

Environmental Assessment Scoping Report for:

December 2021

*Subdivision of RE/740,
Permanent Closure and
Rezoning of Erf A/740, and
Consolidation of Erven A/740,
RE/740, 2002 and 2003,
Keetmanshoop, //Karas Region*

APP - 003367

Prepared for: Keetmanshoop Private School

Po Box 708 Keetmanshoop

Contact Number: +264 63 225 688

Contact Person: Dr Leon Coetzee

Email: khabumed@iway.na

Prepared by: Stubenrauch Planning Consultants

P.O. Box 41404, Windhoek

Contact Person: Bronwynn Basson




Contact Number: +264 (61) 25 11 89

Fax Number: +264 (61) 25 21 57

Email: bronwynn@spc.com.na



PROJECT DETAILS

Title	Environmental Scoping Report for the: <ul style="list-style-type: none"> Subdivision of RE/740, Permanent Closure and Rezoning of Erf A/740, and Consolidation of Erven A/740, RE/740, 2002 and 2003, Keetmanshoop, //Karas Region 		
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SPC Reference	W/21021		
Proponent	Keetmanshoop Private School Po Box 708 Keetmanshoop Contact Number: +264 63 225 688 Contact Person: Dr Leon Coetzee Email: khabumed@iway.na		
Environmental Assessment Practitioner	Stubenrauch Planning Consultants P.O. Box 41404, Windhoek Contact Person: Bronwynn Basson Contact Number: +264 (61) 25 11 89 Fax Number: +264 (61) 25 21 57 Email: bronwynn@spc.com.na		
Report date	December 2021		
	Name	Signature	Date
Authors	Victoria Shikwaya		December 2021
Reviewer	Stephanie Strauss		December 2021

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EXECUTIVE SUMMARY

Introduction

Keetmanshoop Private School hereinafter referred to as the proponent intends to undertake the following activities:

- **Subdivision of Erf RE/740, Keetmanshoop (Street) into Erf A/740 and Remainder;**
- **Permanent closure of Erf A/740, Keetmanshoop as a Street;**
- **Rezoning of Erf A/740 from Street to Institutional;**
- **Consolidation of Erven A/740 (Street), RE/741, 2002 and 2003, Keetmanshoop into Consolidated Erf X.**

The above development 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 such the proponent appointed Stubenrauch Planning Consultants (SPC) to undertake an independent Environmental Assessment (EA) in order to obtain an Environmental Clearance Certificate (ECC) for the above activities. The competent authority is the Ministry of Environment and Tourism: Department of Environmental Affairs and Forestry (MEFT: DEAF).

Project Description

The Keetmanshoop Private School is currently operating on Erven RE/741, 2002 and 2003. The erven are situated next to one another along Twelfth street (Erf RE/740) in Keetmanshoop. Proposed Erf A/740, Keetmanshoop is currently leased by the Private School and used as parking and as a drop off area for the learners before and after school. This portion is additionally used by the learners, teachers, and staff members of the Private School to access the school hostel, offices and classrooms which are situated on Erven RE/741, 2002, and 2003, respectively.

The school has built a pedestrian crossing to ease the movement on the street, but the general public has access to the street and use it to access other parts of the neighbourhood. This constitutes a safety hazard as many drivers have been noticed to drive recklessly which endangers the lives of the learners. In addition, the public use of the street has made it difficult for the school to monitor movements around the school premises and so ensure the safety of its learners and property.

For this reason, it is proposed that the street (Erf A/740) be closed to the public and purchased by the proponent to form part of Keetmanshoop Private School property thus restricting use of the street for the school only.

Public Participation

Communication with Interested and Affected Parties (I&APs) about the proposed development was facilitated through the following means and in this order:

- A Background Information Document (BID) containing descriptive information about the proposed activities was compiled and sent out to all identified and registered I&APs via email on **22 July 2021**;
- Notices were placed in The New Era and The Sun newspapers dated **22 July 2021 and 29 July 2021**, briefly explaining the activity and its locality, inviting members of the public to register as I&APs (**Appendix B**); and
- A notice was fixed at the project site (see **Appendix A**).

Public consultation was carried out according to 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 **12 August 2021**).

The Draft Scoping Report was circulated from the **25th of October 2021 until the 8th of November 2021** so that the public could review and comment on it. The comment period remains open until the final scoping report is submitted to MEFT.

Conclusions and Recommendations

With reference to **Table 8**, none of the negative operational phase impacts were deemed to have a high significant impact on the environment. The construction impacts were assessed to a Medium to Low (negative) significance, without mitigation measures. With the implementation of the recommended mitigation measures in Chapter 7 as well as in the EMP, the significance of the construction phase impacts is likely to be reduced to a Low (negative).

It is recommended that this project be authorised because should the development not proceed the subject street will remain open to be used by the general public and will not formally form part of the school premises. None of the positive or negative impacts from the proposed development would be realized.

The “no go” alternative was thus deemed to have a High (negative) impact, as all the benefits resulting from the development 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 the EMP should be included as a condition of approval.

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LIST OF ACRONYMS

AIDS	Acquired Immune Deficiency Syndrome
CRR	Comments and response report
dB	Decibels
DESR	Draft Environmental Scoping Report
EA	Environmental Assessment
EAP	Environmental Assessment Practitioner
EAR	Environmental Assessment Report
ECC	Environmental Clearance Certificate
ECO	Environmental Control Officer
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
FESR	Final Environmental Scoping Report
GG	Government Gazette
GTZ	Gesellschaft für Technische Zusammenarbeit
HIV	Human Immunodeficiency Virus
I&AP	Interested and Affected Party
IUCN	International Union for Conservation of Nature
MET	Ministry of Environment and Tourism
MEFT: DEAF	Ministry of Environment, Forestry and Tourism and Forestry: Department of Environmental Affairs and Forestry
M	Meter
Mm	Millimeter
MURD	Ministry of Urban and Rural Development
MWTC	Ministry of Works Transport and Communication
NAMPAB	Namibia Planning Advisory Board
NHC	National Heritage Council
NPC	Namibia Planning Commission
PPP	Public Participation Process
SADC	Southern African Development Community
SPC	Stubenrauch Planning Consultants
USAID	United States Agency for International Development
VMMC	Voluntary Medical Male Circumcision

1 INTRODUCTION

1.1 PROJECT BACKGROUND

The Keetmanshoop Private School is currently operating on Erven RE/741, 2002 and 2003 in Keetmanshoop. The erven are situated next to one another along Twelfth street (Erf RE/740). Proposed Erf A/740, Keetmanshoop is currently leased by the Private School and used as parking and as a drop off area for the learners before and after school. This portion is additionally used by the learners, teachers, and staff members of the Private School to access the school hostel, offices and classrooms which are situated on Erven RE/741, 2002, and 2003, respectively.

The school has built a pedestrian crossing to ease the movement on the street, but the general public has access to the street and use it to access other parts of the neighbourhood. This constitutes a safety hazard as many drivers have been noticed to drive recklessly which endangers the lives of the learners. In addition, the public use of the street has made it difficult for the school to monitor movements around the school premises and so ensure the safety of its learners and property.

For this reason, that the Keetmanshoop Private School (the proponent) has proposed that the street (Erf A/740) be closed to the public and purchased by the proponent to form part of Keetmanshoop Private School property thus restricting use of the street for the school only. The following statutory steps are to be undertaken in order to allow for the intended development:

- **Subdivision of Erf RE/740, Keetmanshoop (Street) into Erf A/740 and Remainder;**
- **Permanent closure of Erf A/740, Keetmanshoop as a Street;**
- **Rezoning of Erf A/740 from Street to Institutional;**
- **Consolidation of Erven A/740 (Street), RE/741, 2002 and 2003, Keetmanshoop into Consolidated Erf X.**

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 (b) Infrastructure	The construction of Public roads	The proposed project includes the permanent closure of street portions.
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 permanent closure of street portions.

The above activities will be discussed in more detail in Chapter 4. The proponent appointed Stubenrauch Planning Consultants (SPC) to undertake an independent Environmental Assessment (EA) in order to obtain an Environmental Clearance Certificate (ECC) for the above activities. The competent authority is the Ministry of Environment and Tourism: Department of Environmental Affairs (MEFT: DEAF).

The process will be undertaken in terms of the gazetted Namibian Government Notice No. 30 Environmental Impact Assessment Regulations (herein referred to as EIA Regulations) and the Environmental Management Act (No 7 of 2007) (herein referred to as the EMA). The EIA process will investigate if there are any potential significant bio-physical and socio-economic impacts associated with the intended activities. The EIA process would also serve to provide an opportunity for the public and key stakeholders to provide comments and participate in the process.

1.2 PROJECT LOCATION, SIZE AND OWNERSHIP

Erven RE/741, 2002 and 2003 are located next to each other along Twelfth Street (also known as Erf RE/740, Keetmanshoop) in Keetmanshoop as shown in **Figure 1** below.

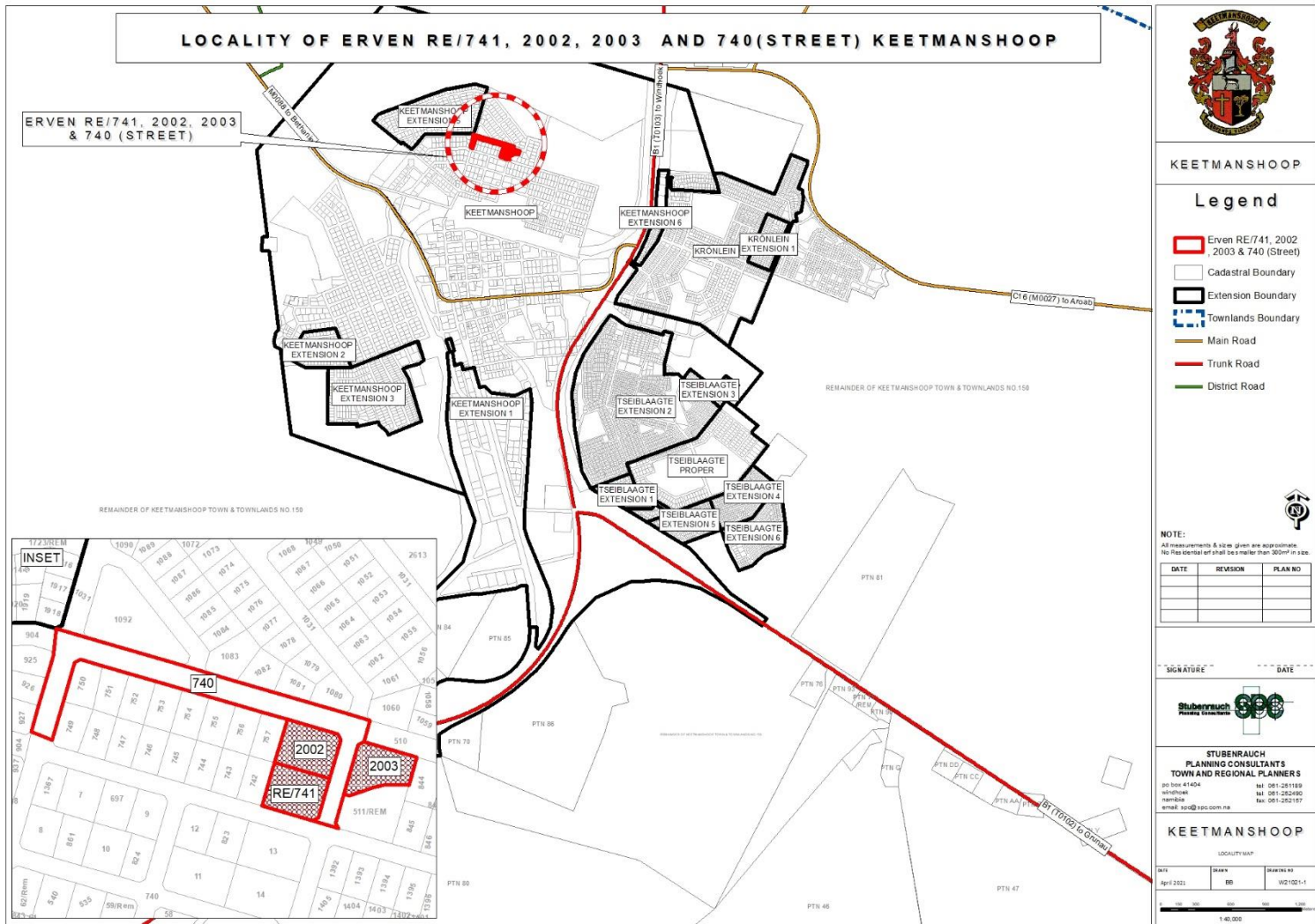


Figure 1: Locality of proposed development in Keetmanshoop

1.3 TERMS OF REFERENCE AND SCOPE OF PROJECT

The scope of this project is limited to conducting an environmental impact assessment and applying for an Environmental Clearance Certificate for the following as indicated in section 1.1 above:

- **Subdivision of Erf RE/740, Keetmanshoop (Street) into Erf A/740 and Remainder;**
- **Permanent closure of Erf A/740, Keetmanshoop as a Street;**
- **Rezoning of Erf A/740 from Street to Institutional;**
- **Consolidation of Erven A/740 (Street), RE/741, 2002 and 2003, Keetmanshoop into Consolidated Erf X.**

1.4 ASSUMPTIONS AND LIMITATIONS

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

- Assumes the information provided by the proponent is accurate and discloses all information available.
- The limitation that no alternative except for the preferred layout plans and the 'no-go' option was considered during this assessment. The unique character and appeal of Keetmanshoop were however taken into consideration with the design perspective. Various layout alternatives were initially considered by the proponent, also taking terrain and environmental constraints into account, thus the current design plans being the most feasible result.

1.5 CONTENT OF ENVIRONMENTAL ASSESSMENT REPORT

Section 8 of the gazetted EIA Regulations requires specific content to be addressed in a Scoping / Environmental Assessment Report. **Table 2** below is an extract from the EMA and highlights the required contents of a Scoping / Environmental Assessment Report whilst assisting the reader to find the relevant section in the report.

Table 2: Contents of the Scoping / Environmental Assessment Report

Section	Description	Section of FESR/ Annexure
8 (a)	The curriculum vitae of the EAPs who prepared the report;	Refer to Annexure E
8 (b)	A description of the proposed activity;	Refer to 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;	Refer to Chapter 3
8 (d)	A description of the environment that may be affected by the proposed activity and the	Refer to Chapter 3

Section	Description	Section of FESR/ Annexure
	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;	Refer to Chapter 2
8 (f)	Details of the public consultation process conducted in terms of regulation 7(1) in connection with the application, including	Refer to Chapter 5
	(i) the steps that were taken to notify potentially interested and affected parties of the proposed application	Refer to Chapter 5
	(ii) proof that notice boards, advertisements and notices notifying potentially interested and affected parties of the proposed application have been displayed, placed or given;	Refer to Annexures A and B for site notices and advertisements respectively.
	(iii) 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;	Refer to Annexure C
	(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;	Refer to Annexure C
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;	Refer to Chapter 4

Section	Description	Section of FESR/ Annexure
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;	Refer to Chapter 7
8 (i)	terms of reference for the detailed assessment;	NB – Assessment of impacts are included in this EA Report
8 (j)	An environmental management plan	Refer to Annexure F

2 LEGAL FRAMEWORK

2.1 LEGISLATION RELEVANT TO THE PROPOSED DEVELOPMENT

There are multiple legal instruments that regulate and have a bearing on good environmental management in Namibia. **Table 3** below provides a summary of the legal instruments considered to be relevant to this development and the environmental assessment process.

Table 3: Legislation applicable to the proposed development

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 (b) Infrastructure Activity 10.2 (a) Infrastructure
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.

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO PROJECT
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 must 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 No 5 of 2018	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 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	The proposed development must adhere to the provisions regarding the subdivision and rezoning of land.

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO PROJECT
	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	<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 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	Contractors and users of the proposed development are to comply with these legal requirements.

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO PROJECT
	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).	
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.
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	Protected tree and plant species as per the Forest Act No 12 of 2001

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO PROJECT
	<p>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.</p>	<p>and Forest Regulations of 2015 may not be removed without a permit from the Ministry of Agriculture, Water and Forestry.</p>
<p>Atmospheric Pollution Prevention Ordinance No 45 of 1965</p>	<p>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.</p>	<p>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).</p>

LEGISLATION/POLICIES	RELEVANT PROVISIONS	RELEVANCE TO PROJECT
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 importation, manufacture, sale, use, operation, application, modification, disposal or dumping of such substances; and to provide for matters connected therewith.	The handling, usage and storage of hazardous substances on site should be carefully controlled according to this Ordinance.
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.

This EIA process will be undertaken in accordance with the EIA Regulations. A Flow Diagram (refer to **Figure 2** below) provides an outline of the EIA process to be followed.

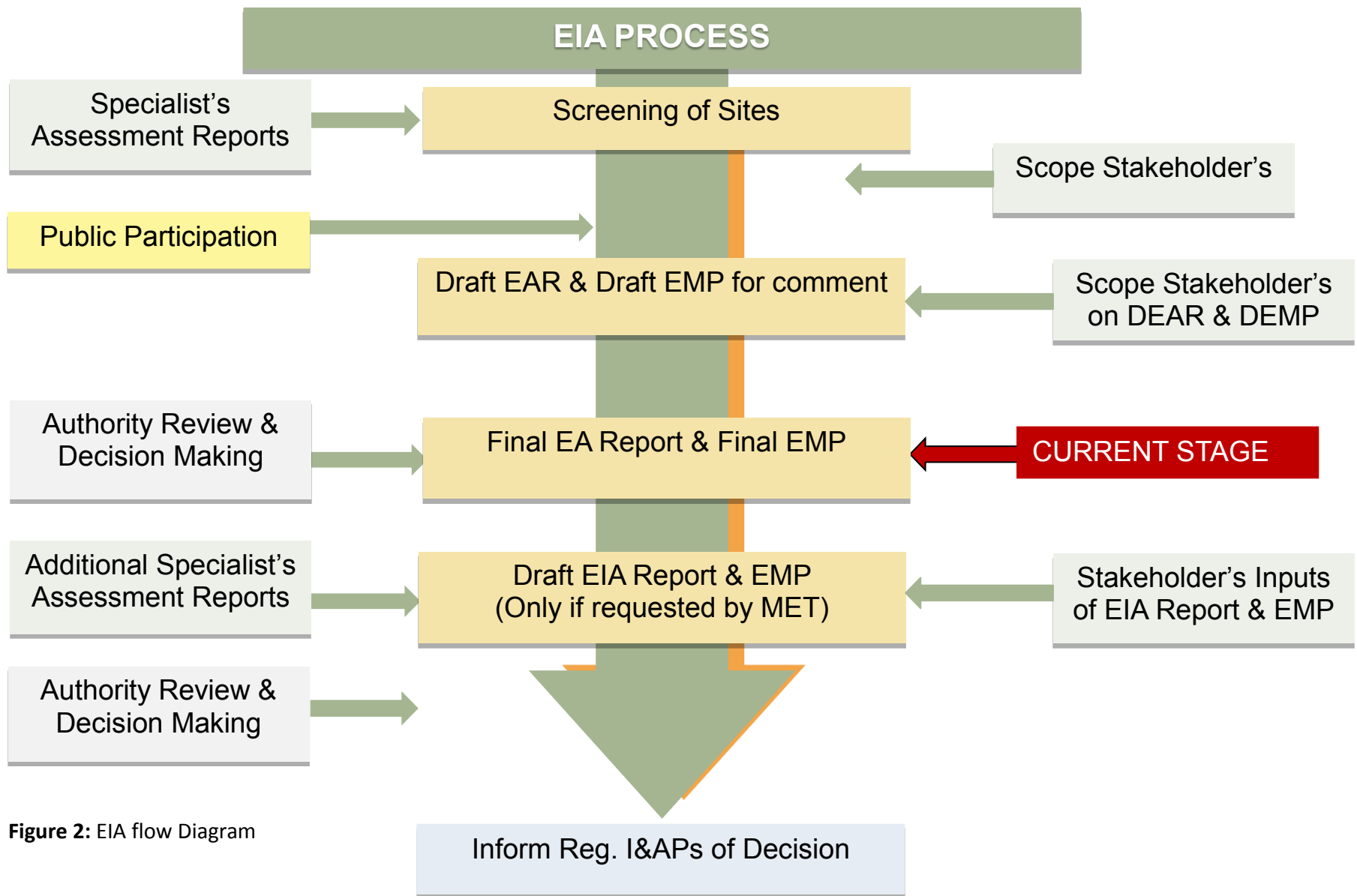


Figure 2: EIA flow Diagram

3 ENVIRONMENTAL BASELINE DESCRIPTION

3.1 SOCIAL ENVIRONMENT

3.1.1 Socio-Economic Context

The statistics shown in **Table 4** below are derived from the 2011 Namibia Population and Housing Census (Namibia Statistics Agency, 2011), and presented from a local and regional perspective.

Table 4: Statistics of the Keetmanshoop Urban Constituency and //Karas Region (Namibia Statistics Agency, 2013)

KEETMANSHOOP URBAN CONSTITUENCY	
ATTRIBUTE	INDICATOR
Population	19,447
Females	9,970
Males	9,477
Population under 5 years	11%
Population aged 5 to 14 years	20%
Population aged 15 to 59 years	63%
Population aged 60 years and above	7%
Female: male ratio	95:92
Literacy rate of 15 years old and above	97%
People above 15 years who have never attended school	3%
People above 15 years who are currently attending school	12%
People above 15 years who have left school	83%
People aged 15 years and up who belong to the labour force	72%
Population employed	65%
Homemakers	10%
Students	44%
Income from pension	10%
Income from business and non-farming activities	7%
Income from farming	1%
Income from cash remittance	5%
Wages and salaries	73%
//KARAS REGION	
ATTRIBUTE	
Population	77,421
Rural population	46%
Females	38,014
Males	39,407
Main Language	Afrikaans (36%)

3.1.2 Archaeological and Heritage Context

Keetmanshoop has a rich history and a number of architectural heritage buildings. These buildings form part of the history of the town and the uniqueness of the town which should be protected.

It is unlikely that the proposed project area will have any significant archaeological resources due to the fact that no major historical activity took place within close proximity to the sites. An accidental find procedure may, however, be required in the EMP.

3.2 BIO-PHYSICAL ENVIRONMENT

3.2.1 Air Quality

Air quality in Keetmanshoop urban is characterised to be comparatively good, since there are no current large-scale anthropogenic activities. With any construction activity the creation of fugitive dust will result which may be both a nuisance and a health risk. Dust may be generated by a variety of activities on site but taking the already high background dust levels into consideration, the increase resulting from this activity will be negligible under normal circumstances or when considered in combination with other activities.

3.2.2 Climate

The town of Keetmanshoop is situated in a semi-desert climate, with low rainfall, high evaporation and high day time temperatures. Day time temperatures in summer can reach between 32 - 36 °C. Night time temperatures in winter can get quite cold, with average temperatures between 4-6 °C (Mendelsohn, Jarvis, Roberts & Roberston, 2002). The average daily temperatures rise from about 13.8° C in July to about 26.7° C in January, a difference of 12.9 °C. These two months of December and January also experience the highest maximum temperatures for the year of about 36° C as depicted in **Figure 3** below (Robertson, Jarvis, Mendelsohn, & Swart, 2012).

Average annual evaporation rates for Keetmanshoop are between 2,520 and 2,660 mm per year. The number of days of frost per year is low – between 1 – 5 days of frost per year (Mendelsohn *et al.*, 2002).

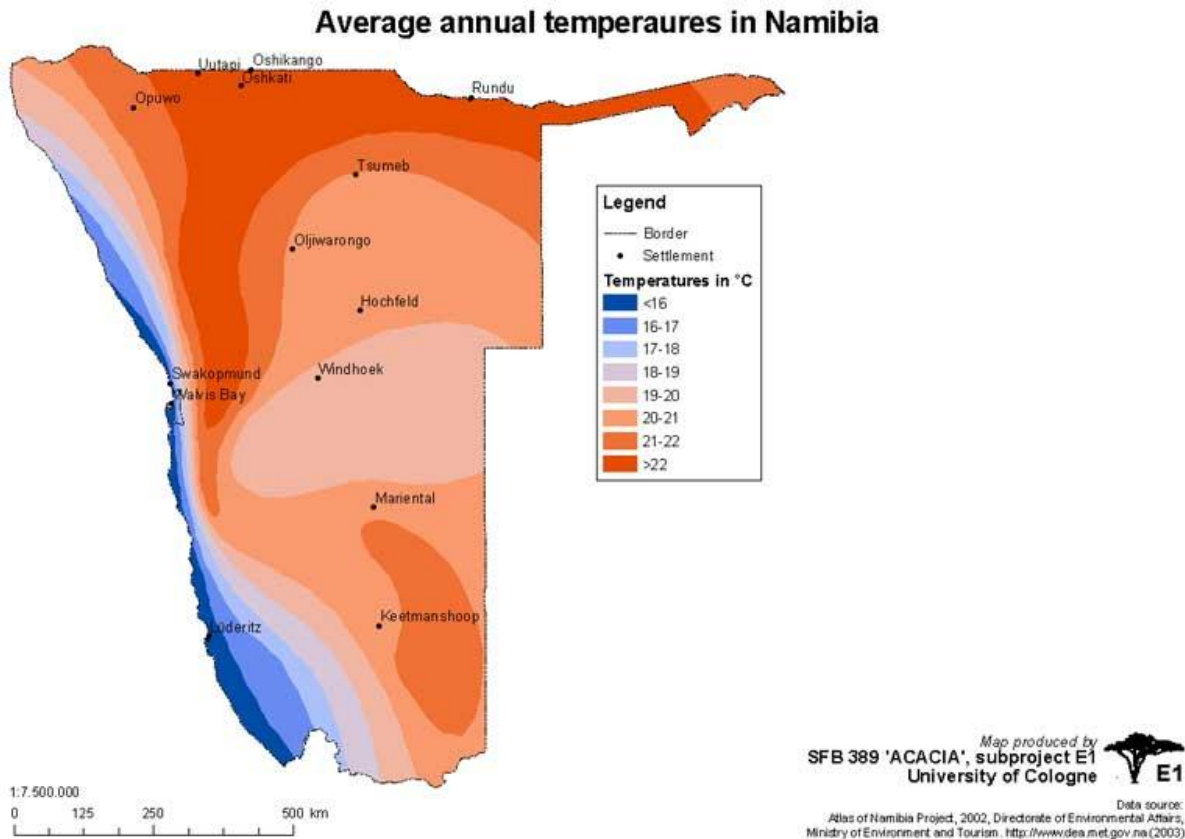


Figure 3: Annual average temperature (Acacia Project E1, n.d.)

Keetmanshoop is relatively dry with an annual average rainfall of between 100 – 150mm per year as indicated in **Figure 4** below. The main problem with the rainfall is that it is highly variable in terms of amount of rainfall and its distribution. The relative humidity for the Keetmanshoop area ranges between 50-60% in the highest humidity times (April) and between 10-20% in time of the least humidity (October)(Mendelsohn et al., 2002).

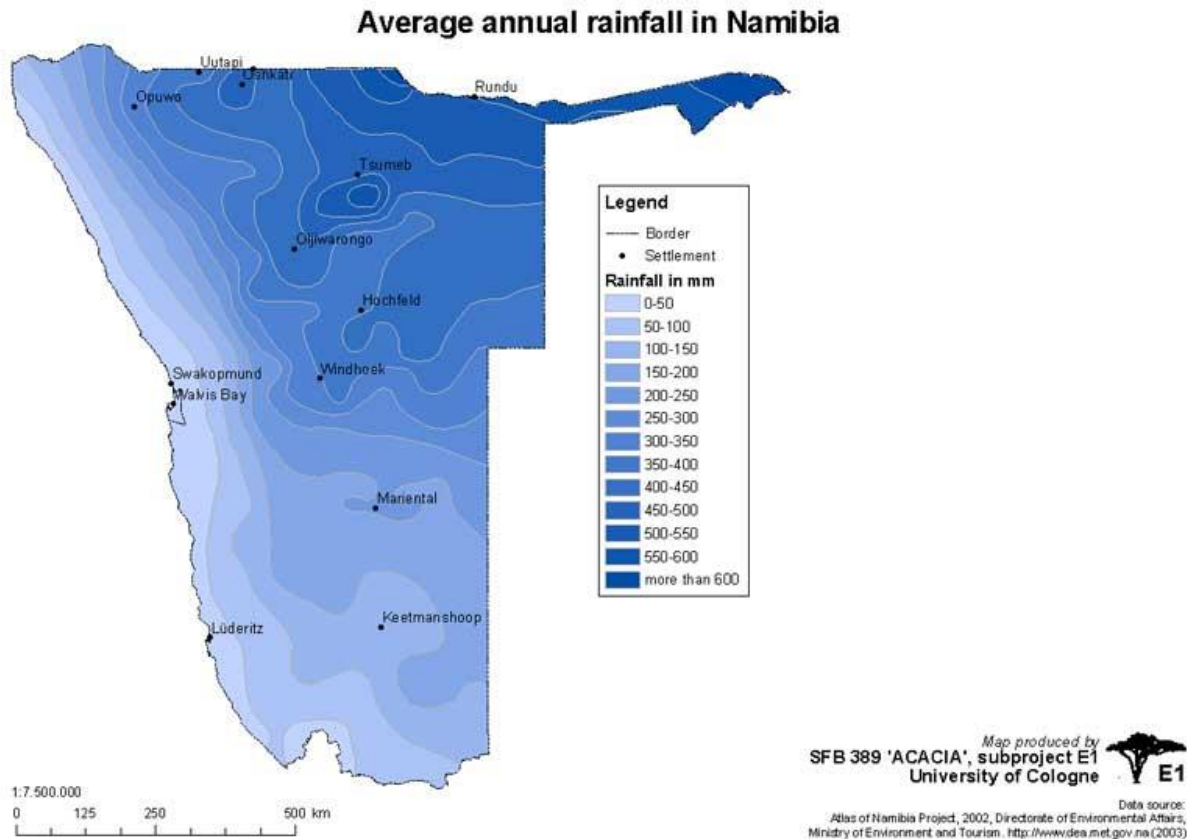


Figure 4: Average annual Rainfall (Acacia Project E1, n.d.)

3.2.3 Topography, Hydrogeology and Geology

Keetmanshoop is situated within the Karoo Supergroup Geological division as indicated in Figure 5 below. Keetmanshoop belongs to the Nama-Karoo Basin, which is a large, flat lying plateau which dominates much of southern Namibia. Sedimentary rocks forms the foundations of the landscape. The basin slants from the north, where heights are approximately 1,400 m over ocean level, to the south, where elevations are roughly 900 m above sea level (Mendelsohn et al., 2002).

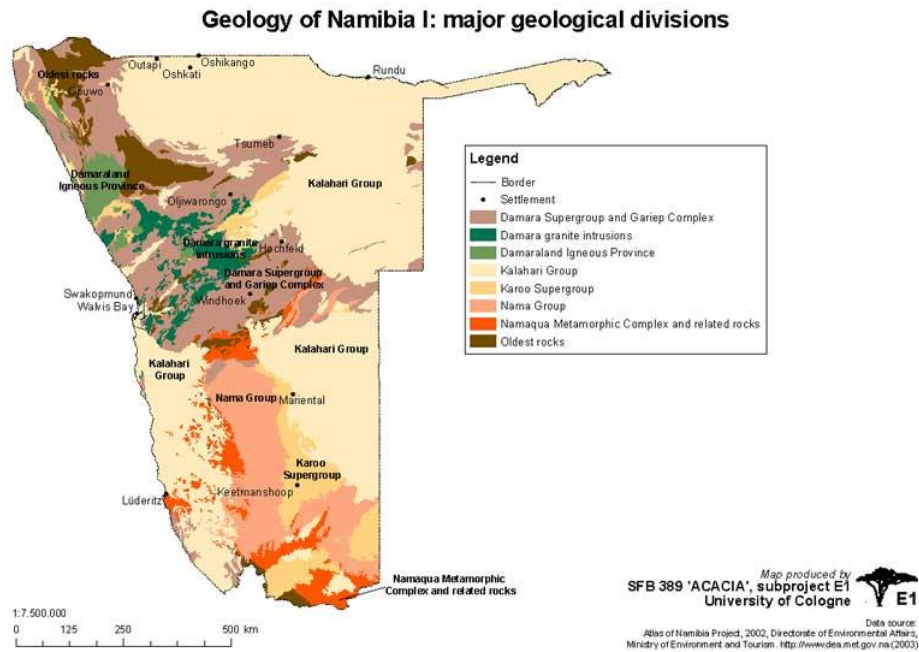


Figure 5: Geology of Namibia (Acacia Project E1, n.d.)

The town of Keetmanshoop and a large part of the //Karas Region falls within the Fish River water basin and Fish River catchment area as depicted in **Figure 6** below. 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.

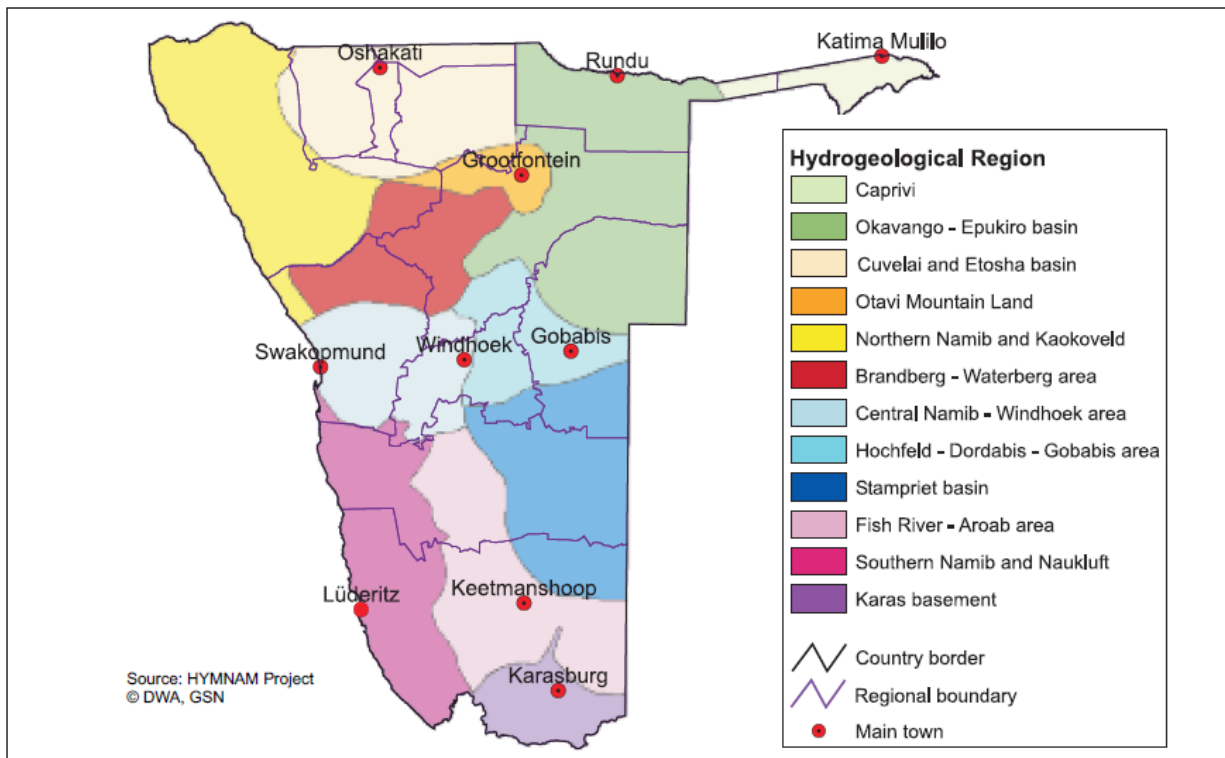


Figure 6: Groundwater basins and hydrogeological regions in Namibia (Ministry of Agriculture Water and Rural Development, 2011)

3.3 TERRESTRIAL ECOLOGY

3.3.1 Flora and Fauna

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.

4 PROJECT DESCRIPTION

4.1 PROJECT COMPONENTS

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

- **Subdivision of Erf RE/740, Keetmanshoop (Street) into Erf A/740 and Remainder;**
- **Permanent closure of Erf A/740, Keetmanshoop as a Street;**
- **Rezoning of Erf A/740 from Street to Institutional;**
- **Consolidation of Erven A/740 (Street), RE/741, 2002 and 2003, Keetmanshoop into Consolidated Erf X.**

These components will be described in further detail below, in terms of their design, layout and footprint.

4.2 ALTERNATIVES

Alternatives are defined as: “different means of meeting the general purpose and requirements of the activity” (Environmental Management Act (Act 7 of 2007) of Namibia and its regulations (2012)). Due to the development being mostly a formalisation of an existing area no alternatives were assessed for the development except the no-go alternative. The no-go alternative is discussed in the section below.

4.2.1 No – Go Alternative

The no-go alternative is the baseline against which all alternatives are assessed. The no-go alternative would essentially entail maintaining the current situation, whereby the proposed street closure and subdivision will not take place. This would mean that the subject street will remain open for public access and would not form part of the school premises. As such none of the positive or negative impacts associated with the development would be realised.

4.3 THE PROPOSED DEVELOPMENT

The Keetmanshoop Private School is currently operating on Erven RE/741, 2002 and 2003, Keetmanshoop. The subject erven are situated adjacent to one another, with a portion of Twelfth Street (proposed Erf A/740, Keetmanshoop) situated between Erf 2003 and Erven RE/741 and 2002, Keetmanshoop.

Proposed Erf A/740, Keetmanshoop (street) is currently leased by the proponent and used as parking and as a drop off area where parents drop off learners in the morning and pick up them up in the afternoon. This portion of the street is frequently used by learners, teachers, and staff members of the Private School to access the school hostel, offices and classrooms which are situated on Erven

RE/741, 2002 and 2003, respectively. A pedestrian crossing to calm traffic and ease pedestrian movements between the different components of the school has been built over proposed Erf A/740, Keetmanshoop (street).

This portion of the street is however not restricted for the use of the school only, as such it is used by the general public to access other parts of the surrounding neighbourhood. This constitutes a safety hazard as some drivers are reckless and do not maintain minimum speed when entering this street that is mainly used by learners. This has over the years lead to several incidents where learners have almost been hit by oncoming traffic. In addition, the free use of the subject portion of this street by the general public has also challenged the school’s ability to monitor movements around the school premises and ensure the safety of its learners and properties.

In light of the above, the Keetmanshoop Private School seeks to purchase a portion of Erf 740, Keetmanshoop (proposed Erf A/740, Keetmanshoop) (street), from the Municipality for consolidation with Erven RE/741, 2002 and 2003, Keetmanshoop into Consolidated Erf “X”.

The proponent intends to fence off proposed Consolidated Erf “X” to ensure the safety of learners and protect the school premises, as the street will then be restricted to the use of the school only. Given that the proposed Erf A/740 (street), currently accommodates water pipelines, no construction of buildings will take place over the street. The street will only be used as parking and as a drop-off area for learners.

The proposed development will also allow the school to expand its classrooms in line with the building regulations of the Keetmanshoop Municipality. This expansion will take place on Erf 2003. No buildings will be constructed over Portion A/740 (street).

4.3.1 The Proposed Subdivisions

The proponent intends to subdivide Erf RE/740, Keetmanshoop (street) into Erf A and the Remainder, as depicted by **Table 5 and Figure 7** below.

Table 5: Subdivision of Erf 740, Keetmanshoop (Street)

Erf No.	Size ±m ²	Reservation	Proposed Zoning
A/740, Keetmanshoop	2050.00	Street	Institutional

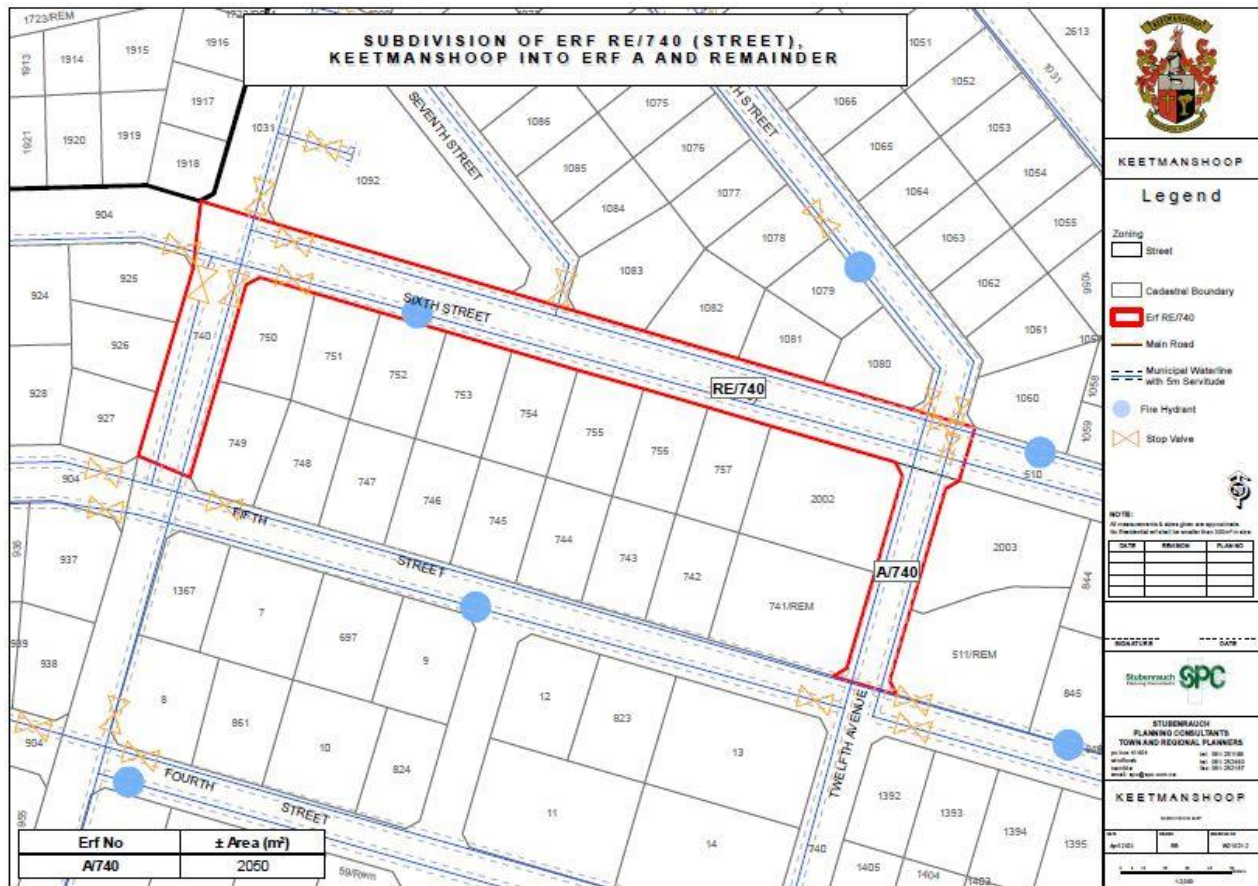


Figure 7: Subdivision of RE/Erf 740 (Street) Keetmanshoop into Erf A and Remainder

4.3.2 The Proposed Permanent Closure and Rezoning

The Proponent intends to Permanently close Erf A/740, Keetmanshoop (street) as a “Street” and rezone Erf A to “Institutional” to enable its consolidation with Erven RE/741, 2002 and 2003, Keetmanshoop, which are all currently zoned for “Institutional” purposes as shown in **Figure 8** below.

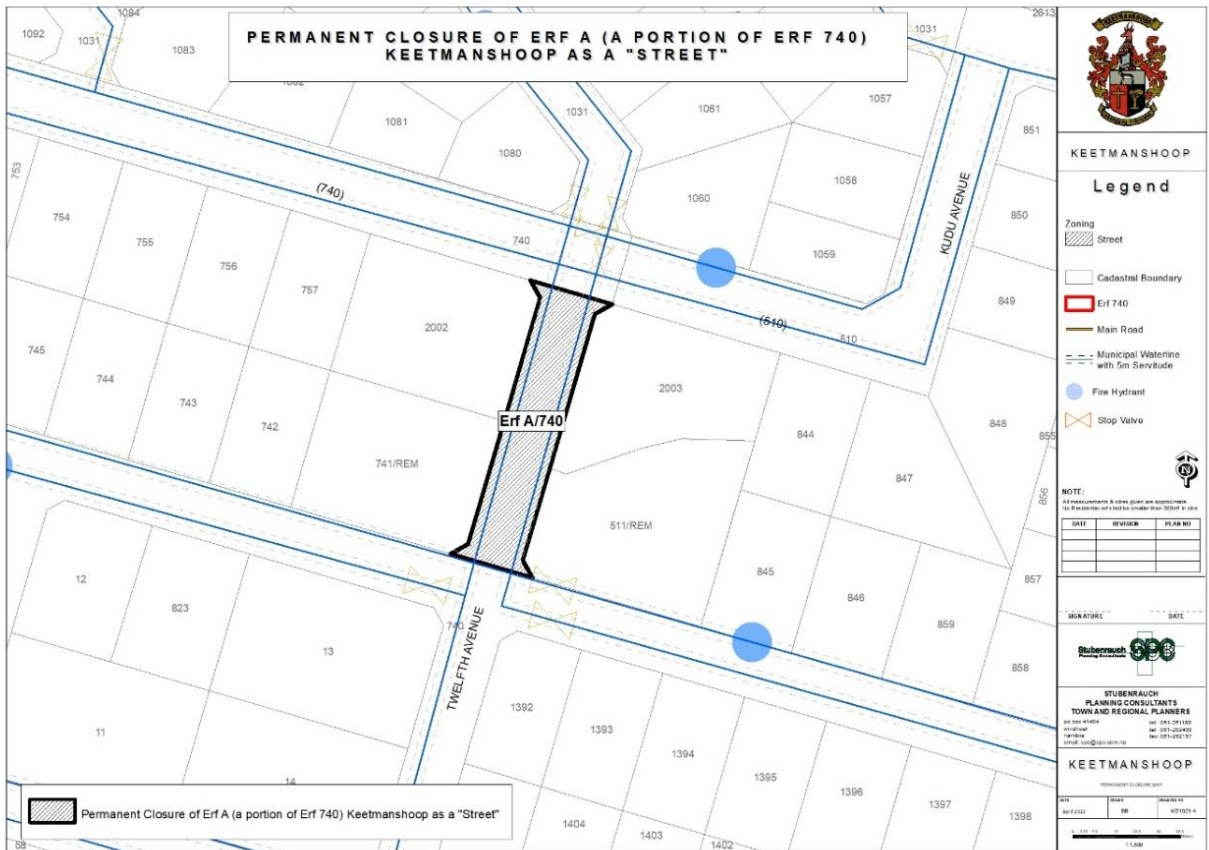


Figure 8: Permanent closure of Erf A (a portion of Erf 740), Keetmanshoop as “street”

4.3.3 The Proposed Consolidation

The proponent Further aims to consolidate Erf A/740 with Erven RE/741, 2002 and 2003 into Consolidated Erf “X”. Consolidated Erf “X” will be utilised for institutional purposes as indicated in **Table 6** and **Figure 9** below.

Table 6: Consolidation of Erf A/740 with Erven RE/741, 2002 and 2003, Keetmanshoop

Erf No.	Size ±m ²	Current Zoning	Proposed Zoning
A/740, Keetmanshoop	2050.00	Street	Institutional
RE/741, Keetmanshoop	3163.00	Institutional	Institutional
2002, Keetmanshoop	3001.00	Institutional	
2003, Keetmanshoop	3162.00	Institutional	
Consolidated Erf “X”	11376.00		Institutional

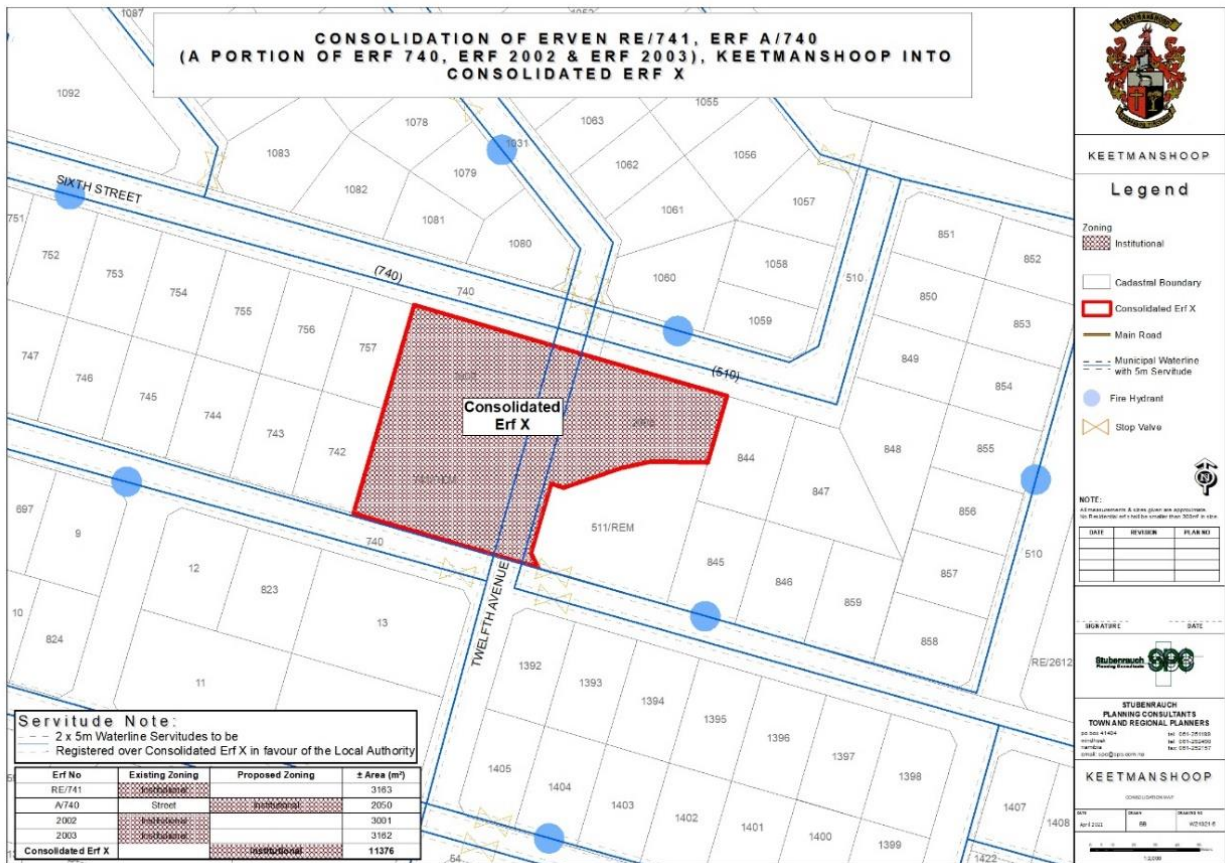


Figure 9: Consolidation of Erven RE/741, Erf A/740, Erf 2002 and Erf 2003, Keetmanshoop into Consolidated Erf “X”

4.3.4 Engineering Services and Access Provision

Erven RE/741, 2002 and 2003, Keetmanshoop are connected to the municipal reticulation system of the Keetmanshoop Municipality. The existing services are sufficient and can accommodate the activities on Consolidated Erf “X”.

Erf RE/740, Keetmanshoop accommodates underground water pipelines. Two 5-meter servitudes will be registered over these pipelines, over proposed Consolidated Erf “X”, in favour of the Local Authority.

4.3.5 Access Provision

Access to Erven RE/741, 2002 and 2003, Keetmanshoop is currently gained from adjacent Twelfth Street (proposed Erf A/740, Keetmanshoop) which is 20m wide. Consolidated Erf "X" will gain access from Fifth and Sixth Street, which also form part of the adjacent street network.

The proposed street closure is not expected to negatively affect traffic circulation and intensity as proposed Erf A/740 is currently primarily used by the school. Traffic to surrounding parts of the neighbourhood can continue making use of Fifth and Sixth Street.

It should be noted that entrance to Erf RE/511, Keetmanshoop (situated across Erf RE/741, Keetmanshoop) is along Fifth Street. The proposed street closure as such is not expected to have any negative impact on Erf RE/511, Keetmanshoop.

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 international best practice. Please see **Table 5** below for the activities undertaken as part of the public participation process. The I&APs were given time to comment from **22 July 2021 to 12 August 2021**.

Table 6: Table of Public Participation Activities

ACTIVITY	REMARKS
Placement of site notice in Keetmanshoop	See Annexure A
Placing advertisements in two newspapers namely the New Era and The Sun (22 July 2021 and 29 July 2021)	See Annexure B
Written notice to surrounding property owners and Interested and Affected Parties via Email and/or registered mail (22 July 2021)	See Annexure C

5.1.1 Environmental Assessment Phase 2

The second phase of the PPP involved the lodging of the Draft Environmental Scoping Report (DESR) to all registered I&APs for comment. Registered and potential I&APs were informed of the availability of the DESR for public comment via a letter/email dated **25 October 2021**. An Executive Summary of the DESR was included in the letters to the registered I&APs. I&APs had until **8 November 2021** to submit comments or raise any issues or concerns they may have with regard to the proposed project.

6 ASSESSMENT METHODOLOGY

The purpose of this chapter is to describe the assessment methodology utilized in determining the significance of the construction and operational impacts of the proposed project, and where applicable the possible alternatives, on the biophysical and socio-economic environment.

Assessment of predicted significance of impacts for a proposed development is by its nature, inherently uncertain – environmental assessment is thus an imprecise science. To deal with such uncertainty in a comparable manner, a standardised and internationally recognised methodology has been developed. Such accepted methodology is applied in this study to assess the significance of the potential environmental impacts of the proposed development, outlined as follows in **Table 7**.

Table 7: Impact Assessment Criteria

CRITERIA	CATEGORY
Impact	Description of the expected impact
Nature Describe type of effect	Positive: The activity will have a social / economical / environmental benefit. Neutral: The activity will have no effect Negative: The activity will have a social / economical / environmental harmful effect
Extent Describe the scale of the impact	Site Specific: Expanding only as far as the activity itself (onsite) Small: restricted to the site’s immediate environment within 1 km of the site (limited) Medium: Within 5 km of the site (local) Large: Beyond 5 km of the site (regional)
Duration Predicts the lifetime of the impact.	Temporary: < 1 year (not including construction) Short-term: 1 – 5 years Medium term: 5 – 15 years Long-term: >15 years (Impact will stop after the operational or running life of the activity, either due to natural course or by human interference) Permanent: Impact will be where mitigation or moderation by natural course or by human interference will not occur in a particular means or in a particular time period that the impact can be considered temporary
Intensity Describe the magnitude (scale/size) of the Impact	Zero: Social and/or natural functions and/ or processes remain unaltered Very low: Affects the environment in such a way that natural and/or social functions/processes are not affected

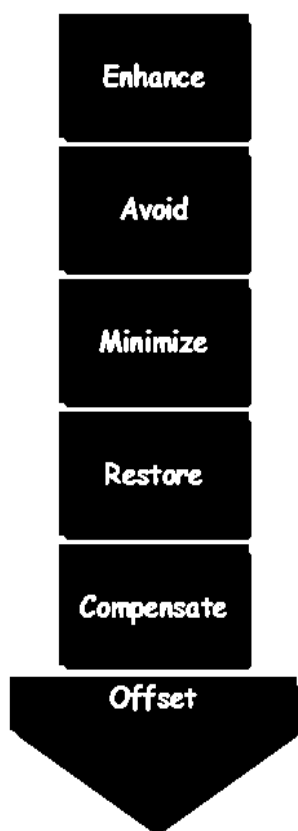
CRITERIA	CATEGORY
	<p>Low: Natural and/or social functions/processes are slightly altered</p> <p>Medium: Natural and/or social functions/processes are notably altered in a modified way</p> <p>High: Natural and/or social functions/processes are severely altered and may temporarily or permanently cease</p>
<p>Probability of occurrence Describe the probability of the Impact <u>actually</u> occurring</p>	<p>Improbable: Not at all likely</p> <p>Probable: Distinctive possibility</p> <p>Highly probable: Most likely to happen</p> <p>Definite: Impact will occur regardless of any prevention measures</p>
<p>Degree of Confidence in predictions State the degree of confidence in predictions based on availability of information and specialist knowledge</p>	<p>Unsure/Low: Little confidence regarding information available (<40%)</p> <p>Probable/Med: Moderate confidence regarding information available (40-80%)</p> <p>Definite/High: Great confidence regarding information available (>80%)</p>
<p>Significance Rating The impact on each component is determined by a combination of the above criteria.</p>	<p>Neutral: A potential concern which was found to have no impact when evaluated</p> <p>Very low: Impacts will be site specific and temporary with no mitigation necessary.</p> <p>Low: The impacts will have a minor influence on the proposed development and/or environment. These impacts require some thought to adjustment of the project design where achievable, or alternative mitigation measures</p> <p>Medium: Impacts will be experienced in the local and surrounding areas for the life span of the development and may result in long term changes. The impact can be lessened or improved by an amendment in the project design or implementation of effective mitigation measures.</p> <p>High: Impacts have a high magnitude and will be experienced regionally for at least the life span of the development, or will be irreversible. The impacts could have the no-go proposition on portions of the development in spite of any mitigation measures that could be implemented.</p>

*NOTE: Where applicable, the magnitude of the impact has to be related to the relevant standard (threshold value specified and source referenced). The magnitude of impact is based on specialist knowledge of that particular field.

For each impact, the EXTENT (spatial scale), MAGNITUDE (size or degree scale) and DURATION (time scale) are described. These criteria are used to ascertain the SIGNIFICANCE of the impact, firstly in the case of no mitigation and then with the most effective mitigation measure(s) in place. The decision as to which combination of alternatives and mitigation measures to apply lies with the proponent, and their acceptance and approval ultimately with the relevant environmental authority.

The SIGNIFICANCE of an impact is derived by taking into account the temporal and spatial scales and magnitude. Such significance is also informed by the context of the impact, i.e. the character and identity of the receptor of the impact.

6.1 MITIGATION MEASURES



There is a mitigation hierarchy of actions which can be undertaken to respond to any proposed project or activity (See **Figure 10** below). These cover avoidance, minimization, restoration and compensation. It is possible and considered sought after to enhance the environment by ensuring that positive gains are included in the proposed activity or project. If negative impacts occur then the hierarchy indicates the following steps.

Impact avoidance: This step is most effective when applied at an early stage of project planning. It can be achieved by:

- not undertaking certain projects or elements that could result in adverse impacts;
- avoiding areas that are environmentally sensitive; and
- putting in place preventative measures to stop adverse impacts from occurring.

Impact minimization: This step is usually taken during impact identification and prediction to limit or reduce the degree, extent, magnitude, or duration of adverse impacts. It can be achieved by:

- scaling down or relocating the proposal;
- redesigning elements of the project; and
- taking supplementary measures to manage the impacts.

Restoration: This step is taken to improve degraded or removed ecosystems following exposure to impacts that cannot be completely avoided or minimised. Restoration tries to

Figure 10: Mitigation Hierarchy

return an area to the original ecosystem that occurred before impacts. Restoration is frequently needed towards the end of a project's life-cycle but may be possible in some areas during operation.

Impact compensation: This step is usually applied to remedy unavoidable residual adverse impacts. It can be achieved by:

- rehabilitation of the affected site or environment, for example, by habitat enhancement;
- restoration of the affected site or environment to its previous state or better; and
- replacement of the same resource values at another location (off-set), for example, by wetland engineering to provide an equivalent area to that lost to drainage or infill.

7 ASSESSMENT OF POTENTIAL IMPACTS AND POSSIBLE MITIGATION MEASURES

7.1 INTRODUCTION

This Chapter describes the potential impacts on the biophysical and socio-economic environments, which may occur due to the proposed activities described in Chapter 4. These include potential impacts, which may arise during the operation of the proposed development (i.e. long-term impacts) as well as the potential construction related impacts (i.e. short to medium term). The assessment of potential impacts will help to inform and confirm the selection of the preferred layouts to be submitted to MEFT: DEAF for consideration. In turn, MEFT: DEAF's decision on the environmental acceptability of the proposed project and the setting of conditions of authorisation (should the project be authorised) will be informed by this chapter, amongst other information, contained in this EA Report.

The baseline and potential impacts that could result from the proposed development are described and assessed with potential mitigation measures recommended. Finally, comment is provided on the potential cumulative impacts which could result should this development, and others like it in the area, be approved.

7.1 PLANNING AND DESIGN PHASE IMPACTS

7.1.1 Traffic Impacts

The proposed development involves the closure of a portion of street (Erf A/740). The proposed street closure is not expected to negatively affect traffic circulation and intensity as proposed Erf A/740 is currently primarily used by the school. Traffic to surrounding parts of the neighbourhood can continue making use of Fifth and Sixth Street.

It should be noted that entrance to Erf RE/511, Keetmanshoop (situated across Erf RE/741, Keetmanshoop) is along Fifth Street. The proposed street closure of proposed Erf A/740 as such is not expected to have any negative impact on Erf RE/511, Keetmanshoop

7.2 CONSTRUCTION PHASE IMPACTS ON THE BIOPHYSICAL ENVIRONMENT

The construction phase impacts are those impacts on the biophysical and socio-economic environment that would occur during the construction phase. These impacts are inherently temporary in duration but may have longer lasting effects.

7.2.1 Flora and Fauna Impacts (Biodiversity)

The proposed site is mostly developed as such no significant impacts on biodiversity are anticipated for the proposed activity. It is anticipated that the proposed development area and associated infrastructure (e.g. water, sewage, access route, etc.) would have localised negative implications on the environment and associated fauna and flora should the proposed mitigation measures as outlined in the EMP be enforced.

7.2.2 Waste Generation

During construction, waste may be generated on site which would have to be disposed of at an approved landfill site.

7.2.3 Surface and Ground Water Impacts

Surface and groundwater impacts may be encountered during the construction and operation phase, especially if development takes place within the rainy season. The risk of contaminating such water sources can be increased by accidental spillage of oils and fuels and any other equipment used during construction. This risk is minimised by the fact that the construction phase will be a short-term activity.

7.3 CONSTRUCTION PHASE IMPACTS ON THE SOCIO-ECONOMIC ENVIRONMENT

7.3.1 Heritage impacts

No archaeological and heritage resources are expected to be found on the site. The project management should however be made aware of the provisions of the National Heritage Act regarding the prompt reporting of archaeological finds. Section 3.1.2 provides an overview of the archaeological and heritage context of the town and region.

7.3.2 Health, Safety and Security Impacts

Due to the demand for construction workers during the construction of the proposed project an influx of migrant workforce who will require temporary accommodation in Keetmanshoop might be experienced. Experience with other construction projects in a developing-world context has shown that, where migrant construction workers have the opportunity to interact with the local community, a significant risk is created for the development of social conditions and sexual behaviors that contribute to the spread of HIV and 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.

7.3.3 Traffic Impacts

Traffic is expected to increase during the construction phase of the project in areas where construction will take place. A number of trucks and other heavy machinery will be required to deliver, handle and position construction materials as well as to remove spoil material. Not only will the increase in traffic result in associated noise impacts, it will also impact on the roads in the area.

7.3.4 Noise Impacts

Construction may result in associated noise impacts. These noise impacts will mainly be associated with construction machinery and construction vehicles. The impact is however limited mainly to the construction period only.

7.3.5 Dust and Emission Impacts

Excavation and stockpiles during the construction phase could result in dust impacts, if not managed correctly. Dust could impact negatively on the health of the nearby community if mitigation measures are not implemented. Dust impacts are primarily associated with the construction phase.

7.3.6 Municipal Services

The construction phase will result in additional people on-site, who will require provision of the following services:

- Potable water for domestic (ablution and drinking) and construction purposes.
- Temporary toilets during the construction phase.
- Solid waste management (domestic and construction waste).

These services if not managed well are likely to create an opportunity for water wastage; litter; solid and human waste pollution.

7.3.7 Storage and Utilisation of Hazardous Substances

Hazardous substances are regarded by the Hazardous Substance Ordinance (No. 14 of 1974) as those 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. During the construction period, the use and storage of these types of hazardous substances, such as shutter oil, curing compounds, types of solvents, primers and adhesives and diesel, on-site could have negative impacts on the surrounding environment if these substances spill and enter the environment.

7.4 OPERATIONAL PHASE IMPACTS

The operational phase impacts are those impacts on the biophysical and socio-economic environment that would occur during the operational phase of the proposed project and are inherently long-term in duration.

7.4.1 Traffic Impacts

Impacts on traffic are anticipated due to the proposed street to be closed being identified as a major activity corridor in the town. Traffic is expected to increase in the area as one of the main connectivity streets that is earmarked to link Keetmanshoop with Noordhoek in the future will be closed for utilisation by vehicles and pedestrians. As such the proposed impact is anticipated to be of medium significance.

7.4.2 Sense of Place Impacts

The development involves the closure of a street that has been open to the public for years. The change in traffic conditions will impact the people who have been using the street to gain access to certain areas as they would now have to make use of an alternative route which may cause some inconvenience for residents of the area.

7.4.3 Noise Impacts

The operational activities may result in associated noise impacts, depending on the exact type of activities taking place on the properties. However due to the nature of the land uses proposed for the subject even it is not expected that the noise levels will be significant if managed well.

7.4.4 Emission Impacts

The air quality in the area is considered to be fairly good. Additional emissions are not expected due to the land uses that are intended for the site.

7.4.5 Employment creation

A small number of residents from Keetmanshoop could benefit from employment during construction and possibly by the activities taking place at the site.

7.4.6 Social Impact

Fencing off the street will ensure that right of way entry will only be permitted to parents, learners and staff of the Private School. This will allow the school to monitor movements on the school premises, thus promoting safety by reducing the occurrence of possible accidents and criminal activities.

7.5 CUMULATIVE IMPACTS

The cumulative impact of the proposed developments in regard to the degradation of the project area is very difficult to rate. If all proposed mitigation measures are however in place to minimise the overall impacts, then the cumulative impact can be expected to be rated as **Medium-Low (negative)** for the proposed developments.

7.6 ENVIRONMENTAL MANAGEMENT PLAN

An Environmental Management Plan (EMP) is contained in **Annexure F** of this report. The purpose of the EMP is to outline the type and range of mitigation measures that should be implemented during the construction and decommissioning phases of the project to ensure that negative impacts associated with the development are avoided or mitigated.

7.7 SUMMARY OF POTENTIAL IMPACTS

A summary of all the potential impacts from the proposed project assessed above is included in **Table 8**. The **Tables 9-11** provide a summary of the mitigation measures proposed for the impacts. While some difference in magnitude of the potential impacts would result from the proposed alternatives this difference was not considered to be significant for any of the potential impacts. As such, the table below applies to all proposed alternatives.

Table 8: Summary of the significance of the potential impacts

Description of potential impact	Project alternative	No mitigation / mitigation	Extent	Magnitude	Duration	SIGNIFICANCE	Probability	Confidence	Reversibility	Cumulative impact
PLANNING AND DESIGN PHASE										
1. Traffic	Keetmanshoop Private School	No mitigation	Local	Medium	Medium term	Medium	Probable	Certain	Reversible	Medium-Low (-ve)
		Mitigation	Local	Low	Medium term	Low	Probable	Certain	Reversible	Low (-ve)
	No go	No mitigation	Local	Neutral	Medium term	Neutral	Probable	Certain	Reversible	Neutral
		Mitigation	Local	Neutral	Medium term	Neutral	Probable	Certain	Reversible	Neutral
CONSTRUCTION PHASE										
2. Biodiversity (Fauna and Flora)	Keetmanshoop Private School	No mitigation	Local	Low	Short term	Low	Probable	Certain	Reversible	Medium (-ve)
		Mitigation	Local	Very Low	Short term	Very Low	Probable	Certain	Reversible	Low (-ve)
	No go	No mitigation	Local	Neutral	Short term	Neutral	Probable	Certain	Reversible	Neutral
		Mitigation	Local	Neutral	Short term	Neutral	Probable	Certain	Reversible	Neutral
3. Surface & ground water	Keetmanshoop Private School	No mitigation	Local	Medium	Short term	Medium	Probable	Certain	Reversible	Medium (-ve)
		Mitigation	Local	Low	Short term	Medium - low	Probable	Certain	Reversible	Medium - Low (-ve)
	No go	No mitigation	Local	Neutral	Short term	Neutral	Probable	Certain	Reversible	Neutral

Description of potential impact	Project alternative	No mitigation / mitigation	Extent	Magnitude	Duration	SIGNIFICANCE	Probability	Confidence	Reversibility	Cumulative impact
		Mitigation	Local	Neutral	Short term	Neutral	Probable	Certain	Reversible	Neutral
4. Waste Generation	Keetmanshoop Private School	No mitigation	Local	Medium	Short term	Medium	Probable	Certain	Reversible	Medium – low (-ve)
		Mitigation	Local	Low	Short term	Low	Probable	Certain	Reversible	Low (-ve)
	No go	No mitigation	Local	Neutral	Short term	Neutral	Probable	Certain	Reversible	Neutral
		Mitigation	Local	Neutral	Short term	Neutral	Probable	Certain	Reversible	Neutral
5. Heritage	Keetmanshoop Private School	No mitigation	Local	Very low	Short term	Very low	Probable	Certain	Irreversible	Very low(-ve)
		Mitigation	Local	Negligible	Short term	Negligible	Probable	Certain	Irreversible	Negligible (-ve)
	No go	No mitigation	Local	Neutral	Short term	Neutral	Probable	Certain	Reversible	Neutral
		Mitigation	Local	Neutral	Short term	Neutral	Probable	Certain	Reversible	Neutral
6. Health, safety and security	Keetmanshoop Private School	No mitigation	Local	Medium-Low	Short term	Medium-Low	Probable	Certain	Reversible	Medium-Low (-ve)
		Mitigation	Local	Low	Short term	Low	Probable	Certain	Reversible	Low (-ve)
	No go	No mitigation	Local	Neutral	Short term	Neutral	Probable	Certain	Reversible	Neutral
		Mitigation	Local	Neutral	Short term	Neutral	Probable	Certain	Reversible	Neutral

Description of potential impact	Project alternative	No mitigation / mitigation	Extent	Magnitude	Duration	SIGNIFICANCE	Probability	Confidence	Reversibility	Cumulative impact
7. Traffic impacts	Keetmanshoop Private School	No mitigation	Local	Medium	Short term	Medium	Probable	Certain	Reversible	Low (-ve)
		Mitigation	Local	Medium-Low	Short term	Medium-Low	Probable	Certain	Reversible	Very low
	No go	No mitigation	Local	Neutral	Short term	Neutral	Probable	Certain	Reversible	Neutral
		Mitigation	Local	Neutral	Short term	Neutral	Probable	Certain	Reversible	Neutral
8. Noise impacts	Keetmanshoop Private School	No mitigation	Local	Medium	Short term	Medium - low	Probable	Certain	Reversible	Medium - Low (-ve)
		Mitigation	Local	Low	Short term	Low	Probable	Certain	Reversible	Very low (-ve)
	No go	No mitigation	Local	Neutral	Short term	Neutral	Probable	Certain	Reversible	Neutral
		Mitigation	Local	Neutral	Short term	Neutral	Probable	Certain	Reversible	Neutral
9. Dust & emissions impacts	Keetmanshoop Private School	No mitigation	Local	Medium	Short term	Medium - low	Probable	Certain	Reversible	Medium - Low (-ve)
		Mitigation	Local	Low	Short term	Low	Probable	Certain	Reversible	Low (-ve)
	No go	No mitigation	Local	Neutral	Short term	Neutral	Probable	Certain	Reversible	Neutral
		Mitigation	Local	Neutral	Short term	Neutral	Probable	Certain	Reversible	Neutral
10. Municipal services	Keetmanshoop Private School	No mitigation	Local	Low	Short term	Low	Probable	Certain	Reversible	Low (-ve)

Description of potential impact	Project alternative	No mitigation / mitigation	Extent	Magnitude	Duration	SIGNIFICANCE	Probability	Confidence	Reversibility	Cumulative impact
	No go	Mitigation	Local	Very low	Short term	Very low	Probable	Certain	Reversible	Very low (-ve)
		No mitigation	Local	Neutral	Short term	Neutral	Probable	Certain	Reversible	Neutral
		Mitigation	Local	Neutral	Short term	Neutral	Probable	Certain	Reversible	Neutral
11. Hazardous Substances	Keetmanshoop Private School	No mitigation	Local	Low	Short term	Medium	Probable	Certain	Reversible	Medium (-ve)
		Mitigation	Local	Very low	Short term	Medium-Low	Probable	Certain	Reversible	Medium-low (-ve)
	No go	No mitigation	Local	Neutral	Short term	Neutral	Probable	Certain	Reversible	Neutral
		Mitigation	Local	Neutral	Short term	Neutral	Probable	Certain	Reversible	Neutral
12. Waste	Keetmanshoop Private School	No mitigation	Local	Low	Short term	Medium	Probable	Certain	Reversible	Medium (-ve)
		Mitigation	Local	Very low	Short term	Medium-Low	Probable	Certain	Reversible	Medium low (-ve)
	No go	No mitigation	Local	Neutral	Short term	Neutral	Probable	Certain	Reversible	Neutral
		Mitigation	Local	Neutral	Short term	Neutral	Probable	Certain	Reversible	Neutral
OPERATIONAL PHASE										
1. Sense of place	Keetmanshoop Private School	No mitigation	Local	Medium	Medium term	Medium	Probable	Certain	Reversible	Medium (-ve)

Description of potential impact	Project alternative	No mitigation / mitigation	Extent	Magnitude	Duration	SIGNIFICANCE	Probability	Confidence	Reversibility	Cumulative impact
		Mitigation	Local	Medium-Low	Medium term	Medium-Low	Probable	Certain	Reversible	Medium-Low (-ve)
	No go	No mitigation	Local	Neutral	Medium term	Neutral	Probable	Certain	Reversible	Neutral
		Mitigation	Local	Neutral	Medium term	Neutral	Probable	Certain	Reversible	Neutral
2. Traffic Impacts	Keetmanshoop Private School	No mitigation	Local	Medium	Medium term	Medium	Probable	Certain	Reversible	Medium (-ve)
		Mitigation	Local	Medium-Low	Medium term	Medium-Low	Probable	Certain	Reversible	Medium-Low (-ve)
	No Go	No Mitigation	Local	Neutral	Medium term	Neutral	Probable	Certain	Reversible	Neutral
		Mitigation	Local	Neutral	Medium term	Neutral	Probable	Certain	Reversible	Neutral
3. Noise	Keetmanshoop Private School	No mitigation	Local	Medium-Low	Medium term	Medium-Low	Probable	Certain	Reversible	Medium-Low (-ve)
		Mitigation	Local	Low	Medium term	Low	Probable	Certain	Reversible	Low (-ve)
	No go	No mitigation	Local	Neutral	Medium term	Neutral	Probable	Certain	Reversible	Neutral
		Mitigation	Local	Neutral	Medium term	Neutral	Probable	Certain	Reversible	Neutral
4. Dust & emissions	Keetmanshoop Private School	No mitigation	Local	Medium-Low	Medium term	Low	Probable	Certain	Reversible	Medium-Low (-ve)
		Mitigation	Local	Low	Medium term	Medium-Low	Probable	Certain	Reversible	Low (-ve)

Description of potential impact	Project alternative	No mitigation / mitigation	Extent	Magnitude	Duration	SIGNIFICANCE	Probability	Confidence	Reversibility	Cumulative impact
	No go	No mitigation	Local	Neutral	Medium term	Neutral	Probable	Certain	Reversible	Neutral
		Mitigation	Local	Neutral	Medium term	Neutral	Probable	Certain	Reversible	Neutral
5. Employment Creation	Keetmanshoop Private School	No mitigation	Local	Medium	Long term	Medium (+)	Probable	Probable	Reversible	High (+)
	No go	No mitigation	Local	Neutral	Long term	Neutral	Probable	Probable	Reversible	Neutral
6. Social impact	Keetmanshoop Private School	No mitigation	Local	Medium	Long term	Medium (+)	Probable	Probable	Reversible	High (+)
	No go	No mitigation	Local	Neutral	Long term	Neutral	Probable	Probable	Reversible	Neutral

Table 9: Proposed mitigation measures for the planning and design phase

PLANNING AND DESIGN PHASE IMPACTS	
Impact	Mitigation Measures
Traffic	<ul style="list-style-type: none"> • Ensure that road junctions have good sightlines. • Provide formal road crossings at relevant areas. • Provide for speed reducing interventions such as speed bumps at relevant road sections. • Adhere to the speed limit.

Table 10: Proposed mitigation measures for the construction phase

CONSTRUCTION PHASE IMPACTS	
Impact	Mitigation Measures
Flora and Fauna	<ul style="list-style-type: none"> • Prevent the destruction of protected and endemic plant species. • Recommend the planting of local indigenous species of flora as part of the landscaping as these species would require less maintenance than exotic species. • Transplant removed plants where possible, or plant new plants in lieu of those that have been removed. • Prevent the introduction of potentially invasive alien ornamental plant species such as; <i>Lantana</i>, <i>Opuntia</i>, <i>Prosopis</i>, <i>Tecoma</i>, etc.; as part of the landscaping as these species could infest the area further over time.
Surface and Ground Water Impacts	<ul style="list-style-type: none"> • It is recommended that construction takes place outside of the rainy season in order to limit flooding on site and surface water pollution. • No dumping of waste products of any kind in or in close proximity to surface water bodies. • Heavy construction vehicles should be kept out of any surface water bodies and the movement of construction vehicles should be limited where possible to the existing roads and tracks.

CONSTRUCTION PHASE IMPACTS	
Impact	Mitigation Measures
	<ul style="list-style-type: none"> • Ensure that oil/ fuel spillages from construction vehicles and machinery are minimised and that where these occur, that they are appropriately dealt with. • Drip trays must be placed underneath construction vehicles when not in use to contain all oil that might be leaking from these vehicles. • Contaminated runoff from the construction sites should be prevented from entering the surface and ground water bodies. • All materials on the construction site should be properly stored. • Disposal of waste from the sites should be properly managed and taken to the designated landfill site. • Construction workers should be given ablution facilities at the construction sites that are located at least 30 m away from any surface water and regularly serviced. • Washing of personnel or any equipment should not be allowed on site. Should it be necessary to wash construction equipment these should be done at an area properly suited and prepared to receive and contain polluted waters.
Heritage	<ul style="list-style-type: none"> • The project management should be made aware of the provisions of the National Heritage Act regarding the prompt reporting of archaeological finds. • In the event of such finds, construction must stop, and the project management or contractors should notify the National Heritage Council of Namibia immediately.
Health, Safety and Security	<ul style="list-style-type: none"> • Construction personnel should not overnight at the site, except the security personnel. • Ensure that all construction personnel are properly trained depending on the nature of their work. • Provide for a first aid kit and a properly trained person to apply first aid when necessary. • Restrict unauthorised access to the site and implement access control measures. • Clearly demarcate the construction site boundaries along with signage of “no unauthorised access”. • Clearly demarcate dangerous areas and no-go areas on site.

CONSTRUCTION PHASE IMPACTS	
Impact	Mitigation Measures
	<ul style="list-style-type: none"> • Staff and visitors to the site must be fully aware of all health and safety measures and emergency procedures. • The contractor must comply with all applicable occupational health and safety requirements. • The workforce should be provided with all necessary Personal Protective Equipment where appropriate.
Traffic	<ul style="list-style-type: none"> • Limit and control the number of access points to the site. • Ensure that road junctions have good sightlines. • Construction vehicles' need to be in a road worthy condition and maintained throughout the construction phase. • Transport the materials in the least number of trips as possible. • Adhere to the speed limit. • Implement traffic control measures where necessary.
Noise	<ul style="list-style-type: none"> • No amplified music should be allowed on site. • Inform immediate neighbours of construction activities to commence and provide for continuous communication between the neighbours and contractor. • Limit construction times to acceptable daylight hours. • Install technology such as silencers on construction machinery. • Do not allow the use of horns as a general communication tool but use it only where necessary as a safety measure.
Dust and Emission	<ul style="list-style-type: none"> • Dust abatement techniques should be implemented if dust levels are found to be significant. • Construction vehicles to only use designated roads. • During high wind conditions the contractor must make the decision to cease works until the wind has calmed down. • Cover any stockpiles with plastic to minimise windblown dust.

CONSTRUCTION PHASE IMPACTS	
Impact	Mitigation Measures
	<ul style="list-style-type: none"> • Provide workers with dust masks if dust levels are significant.
Waste	<ul style="list-style-type: none"> • It is recommended that waste from the temporary toilets be disposed of at an approved Wastewater Treatment Works. • A sufficient number of waste bins should be placed around the site for the soft refuse. • A sufficient number of skip containers for the heavy waste and rubble should be provided for around the site. • Solid waste must be collected and disposed of at an appropriate local landfill or an alternative approved site, in consultation with the local authority.
Hazardous Substances	<ul style="list-style-type: none"> • Storage of the hazardous substances in a bunded area, with a volume of 120 % of the largest single storage container or 25 % of the total storage containers whichever is greater. • Refuel vehicles in designated areas that have a protective surface covering and utilise drip trays for stationary plant.

Table 11: Proposed mitigation measures for the operational phase

OPERATIONAL PHASE IMPACTS	
Impact	Mitigation Measures
Traffic	<ul style="list-style-type: none"> • Limit and control the number of access points to the site. • Ensure that road junctions have good sightlines. • Adhere to the speed limit. • Implement traffic control measures where necessary.
Visual and Sense of place	<ul style="list-style-type: none"> • It is recommended that more 'green' technologies be implemented within the architectural designs and building materials of the development where possible in order to minimise the visual prominence of such a development within the more natural surrounding landscape. • Natural colours and building materials such as wood and stone should be incorporated as well as the use of indigenous vegetation in order to help beautify the development. • Visual pollutants can further be prevented through mitigations (i.e. keep existing trees, introduce tall indigenous trees; keep structures unpainted and minimizing large advertising billboards).
Noise	<ul style="list-style-type: none"> • Continuous monitoring of noise levels should be conducted to make sure the noise levels does not exceed acceptable limits. • No activity having a potential noise impact should be allowed after 18:00 hours if possible.
Emissions	<ul style="list-style-type: none"> • Manage activities that generate emissions.
Social Impacts	No specific mitigation measures are required, only that the local community be consulted in terms of possible job creation opportunities and must be given first priority if unspecialised job vacancies are available.

8 CONCLUSION

The purpose of this Chapter is to briefly summarise and conclude the DESR and describe the way forward.

8.1 CONSTRUCTION PHASE IMPACTS

With reference to **Table 8**, none of the negative construction phase impacts were deemed to have a high significance impact on the environment. The construction impacts were assessed to a **Medium to Low (negative)** significance, without mitigation measures. With the implementation of the recommended mitigation measures in Chapter 7 as well as in the EMP, the significance of the construction phase impacts is likely to be reduced to a **Low (negative)**.

8.2 OPERATIONAL PHASE

With reference to **Table 8**, none of the negative operational phase impacts were deemed to have a high significance impact on the environment. The construction impacts were assessed to a **Medium to Low (negative)** significance, without mitigation measures. With the implementation of the recommended mitigation measures in Chapter 7 as well as in the EMP, the significance of the construction phase impacts is likely to be reduced to a **Low (negative)**.

8.3 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: DEAF to be able to determine the environmental acceptability of the proposed project.

It is acknowledged that the project details 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.

8.4 MITIGATION MEASURES

With the implementation of the recommended mitigation measures in Chapter 7 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: DEAF could be enforced as Conditions of Approval in the Environmental Authorisation, should MEFT: DEAF issue a positive Environmental Authorisation.

8.5 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 recommended that this project be authorised as 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.

8.6 WAY FORWARD

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

9 REFERENCES

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