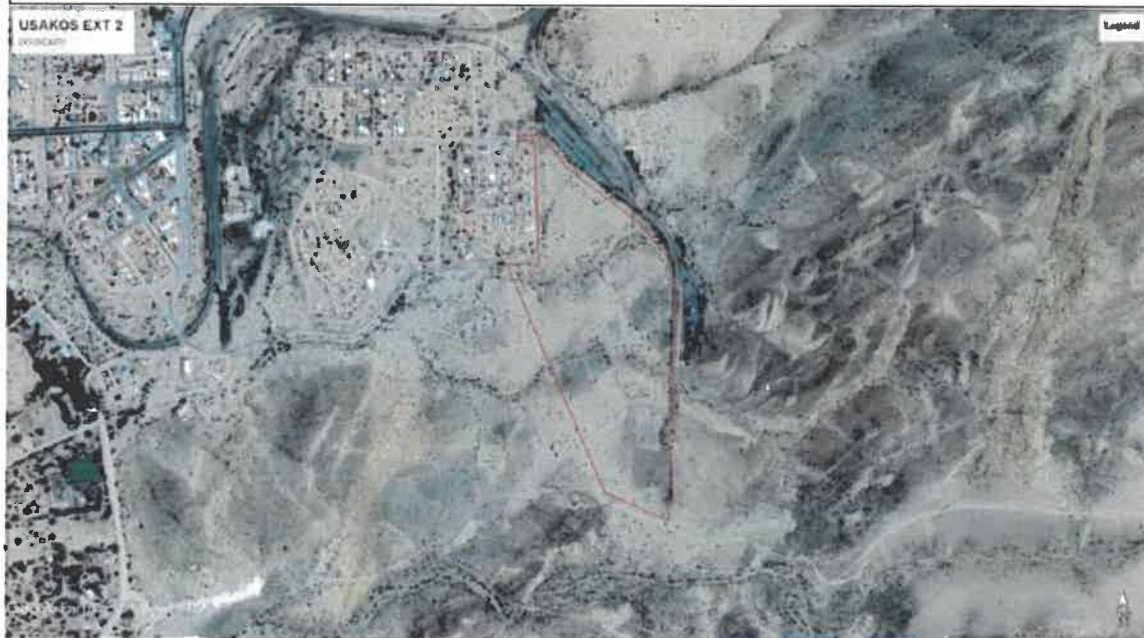


**ENVIRONMENTAL ASSESSMENT OF THE
PROPOSED NEW TOWNSHIP DEVELOPMENT
ON REMAINDER OF PORTION 455 OF
USAKOS SUD NO 41, ON AN
APPROXIMATELY 26 HECTARES LAND
PARCEL IN THE ERONGO REGION, NAMIBIA.**

FINAL SCOPING REPORT



Title	ENVIRONMENTAL SCOPING REPORT FOR THE PROPOSED NEW TOWNSHIP DEVELOPMENT ON REMAINDER OF PORTION 455 OF USAKOS SUD NO 41, ON AN APPROXIMATELY 26 HECTARES LAND PARCEL IN THE ERONGO REGION, NAMIBIA.		
Report Status	Final		
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ENVIRONMENTAL ASSESSMENT PRACTITIONER DECLARATION

I hereby declare that I do/will:

- a) Have knowledge of and experience in conducting assessments, including knowledge of the Environmental Management Act (Act 7 of 2007) and the Regulations and Guidelines that have relevance to the proposed activity;
- b) Perform the work relating to the application in an objective manner, even if these results in views and finding that is not favorable to the applicants;
- c) Comply with the abovementioned Act, its Regulations, Guidelines and other applicable laws.

I also declare that there is, to my knowledge, no information in my possession that reasonably has or may have the potential of influencing-

- I. any decision to be taken with respect to the application in terms of the Act and its Regulation; or
- II. the objectivity of this report, plan or document prepared in terms of the Act and its Regulations.

Mr. David Aiyambo



Environmental Assessment Practitioner



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List of Acronyms

AIDS	Acquired immune deficiency syndrome
Covid19	Coronavirus disease 2019 (COVID-19) is an infectious disease caused by severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2)
EA	Environmental Assessment
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
ECO	Environmental Control Officer
EMA	Environmental Management Act
ESMP	Environmental & Social Management Plan
FEAR	Final Environmental Assessment Report
GTZ	Gesellschaft für Technische Zusammenarbeit
HEEC	Healthy Earth Environmental Consultants CC
HIV	Human immunodeficiency virus
MEFT: DEA	Ministry of Environment, Forestry and Tourism: Department of Environmental Affairs
MHSS	Ministry of Health & Social Services



Executive summary

Background

Khan Property Development Group (Pty) Ltd intends partnering with the Usakos Town Council to develop the land outlined in red on the Google Earth extract below, for low income residential purposes. The land is formally part of Portion 455 of Usakos SUD No 41. Khan Property Development Group (Pty) Ltd propose to purchase the land from the Council, and to administer all the necessary planning, surveying and engineering steps to create a new quality housing development that will complement the adjacent Usakos Township. The bulk infrastructural services will be constructed and individual erven sold either on a plot and plan basis, or with the units included.



Figure 1: Locality of the proposed Usakos Extension, in Erongo Region (Google Earth, 2020)

Health Earth Environmental Consultants CC (HEEC) has undertaken the environmental assessment process, required in terms of the Environmental Management Act (2007) on behalf of Khan Property Development Group (Pty) Ltd. This involves identifying all potential ecological and social impacts related to the project and recommending ways to address them.



Tasks of the study

Our work involved communicating with the adjacent community (Usakos) and the current parties that stay next to development land. We also enquired from the Usakos Municipality, TransNamib and other authorities whether they have any comments that need to be considered during the study. Inputs have been incorporated in the study and outcome, which is this report.

We also conducted a basic baseline study using secondary sources, experiences about the area and inputs from the Town Planner on the project, Mr. Barrie Watson. We considered applicable legislation applicable in the area which informs the environmental and social obligations of the developer. These were incorporated into the Environmental and Social Management Plan.

Findings

The following potential impacts are the key ones that have been identified as they relate to the various phases of this housing project.

Planning Phase

- The complaints from the neighbors that the place has now become a dumpsite for some of the people living in the vicinity and some community members are making use of the place of scrap yard. The place is very much open for crime and house break thieves can easily come from the back side.
- Loss of opportunity to accommodate ultra-low-income clients on the site. There is ample planning for new ultra-low-income sites which are affordable. However, progress seems to be slow, leaving many households without land to settle on. This issue is not as a result of this particular project and needs to be addressed at a higher level. This report may only serve as encouragement to press on with the ultra-low-income land and housing projects.



Construction Phase

- Hydrocarbon spills, sewerage leakages that end up in the environment and the run-off. This needs to be managed by means of strictly abiding to the accompanying ESMP during construction.
- Increased water demand and additional pressure on already over utilized water resource (Omdel Scheme). Water saving measures are important as part of the housing development as detailed in the ESMP.
- Social impacts, including job creation, informal settlement, increased HIV/AIDS, risk of infection from the current Covid19 pandemic, increased disorderly unhygienic markets, safety and security issues. These matters are addressed in the ESMP.
- General waste, soil pollution, noise, dust, traffic congestion, etc. during construction. These matters are addressed in the ESMP.

Operational Phase

- Reduces pressure on low to medium income housing demand.
- Hydrocarbon spills, sewerage leakage that end up in the environment and the run-off. These matters need to be addressed in the maintenance plan of the Municipality and for the area and as per the Usakos Environmental Management Plan.
- Increased water demand and additional pressure on already over utilized water resources (Omdel Scheme). Prepaid water metering technology should be introduced in the design phase, leakage managed, and water demand management must be introduced. These matters are addressed in the ESMP.
- Increase accidents at the railway line involving vehicles and pedestrians. TransNamib has indicated that sufficient barriers must be erected between the railway line and the housing development to prevent accidents, especially involving children. TransNamib has indicated that no new level crossing will be allowed alongside the extension.

Should the environmental clearance certificate (ECC) be issued, it will be valid for three years. With the renewal it should be proven to the Ministry of Environment, Forestry and Tourism: Department of Environmental Affairs (MEFT: DEA) that the above matters have been adequately dealt with.

The other matters are being dealt with in the Environmental and Social Management Plan for planning construction. The Usakos EMP & Town Plan should include this area in its operational phase, i.e. the services and amenities maintenance phase, which is the responsibility of the Usakos Municipality.



METHODOLOGY

The initial screening of the potential ecological and social risks of this project revealed that sufficient information was expected to successfully answer all questions and explain all issues to the satisfaction of the authorities and interested and affected parties. All potential impacts were readily understood without the need for specialists' investigations.

Focus was given to potential social impacts, particularly the fate of those currently leasing on the site.

Otherwise the desk study work was conducted, to understand the bio-physical and socio-economic context.

Interaction with engineering and planning teams allowed the consultant to understand the project and the technical solutions proposed for the development. These were assessed in relation to the bio-physical and socio-economic baseline.

LEGAL REQUIREMENTS

In terms of 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 which apply to the proposed project

Activity description and No(s):	Description of relevant Activity	The portion of the development as per the project description that relates to the applicable listed activity
Activity 10.1 (a) (Infrastructure)	The construction of – Oil, water, gas and petrochemical and other bulk supply pipelines.	The proposed project includes the installation of bulk municipal services
Activity 10.1 (b) (Infrastructure)	The construction of – Public 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.

This environmental assessment process therefore deals with not only the proposed township, but with the infrastructure associated with it.



The Developer is responsible for the direct capital costs for the construction of water, sewer and electrical infrastructure within the extension, up to existing services it connects to and for upgrades to these existing services if the supply is found incapable of handling/ supplying the added flow/ use. The EA covers the entire infrastructure required for the development, as well as the highlighted issues that were discussed on site with the Municipal representatives of the infrastructure connections.

Even though the development will contribute to the Town's bulk infrastructure (water reservoir, sewerage treatment works, electricity substations and associated bulk distribution networks) these fall outside of the ambit of this Environmental Impact Assessment and its Environmental Management Plan which will become mandatory and legally enforceable during implementation.

The scope of the EIA therefore covers the internal services of the estate as well as the water, sewer and electrical connections up to the existing municipal infrastructure.



1. PROJECT DESCRIPTION

1.1 WHY THE PROPOSED USAKOS EXTENSION?

The rationale for this development is being put forward as proposed in the Town Planning Report of the Development, as follows. The Usakos Municipality is struggling to keep up with the provision of serviced land, to meet the demand for the sites according to economic and population growth. There has been a population increase of 70 % in 10 years, which makes land delivery a major challenge. The most crucial concern is the provision of serviced even for residential and particularly low-income development.

The mining & farming industry in the inland, which has grown exponentially, created jobs and expectations for job opportunities, this has contributed to a growing population in the town. People move to Usakos from rural areas and surrounding smaller towns in the hope of finding work. The town is also developing due to its attraction for retirees and tourism.

The Municipality of Usakos is therefore partnering with private entities such as Khan Property Development Group (Pty) Ltd to provide for this growing demand in housing.

Table 1: List of triggered activities identified in the EIA Regulations which apply to the proposed project

Activity description and No(s):	Description of relevant Activity	The portion of the development as per the project description that relates to the applicable listed activity
Activity 10.1 (Infrastructure) (a)	The construction of – Oil, water, gas and petrochemical and other bulk supply pipelines.	The proposed project includes the installation of bulk municipal services
Activity 10.1 (Infrastructure) (b)	The construction of – Public roads.	The proposed project includes the construction of roads.
Activity 10.2 (Infrastructure) (a)	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.



1.2 THE SITE

The applicable land is formally known as the Remainder of Portion 455 of Usakos SUD No 41. The land is approximately 26 Hectares in extent. It is located on the eastern edge of the existing Usakos Township adjacent to the railway line. The area south of the railway line accommodates the Usakos industrial area. The land in between these already developed areas has great potential but is currently largely underutilized. It is in state of neglect and could be put to better use, i.e. as a residential extension of the existing development in the area.

1.3 THE DESIGN PROPOSALS

The proposal is to develop a mix of low income single residential and high-density residential erven (i.e. for apartment blocks). See Figure 2.

The various sites and their land uses proposed are as follows:

As highlighted in the Town Planning Report, the preliminary or estimated breakdown of the extension as follows:






 <p>Yelkos Namibia Consulting Engineers (Pty) Ltd PO Box 9993, 24 Dr K. Riruako Street, Windhoek; 061 223004</p>	<p>Ref. Usakos & A. Marsh Author: BPW Revision: 2nd draft Date: 190326 Scale: Approx. 1:5,000 on A4 size paper</p>	<p>Legend Green = 5 Public Open Space Yellow = 312 Residential Orange = 3 General Res Light Blue = 1 Business Dark Blue = 1 Lodge Brown = 1 Institutional Total erven = 323</p>	<p>Title: PROVISIONAL LAYOUT FOR USAKOS EXT. Pre-contour design. Preliminary numbers – see list</p>
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Figure 2: The proposed development mix of the extension in Usakos.

Area of Township:	26 ha
Area of Streets:	2.9 ha
Single residential stands of app.300m ² each	312
High Density residential stands (1 dwelling per 100m ² allowing for 352 units)	3.52ha
Commercial land	0.25 ha
Parks stands	1.5 ha



As shown in the Town Planning Report, some of the key elements of the township are as follows:

- The proposal complies with the Usakos Structure Plan, which designates the area zoned as a residential site.
- Another business erf is added to existing commercial node, to strengthen it.
- The high-density residential erven are placed in the vicinity of the business area.
- The main road through the area will be tarred or interlocked and serve for public transport and as an improved taxi route.
- Open space is provided in compliance with national standards. A total of 1.5 ha being included which is spread over 6 sites.
- The developer intends constructing affordable houses. Please refer to Figure 3 following for a similar product offered on a previous project.

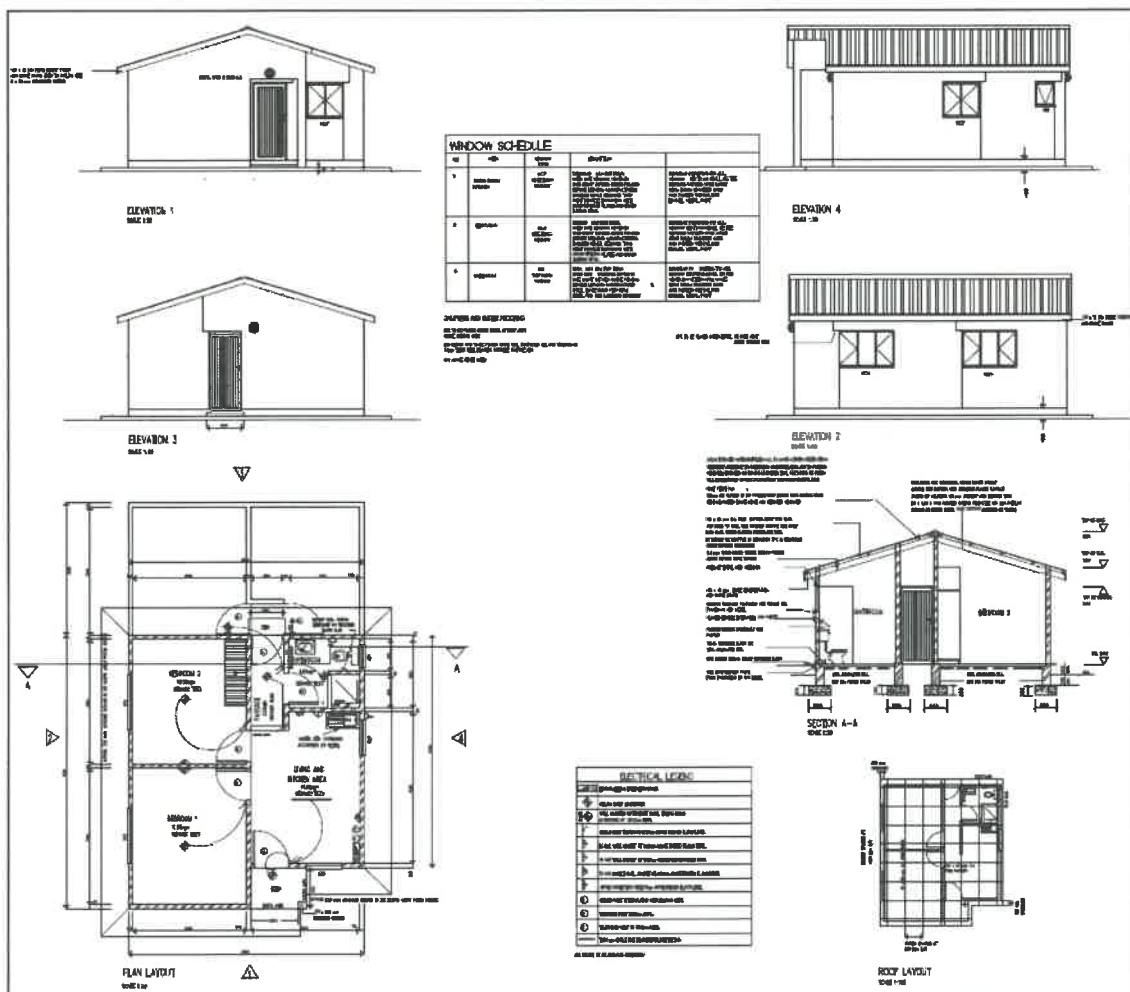


Figure 3: Affordable housing example



The zonings to be allocated are according to the Usakos Town Planning Scheme, which determines the land use rights (primary uses, consent uses, parking requirements, density, bulk, etc.) for each property.

1.4 PROPOSED SERVICES

The adjacent Usakos Township (Extension 1) is fully serviced. These existing services can be extended to Extension 2. Water and sewer services will be linked to the existing reticulation network.

The services proposed will be discussed in principle in the Bulk Services Statement when being undertaken. The arrangements and discussions between the Developer's Engineer and the Usakos Town Council will be highlighted here.

1.4.1 Water supply

The water supply network will be designed according to standards by the Developer's Engineer when all the site data is available. These include topography, town planning, water pressure at proposed connection position, water supply, etc.

The information base to be used for the design of water systems includes the following general specifications:

- Guidelines for Human Settlement, Planning and Design (Red Book)
- SANS 1200: Standardized Specification for Civil Engineering Construction

The Town Council indicated a proposed connection position to the existing reticulation as well as confirmed that the supply is intact. However, the supply and demand should be analyzed to determine whether the connection provides sufficient supply and pressure towards Usakos Extension 2.

The water reticulation network to be constructed, will vary between bulk lines, normally uPVC pipes of 90-200mm diameter, and internal reticulation towards the various units of 63mm. Valves will be constructed at various locations to enable servicing of the network. House connections to be provided from the main reticulation.

The layout and design will be done to ensure that the supply and location of fire hydrants comply with the standards in the above documentation as well as municipal requirements.

If found that the supply towards the extension is weak, proposals will be made to the municipality involving upgrading of pump stations, elevated storage tanks etc. to cater for peak flow.

1.4.2 Sewerage

There is an existing sewer line running north of the proposed development along the river towards the municipal treatment works. Extension 2's sewer, based on the site topography, will connect to this line via 2 main lines. Both situated in the natural watercourses.

The size, slope, layout will be finalized once the topographic survey is available and town planning completed. If found necessary, the existing municipal line in the river will have to be upgraded to accommodate the additional flow.

Internal sewer reticulation will be designed according to the following standards:



- Guidelines for Human Settlement, Planning and Design (Red Book)
- SANS 1200: Standardized Specification for Civil Engineering Construction

The Engineer recommends that if possible, lines be constructed midblock, and where not in the road reserves.

The existing ponds and treatment facility will be evaluated to handle the additional load from extension 2.

1.4.3 Stormwater

As mentioned above, there are 2 natural rivers flowing through the proposed development. The design approach will be to accommodate natural and surface flow towards these water courses as most feasible.

Culverts will be constructed at the river crossing. These will be designed in line with:

- Drainage manual 5th edition (SANRAL)
- SANS 1200: Standardized Specification for Civil Engineering Construction

1.4.4 Road network

The roads approach will be as follows:

- To have a surfaced (interlock or bitumen) main road throughout the extension.
- The secondary roads connecting to this main road will be gravel surface due to the affordable occupancy and light vehicle traffic expected.

The following information base to be used for roads design:

- Guidelines for Human Settlement, Planning and Design (Red Book)
- SANS 1200: Standardized Specification for Civil Engineering Construction
- Draft UTG2 – Structural Design of Segmental Block Pavements for Southern Africa
- Draft TRH 4: 1996 – Structural Design of Flexible Pavements for Interurban and Rural Roads
- South African Road Traffic Signs Manual.

The roads vertical profile will mostly be designed to have the finished road surface on natural ground level, and horizontally within the town planning layout.

These designs will only be finalized once the town planning layout is registered and the topographical survey available.

1.4.5 Electricity

The new development is adjacent to Usakos Extension 1. To the south of Extension 1 and to the East, there is an existing overhead electrical line, which is located in an electrical servitude. It is assumed that these existing lines will have sufficient capacity to supply the expected demand of Extension 2. This needs to be confirmed with Erongo RED as part of a formal application process, together with proposed sub-station positions, kiosks and daily demand.




The electrical network will comprise of above-ground or underground Medium-Voltage and Low-Voltage reticulation pending on ErongoRed and Municipal approval and to their standards.

The final design and layout will be done when the town layout has been finalized.



The proposed layout of the Usakos Extension



 <p>Tebos Namibia Consulting Engineers (Pty) Ltd PO Box 3993, 24 Dr K. Riruako Street, Windhoek; 061 223004</p>	<p>Ref. Usakos & A. Marsh Author: BPW Revision: 2nd draft Date: 190326 Scale: Approx. 1:5,000 on A4 size paper</p>	<p>Legend Green = 5 Public Open Space Yellow = 312 Residential Orange = 3 General Res Light Blue = 1 Business Dark Blue = 1 Lodge Brown = 1 Institutional Total erven = 323</p>	<p>Title: PROVISIONAL LAYOUT FOR USAKOS EXT. Pre-contour design. Preliminary numbers – see list</p>
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2. TOWN PLANNING PROCESS

The land in question is made up of several portions that need to undergo subdivisions and consolidations before the process of Township Establishment can be followed in terms of the Subdivision of Land Ordinance. The necessary applicants for these processes are being submitted first to the sitting Municipality of Usakos, followed by submissions to the Namibia Planning Advisory Boards and the Townships Board. The Boards consider matters such as the need and the desirability of the project, and the various standards for creating a safe, healthy and convenient residential township.

Once these approvals have been obtained, the new township will be surveyed and submitted to the Surveyor General for the opening of a new township register which contains the new erven. Each erf will have its own Title Deed which will be transferred to the owners.



3.0 LEGAL AND REGULATORY REQUIREMENTS

This section provides a review summary (Table 2) of applicable environmental legislation pertaining to the project, both international and national.

3.1 LEGAL INSTRUMENTS

Table 2: Relevant provisions from applicable legal instruments

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO PROJECT
The Constitution of the Republic of Namibia as Amended	Article 91 (c) provides for duty to guard against “the degradation and destruction of ecosystems and failure to protect the beauty and character of Namibia.” Article 95(l) deals with the “maintenance of ecosystems, essential ecological processes and biological diversity” and sustainable use of the country's natural resources.	Sustainable development should be at the forefront of this development.
Environmental Management Act No. 7 of 2007 (EMA)	Section 2 outlines the objective of the Act and the means to achieve that. Section 3 details the principle of Environmental Management	The development should be informed by the EMA.
EIA Regulations GN 28, 29, and 30 of EMA (2012)	GN 29 Identifies and lists certain activities that cannot be undertaken without an environmental clearance certificate. GN 30 provides the regulations governing the environmental assessment (EA) process.	Activity 10.1 The construction of public roads Activity 10.2 The route determination of roads and design of associated physical infrastructure where – it is a public road
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.
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.
Township and Division of Land Ordinance 11 of 1963	The Townships and Division of Land Ordinance regulates subdivisions of portions of land falling within a Local Authority area	In terms of Section 19 such applications is to be submitted to the Namibia Planning Advisory Board (NAMPAB)
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 has to 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	<ul style="list-style-type: none"> • Section 3.1 deals with width of proclaimed roads and road reserve boundaries • Section 27.1 is concerned with the control of traffic on urban trunk and main roads • Section 36.1 regulates rails, tracks, bridges, wires, cables, subways or culverts across or under proclaimed roads • Section 37.1 deals with Infringements and obstructions on and interference with proclaimed roads. 	Adhere to all applicable provisions of the Roads Ordinance.
Public Health Act no 36 of 1919	Section 119 prohibits persons from causing nuisance.	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 have to be managed within the legal confines.



Usakos Planning Ordinance 18 Of 1954	Subdivision of land situated in any area to which an approved Town Planning Scheme applies must be consistent with that scheme	The land uses of the area need to be considered vs the impact the road alignment would have on them
Usakos Town Planning Scheme	Various Town Planning regulations to be met, i.e. density, parking, land use, nuisances, health issues etc. The Municipality has the responsibility to oversee the entire scheme in the new township	Include specific environmental specifications in the Environmental & Social Management Plan.

The most important legal instrument for this project includes those which provide health and safety provisions. These provisions have all been included in the Environmental & Social Management Plan.

It should further be noted that the Environmental Management Act currently requires that projects be submitted to the department of Environmental affairs every 3 years. Should this project not be implemented within 3 years, a renewal process will be due.

3.2 REGULATORY PLANNING INSTRUMENTS

The Usakos long term plan, it indicates what the town intends doing with currently open land uses they are to provide on each. The current site is an undesignated portion of land that naturally extends from the existing Usakos townlands boundaries. It does not have a future zoning but is indicated in the same notation as existing under Usakos jurisdiction.



4. SOCIO ECONOMIC STATUS QUO

4.1 Land use

The site lies enveloped between the existing residential area of Usakos (Bo DORP), which is lower end cost housing, towards the west, south-west and north-west. The railway line to the east marks the border between the residential area and the light industrial zone beyond it. This area is currently used as a dumping site by some of the irresponsible community members.





Figure 4: The existing land parcel for the proposed establishment of a new housing extension in Usakos.



4.2 Salient socio-economic features of the Erongo region

According to the projections of the 2011 National Housing and Population Census, the Erongo Region has an estimated population of 189 014 people. The growing rate is likely to have increased since 2011 due to recent growth spurts, so this figure is likely to be conservative. The Erongo region counted 44,900 households in 2011 at an average size of 2.6 people per household, while in 2001 the region had 27,496 households at an average size of 3.8.

This growth can be attributed to a number of pull factors to the region. These include the fishing industry, mining activities, and more recently, the Erongo Region uranium rush', resulting from the renewed interest in nuclear energy. Even more recently, the town of Walvis Bay is expanding in order to cater for the new harbor development and the container terminal expansion project.

Usakos has also grown considerably to cater for the additional housing and ancillary facilities related to the growing mining, tourism and retirement accommodation sectors. In 2011, the employment rate for the labour force (71 percent of those 15+) was 66 percent employment and 34 percent unemployment. For those 15+ years old and not in labour force (24 percent), 35 percent were students, 34 percent homemakers, and 31 percent retired.

The population figures for Usakos underwent a staggering 70% increase from 2001 to 2011, from 23808 to 44725. This does not include the growth spurt which came after the 2011 census. Consequently, the Usakos Municipality faces a tremendous challenge to provide infrastructure and serviced sites to cater for the new households in need of housing that accompany the population and economic growth. There is also need for business and industrial sites, but the greatest need is residential provision. Erven are also urgently needed to support the Government's mass housing drive.

Mr. Watson, the project's Town Planner, explains further as follows (pers. Comm.,2017):

"Usakos is targeted for a major economic boost. This will exacerbate an existing housing shortage. Of greatest importance for addressing the backlog is the need to locate new development near to the town centre where the short distance and mutual interaction will reinforce economic development. It better integrates the older town with a newer community and without any transport issues because of relative proximity. New housing serves to address the housing crisis and supports new investments in industrial and business sites."

According to a survey commissioned by the Municipality and conducted by WINPLAN, 5 824 backyard shacks were registered throughout Usakos. The settlement area as comprised of 1973 structured in April 2010. A large but uncertain number of households are squeezed into shared accommodation because of the lack of decent alternatives. In the whole of Usakos the



backlog in serviced sites is estimated to be around 8000 erven. Usakos Municipal Council has resolved to become more proactive and to prepare layouts for ready servicing with infrastructure as and when funds become available. All forward planning is being done in accordance with a Structure Plan and a development plan that is amended from time to time according to the vision and needs of the town. Regular sale of serviced sites in itself releases funds for investment in infrastructure to further unserviced sites. Having a plentiful supply will aid the home seeker and replenish the market.

The other reality is that affordability levels are diminishing. While there are no figures available for this, reports from the community (from meeting held on 09 April 2020), it is clear that infrastructure and housing provided is not affordable to many, if not the majority. Experience has shown that the low-income sector cannot afford a fully serviced erf, let alone a serviced erf with a house. There seems to be a big drive to provide lower income residential areas. However, it is not certain how affordable these areas will be for the ultra-low-income group entering the town with the lowest of incomes who can hardly afford their daily bread.

The table below provides the significant socio-economic features of Usakos and the region.

Table 3: Socio- economic sensitives

Environmental feature	Description	Sensitivities/ opportunities
Job creation	Usakos is one of the small town main magnets for employment seekers	Job opportunities during construction – direct employment and contractors. Informal settlement and business near construction activities.
The Corona/Covid19 virus pandemic	Due to the prevalence of the covid19 virus, the Erongo region has been placed under lockdown stage 1 to contain the spread of the transmission. Emphasis is on basic health precautions, especially frequent handwashing with soap and water, or an alcohol-based hand sanitizer if soap and water are unavailable.	Once the covid19 virus has been contained or a vaccine is developed the lockdown restrictions in the Erongo region will be eased and thereby allowing the construction activities to be undertaken.



	Practice good coughing/sneezing etiquette (i.e., covering coughs and sneezes with a disposable tissue, maintaining distance from others, and washing hands).	
HIV/AIDS	Declined from peak prevalence in the past	Continued contribution of construction projects to the spread of HIV/AIDS. In response to the threat the pandemic poses, MEFT has developed a policy on HIV and AIDS. This policy, which was developed with support from USAID, GTZ and the German Development Fund, provides for a non-discriminatory work environment and for workplace programs managed by a Ministry-wide committee. The MEFT has also recently initiated a programme aimed at mainstreaming HIV and gender issues into environmental impact assessments.
Land delivery and housing	Limited housing and serviced land, increased informal settlement and socio-economic disparities. There is a vast number of erven created for ultra-low oncome group.	Opportunities to provide housing to the low-income bracket Ultra-low-income bracket not assisted through this project, but they can get assistance through the other municipal projects, although these may still be unaffordable to many.



Past and existing land use	The land is use as the dumping site by the community.	The site will be used in the further for development purpose
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4.3 SUMMARY OF ISSUES

The issues listed here are based on the experience of the consultant, coupled with comments/questions raised during consultation.

- The housing demand is addressed for the low to medium income community.
- The site, currently some unlawful sub-lessees, will be upgraded to provide an improved environment from a visual, functional and security point of view.
- The low to ultra-low-income component of the community is not assisted through this project
- TransNamib, who manages the adjacent railway line, contributed the following safety and technical concerns:
 - Since it will be a high-density residential area, adequate measures should be in place in order to keep people, especially children from the track (e.g. fencing or boundary walls).
 - There should be no increase in storm water runoff towards the railway reserve.
 - No new or temporary level crossing will be allowed
 - Permission for services crossing the railway reserve or track should be sought timeously from TransNamib.

4.3.1 COVID19 Regulations

- Construction companies are required to train employees on the correct use of personal protective equipment, to provide hand sanitiser at site entrances and exits, and to clean and sanitise surfaces.
- Construction workers are also obligated to implement safety measures typically withheld for responses to disasters.
- These include compliance with laid out regulations & working alongside recommendations from the country's department of health, department of employment and labour, and the World Health Organisation, to limit the spread of the virus as much as possible.



- The objective of these guidelines is to assist employers as far as reasonably practicable to establish and maintain a Covid-19 prevention, mitigation and management programme.
- This is to ensure that construction employees returning to work, and any other persons at the site, are protected from transmission of the Coronavirus at the workplace, and, where reasonably practicable, in the community, whilst providing guidance to all stakeholders regarding their roles and responsibilities in the management of the virus.
- Failure to comply with these regulations is considered a criminal offence, and could see the property developers charged should they be found guilty of failing to implement the rules.

Property developers are now obligated to implement a code of practice that complies with “any relevant guidelines and instructions issued by [the] government”, according to the MoHSS, and names a number of specific regulations mining companies must follow in order to continue operating as the Covid19 pandemic evolves.

Other generic issues regarding the development include influx of job seekers, security and nuisance issues with the neighbors during construction, waste management and pollution issues typical of construction projects.

There are no specific bio-physical sensitivities on the site that cause alert to potential impacts of concern other than these generic issues to be addressed in the ESMP.



5. CONCLUSION AND RECOMMENDATIONS

The purpose of this Chapter is to briefly summarise and conclude the FESR and describe the way forward. The following key potential impacts have been identified as they relate to the various phases of this housing project.

5.1 Planning Phase

- Loss of opportunity to accommodate ultra-low-income clients on the site. There is ample planning for new ultra-low-income sites which are affordable. However, progress seems to be slow, leaving many households without land to settle on. This issue is not as a result of this particular project and needs to be addressed at a higher level. This report may only serve as encouragement to press with the ultra-low-income land and housing projects.

5.2 Construction Phase

- Hydrocarbon spills, sewerage leakage that end up in the environment and the runoff. This needs to be managed strictly according to the ESMP during construction.
- Increased water demand and additional pressure on the existing network. Water saving measures are important as part of the ESMP.
- Social impacts, including, job creation, informal settlement, risk of contamination of the Covid19 virus, increased HIV/AIDS, increased disorderly unhygienic markets, and safety and security issues. These matters are addressed in the ESMP.
- General waste, soil pollution, noise, dust, traffic congestion, etc. during construction. These matters are addressed in the ESMP.

5.3 Operational phase

- Reduces pressure on low to medium income housing demand.
- Hydrocarbon spills, sewerage leakages that end up in the environment and the runoff. These matters need to be addressed in the maintenance plan of the Municipality and for the area and as per the Usakos Environmental Management Plan.
- Increases water demand and additional pressure on already over utilized water resources (Omdel Scheme). Water saving technology should be introduced in the design phase, leakages management, and water demand management introduces. These matters are addressed in the EMP.
- Increased accidents at the railway line involving vehicles and pedestrians. TransNamib has indicated that sufficient barriers must be erected between the railway line and the



housing development to prevent accidents especially involving children. TransNamib has indicated that no new level crossings will be allowed in the area.

Should the environmental clearance certificate (ECC) be issued, it will be valid for three years. With the renewal it should be proven to the Ministry of Environment, Forestry and Tourism: Department of Environmental Affairs (MEFT: DEA) that the above matters have been adequately dealt with.

The other matters are being dealt with in the Environmental and Social Management Plan for planning construction. The Usakos EMP & Town Plan should include this area in its operational phase, i.e. the services and amenities maintenance phase, which is the responsibility of the Usakos Municipality.

5.4 LEVEL OF CONFIDENCE IN ASSESSMENT

With reference to the information available at the project planning cycle, the confidence in the environmental assessment undertaken is regarded as being acceptable for the decision-making, specifically in terms of the environmental impacts and risks. The Environmental Assessment Practitioner believes that the information contained within this FESR is adequate to allow MEFT: DEA to be able to determine the environmental acceptability of the proposed project.

It is acknowledged that the project details (especially in regards to the additional municipal service infrastructure construction) will evolve during the detailed design and construction phases. However, these are unlikely to change the overall environmental acceptability of the proposed project and any significant deviation from what was assessed in this FESR should be subject to further assessment. If this was to occur, an amendment to the Environmental Authorisation may be required in which case the prescribed process would be followed.

5.5 MITIGATION MEASURES

With the implementation of the recommended mitigation measures in Chapter 4 as well as in the EMP, the significance of the construction and operational phase impacts is likely to be reduced to a Low (negative). It is further extremely important to include an Environmental Control Officer (ECO) on site during the construction phase of the proposed project to ensure that all the mitigation measures discussed in this report and the EMP are enforced.



It is noted that where appropriate, these mitigation measures and any others identified by MEFT: DEA could be enforced as Conditions of Approval in the Environmental Authorisation, should MEFT: DEA issue a positive Environmental Authorisation.

5.6 OPINION WITH RESPECT TO THE ENVIRONMENTAL AUTHORISATION

Regulation 15(j) of the EMA, requires that the EAP include an opinion as to whether the listed activity must be authorised and if the opinion is that it must be authorised, any condition that must be made in respect of that authorisation.

It is highly recommended that this proposed project be authorised as this will meaningfully contribute to the diversification of the local economy of Usakos and therefore it is of high importance to the town. The development will also create additional job opportunities and as such will indirectly contribute to the social uplifting of a number of households residing within the proclaimed urban area of Usakos. Furthermore, the Usakos Municipal Council will benefit from the development through rates and taxes income to be levied on the newly created properties while positively contributing to the development of Usakos by following a visionary and well managed planning and development strategy. The significance of the social impact was therefore deemed to be High (positive).

The “no go” alternative on the other hand was deemed to have a High (negative) impact, as all the social benefits resulting from intended activities would not be realised.

The significance of negative impacts can be reduced with effective and appropriate mitigation provided in this report and the EMP. If authorised, the implementation of an EMP should be included as a condition of approval.

5.7 WAY FORWARD

The Final Environmental Scoping Report is herewith submitted to MEFT: DEA for consideration and decision making. If MEFT: DEA approves or requests additional information / studies all registered I&APs and stakeholders will be kept informed of progress throughout the assessment process.

