIAs and compiling EMPs (2008)	Part 1, Stage 8 of the guidelines states that if a proposal is likely to affect people, certain guidelines should be considered by the proponent in the scoping process.	The EA process should incorporate the aspects outlined in the guidelines.
Namibia Vision 2030	Vision 2030 states that the solitude, silence and natural beauty that many areas in Namibia provide are becoming sought after commodities and must be regarded as valuable natural assets.	Care should be taken that the development does not lead to the degradation of the natural beauty of the area.
Water Act No. 54 of 1956	Section 23(1) deals with the prohibition of pollution of underground and surface water bodies.	The pollution of water resources should be avoided during construction and operation of the development.
The Ministry of Environment and Tourism (MET) Policy on HIV & AIDS	MET has recently developed a policy on HIV and AIDS. In addition, it has also initiated a programme aimed at mainstreaming HIV and gender issues into environmental impact assessments.	The proponent and its contractor have to adhere to the guidelines provided to manage the aspects of HIV/AIDS. Experience with construction projects has shown that a significant risk is created when migrant construction workers interact with local communities.
Urban and Regional Planning Act 5 of 2018	The Act provides to consolidate the laws relating to urban and regional planning; to provide for a legal framework for spatial planning in Namibia; to provide for principles and standards of spatial planning; to establish the urban and regional planning board; to decentralise certain matters	The rezoning is to be done in accordance with the act.

Legislation	Relevant Provisions	Relevance to Project
	relating to spatial planning; to provide for the preparation, approval and review of the national spatial development framework, regional structure plans and urban structure plans; to provide for the preparation, approval, review and amendment of zoning schemes; to provide for the establishment of townships; to provide for the alteration of boundaries of approved townships, to provide for the disestablishment of approved townships; to provide for the change of name of approved townships; to provide for the subdivision and consolidation of land; to provide for the alteration, suspension and deletion of conditions relating to land; and to provide for incidental matters.	
Local Authorities Act No. 23 of 1992	The Local Authorities Act prescribes the manner in which a town or municipality should be managed by the Town or Municipal Council.	The development must comply with provisions of the Local Authorities Act.
Labour Act no. 11 of 2007	Chapter 2 details the fundamental rights and protections. Chapter 3 deals with the basic conditions of employment.	Given the employment opportunities presented by the development, compliance with the labour law is essential.
National Heritage Act No. 27 of 2004	The Act is aimed at protecting, conserving and registering places and objects of heritage significance.	All protected heritage resources (e.g. human remains etc.) discovered, need to be reported immediately to the National Heritage Council (NHC) and require a permit from the NHC before they may be relocated.
Roads Ordinance 17 of 1972	Section 3.1 deals with width of proclaimed roads and road reserve boundaries <ul style="list-style-type: none"> <li>• Section 27.1 is concerned with the control of traffic on urban trunk and main roads</li> <li>• Section 36.1 regulates rails, tracks, bridges, wires, cables,</li> </ul>	Adhere to all applicable provisions of the Roads Ordinance.

Legislation	Relevant Provisions	Relevance to Project
	subways or culverts across or under proclaimed roads <ul style="list-style-type: none"> <li>Section 37.1 deals with Infringements and obstructions on and interference with proclaimed roads.</li> </ul>	
Public and Environmental Health Act of 2015	This Act (GG 5740) provides a framework for a structured uniform public and environmental health system in Namibia. It covers notification, prevention and control of diseases and sexually transmitted infections; maternal, ante-natal and neo-natal care; water and food supplies; infant nutrition; waste management; health nuisances; public and environmental health planning and reporting. It repeals the Public Health Act 36 of 1919 (SA GG 979).	Contractors and users of the proposed development are to comply with these legal requirements.
Nature Conservation Ordinance no. 4 of 1975	Chapter 6 provides for legislation regarding the protection of indigenous plants	Indigenous and protected plants must be managed within the legal confines.
Water Quality Guidelines for Drinking Water and Wastewater Treatment	Details specific quantities in terms of water quality determinants, which wastewater should be treated to before being discharged into the environment	These guidelines are to be applied when dealing with water and waste treatment
Environmental Assessment Policy of Namibia (1995)	The Policy seeks to ensure that the environmental consequences of development projects and policies are considered, understood and incorporated into the planning process, and that the term ENVIRONMENT is broadly interpreted to include biophysical, social, economic, cultural, historical and political components.	This EIA considers this term of Environment.

Legislation	Relevant Provisions	Relevance to Project
Water Resources Management Act No. 11 of 2013	Part 12 deals with the control and protection of groundwater Part 13 deals with water pollution control	The pollution of water resources should be avoided during construction and operation of the development. Should water need to be abstracted, a water abstraction permit will be required from the Ministry of Water, Agriculture and Forestry.
Forest Act 12 of 2001 and Forest Regulations of 2015	To provide for the establishment of a Forestry Council and the appointment of certain officials; to consolidate the laws relating to the management and use of forests and forest produce; to provide for the protection of the environment and the control and management of forest fires; to repeal the Preservation of Bees and Honey Proclamation, 1923 (Proclamation No. 1 of 1923), Preservation of Trees and Forests Ordinance, 1952 (Ordinance No. 37 of 1952) and the Forest Act, 1968 (Act No. 72 of 1968); and to deal with incidental matters.	Protected tree and plant species as per the Forest Act No 12 of 2001 and Forest Regulations of 2015 may not be removed without a permit from the Ministry of Agriculture, Water and Forestry.
Atmospheric Pollution Prevention Ordinance No 45 of 1965	Part II - control of noxious or offensive gases, Part III - atmospheric pollution by smoke, Part IV - dust control, and Part V - air pollution by fumes emitted by vehicles.	The development should consider the provisions outlined in the act. The proponent should apply for an Air Emissions permit from the Ministry of Health and Social Services (if needed).
Hazardous Substance Ordinance 14 of 1974	To provide for the control of substances which may cause injury or ill-health to or death of human beings by reason of their toxic, corrosive, irritant, strongly sensitizing or flammable nature or the generation of pressure thereby in certain circumstances; to provide for the division of such substances into groups in relation to the degree of danger; to provide for the prohibition and control of the	The handling, usage and storage of hazardous substances on site should be carefully controlled according to this Ordinance.

Legislation	Relevant Provisions	Relevance to Project
	importation, manufacture, sale, use, operation, application, modification, disposal or dumping of such substances; and to provide for matters connected therewith.	
Soil Conservation Act No 76 of 1969	Act to consolidate and amend the law relating to the combating and prevention of soil erosion, the conservation, improvement and manner of use of the soil and vegetation and the protection of the water sources	The proposed activity should ensure that soil erosion and soil pollution is avoided during construction and operation.

The EIA process was undertaken in accordance with the EIA Regulations. A Flow Diagram as depicted below in **Figure 3** provides an outline of the EIA process:

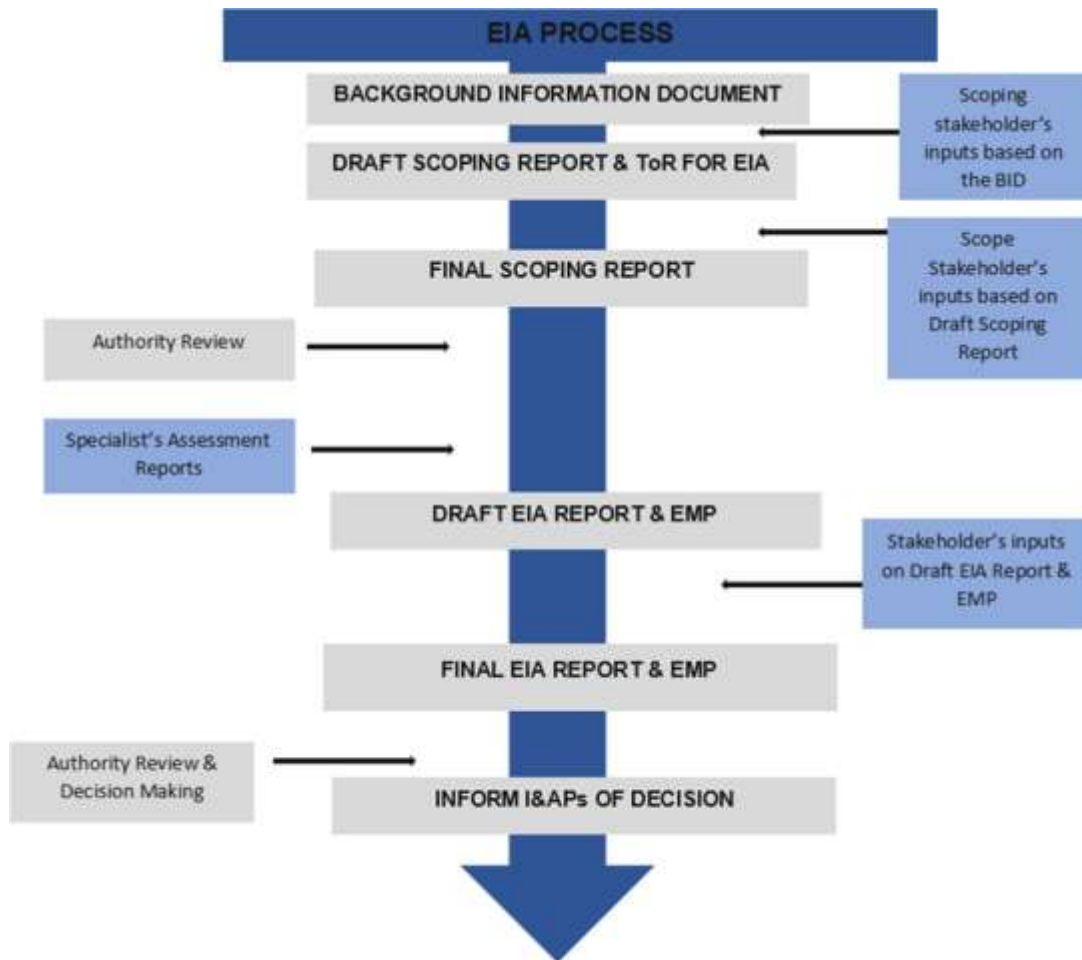


Figure 3: EIA flow Diagram

### 3. Environmental Baseline Description

#### 3.1 Social Environment

##### 3.1.1 Socio- Economic Context

Lüderitz, located approximately 120 kilometres from Aus and about 683 kilometres from Windhoek, is a coastal town situated in the //Karas Region. The town was established primarily as a harbour settlement and later developed into an important centre for fishing, trade, and diamond mining activities in the area. Over time, Lüderitz has grown into a small but significant economic hub within the region.

Lüderitz serves as a local service centre for surrounding communities and industries, contributing to regional economic activity. The statistics presented in Table 4 below are derived from the 2024 Namibian Population and Housing Census (Namibian Statistics Agency, 2024) and are described from both a local and regional perspective.

**Table 4: Statistics of the Lüderitz Constituency and //Kharas Region**

<b>//KHARAS REGION</b>	
<b>ATTRIBUTE</b>	<b>INDICATOR</b>
Population	109 893
Females	54 223
Males	55 670
Population under 5 years	10.9%
Population aged 5 -14 years	18.6%
Population aged 15- 59 years	64.5%
Population aged above 60 years and above	6.0%
Female: Male ratio	100:103
Literacy rate of 15 years old and above	95.6%
People above 15 years who have never attended school	3.5
People above 15 years who are currently attending school	12.3
People above 15 years who have left school	83.3
People aged 15 years and above who belong to the labour force	76%
Population employed	33,798
Main Language	Afrikaans
<b>LUDERITZ (URBAN)</b>	
<b>ATTRIBUTE</b>	<b>INDICATOR</b>
Population	17 243
Population aged 60 years and above	2 143
Females	8 812
Males	8 431

The site is in Lüderitz (urban area), where land use is predominantly characterized by *Undetermined* and *Residential*. The proposed development is expected to yield positive socio-economic impacts, including the generation of additional municipal revenue through property rates and taxes. This increased revenue base can support the enhancement of service delivery, infrastructure maintenance, and the upgrading of essential social facilities within the town. Furthermore, the development may contribute to local economic stimulation through increased investment and potential employment opportunities during both the construction and operational phases.

### **3.1.2 Archaeological and Heritage Context**

The urban landscape of Lüderitz is primarily shaped by its origins as a harbour town, with development closely linked to maritime trade, fishing, and diamond mining activities. The town's layout reflects planned urban development associated with industrial and port activities, complemented by a concentration of colonial-era

architectural landmarks. Key institutional and community facilities within Lüderitz serve functional roles in supporting the local population and workforce.

Although Lüderitz possesses several prominent historical buildings and landmarks, particularly of German colonial heritage, its significance lies both in its architectural character and its contribution to Namibia's coastal economy. The town forms part of the broader //Karas Region, which is rich in geological, cultural, and heritage resources.

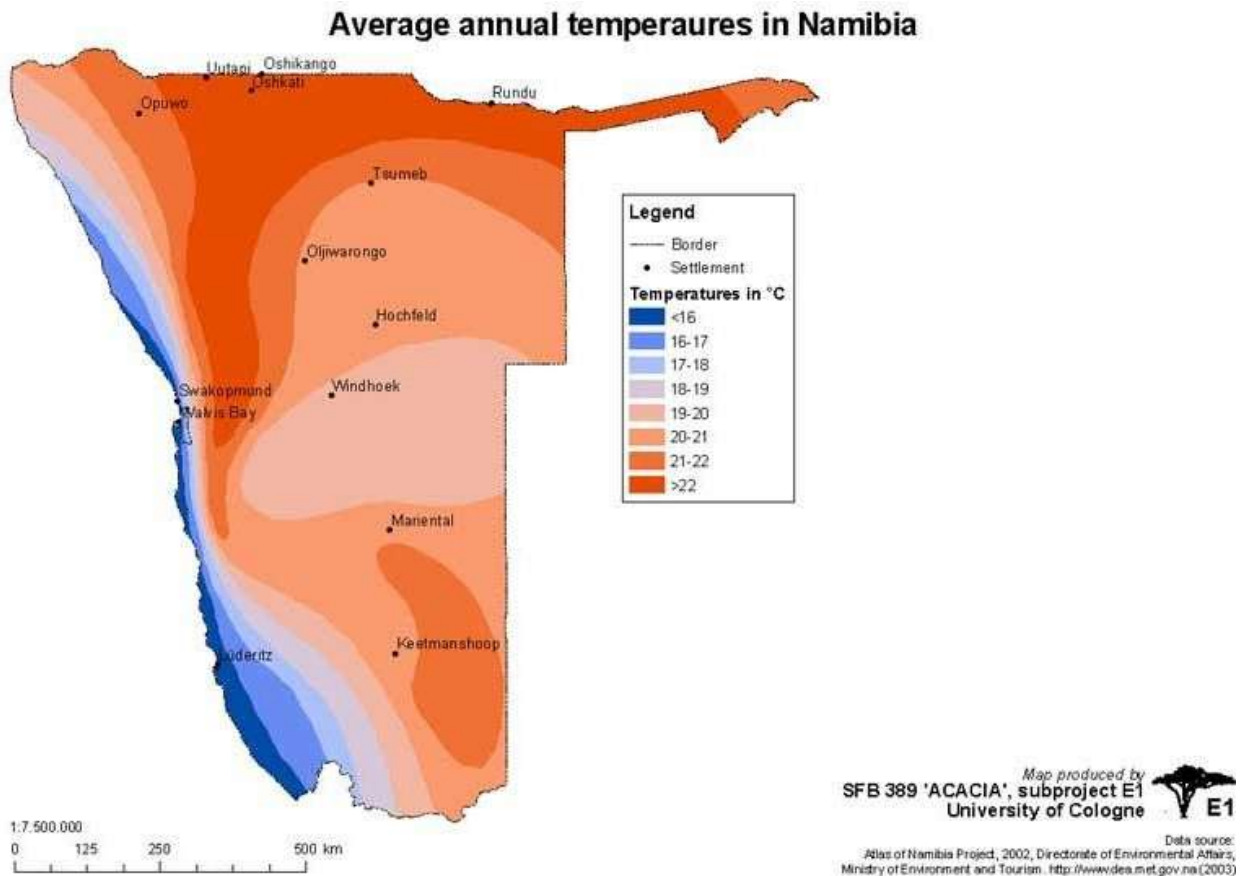
Near to Lüderitz are several notable sites of cultural and natural importance. These include the historic settlement of Kolmanskop, renowned for its abandoned diamond mining structures and German colonial architecture, as well as the Diaz Point, marked by its historic cross and coastal heritage significance. Additionally, the surrounding Namib Desert and Sperrgebiet National Park host unique ecological and archaeological features. The site in question, however, does not fall within or directly adjacent to any formally recognized archaeological, cultural, or heritage sites. As such, the proposed development is unlikely to have any significant impact on heritage resources within Lüderitz or its surrounding areas.

## **3.2 Bio- Physical Environment**

### *3.2.1 Climate*

Lüderitz has a cool desert climate influenced strongly by its coastal location and the cold Benguela Current. Rainfall is very low and highly variable, while temperatures remain moderate throughout the year compared to inland towns. Summers are generally mild to warm rather than extremely hot, and winters are cool with crisp mornings and evenings.

In contrast to inland areas, temperature fluctuations between day and night are less extreme, and the region is frequently affected by coastal fog. This fog contributes valuable moisture to an otherwise arid environment, shaping both the ecological conditions and the lived experience of the town.



**Figure 4: Annual average temperature (Acacia Project E1, n.d.)**

Lüderitz receives very low and unreliable rainfall, typically averaging less than 50 mm annually, with precipitation occurring sporadically, mainly during the summer months. Humidity levels are generally low; however, the area is frequently influenced by coastal fog associated with the Benguela Current, which provides an important supplementary moisture source in this arid environment.

Windy conditions are common, contributing to the dry climate and occasional dust events. Despite these harsh conditions, the surrounding environment supports specialized desert-adapted vegetation and fauna capable of surviving in extremely low-rainfall conditions.

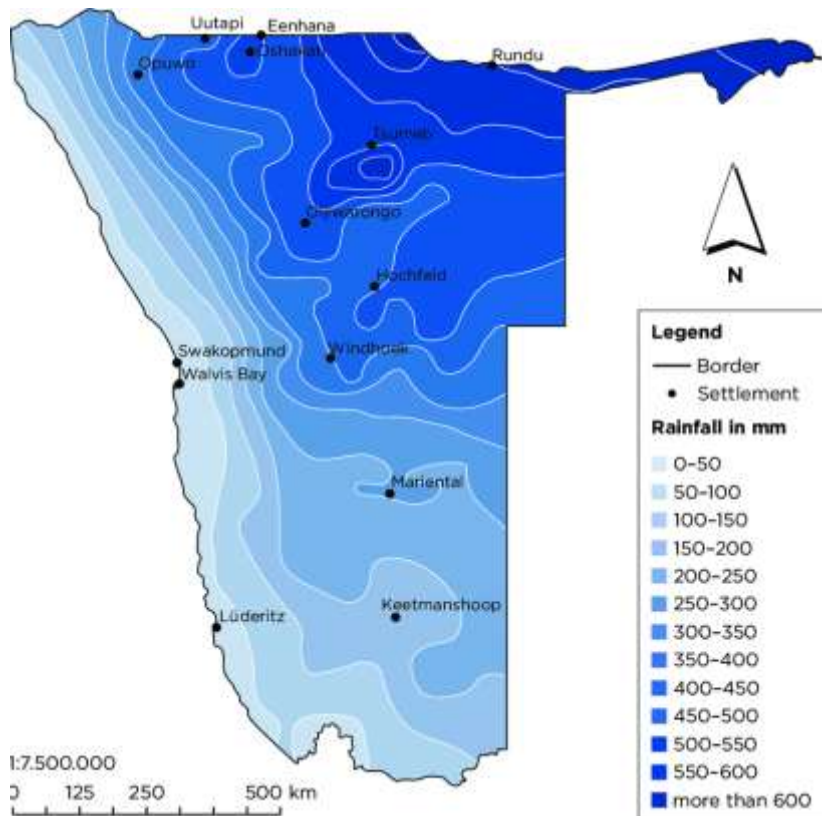


Figure 5: Average annual Rainfall (Acacia Project E1, n.d.)

### 3.2.2 Biodiversity and Vegetation

Lüderitz is situated within the Namib Desert region in the //Karas area, characterized by arid coastal landscapes, sandy plains, and rocky outcrops rather than plateau environments. The surrounding terrain is shaped by desert geomorphological processes, with sparse vegetation adapted to extremely low rainfall conditions. Plant species in the area are typically limited to drought-resistant shrubs, lichens, and ephemeral grasses that emerge only after occasional rainfall events.

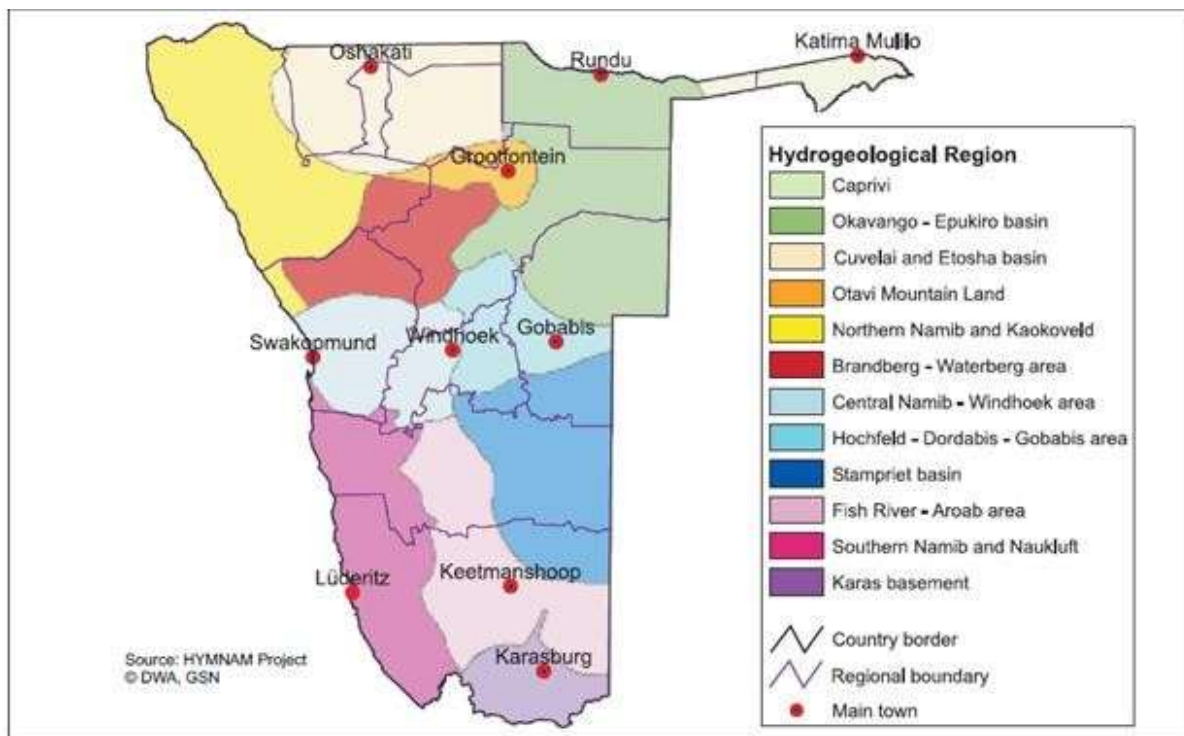
The vegetation in and around Lüderitz forms part of the broader Namib Desert biome, which is influenced by coastal climatic conditions and nutrient-poor sandy and gravelly soils. Unlike more vegetated regions, biodiversity is relatively low but highly specialized, with species adapted to survive prolonged dry periods and reliance on fog as a moisture source.

The site under consideration is located within an already developed urban area and currently accommodates built infrastructure. As such, there is no significant natural vegetation present onsite, nor does it provide habitat for large wildlife species.

#### CONCLUSION AND IMPACT

The site itself has no protected status. The screening process did not reveal any significant biodiversity-related critical aspects pertaining to the proposed development which require further investigation.

### 3.2.3 Hydrology and Hydrogeology



**Figure 6: Groundwater basins and hydrogeological regions in Namibia (Ministry of Agriculture Water and Rural Development, 2011)**

Lüderitz is located within the arid Namib Desert region, which is largely characterized by the absence of perennial surface water systems. Unlike towns situated within major catchment areas, Lüderitz does not fall within a well-defined river basin with permanent rivers. Instead, the area is associated with ephemeral drainage systems that only flow briefly following rare rainfall events.

The nearby Koichab River is the most significant ephemeral river in the broader region, flowing westward towards the Atlantic Ocean, although it does not directly traverse the town. These ephemeral systems play a limited but important role in groundwater recharge when flow does occur.

The hydrology and hydrogeology of Lüderitz present notable challenges due to extremely low rainfall, high evaporation rates, and the absence of reliable surface water sources. As a result, the town is heavily reliant on managed water supply systems linked to regional infrastructure, as well as groundwater resources.

Effective water resource management strategies, such as careful monitoring of groundwater abstraction, water conservation measures, and protection of existing supply infrastructure, are essential to ensure long-term sustainability. All water sources must be managed with caution to prevent contamination, as any degradation in water quality could significantly impact the town's water security and overall development potential.

## **CONCLUSION AND IMPACT**

The proposed subdividing and rezoning of Portion A of the Remainder of Portion B of the Lüderitz Town and Townlands No. 11 from “*Undetermined*” to “*Residential 2*” is not expected to have a significant impact on existing environmental and infrastructure conditions. The rezoning is intended to facilitate planned development and formalize future land use activities within the area.

As such, no substantial increase in pressure on water resources or alterations to groundwater recharge and extraction patterns are anticipated. However, sustainable water management practices will remain important to ensure long-term water security within Lüderitz, particularly considering the arid nature of the region.

## **4. Project Description**

### **4.1 Project Components**

As outlined in Section 1.1, the project being proposed involves the following:

- **Subdivision of the Remainder of Portion B of the Lüderitz Town and Townlands No. 11 into Portion A, Portion B and Remainder of Portion B of the Lüderitz Town and Townlands No. 11.**
- **Rezoning the proposed Portion A from ‘Undetermined’ to ‘Residential 2’ with a density of 1:150.**
- **Rezoning of the proposed Portion B from ‘Undetermined’ to ‘Street’.**
- **Alteration of the Boundaries of Lüderitz Proper to include Portion A and B.**

What follows below is a brief description of the components thereof, as it pertains to design, layout and footprint.

### **4.2 Alternatives**

As mentioned in section 1, different layout alternatives were considered by the proponent, which have resulted in the final layout as proposed in this document.

#### *4.2.1 No- Go Alternative*

The no-go alternative represents the baseline scenario against which the proposed development is assessed. Under this alternative, the street would not be created, and as such the newly created erf would have no access.

Consequently, the potential economic benefits associated with such as Council being able to collect rates and taxes from the created erf, would be limited.

As a result, the no-go alternative is not considered the preferred option for the development of Lüderitz.

### **4.3 The Proposed Development**

In order to increase the economic capacity of Portion A and realise the vision of developing residential on the property, a subdivision and subsequent rezoning will be necessary to amend the legal status of the proposed Portion A, to align the proposed land use with the appropriate zoning, in accordance with the Lüderitz Zoning Scheme.

As per the analysis of the Lüderitz Zoning Scheme, the best fitting land use that will allow for the intended activity is the ‘Residential 2’ zoning, with a density of 1:150m<sup>2</sup> on the proposed Portion A. Considering that the proposed subdivided Portion A measures 1000m<sup>2</sup>, the proposed density will allow for a high-density development of 6 units.

High-density developments increase the efficiency with which municipal services can

be provided, create economies of scale, and preserve the surrounding natural environment. The establishment of the proposed land use adds to the diversity in the neighbourhood, creating a mixed land use neighbourhood.

Mixed-use development encourages public transportation, pedestrian and bike travel, reducing a neighbourhood’s carbon footprint. By limiting car usage and street congestion, mixed-use communities are able to minimise air pollution and promote energy conservation. High density developments accommodate the economic group that is unable to afford low-density free-standing Portions. High density residential developments respond to the current housing needs, given the current housing backlog in the country.

Furthermore, the proposed development will benefit not only the owner of the property, but will benefit the Lüderitz Town Council, through the collection of property tax from the general increase in land values on Portion A. The creation of a street on the proposed Portion B will not only benefit the owners of Portion A but will also benefit the owners of Portions 689 and 690, Lüderitz Proper, as they currently do not have access to a registered street.

The owners of the proposed subdivided Portions A and B intend to rezone Portion A to ‘Residential 2’ and Portion B to ‘Street’. They also intend to alter the boundaries of Lüderitz Proper to include the proposed subdivided Portions A and B. In addition, the owners wish to commence construction while this application is being processed.

The purpose of this application is to enable Rocky Bay Investment CC, who were allocated Portion A as per the Council resolution attached under Annexure D, to construct workers’ accommodation on the proposed Portion A and to create a street on the proposed Portion B. The remainder of Portion B within Lüderitz Town and Townlands No. 11 will remain unchanged.

As the proposed Portion A currently does not have access to a formal street, Rocky Bay Investment CC will be required to construct a new street on Portion B at their own cost. Therefore, Rocky Bay Investment CC is requesting a waiver of the betterment and endowment fees in lieu of the cost of constructing the street on Portion B.

The table below provides a summary of the Portion size for the proposed subdivided Portion A

**Table 5: Recommended size for the proposed Portion A**

<b>Portions</b>	<b>Size (m<sup>2</sup>)</b>	<b>Proposed Zoning</b>
Portion A	1 000	Residential 2

The ‘Residential 2’ zoning allows for the construction of blocks flats as outlined in the Lüderitz Zoning Scheme:

**Table 6: Extract from Table B of the Lüderitz Zoning Scheme**

<b>ZONE</b>	<b>MAP REFERENCE</b>	<b>PRIMARY USE</b>
Residential 2	Orange hatch (45° left)	Dwelling house/s, townhouses, accommodation establishment, guest house.

The Lüderitz Zoning Scheme defines ‘townhouses’ as two or more residential units, with a maximum height of three storeys, where the dividing line between the dwellings is vertical.

The table below provides a summary of the Portion size of Portions A and B, current zoning and land use, as well as the proposed zoning and land use following the application:

**Table 7: Portion Size, Current and Proposed Zoning, and Land Use**

<b>Area (m<sup>2</sup>)</b>	<b>Current Zoning</b>	<b>Current Land Use</b>	<b>Proposed Zoning</b>	<b>Proposed Land Use</b>
1 000	Undetermined	Vacant	Residential 2	Block of Flats
-	Undetermined	Vacant	Street	Street

It should be noted that Clause 8.3(a) of the Lüderitz Zoning Scheme stipulates that Portions zoned for ‘Residential 2’ purposes, on which townhouses are to be established, must have a minimum size of 600 m<sup>2</sup>, with a coverage of 10-60%. The proposed subdivided Portion A complies with this requirement.

The table below outlines the number of units, coverage and parking calculations that will apply to the proposed subdivided Portion A, under the ‘Residential 2’ zoning.

**Table 8: Bulk, Coverage and Parking Calculations**

	<b>Number of Units</b>	<b>Coverage</b>	<b>Parking</b>
<b>Calculation</b>	1 000m <sup>2</sup> m <sup>2</sup> * (1/150) = 6.7	1000m <sup>2</sup> *(60/100)	1 bay per dwelling unit.
<b>Total</b>	= Maximum 6 units	= maximum 600m <sup>2</sup> of the Portion area can be covered	= minimum 6 Parking Bays for 6 units

The Lüderitz Zoning Scheme defines a street or road as including the whole or any portion of any street, road, bridge, subway, avenue, lane, sanitary lane, or thoroughfare shown on the general plan of the town, where a right of way is registered in favour of the general public or where the public has a right of way by prescription.

The proposed Portion B is 10m wide, in line with the Ministry of Regional and Local Government, Housing and Rural Development (now the Ministry of Urban and Rural Development) Town Planning Standards and Urban Design Guidelines for Principal Layout Plans, attached under Annexure E. The Guidelines allow for a minimum street

width of 10m for vacant land, comprising 6m for vehicular traffic and 4m for pedestrians and services required within the street reserve.

#### 4.3.1 Engineering Services

The proposed subdivided Portion A will be connected to the existing bulk water, sewage, and electricity infrastructure in the neighbouring townships, as stipulated in the council resolution attached as Annexure D. Portion B does not require connection to the above-mentioned services, as it will be rezoned to street.

#### 4.3.2 Access Provision

Access to the proposed subdivided Portion A will be provided through the proposed Portion B, which will be rezoned to 'Street'.

### 5. Public Participation Process

#### 5.1 Public Participation Requirements

In terms of Section 21 of the EIA Regulations a call for open consultation with all I&APs at defined stages of the EIA process is required. This entails participatory consultation with members of the public by providing an opportunity to comment on the proposed project. Public Participation has thus incorporated the requirements of Namibia's legislation, but also takes account of international guidelines, including Southern African Development Community (SADC) guidelines and the Namibian EIA Regulations. Public participation in this project has been undertaken to meet the specific requirements in accordance with the best international practice. Please see Table xx below for the activities undertaken as part of the public participation process. The I&APs were given time to comment from 29 August 2025 – 09 October 2025.

**Table 9: Table of Public Participation Activities**

<b>ACTIVITY</b>	<b>REMARKS</b>
Placement of site notice in Lüderitz	Attached as supporting Document
Placing advertisements in two newspapers namely the Confidente and the New Era: Confidente – 29 August 2025 and 05 September 2025 New Era – 29 August 2025 and 05 September 2025	Attached as supporting Document
Written notice to surrounding property owners via registered mail and Interested and Affected Parties via Email on the 28 August 2025	Attached as supporting Document

##### 5.1.1 Environmental Assessment Phase 2

The second phase of the Public Participation Process (PPP) involves lodging the Draft

Environmental Scoping Report (DESR) for review by all registered and potential Interested and Affected Parties (I&APs). Registered and potential I&APs are being informed of the availability of the DESR for public comment via email and/or letter. An Executive Summary of the DESR is included in the correspondence. I&APs are invited to submit comments or raise any issues or concerns they may have regarding the proposed project within the specified commenting period. At the time of writing, no comments have been received.

**6. Assessment Methodology**

This chapter explains the approach used to assess the potential impacts of the proposed rezoning, both during and after implementation—on the biophysical and socio-economic environment. Where relevant, it also considers possible alternatives. The scoping process has identified potential project impacts during its planning and operation phase and examined each of these issues. In assessing the impact of the proposed development, four rating scales were considered. Each issue identified was evaluated in terms of the most important parameter applicable to environmental management. These include the extent, intensity, probability, and significance of the possible impact on the environment. The rating scales used are as follows.

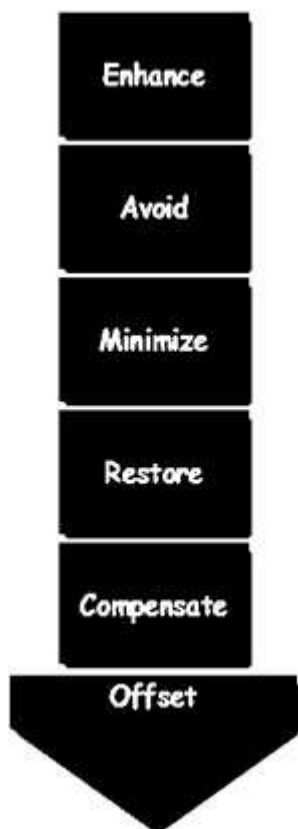
**Table 10: Impact Assessment Criteria**

<b>Criteria</b>	<b>Description</b>			
<b>Extent</b>	<b>National (4)</b> The whole country	<b>Regional (3)</b> //Kharas region and neighbouring regions	<b>Local (2)</b> Within a radius of 2km of the proposed site	<b>Site (1)</b> Within the proposed site
<b>Duration</b>	<b>Permanent (4)</b> Mitigation either by man or natural process will not occur in such a way or in such a time span that the impact can be considered transient	<b>Long-term (3)</b> The impact will continue/last for the entire operational life of the development but will be mitigated by direct human action or by natural processes thereafter.	<b>Medium-term (2)</b> The impact will last for the period of the construction phase, where after it will be entirely negated	<b>Short-term (1)</b> The impact will either disappear with mitigation or will be mitigated through natural process in a span shorter than the construction phase

<b>Intensity</b>	<b>Very High (4)</b> Natural, cultural, and social functions and processes are altered to extent that they permanently cease	<b>High (3)</b> Natural, cultural, and social functions and processes are altered to extent that they temporarily cease	<b>Moderate (2)</b> Affected environment is altered, but natural, cultural, and social functions and processes continue albeit in a modified way	<b>Low (1)</b> Impact affects the environment in such a way that natural, cultural, and social functions and processes are not affected
<b>Probability</b>	<b>Definite (4)</b> Impact will certainly occur	<b>Highly Probable (3)</b> Most likely that the impact will occur	<b>Possible (2)</b> The impact may occur	<b>Improbable (1)</b> Likelihood of the impact materialising is very low
<b>Significance</b>	Is determined through a synthesis of impact characteristics. Significance is also an indication of the importance of the impact in terms of both physical extent and time scale, and therefore indicates the level of mitigation required. The total number of points scored for each impact indicates the level of significance of the impact.			

**\*NOTE:** For each identified impact, the **extent** (spatial scale), **intensity** (severity or degree), **duration** (how long the impact may last), and **probability** (likelihood of the impact occurring) are considered. These factors are assessed to determine the overall **significance** of the impact, first without any mitigation in place, and then again assuming the best possible mitigation measures are implemented. The final decision on which alternatives and mitigation options to apply rests with the project proponent, while approval lies with the relevant environmental authority. The **significance** of each impact is influenced not only by its extent, intensity, duration, and probability, but also by the context, specifically the nature of the environment or community that may be affected.

## 6.1 Mitigation Measures



For the proposed street creation, a mitigation hierarchy is applied to guide the management of potential environmental and socio-economic impacts. This hierarchy includes actions to **avoid**, **minimize**, **restore**, **compensate**, **offset**, and where possible, **enhance** the surrounding environment.

**Avoidance** is most effective during the early stages of planning and involves steps such as steering clear of environmentally sensitive areas and ensuring that the rezoning does not result in unnecessary disruption to adjacent land uses or community assets.

**Minimization** comes into play where avoidance is not fully possible. In this case, it includes managing operational activities of the existing office building to reduce noise, traffic disruptions, or service strain. Design and layout considerations should also aim to maintain harmony with the surrounding urban fabric.

**Restoration** focuses on maintaining or improving the site's physical condition and urban aesthetics during and after implementation. This could involve landscaping or greening efforts to align with existing public open spaces nearby.

**Compensation** applies in cases where residual impacts may remain despite efforts to avoid or minimize them. Measures may include supporting local amenities or services to balance any additional load placed on infrastructure due to increased commercial activity.

**Offsetting** refers to creating equivalent benefits elsewhere, should any unavoidable and permanent impacts occur, although in this case, significant negative impacts are not anticipated. Finally, the project presents opportunities to **enhance** the area by formalizing the existing commercial use and potentially contributing to economic activity, service access, and urban vibrancy in central Lüderitz.

## **7. Assessment Of Potential Impacts and Possible Mitigation Measures**

### **7.1 Introduction**

This chapter outlines the potential environmental impacts, both biophysical and socio-economic, associated with the proposed street creation on Portion B, Lüderitz. The assessment covers anticipated short- to medium-term impacts during the construction phase as well as long-term impacts expected during the operational phase of the development. These assessments are informed by the project description and aim to guide decision-making by the Ministry of Environment, Forestry and Tourism (MEFT), particularly with regard to the issuance of an Environmental Clearance Certificate (ECC) and the application of appropriate conditions.

The analysis herein is based on site-specific baseline data and reflects the likely changes to the natural and built environments resulting from the construction of a 10m wide street reserve. The impact assessment also serves to inform the finalisation of the proposed layout and engineering requirements for the street. Each impact is assessed with corresponding mitigation measures, as outlined in this chapter and detailed further in the Environmental Management Plan (EMP).

### **7.2 Construction Phase Impacts on the Biophysical Environment**

The construction of the proposed street on Portion B may introduce a range of short- to medium-term impacts on the biophysical environment. These impacts are generally temporary but may result in residual effects if not appropriately managed.

#### *7.2.1 Flora and Fauna Impacts (Biodiversity)*

Clearing of land for the establishment of the street reserve, including space for vehicular movement, pedestrian access, and services, will result in vegetation loss and habitat disturbance. Although the site is currently vacant, construction activities may still disturb local flora and fauna. Mitigation measures include limiting vegetation clearing to the street reserve and avoiding unnecessary disturbance to surrounding areas.

#### *7.2.2 Surface and Groundwater Impacts*

Construction activities may result in surface runoff carrying sediments or pollutants into surrounding areas, particularly during rainfall events. Potential contamination may arise from fuel spills, oil leaks, or improper handling of construction materials. Proper storage of fuels, spill containment measures, and site management practices must be implemented.

#### *7.2.3 Dust and Emission Impacts*

Dust generation from excavation, grading, and vehicle movement is expected during the construction of the street. This may affect local air quality if not controlled. Dust suppression measures, including water spraying and controlled movement of construction vehicles, will be required.

#### *7.2.4 Soil Erosion Impacts*

The removal of vegetation and disturbance of soil during construction may increase the risk of erosion. Mitigation measures include phased construction, stabilisation of exposed surfaces, and implementation of erosion control measures where necessary.

### **7.3 Construction Phase Impacts on the Socio-Economic Environment**

#### *7.3.1 Heritage Impacts*

No known heritage resources are associated with the proposed Portion B. However, any unexpected discoveries during construction must be reported in accordance with the National Heritage Act.

#### *7.3.2 Health, Safety, and Security Impacts*

Construction of the street will involve machinery and labour, which may pose safety risks. Appropriate health and safety measures, including the use of personal protective equipment and site management protocols, must be enforced.

#### *7.3.3 Traffic Impacts*

Construction activities may temporarily disrupt local movement due to the transport of materials and equipment. However, these impacts are short-term and can be managed through proper scheduling and coordination.

#### *7.3.4 Noise Impacts*

Noise from construction machinery and vehicles is expected but will be temporary. Limiting construction activities to standard working hours will reduce disturbance.

#### *7.3.5 Municipal Services*

Construction activities will require temporary provision of water, sanitation, and waste management. These must be managed to avoid undue pressure on existing services.

#### *7.3.6 Storage and Handling of Hazardous Substances*

Materials such as fuels and lubricants may pose contamination risks. These must be stored and handled in accordance with relevant regulations and the EMP.

### **7.4 Operational Phase Impacts**

Once the street is constructed, impacts shift from temporary disturbances to long-term benefits associated with improved access and infrastructure provision.

#### *7.4.1 Impacts on the Surrounding Area*

The establishment of the street will improve accessibility within the area and facilitate development on Portion A. It will also provide access to Portions 689 and 690, Lüderitz

Proper, which currently do not have access to a registered street.

#### *7.4.2 Visual Impacts*

The transformation of vacant land into a formalised street will alter the visual character of the area. However, this change is consistent with urban development and is expected to have a positive impact.

#### *7.4.3 Traffic Impacts*

The completed street will accommodate vehicular and pedestrian movement, improving circulation and connectivity. It is not expected to result in significant negative traffic impacts.

#### *7.4.4 Social and Economic Impacts*

The creation of the street is essential to enable development on Portion A and surrounding properties. Improved access will support economic activity, increase land value, and facilitate service delivery.

### **7.5 Cumulative Impacts**

The cumulative impact of the proposed street creation, in combination with surrounding developments, relates primarily to increased infrastructure and service demands. However, these impacts are expected to be minimal and manageable.

### **7.6 Environmental Management Plan**

An Environmental Management Plan (EMP) is included to outline mitigation measures to be implemented during the construction of the street to ensure that negative impacts are avoided or minimised.

### **7.7 Summary of Potential Impacts**

A summary of the potential impacts associated with the proposed street creation is provided, together with mitigation measures. The impacts are generally low to moderate and can be effectively managed through the implementation of the EMP.

## 7.8 Potential Impacts

Table 11: Summary of the significance of the potential impacts

ASPECT	POTENTIAL IMPACT	EXTENT	DURATION	INTENSITY	PROBABILITY	SIGNIFICANCE	MITIGATION
<b>BIOPHYSICAL</b>							
Biodiversity	No impact expected	1	1	1	1	Low	Portion B is located in a built-up urban area.
Visual Impact	No negative impact; visual character of the area remains unchanged	1	1	1	1	Low	The proposed street is compatible with the surrounding urban landscape.
Soil Disturbance	No impact expected	1	1	1	1	Low	The site is already sealed and developed, with no earthworks planned
Water Contamination	Potential contamination due to poor waste disposal or sewage overflow during operation	1	1	1	1	Low	Connected to municipal sewer system; good waste management practices must be followed.
Erosion/Runoff	No impact expected	1	1	1	1	Low	Site is serviced with existing stormwater infrastructure.
<b>SOCIO-ECONOMIC</b>							
Traffic Flow	Slight increase in vehicle movement due to business activity	1	1	1	1	Low	Proposed street will accommodate increased flow; no additional traffic infrastructure needed
Waste Management	Poor management could lead to litter or nuisance	1	1	1	1	Low	Continue proper disposal at municipal waste site; avoid illegal dumping.

Land use compatibility	Potential conflict with surrounding residential use if activities become too intensive	1	1	1	1	Low	Maintain office-related activities only; comply with zoning and municipal regulations.
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Table 8:

## **8. Conclusion and Recommendation**

The purpose of this scoping exercise was to define the scope of potential environmental impacts associated with the proposed rezoning and determine whether any further specialist studies are required. Based on the assessment conducted, it is concluded that the objectives of the Scoping Phase have been met, and that the environmental considerations have been adequately addressed.

### **8.1 Assumptions and Conclusions**

- The proposed street creation does not negatively affect the biophysical or socio- economic environment.
- No significant objections or critical environmental concerns were raised during the assessment process.
- The nature of the project, involving no physical alterations to the existing structure, indicates that no additional specialist studies are necessary.

Given the minimal nature of the anticipated impacts and the proposed mitigation measures outlined in this report and the accompanying Environmental Management Plan, it is recommended that the Environmental Commissioner favourably consider this application and issue an Environmental Clearance Certificate for the Subdivision Of the Remainder of Portion B of the Lüderitz Town and Townlands No. 11 Into Portions A, B and Remainder, Rezoning of Portion B from 'Undetermined' to 'Street' (Street Creation), Lüderitz, Karas Region.

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