THE PROPOSED CLOSURE OF PORTION A OF ERF 1518 TSEIBLAAGTE, EXTENSION 2 AS 'PUBLIC OPEN SPACE AND REZONING OF PORTION A FROM PUBLIC OPEN SPACE TO RESIDENTIAL 2 WITH A DENSITY OF 1:150M2 IN KEETMANSHOOP, //KARAS REGION-NAMIBIA



ENVIRONMENTAL SCOPING REPORT (ESR)

Prepared By:



APP-002157

PROJECT	ENVIRONMENTAL SCOPING ASSESSMENT (ESA) FOR THE PROPOSED CLOSURE OF
TITTLE:	PORTION A OF ERF 1518 TSEIBLAAGTE, EXTENSION 2 AS 'PUBLIC OPEN SPACE AND
	REZONING OF PORTION A FROM PUBLIC OPEN SPACE TO RESIDENTIAL 2 WITH A
	DENSITY OF 1:150M2 IN KEETMANSHOOP, //KARAS REGION-NAMIBIA
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Definitions

TERMS	DEFINITION
BID	Background Information Document
EAP	Environmental Assessment Practitioner
ECC	Environmental Clearance Certificate
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
EMP	Environmental Management Plan
GHG	Greenhouse Gasses
ISO	International Organization for Standardization
I&APs	Interested and Affected Parties
MEFT: DEA	Ministry of Environment, Forestry and Tourism's Directorate of
	Environmental Affairs
NHC	National Heritage Council
NEMA	Namibia Environmental Management Act
PRP	Pit Rehabilitation Plan
ToR	Terms of Reference
UNFCCC	United Nations Framework Convention on Climate Change

EXECUTIVE SUMMARY

Plan Africa Consulting cc has been engaged by the Knowledge Solution Consultancy cc, herein referred to as the project proponent, to conduct the Environmental Impact Assessment (EIA) and develop an Environmental Management Plan (EMP) for the proposed closure of portion A of erf 1518 Tseiblaagte, extension 2 as 'public open space and rezoning of portion A from public open space to residential 2 with a density of 1:150m2 in Keetmanshoop, //Karas region-Namibia and to apply for an Environmental Clearance Certificate for the proposed project.

The development project has triggered the application for an environmental clearance certificate as the following listed activity will be triggered by:

LAND USE AND DEVELOPMENT ACTIVITIES

-Closure of public open space and rezoning of a public open space to residential use.

Environmental Impacts

- -Low potential environmental impact.
- -Relative or moderate social impact (positive)

Social Impacts

The project is set to improve the socio-economic environment of Keetmanshoop through a major boost in business through affordable accommodation and employment creation.

1. CHAPTER ONE: BACKGROUND

1.1. INTRODUCTION

units.

The proponent, Knowledge Solution Consultancy cc, prospective owner of portion A of ERF 1518 Tseiblaagte, intends to invest in the housing sector in Keetmanshoop. Background to which the Keetmanshoop Town Council recommended that Erf 1518 be subdivided into a portion and Remainder and at least 30% of the erf be remain public open space. The Portion A of Erf 1518, be rezoned to "residential 2" for high density residential development. The process should be preceded by the closure of the portion as "public open space". The rezoning of the respective Portion A to general residential would enable the prospective owner and developer to construct 34 residential

Plan Africa Consulting is appointed to undertake an Environmental Scoping Assessment (ESA), formulate an Environmental Management Plan (EMP) and apply for an Environmental Clearance Certificate (ECC) to the Ministry of Urban and Rural Development, Townships Board and Namibia Planning and Advisory Board: Directorate of Environmental Affairs (DEA) for the closure of the public open space.

In this respect, this document forms part of the application to be made to the DEA's office for an Environmental Clearance certificate for the proposed rezoning according to the guidelines and statutes of the Environmental Management Act No.7 of 2007 and the environmental impacts regulations (GN 30 in GG 4878 of 6 February 2012).

1.2. PROJECT LOCATION

Portion A of Erf 1518 is located in "Tseiblaagte" Extension 2 one of the older residential suburbs in the town. The area is relatively flat and thus easy to develop. The erf is located in close proximity of the intersection which links the well- known suburbs of Kronlein and Tseiblaagte. Portion A of Erf 1518 is 5117m² in extent and is reserved as "public open space". (Fig 1) gives an Arial view of the project site



Figure 1:ERF 1518 Locality

1.3. PROJECT DESCRIPTION

Development Proposal & Layout

The Town Council recommended that Erf 1518 be subdivided into a portion and Remainder and at least 30% of the erf be remain public open space. The portion A of Erf 1518, be rezoned to "residential 2" for high density residential development. The process should be preceded by the closure of the portion as "public open space". The rezoning of the respective Portion A to general residential would enable the prospective owner and developer to construct 34 residential units. There is currently a shortage of residential stands in Keetmanshoop.

The intention is to develop quality affordable housing especially for government employees and those of state-owned enterprises.

It is advised that the remainder of Erf 1518 (of the public open space) should remain for sport and recreation and no further subdivisions of the erf be allowed. Fig 2 below shows the proposed subdivision of erf 1518.

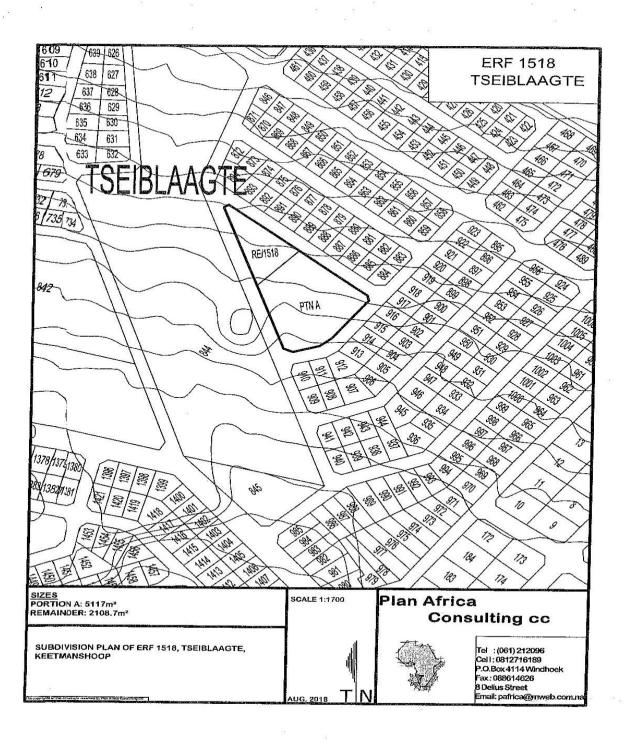


Figure 2: Proposed Closure of ERF 1518, Tseiblaagte-Keetmanshoop

1.4. ACCESSIBILITY

The site is already accessed through 13th Avenue and 27th Street Tseiblaagte.

1.5. TOPOGRAPHY, STORM WATER AND EXISTING USAGE

The area is on flat surface area, thus standard storm water drainage will have to be constructed. Sewage reticulation system will be connected to the existing Town Council infrastructure.

1.6. INFRASTRUCTURE AND SERVICES

Water and electrical services will be linked to the existing town services reticulation networks. The wastewater sanitary system has been designed for the safe handling of liquid waste in the particular inclined landscape scenario.

1.7. **N**EED AND **D**ESIRABILITY

The Od Keetmanshoop experiences an acute shortage of housing. There is however no or very small market demand for the sale of houses because of relatively low affordability levels of communities, and employment insecurity. However there is a need for accommodation in general, especially rental accommodation. The immediate need is therefore rented accommodation, which is affordable. The rezoning of the erf would not only accommodate more people and families but at the same time would make any investment in housing more feasible than the construction of single family houses. The increase density increases the feasibility of the development and the chances of the economic success of the development. The services are used to its full capacity and the cost per unit is therefore kept to the minimum because it would be shared among more dwelling units.

The subdivision, closure and rezoning would not have an adverse effect on the surrounding area, Council should therefore consider the rezoning of erf 1518 Tseiblaagte favorably.

The closure of a portion of the erf is in line with the open space policy of the Municipality of Keetmanshoop and the provisions of the Structure Plan. The public open space is currently wasted for a number of years undeveloped. The open space can now be put in good use. Extension 2 is however covers a sizable area and public open spaces may be needed in future. Its is therefore proposed that the closed and defunct adjacent cemetery be reserved as "public open space" for development for recreation, outdoor activities, leisure, etc. Erf 844 ism² and of a sufficient size for a number of open space related activities., A portion of Erf R/843 the former soccer pitch, can also be reserved as "public open space." There will therefore be no shortage of space for public open space purposes.

1.8. OBJECTIVE OF THIS STUDY

This Environmental Impact Assessment is being undertaken in compliance with the Environmental Management Act No.7 of 2007 and the Environmental Impacts Assessments Regulations (GN 30 in GG 4878 of 6 February 2012). It is a prerequisite by the law to have an Environmental Impact Assessment carried out before the implementation of the prescribed projects as elaborated in the Environmental Impacts Regulations (GN 30 in GG 4878 of 6 February 2012). The main objectives of this study are as follows:

- To identify and provide mitigation measures of the expected impacts of the proposed land development project to protect the environment;
- To brief the Project Proponent of the legal and policy framework govern the proposed activity;
- To identify the possible changes in bio-diversity index that might be because of Project implementation in the area;
- To reflect on the various public concerns which will help the National Environmental Action
 Planners, economist and concerned stakeholders to make decisions;
- To come up with preventative and precautionary measures for the expected physical and biological environmental negative impacts associated with the proposed activities;
- To structure an effective environmental management plan for the sub division and servicing of the land facet to minimise and prevent negative impacts and maximise the positive impacts.

2. CHAPTER TWO: POLICY, LEGAL AND ADMINISTRATIVE FRAMEWORK

2.1. Introduction

An important part of the EIA is identifying and reviewing the administrative, policy and legislative situation concerning the proposed activity, to inform the proponent about the requirements to be fulfilled in undertaking the construction and land servicing activities. This section looks at the legislative framework within which the proposed development will be serviced and operate under.

The focus is on the compliance with the legislation during the planning, construction and operational phases. All relevant legislations, policies and international statutes applying to the project are highlighted in table 2. below as specified in the Environmental Management Act, 2007 (Act No.7 of 2007) and the regulations for Environmental Impact Assessment as set out in the Schedule of Government Notice No. 30 (2012).

Table 1: Applying Policies, Legal and Administrative Regulations

Legislation/Policy/Guiding	Provision	Project implication	
document			
The Constitution of the Republic	The articles 91(c) and 95(i) commits the state to	Through implementation of the environmental	
of Namibia (1990)	actively promote and sustain environmental welfare	management plan the proposed development will	
	of the nation by formulating and institutionalizing	be in conformant to the constitution in terms of	
	policies to accomplish the sustainable objectives	environmental management and sustainability.	
	which include:		
	- Guarding against overutilization of biological natural		
	resources,		
	- Limiting over-exploitation of non-renewable		
	resources,		
	- Ensuring ecosystem functionality,		
	- Maintain biological diversity.		
Vision 2030 and National	Namibia's overall Development ambitions are	The proposed project will increase availability of	
Development Plans	articulated in the Nations Vision 2030. At the	accommodation, an institution and business areas	
	operational level, five-yearly national development	in Keetmanshoop as well as creating employment	
	plans (NDP's) are prepared in extensive consultations	in construction and after construction, which wil	
	led by the National Planning Commission in the Office	be in fulfilment to the NDP and Vision 2030.	
	of the President. Currently the Government has so far		
	launched a 5 th NDP that pursues three overarching		
	goals for the Namibian nation: high and sustained		

	economic growth; increased income equality; and employment creation.	
Environmental Assessment Policy of Namibia 1994	The Environmental Assessment Policy of Namibia requires that all projects, policies, Programmes, and plans that have detrimental effect on the environment must be accompanied by an EIA. The policy provides a definition to the term "Environment" broadly interpreted to include biophysical, social, economic, cultural, historical and political components and provides reference to the inclusion of alternatives in all projects, policies, programmes and plans.	The development establishment will only commence after being awarded an environmental clearance certificate, thus by abiding to the requirements of the Environmental Assessment Policy of Namibia. The EIA and EMP will cater for the sustainable management of bio-physical environment.
Environmental Management	The Act aims at	This document is compiled in a nature that project
Act No. 07 of 2007	 ✓ Promoting the sustainable management of the environment and the use of natural resources by establishing principles for decision-making on matters affecting the environment; ✓ To provide for a process of assessment and control of projects which may have significant effects on the environment; ✓ To provide for incidental matters. The Act gives legislative effect to the Environmental Impact Assessment Policy. 	implementation is in line with the objectives of the EMA Act. Guiding procedures were also drawn from the act to facilitate for the carrying out of the EIA and drafting the EMP for the proposed development.

	Moreover, the act also provides procedure for		
	adequate public participation during the		
	environmental assessment process.		
Public Health Act (No. 36 of	Under this act, in section 119:	The project proponent will ensure that all legal	
1919)	"No person shall cause a nuisance or shall suffer to	requirements of the project in relation to	
	exist on any land or premises owned or occupied by	protection of the health of their employees and	
	him or of which he is in charge any nuisance or other	surrounding residents is protected.	
	condition liable to be injurious or dangerous to	-Personal protective equipment shall be provided	
	health."	for employees in construction.	
		-The development shall follow requirements and	
		specification in relation to water supply and	
		sewerage handling so as not to threaten public	
		health of future residents on this piece of land.	
Soil Conservation Act 76 of 1969	The objectives of this Act are to:	The project will have a rather localized impact on	
	✓ Make provisions for the combating and	soils and on the soil through construction and	
	prevention of soil erosion,	access roads construction hence soil protection	
	✓ Promote the conservation, protection and	measures will be employed and preservation of	
	improvement of the soil, vegetation, sources	trees as much as possible.	
	and resources of the Republic.		
Nature Conservation Ordinance	To consolidate and amend the laws relating to the	The proposed project implementation is not	
1996	conservation of nature; the establishment of game	located in any known or demarcated conservation	
	Parks and nature reserves; the control of problem	area, national park or unique environments. The	
	animals; and to provide for matters incidental thereto.	project site was selected with this ordinance in	

		mind to ensure that Namibian nature is conserved.	
Protected Areas and Wildlife	This bill, when it comes into force, will replace the	The project has ensured that their activities do not	
Management Bill	Nature Conservation Ordinance 4 of 1975. The bill	fall within the boundaries of any protected area	
	recognizes that biological diversity must be	and that the project will not affect heavily	
	maintained, and where necessary, rehabilitated and	endangered vegetation and animals on its site.	
	that essential ecological processes and life support		
	systems be maintained. It protects all indigenous		
	species and control the exploitation of all plants and		
	wildlife.		
Forest Act, 2001 (Act No. 12 of	The Act gives provision for the protection of various	- The proponent will also have to ensure that there	
2001)	plant species through the Ministry of Agriculture,	is no indiscriminate cutting down of trees.	
	Water and Forestry (MAWF), Directorate of Forestry).	-The proposed site is sparsely vegetated with	
		white thorn tree species, which are not	
		threatened or protected.	
National Biodiversity Strategy	The action plan was operationalised in a bid to make	The proponent has been advised by the EIA Team	
and Action Plan (NBSAP2)	aware the critical importance of biodiversity	and recognises the need for ecosystems	
	conservation in Namibia putting together	protection to manage the changing climatic	
	management of matters to do with ecosystems	environment.	
	protection, biosafety, biosystematics protection on		
	both terrestrial and aquatic systems.		

National Policy on Climate	In harmony with the findings of the IPCC over time and	The proposed project will ensure that there will be	
Change for Namibia, 2010	the Earth Summits being held annually the policy seeks	limited release of greenhouse gasses such as	
	to outline a coherent, transparent and inclusive	methane, carbon dioxide, nitrous oxides. Methods	
	framework on climate risk management in accordance	such as wet surface operations to reduce dust	
	with Namibia's national development agenda, legal	emissions will be utilised to remove aerosols	
	framework, and in recognition of environmental	emitted into the near-surface atmosphere.	
	constraints and vulnerability. Furthermore, the policy		
	pursues the strengthening of national capacities to		
	reduce climate change risk and build resilience for any		
	climate change shocks.		
Wetland Policy, 2004	The policy provides a platform for the conservation	In compliance to this policy the development will	
	and wise use of wetlands, thus promoting inter-	ensure a standard environmental planning such	
	generational equity regarding wetland resource	that it does not affect any wetlands within its	
	utilization. Furthermore, it facilitates the Nation's	locale through recognition of wetlands to	
	efforts to meet its commitments as a signatory to the	promote the conservation and wise utilization of	
	International Convention on Wetlands (Ramsar) and	wetlands resources.	
	other Multinational Environmental Agreements		
	(MEA's).		
Water Resources Management	This Act provides for the management, protection,	Water usage during construction will be supplied	
Act, 2013 (Act No. 11 of 2013)	development, use and conservation of water	by Keetmanshoop Town Council.	
	resources and the regulation and monitoring of water		
	services and to provide for incidental matters.		
	(Department of Water Affairs).		

National Heritage Act 27 of	Heritage resources to be conserved in development.	During the project implementation as soon as	
2004	(National Heritage	objects of cultural and heritage interests are	
		observed such as graves, artefacts and any other	
		object believed to be order than 50 years, all	
		measures will be taken protect these objects until	
		the National Heritage Council of Namibia have	
		been informed, and approval to proceed with the	
		operations granted accordingly by the Council.	
National Monuments Act of	"No person shall destroy, damage, excavate, alter,	The proposed site of development is not within	
Namibia (No. 28 of 1969) as	remove from its original site or export from Namibia:	any known monument site both movable or	
amended until 1979	(a) any meteorite or fossil; or	immovable as specified in the Act, however in	
	(b) any drawing or painting on stone or a petroglyph	such an instance that any material or sites or	
	known or commonly believed to have been	archeologic importance are identified, it will be	
	executed by any people who inhabited or visited	the responsibility of the developer to take the	
	Namibia before the year 1900 AD; or	required route and notify the relevant	
	(c) any implement, ornament or structure known or	commission.	
	commonly believed to have been used as a		
	mace, used or erected by people referred to in		
	paragraph (b); or		
	(d) the anthropological or archaeological contents of		
	graves, caves, rock shelters, middens, shell		
	mounds or other sites used by such people; or		

	(e) any other archaeological or palaeontological finds,		
	material or object; except under the authority of and		
	in accordance with a permit issued under this section.		
Pollution Control and Waste	This bill has not come into force. Amongst other the	To control air, water and land pollution as agitated	
Management Bill	bill aims to "prevent and regulate the discharge of	by the Act the project proponent will ensure that	
	pollutants to the air, water and land" Of particular	erven will have approved drainage on site and that	
	reference to the Project is: Section 21 "(1) Subject to	sanitation facilities do not threaten public health,	
	sub-section (4) and section 22, no person shall cause	adding on an integrated pollution management	
	or permit the discharge of pollutants or waste into any	strategy following the EMP and will be	
	water or watercourse."	operationalised on site.	
	Section 55 "(1) No person may produce, collect,		
	transport, sort, recover, treat, store, dispose of or		
	otherwise manage waste in a manner that results in or		
	creates a significant risk of harm to human health or		
	the environment."		
Convection on Biological	Namibia is a signatory of the Convention on Biological	The project will preserve tree species on as part of	
Diversity (CBD)	Diversity and thus is obliged to conserve its	their plans for green and sustainable	
	biodiversity.	development.	
United Nations Convection to	Namibia is bound to prevent excessive land	It will be the responsibility of the developer and	
combat Desertification	degradation that may threaten livelihoods.	future land owners to conserve vegetation on and	
		around the area, to avoid encroachment of the	
		desert environs in the area.	

3. CHAPTER THREE: RECEIVING ENVIRONMENT

3.1. SOCIO-ECONOMIC

The project development is proposed in Keetmanshoop town, and the project site is currently affected by illegal dumping. Keetmanshoop population is approximately 20,977 and the economy of Keetmanshoop depends heavily on farming, tourism and logistics.

The construction team will be based in Keetmanshoop. As with most parts of Namibia, HIV/Aids is also a significant issue in Keetmanshoop, therefore awareness session must be conducted with construction team prior to the start of the project..

3.2. CLIMATE

Classification of climate: The climate in Keetmanshoop is classified as BWh by Köppen and Geiger. It is situated in a semi-desert climate.

Average rainfall: There is virtually no rainfall during the year, in a year, the average rainfall is 231mm.

Temperature: In Keetmanshoop, the average annual temperature is 21.8°C. There is high evaporation and high daytime temperatures.

3.3. TERRESTRIAL ECOLOGY

3.3.1. BIODIVERSITY

The vegetation type of Keetmanshoop town falls within the Nama Karoo biome. The Nama Karoo supports a "varied assemblage of plant communities, ranging from deciduous shrub vegetation to perennial grasslands and succulent shrubs. Although dwarfshrubs dominate, there is a wealth of plant species due to the great variety of geological substrates, soils and landforms" (Mendelsohn et al., 2002). The area is characterised by vegetation of the Karas dwarf Shrub land that is mostly found in Eutric Leptosols and Petric Calcisol soils. The vegetation is dominated by grasslands and low shrubs (Mendelsohn et al., 2002). There is no significant flora found on the proposed site as the site is mostly developed already.

The site is presently developed and as such no large wild animals are expected to be inhabitants except maybe for small rodents and insects that shelter in burrows and under rocks.









Figure 3: Portion 187 Current State and surroundings

Portion Portion A of Erf 1518 is located in "Tseiblaagte" Extension 2 one of the older residential suburbs in the town. The area is relatively flat and thus easy to develop. The erf is located in close proximity of the intersection which links the well- known suburbs of Kronlein and Tseiblaagte. Portion A of Erf 1518 is 5117m² in extent and is reserved as "public open space". The Portion is located in a predominantly residential area and is adjacent to the cemetery.

The cemetery was closed in terms of the local Authorities Act, Act 23 of 1992 and is no longer in use. The community was invited to exhumed their loved ones for reburial. Other land uses in the vicinity are the WK Rover Community Hall, the Mina Sachs Primary School a former soccer field which is still occasionally used, and netball fields.

3.4. Pedology, Geology and Topography

Keetmanshoop is situated within the Nama-Karoo Basin, which is a "large, flat lying plateau which dominates much of southern Namibia. Sedimentary rocks deposited in the Nama Basin and later in the same area in the Karoo Basin form the foundations of the landscape. The basin slopes from the north, where elevations are about 1,400 m above sea level, to the south, where altitudes are approximately 900 m above sea level. The Fish, Löwen and Konkiep rivers drain the landscape, all flowing south to the Orange River" (Mendelsohn, 2002).

The proponent will have to ensure that adequate stormwater drainage is provided for the development, to avoid flooding and damage of roads.

3.5. HYDROLOGY

A reconnaissance level field assessment was conducted to confirm the current conditions in the area and to identify potential hydrologic risks associated with establishment of the proposed township development. The town of Keetmanshoop and a large part of the //Karas Region falls within the Fish river water basin and Fish River catchment area. The town itself has a number of smaller ephemeral rivers, the largest being the Skaap River that runs through the eastern part of town, southwards to the Naute dam. These river systems are sensitive areas and care should be taken that developments do not pollute these resources as it will eventually influence the water quality of the town.

The proposed project development is not anticipated to alter or threaten an river or catchment streams. Pollution prevention during construction will be employed, and this will ensure that waterways re not polluted. In addition, Keetmanshoop is a dry area, and most streams are seasonal.

4. CHAPTER FOUR: PUBLIC CONSULTATION

Public Consultation forms an important component of the Environmental Assessment process. It is agitated for in the EIA Regulations (2012), Section 21 of the Regulations details steps to be taken during a given public consultation process and these have been used in guiding our process.

Formal public involvement has taken place via newspaper adverts, site notice and registering I&APs. The public consultation process has been guided by the requirements of Environmental Management Act (EMA) No. 7 of 2007 and the process has been conducted in terms of regulation 7(1) as well as in terms of the EMA Regulations of GN 30 of 6 February 2012.

4.1. Public consultation activities

The following tasks have been undertaken during public consultation process which started in November 2020.

4.2. IDENTIFICATION OF INTERESTED AND AFFECTED PARTIES (I&APS)

After the scoping process, the EIA team identified I&APs and key stakeholders of the proposed project. The public participation activities to be undertaken for this EIA process were incorporated into the overall approach of the EIA background information. Among key stakeholders identified were Keetmanshoop Town Council and neighbours. Other I&APs could register to the EIA team and a special database created capturing all their names and correspondence details.

4.3. DISTRIBUTION OF BID

A Background Information Document (BID) was distributed on request by I&A Parties and it was distributed to key stakeholders identified during the scoping process. The Background Information Document (BID) provided a description summary of the proposed project, and the project proponent and the whole procedure of the EIA to be followed.

4.4. Public Announcement.

An extensive public announcement was done to make sure the public is aware of proposed development by Plan Africa Consulting cc. The EIA study was announced publicly through the following means:

Table 2: Details on public notifications of the EIA study

Method	Area of Distribution	Language	Date Placed
Confidente	Country Wide	English	05 November 2020
			12 November 2020
New Era	Country Wide	English	05 November 2020
			12 November 2020
Site notices	Keetmanshoop Town Council	English	05 November 2020
	Project Site	English	O5 November 2020





Figure 4: Site Notices on the project site, documents were distributed to surrounding neighbors and door to door consultation was conducted-.

ENVIRONMENTAL SCOPING ASSESSMENT (ESA) FOR THE PROPOSED CLOSURE OF PORTION A OF ERF 1518 TSEIBLAAGTE, EXTENSION 2 AS 'PUBLIC OPEN SPACE AND REZONING OF PORTION A FROM PUBLIC OPEN SPACE TO RESIDENTIAL 2 WITH A DENSITY OF 1:150M2 IN KEETMANSHOOP, //KARAS REGION-NAMIBIA

N.B: The consultant took initiative by consulting all neighbors close to the site. Were there were no people a questionnaire and BID was left in post box. No objections were raised by I&AP in relation to the project. Community members and Keetmanshoop Town council administration were all involved.

5. CHAPTER FIVE: ENVIRONMENTAL AND SOCIO-ECONOMIC IMPACTS

5.1. OVERVIEW

The project proponent is committed to sustainability and environmental compliance through coming up with a corrective action plan for all the anticipated environmental impacts associated with the project. This is also in line with the Namibian Environmental Management legislation and International best practices on township establishment and associated activities.

The proponent shall implement the hereto attached Environmental Management Plan (EMP) in order to prevent, minimise and mitigate negative impacts. The EMP developed by Plan Africa cc to address all the identified expected impacts, the plan will be monitored and updated on a continuous basis, with aim for continuous improvement to addressing impacts.

5.2. IMPACT ASSESSMENT METHODOLOGY

An impact assessment matrix was used to assess all possible impacts of the project on the environment. In line with Namibia Environmental Management Act No. 7 of 2007 and the Environmental Impacts Regulations (GN 30 in GG 4878 of 6 February 2012) with the direction on impacts analysis the following impact assessment criteria was identified by the team and deemed suitable.

Table 3: Impact Screening Criteria

Aspect	Description
Nature	Focuses on the type of effect that the proposed establishment will have on
	environmental components. Addresses questions related to "what will be
	affected and how?"
Extent	Spatial extend of the project and anticipated spatial extend of impacts indicating
	whether the impact will be within a limited area (on site where construction is
	to take place); local (limited to within 15km of the area); regional (limited to
	~100km radius); national (extending beyond Namibia's boarders).
Duration	This looks at the temporal issues pertaining to time frames e.g. whether the
	impact will be temporary (during construction only), short term (1-5 years),

	modium town (F. 10 years) langtown (langua then 10 years but will some offer
	medium term (5-10 years), long term (longer than 10 years, but will cease after
	operation) or permanent.
Intensity	Establishes whether the magnitude of the impact is destructive or innocuous
	and whether it exceeds set standards, and is described as none (no impact); low
	(where natural/ social environmental functions and processes are negligibly
	affected); medium (where the environment continues to function but in a
	noticeably modified manner); or high (where environmental functions and
	processes are altered such that they temporarily or permanently cease and/or
	exceed legal standards/requirements).
Probability	Considers the likelihood of the impact occurring and is described as uncertain,
	improbable (low likelihood), probable (distinct possibility), highly probable
	(most likely) or definite (impact will occur regardless of prevention measures).
Significance	Significance is given before and after mitigation. Low if the impact will not have
	an influence on the decision or require to be significantly accommodated in the
	project design, Medium if the impact could have an influence on the
	environment which will require modification of the project design or alternative
	mitigation (the route can be used, but with deviations or mitigation) High where
	it could have a "no-go" implication regardless of any possible mitigation (an
	alternative route should be used).

The application of the above criteria will be used to determine the significance of potential impacts using a combination of duration, extent, and intensity/magnitude, augmented by probability, cumulative effects, and confidence. Significance is described as follows:

Table 4: Impact Rating Criteria

Significance Rating	Criteria
Low	Where the impact will have a negligible influence on the
	environment and no modifications or mitigations are necessary
	for the given development description. This would be allocated
	to impacts of any severity/ magnitude, if at a local scale/ extent
	and of temporary duration/time.
Medium	Where the impact could have an influence on the environment,
	which will require modification of the development design

	and/or alternative mitigation. This would be allocated to										
	impacts of moderate severity/magnitude, locally to regionally,										
	and in the short term.										
High	Where the impact could have a significant influence on the										
	environment and, in the event of a negative impact the										
	activity(ies) causing it, should not be permitted (i.e. there could										
	be a 'no-go' implication for the development, regardless of any										
	possible mitigation). This would be allocated to impacts of high										
	magnitude, locally for longer than a month, and/or of high										
	magnitude regionally and beyond.										

5.3. IMPACT ASSESSMENT

By subjecting each of the potential impacts to the matrix above, the EIA team established the significance of each impact prior to implementing mitigation measures and then after mitigation measures have been implemented. Some of the mitigation measures are mentioned but detailed descriptions of management actions are contained in the accompanying EMP.

Table 5: Environmental impact Assessment Matrix

Impact		Status/nature	Extent	Duration	Intensity	Probability	Significance	9	
							Before	Mitigation applied	Post
							Mitigation		Mitigation
Servicing a	nd Const	ruction Phase	1		1	1	1		1
-Soil	physical	-Erosion	Local	Short	Medium	Definite	High	-Restrict construction activities	Low
disturbanc	e during	-Proliferation of						on defined areas.	
servicing	of the	tracks						-Proper management of	
land	and	-Negative						stockpiles. Excavated material	
construction	on	excavation						must be covered in stockpiles	
activities		methods such as						until reuse.	
		blasting.						-Restrict movement to defined	
								areas. Use existing roads until	
								access require limited new	
								roads.	
								-Use surface anchored	
								foundations with very limited	
								rock breaking.	

Urbanization/	Physical	Regional	Long	Medium	Definite	Low	-All built structures should be	Low
urban growth	expansion of the						constructed according to the	
	town						local Authority bylaws to	
							guarantee strength and	
							longevity of structures built.	
Noise from land	-Nuisance and	Local	Short	Medium	Definite	High	- All workers on site must be	Low
servicing activities	disturbance.						equipped with ear plugs to be	
and construction	-Noise and						used when the noise becomes	
vehicles and	vibrations will						unbearable.	
equipment	also have an						- Switch off machines that are	
	impact on animals						not used.	
	such as birds and						- All locals must be notified	
	reptiles.						about the noise construction	
	-Birds are known						activities on time during	
	to abandon their						excavations and ground	
	nests if subjected						preparation, servicing of the	
	to continuous						land and any constructions	
	noise. Noise to						beyond.	
	the nearby locals						- All noisy construction activities	
	and to						must not be carried during night	
	construction						time, early morning and	
	workers.						evenings, they must be done	
							during daytime to ensure	

							minimum disturbance of the	
							nearby residents.	
-Physical	-these activities	Local	Long	High	Definite	High	-Limit activity footprint and limit	Medium/
destruction of	may result in the		Term				movement to designated areas	Low
vegetation	removal and						only. Implement and monitor	
through land	destruction of						the Vegetation Management	
servicing,	few trees species						Plan if there is a significant	
construction	on site.						destruction of the on-site and	
activities and the							surrounding areas.	
upgrading and								
opening of new								
roads								
Disturbance and	-reptiles and	Local	Tempor	Low	probable	medium	-Forbid indiscriminate killing of	Low
killing of reptiles	small animals in		ary term				animals and reptiles.	
and small animal's	the locality are							
activities	bound and likely							
	to be affected							
Disturbance	-negatively affect	Regional	Tempor	medium	Highly	High	-Minimum disturbance of local	Medium
through noise,	local animals and		ary		probable		environment by ensuring	
movement and	birds if any						operations does not produce	
temporary							extreme noise that negatively	
occupation of an							affect nearby animals and birds.	

otherwise less							- Switch off machines that are	
disturbed habitat							not used.	
Archaeological	-Visual	Local	Long	Medium	Improbabl	Medium	-Demarcate, protect and avoid	Low
Landscape	degradation		term		е		development near sites. If	
							removal is inevitable, apply at	
							Heritage Council via an	
							archaeologist.	
Change in	-Use of	Local	Long	Medium	Probable	High	-Refill all the pits dug to ensure	Low
topography/	caterpillars for		term				that there are no pits left open	
landscape	servicing (roads						on site and creating a new	
character	construction and						paved landscape (use of cement	
	paving of the site)						interlocks)	
Environmental	There will be no	local	Short	Medium	Probable	Medium	-Implement a maintenance	-Low
contamination by	storage of oils and		Term				programme to ensure all	
hydrocarbons	fuel on site						vehicles, machinery and	
release into the	according to the						equipment are and remain in	
environment	engaged						proper working order	
(grease, oils, fuel	contractors,						-Vehicle maintenance should be	
spills and leakages	however there is						Conducted in designated areas	
from machinery	risk of spillage of						only, preferably off-site. If	
and fugitive	hydrocarbons						maintenance is to be conducted	
wastes.)	from vehicles and						on site, these areas should be	

ma	achinery			designed to contain spillages i.e.	
ор	perations,			maintenance site must be	
ma	aintenance			bundled and paved and the use	
th	rough leakages			of chemicals must be	
an	nd spillages			controlled.	
wh	hich may result			-Waste oil, fuels and other	
in:	:			chemicals from drip trays on	
-W	Vashing away of			stationery vehicles and	
со	ontaminated			machinery will be disposed of as	
so	oils by rains into			hazardous waste at a licensed	
ne	earby rivers			facility by a specialist hazardous	
-Po	ollution of soil			waste handler.	
an	nd affecting			-Oil residue will be treated with	
sm	nall living			oil absorbent material such as	
or	ganisms			Drizit or bio-remediation and	
ha	abituating the			removed to an approved waste	
so	pil			disposal site	
-Re	esult in possible			-Spill kits will be easily	
gro	oundwater			accessible and workers will be	
ро	ollution.			trained in the use thereof.	
-P	ossible fire risk			-Staff and contractors will be	
on	n and around			trained in the handling and	
the	e site			storage of oils, fuels, chemicals	

							and other hazardous substances -No bins containing organic solvents such as paint and thinners shall be cleaned on site, unless containers for liquid waste disposal are provided on site.	
Land Pollution	-Negative effect on the ecosystem when waste emanating from construction activities is not managed properly.	Local	Tempor ary	Medium	Probable	Medium	- Ensure that all waste (stockpiles) from construction activities must be stored and contained in designated containers and transported to Keetmanshoop Waste Disposal Site for proper disposal Adequate mobile toilets must be provided at the construction camps for the use of the workers.	Low
Dust from the general servicing of the land and	-Respiratory sicknesses can result from	Local	Tempor ary	High	Probable	Medium	-Equip all the workers exposed to dust with dust masks	Low

construction	prolonged						-Water spray all the areas that	
activities	exposure to dust						are sources of dust to minimize	
	-Dust can						dust.	
	negative affect						- Minimize activities that can	
	the ecosystem in						generate dust during windy	
	general and the						days.	
	nearby residents						- Limit the speed within the	
	-it also causes						whole construction area to a	
	general pollution						maximum of 10 km/h to avoid	
	of the air						excessive generation of dust	
							- Dust will significantly be	
							reduced if excavation and land	
							clearing is carried out after it	
							has rained and the soil is wet or	
							dust suppression can be done	
Employment	-The general	Regional	Tempor	Low	Highly	high	-The Project Manager should	high
opportunities	servicing and all		ary		probable		make it mandatory to	
during the	construction						contractors that all unskilled	
servicing and	activities create						work should be given to the	
construction	job opportunities						locals.	
phases of the	both to the locals,							
development	regional and							
	national, this will							

	have a positive economic impact on surrounding communities and technical companies involved							
The spread of HIV/AIDS and others STDs throughout the construction phase of the project.	-The huge inflow of employees and other people can result in the spread of HIV/AIDS, other STDs	Local	Long term	Medium	Highly probable	Low	-Awareness at workplace and provision of condoms -Massive education of the employees and the general public on the importance of having protective sex	
Operational Phase								
Pollution from solid waste and sewerage	-Failure to manage waste properly result in general pollution of the environment and this might have a	Local	Long term	Low	Highly probable	Medium	-The erven must be serviced and connected to Keetmanshoop Town Council Sewer reticulation system whose manhole for connection is less that 10m from the Erven.	Low

	dataina antal						Desular callection of calle	
	detrimental						-Regular collection of solid	
	impact on the						waste by the municipal	
	people's well-						-Provisions of domestic solid	
	being and the						waste collection bins to the	
	quality of the						residents	
	environment							
Population influx	-Results in social	-Local	-long	Medium	Definite	High	-Educate employees on social	Medium
	tensions and an		term				integration and sexual	
	increase in						behaviour	
	infections of							
	sexually							
	transmitted							
	diseases							
	particularly HIV							
	and AIDS, and							
	other STDs.							
Social integration	Potential for	Local	Short	Medium	Probable	Medium	-Public relations should	Low
	conflict between		Term				adequately address the	
	people of						integrated societal values and	
	different						morals	
	backgrounds and							
	cultural beliefs.							
Community	Employment	Regional	Long	High	Definite	High	-Promote local businesses and	High
development	creation		term				employ locals	

5.4. RISK ANALYSIS

Based on the impacts identified by this study during site visit, process analysis, desk study and stakeholder consultations conducted, an integrated environmental risk analysis was carried out using the DEFRA Guidelines for Environmental Risk Assessment and Management 'Green Leaves III' (latest edition) as well as the international Procedures for best practices. The risk analysis shows that the project will have some negative impacts on the environment (Biophysical, economic, social and political), it has been also noted that the project will deliver some positive impacts on the receiving environment, as well as on social and economic aspects. However, it is imperative to note that the project is being undertaken within an already disturbed locale. In order to prevent or mitigate negative impacts and to increase positive impacts a coordinated project management strategy according to an Environmental Management Plan, developed specific to this development.

Appendix A: References

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