

<b>Title</b>	<b>ENVIRONMENTAL MANAGEMENT PLAN: Subdivision, Closure as a Public Place, and Rezoning of a portion of Lübbert Street, Swakopmund.</b>
<b>Scope of Work</b>	<b>Creation of a new erf to accommodate the existing Electrical Substation situated on Lübbert Street.</b>
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<b>Date</b>	<b>10 October 2025</b>
<b>Signature of EAP</b>	<div style="text-align: center;"> <p>Yours Faithfully,</p>   <b>A R VAN DER WESTHUIZEN</b> </div>

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## **1. Introduction**

The Municipality of Swakopmund and Erongo Regional Electrical Distributor Company (Pty) Ltd entered into an agreement which will allow Erongo Red to transfer all substation into their name. Due to the complexity of historical events, it is in most cases necessary to subdivide both Municipal owned and privately owned properties in order to create a separate property for the substations. Only once the properties have been subdivided and/or rezoned can the transfer of the substations be affected.

In certain cases, as in the current application, the property is very small and the substation is situated in the middle of the erf. This in our opinion is not worth of subdivision as the remainders will be too small and very useless in nature. It is recommended that these properties, due to their limited size, be transferred to the name of Erongo Regional Electrical Distributor Company (Pty) Ltd.

As a matter of fact, such future transfer of the property has already been approved by the Municipality in light of the Transfer Agreement between the two parties.

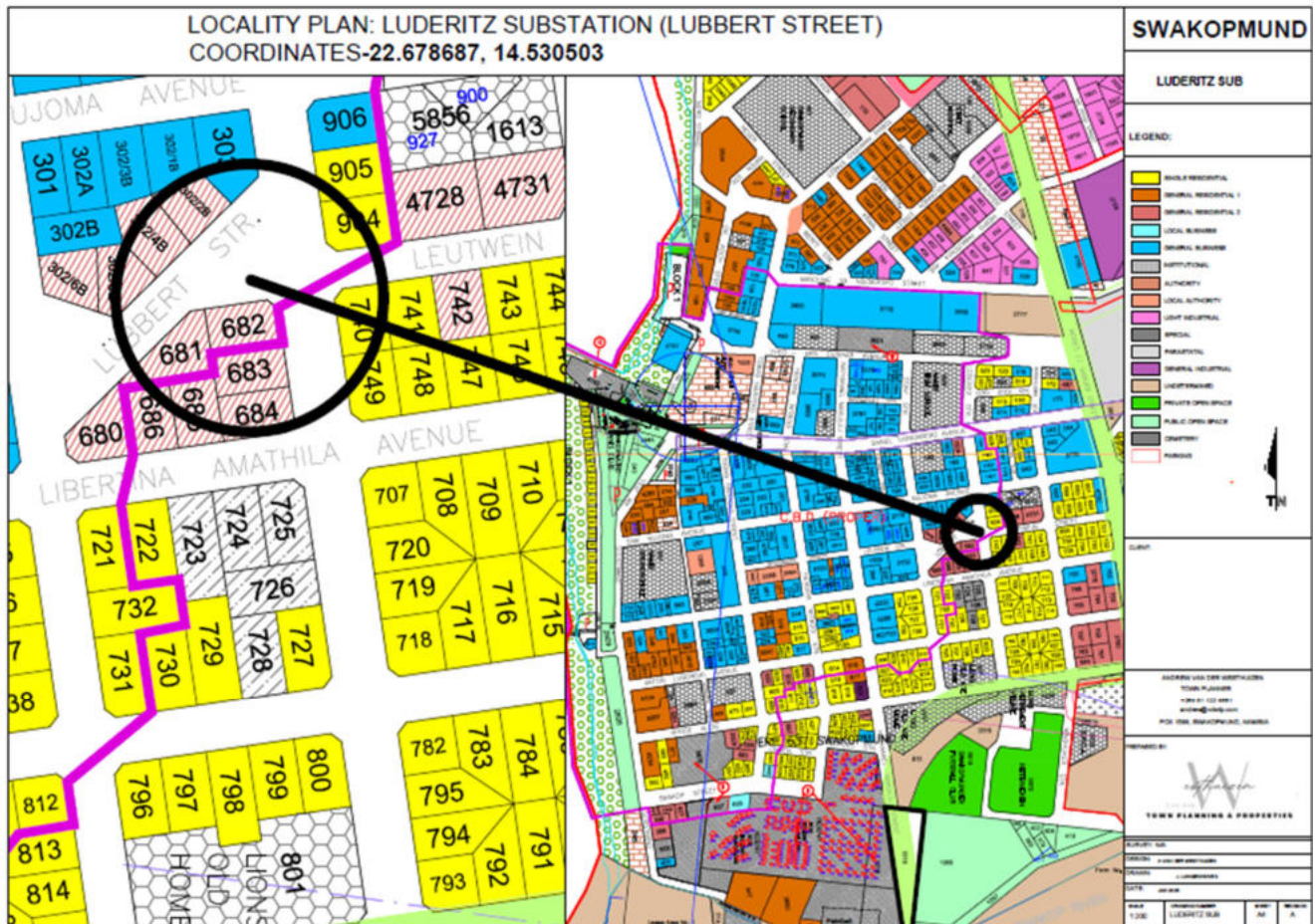
The Electrical Substation known as Lüderitz Substation is existing and situated in the road reserve and as such it is needed to subdivide the Street. The Closure and rezoning of a street portion is a listed activity and thus requires an Environmental Clearance Certificate in terms of the Environmental Management Act (No. 7 of 2007) and Environmental Impact Assessment Regulations (Government Notice No. 30 of 2012). Attached as Annexure A is the Local Authority Support Letter.

As with all Environmental Impact Assessment processes, the Environmental Management Plan is the most important document to effectively mitigate any potential or foreseen negative impacts on the natural and urban fabric. It is the intention of this EMP to mitigate any foreseen impacts and the monitoring actions to be implemented during the Planning Phase, Application Phase and Construction Phase.

## 2. SITE INFORMATION

### 2.1. Locality

Lüderitz Substation is located on the corner of Lübbert street and Lüderitz Street. The approximate size of the substation is approximately 70m<sup>2</sup>. The substation can be found at the **Coordinates: -22.678687, 14.530503**. The site is located within what is known as the CBD of Swakopmund also referred to as Swakopmund Proper.



### 2.2. Ownership and Current Status

All streets and roads on the Townlands of Swakopmund belong to the Municipality of Swakopmund. As mentioned previously in this document, all substation used to belong to the Swakopmund Municipality and as such may substations were constructed on street portions. As it currently stands Erongo Red cannot take possession of the substation as the substation and land on which the substation is situated on belongs to the Municipality.

### 2.3. Zoning

The current zoning of the land is Street and as such the existing Electrical Substation is conflict with the allocated use of the property. It is thus required to perform the necessary statutory procedures to create a separate erf and allocate the correct zoning to the newly created portion.

According to the Swakopmund Town Planning Scheme it is required to provide the new portion with a Parastatal zoning.

Proposed Portion A will be rezoned to Parastatal in order to comply with the provisions of the Swakopmund Town Planning Scheme No. 12.

### 3. INTENTIONS OF CLIENT

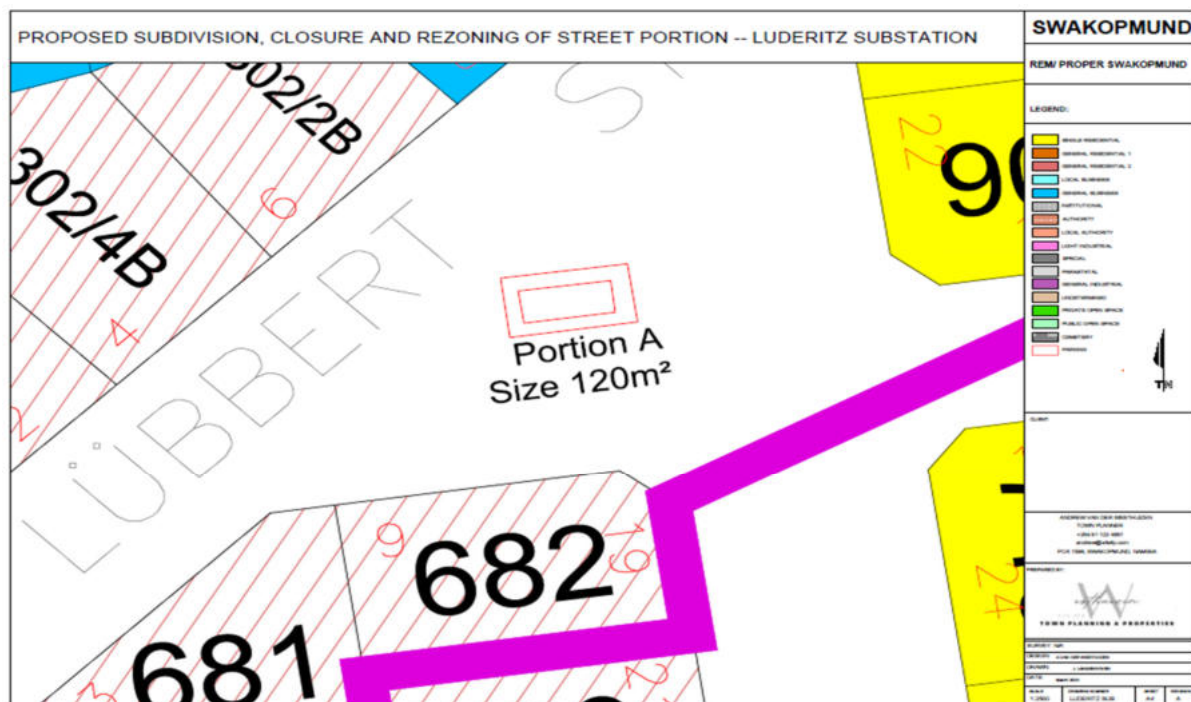
As previously indicated in the introduction, there is a transfer agreement in place between the Municipality of Swakopmund and Erongo Regional Electricity Distribution Company (Pty) Ltd to transfer all Electrical Substation to the name of Erongo Red. As with many substations in Swakopmund, they are situated on street portions belonging to the Municipality of Swakopmund. In order to take transfer of this specific substation it is needed to create a separate erf with its correct zoning to accommodate the substation and use.

It is thus the intention to Subdivide Lubbert Street, into proposed Portion A (120m<sup>2</sup>) and Remainder, close proposed Portion A as a Public Space and Rezone proposed Portion A from Street to Parastatal in order to provide the existing substation with its correctly zoned property. This will effectively allow for the transfer of the property to the name of Erongo Red as per the intention of the Transfer Agreements between the Municipality of Swakopmund and Erongo Red Electrical Distributors.

The long existing Electrical Substation that provides electricity to the area, is seen as a necessity in terms of access to service provision. Now that the substation is in need of transfer to another entity, it is needed to perform the necessary statutory procedures to create such erven for transfer to Erongo Regional Electrical Distribution Company or allocate existing erven with the correct land use in terms of the Swakopmund Town Planning Scheme.

#### 3.1 Subdivision of Lubbert Street into Portion A and Remainder

As previously indicated in this document, it is needed to Subdivide Lubbert Street, into proposed Portion A and Remainder. Proposed Portion A will be approximately 120m<sup>2</sup> in extent while the Remainder remains the entire road network for the area and remains the property of the Swakopmund Municipality.



Subdivision Plan

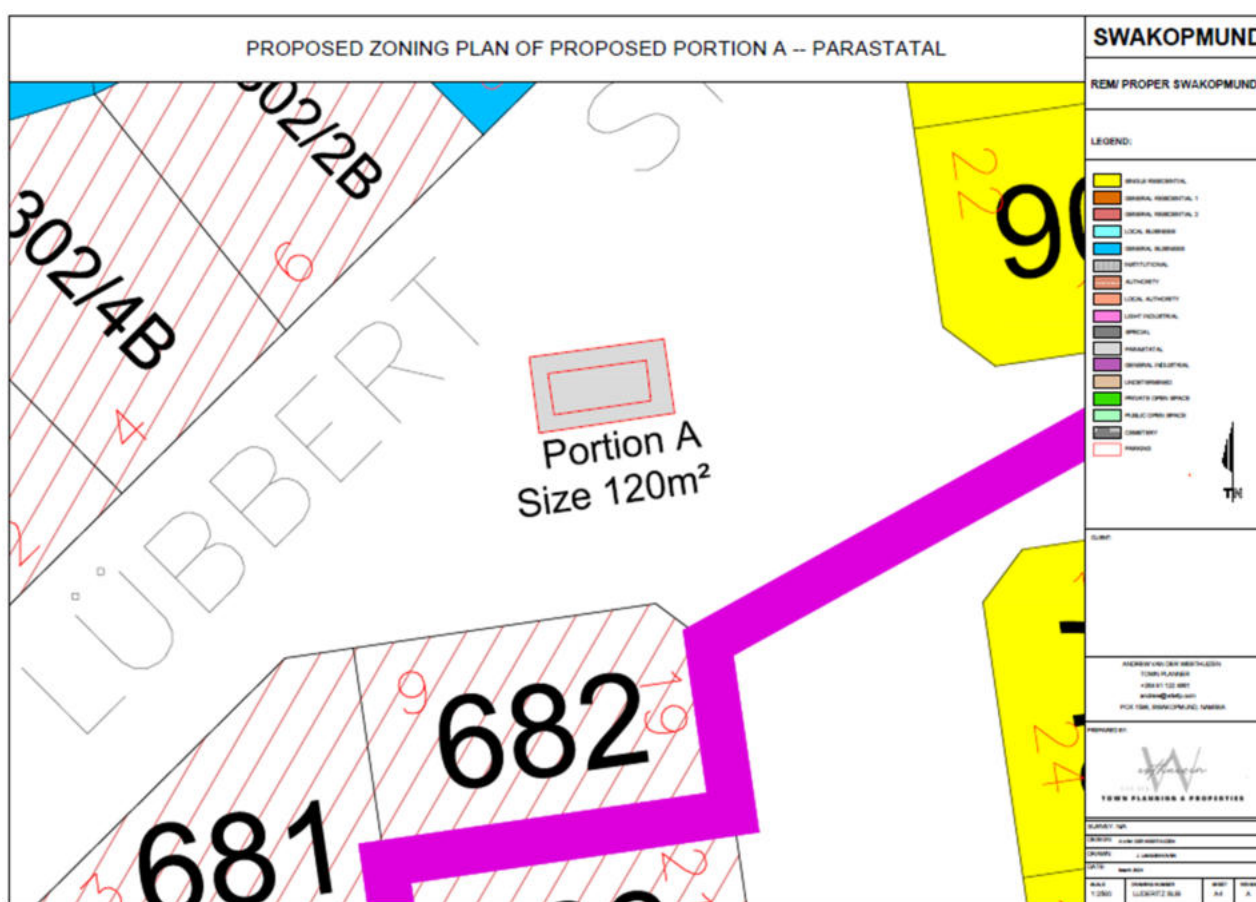


### 3.2. Closure of Proposed Portion A as a Public Place

Due to the fact that Proposed Portion A has a zoning of Street it is needed to close proposed Portion A as a Public Space. This means that a public participation process is needed to be administered in order to obtain any comments from the general public and direct neighbours. This process was also concluded hence the application for ECC.

### 3.3. Rezoning of Proposed Portion A from Street to Parastatal

Simultaneous with the closure of proposed Portion A as a Public Space it is needed to perform a rezoning of the newly created Portion A in order to allocate its correct land use. It is thus necessary to rezone proposed Portion A from Street to Parastatal.



### Proposed Zoning Plan: Parastatal zoning

## **4. RESPONSIBILITIES OF DIFFERENT ROLE-PLAYERS**

Erongo Regional Electrical Distributor Company (Pty) Ltd (Proponent/Developer) is ultimately responsible for the implementation of the EMP. The Proponent may delegate this responsibility at any time, as they deem necessary, from construction, operation and maintenance before handover of infrastructure. The implementation of this EMP requires the involvement of several key individuals, each fulfilling a different but vital role to ensure sound environmental management during each phase of these developments. The following positions and their respective responsibilities are outlined below:

### **4.1. The Developer/Proponent (Erongo Red Electrical Distributors)**

Responsible for the implementation of the final EMP document, as approved by the Environmental Commissioner, before the commencement of the Construction phase and to ensure that the proposed development complies with the Environmental Management Act's requirements and the Environmental Clearance given.

### **4.2. The Proponent's Representative**

If the Proponent does not manage all aspects of the planning & design, construction, and operation & maintenance phase activities, referred to in this EMP, they should assign this responsibility to a suitably qualified individual to oversee the activities. The Proponent may decide to assign the role of a Proponents Representative to one person for all phases. Alternatively, the Proponent may decide to assign a separate PR for each developmental phase of the project.

During the Planning & Design (tender preparation) Phase, the Representative will have the following responsibilities regarding the implementation of this EMP:

- Ensuring that the necessary legal authorizations have been obtained.
- Developing, managing, implementation of, and maintaining all Development Guidelines.
- To ensure the contractor signs the EMP before the commencement of the development.
- Ensure that the management requirements inform the planning and design of the relevant infrastructure developments (i.e., that these requirements are considered during the Planning and Design Phase, not as an afterthought); and
- Ensure that the management requirements inform the preparation of tender documents for the construction of the relevant infrastructure developments.

During the Construction, Operation and Maintenance Phases the Proponent Representative shall assist the Environmental Control Officer where necessary and will have the following responsibilities regarding the implementation of this EMP:

- Ensuring that the necessary legal authorizations and permits have been obtained by the Contractor.



- Assisting the Contractor in finding environmentally responsible solutions to problems with input from the Environmental Officer where necessary.
- Management and monitoring of individuals and/or equipment on-site in terms of compliance with the EMP.
- Issuing fines for the transgression of site rules and penalties for contravention of the EMP; and
- Providing input into the Environmental Officers ongoing internal review of the EMP. This review report should be submitted every month to the Proponent.

#### **4.3. Environmental Control Officer**

The Environmental Control Officer should be a competent person appointed by the Proponent. The Environmental Control Officer is the Developer's on-site representative primarily responsible for the monitoring and review of on-site environmental management and implementation of the EMP by the Contractor. If no Environmental Control Officer is appointed then all duties will fall upon the Proponent.

##### **Responsibility:**

- Assisting the Proponents Representative in ensuring that the necessary legal authorizations have been obtained.
- Management and facilitation of communication between the Proponents Representative, Proponent, the Contractor, and I&APs about this EMP and matters incidental thereto.
- Conduct monthly site inspections of all construction and/or infrastructure maintenance areas about compliance with this EMP.
- Monitor and verify adherence to the EMP (audit the implementation of the EMP) and verify that environmental impacts are kept to a minimum.
- Taking appropriate action if the specifications of the EMP are not adhered to.
- Assisting the Contractor in finding environmentally responsible solutions to problems.
- Advising on the removal of person(s) and/or equipment not complying with the provisions of the EMP in consultation with the Proponents Representative.
- Recommending the issuing of fines for transgressions of site rules and penalties for contraventions of the EMP; and
- Undertaking an annual review of the EMP and recommending additions and/or changes to the document.

#### **4.4. The Contractor & Sub-contractor/s**

It is envisaged that various contractors might be appointed at various times for various tasks throughout the life cycle (construction through to operation & maintenance phase) of this

project. To ensure sound environmental management, the relevant sections of this EMP should be included in all contracts of work outsourced thus legally binding all appointed contractors and sub-contractors.

**Responsibility:**

- To comply with the Environmental Authorization and undertake construction activities in an environmentally sensitive manner and rehabilitation of the site.
- To undertake good housekeeping practices during the duration of the project.
- To ensure that adequate environmental awareness training takes place in the employees' language of choice.
- Report any environmental concerns noticed on and around the primary site of concern to the Proponent's Representative and/or Environmental Officer

**4.5. The Environmental Assessment Practitioner**

The Environmental Assessment Practitioner is responsible to conduct the required Environmental Application which includes compiling an EMP for the proposed development. The EMP is to be submitted with the scoping EA report as supporting documents to the application for an ECC to the Environmental Commissioner of the Ministry of Environment and Tourism. This EMP will be used by Contractors and Engineers as well as the Proponent in guiding them during the construction and operation of the townships to ensure that the impacts on the environment are limited or avoided altogether.

**5. ENVIRONMENTAL AWARENESS TRAINING**

All contractors should ensure that adequate environmental awareness training of senior site personnel takes place and that all construction workers and new employees receive an induction presentation on the importance and implications of the EMP before the work commencing. The presentation should be conducted by the ECO, in the employees' language of choice.

**6. APPLICABLE LEGISLATION**

As with any formal application to the Local Authority, Ministry of Urban and Rural Development and Ministry of Environment and Tourism is imperative to follow the correct procedures. Each of these institutions have a set of requirements that have to be fulfilled in order to accomplish the desired result in terms of an application.

The legislative document that had to be taken into consideration while performing the exercise of apply for Environmental clearance were the following:

### **6.1. The Environmental Management Act of 2007**

The Environmental Management Act specifically deals with the requirements for Environmental applications. Its objective is to: “To promote the sustainable management of the environment and the use of natural resources by establishing principles for decision making on matters affecting the environment; to establish the Sustainable Development Advisory Council; to provide for the appointment of the Environmental Commissioner and environmental officers; to provide for a process of assessment and control of activities which may have significant effects on the environment; and to provide for incidental matters”.

### **6.2. The Urban and Regional Planning Act of 2018**

The Urban and Regional Planning Act deals with the spatial development of land within Namibia and provides the framework for spatial development. The aim of the Act is 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 decentralize 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 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”.

### **6.3. The Swakopmund Town Planning Scheme No. 12**

“The general purpose of the Scheme is the coordinated and harmonious development of the area of Swakopmund including where necessary the redevelopment of any part thereof which has already been subdivided and built upon, in such a way as will most effectively tend to promote health, safety, order, amenity, convenience and general welfare as well as efficiency and economy and conservation of the existing character of the town, in the process of such development”.

### **6.4. The Swakopmund Structure Plan**

The purpose of this document is to provide guidelines to the Swakopmund municipality in dealing with issues of urban sprawl; integration of urban areas; stimulation of mixed-use development areas and residential densification; guiding the urban form through building height restrictions in development areas; development of the beach area for the use of all and re-connecting the town to the beach; defining the urban edges; improving permeability and mobility; maintaining and enhancing the character of the historic town centre; promoting the tourism, education, medical and cleaner technology sectors and encourage environmentally sustainable and visionary development.

It is imperative that the proposed development is initiated and steered within the legal

framework of these documents in order for fulfilment of the requirements and the best possible outcome for the intended actions as being applied for.

## 7. PROJECT PHASES AND MANAGEMENT REQUIREMENTS / ACTIONS

The following will clearly define the responsibilities int rems of requirements and actions of each role player involved during the respective phases of the project.

### 7.1. Planning and Design Phase of Project

During the planning and design phase of the project the following Management Requirements / Actions should be attended to by the Management Team.

Feature	Management Requirements/Actions
Applications and approval	<ul style="list-style-type: none"><li>• Obtain all the relevant approvals from the relevant Authorities. The include the following:<ul style="list-style-type: none"><li>➤ Environmental Clearance Certificate (MEFT)</li><li>➤ Council Approval for intentions</li><li>➤ Ministerial Approval for intentions (MURD)</li><li>➤ Obtain Approved Diagrams (Surveyor Generals Office)</li><li>➤ Transfer new Erf to Erongo Red (Deeds Office)</li></ul></li></ul>
Channels of Communication	<ul style="list-style-type: none"><li>• Clear channels of communication to be established between the various role player.</li><li>• The various role-players should be clearly identified</li></ul>
General observation	<ul style="list-style-type: none"><li>• The management team be response the ensure compliance with the EMP.</li></ul>
Flora and Fauna (Biodiversity)	<ul style="list-style-type: none"><li>• No Fauna or Flora present due to the nature of circumstances.</li></ul>
Interested and Affected Parties	<ul style="list-style-type: none"><li>• Communication with I &amp; AP's</li></ul>

## 7.2. Construction Phase

During the Construction Phase the following Management Requirements / Actions should be attended to by the Proponent, Environmental Officer and Contractor:

Environmental Feature	IMPACT	Management Requirements / Actions	Responsible Entity
Weekly Visual inspection	Visual and Social Impact	<ul style="list-style-type: none"> <li>• Weekly site inspections to be done to ensure compliance with the EMP</li> </ul>	Proponent, Environmental Officer and Contractor
Building rubble	Visual impact and topsoil contamination	<ul style="list-style-type: none"> <li>• Proper onsite disposal facility (skip).</li> <li>• Regular site cleanup</li> </ul>	Contractor
Hazardous waste	Contamination of Topsoil.	<ul style="list-style-type: none"> <li>• Proper onsite disposal facilities.</li> <li>• Disposal of such waste should be done in accordance to the Municipal bylaws.</li> <li>• Disposal only at Municipal approved sites</li> </ul>	Contractor
General waste	Visual impact and soil contamination	<ul style="list-style-type: none"> <li>• The construction site should be kept tidy and neat at all times.</li> <li>• No waste may be buried or burned on the site</li> <li>• No waste may remain on site after the completion of the project.</li> </ul>	Contractor
Road safety	Injury or loss of life	<ul style="list-style-type: none"> <li>• Clear and Proper demarcation of road to be used by construction</li> </ul>	Contractor



		vehicles	
Safety around work sites	Injury or loss of life	<ul style="list-style-type: none"> <li>• Excavations and trenches should be left open for the shortest time possible.</li> <li>• Clearly Demarcate excavated areas and sand piles with demarcation tape to avoid injury.</li> </ul>	Contractor
Ablution facilities	Non-compliance with Health and Safety Regulations / unhygienic site conditions	<ul style="list-style-type: none"> <li>• Portable toilets (i.e. easily transportable) should be available at every construction site</li> <li>• Separate toilets should be available for men and women and should clearly be indicated as such.</li> </ul>	Contractor
General health and safety	Injury or loss of life	<ul style="list-style-type: none"> <li>• All workers should have access to the relevant personal protective equipment (PPE).</li> <li>• No workers should be allowed to drink alcohol during work hours.</li> </ul>	Contractor
Noise	Nuisance impacts	<ul style="list-style-type: none"> <li>• Work hours should be restricted to between normal working hours being 08h00 to 17h00.</li> <li>• The use of power tools and heavy machinery should</li> </ul>	Contractor

		<p>be limited and only be used when required in order to limit the noise pollution.</p> <ul style="list-style-type: none"> <li>• Proper planning in order to minimise time on site.</li> </ul>	
Dust	Nuisance and health impacts	<ul style="list-style-type: none"> <li>• A watering truck should be used on gravel roads with the heaviest vehicle movement especially during dry and windy conditions. However, due consideration should be given to water restrictions during times of drought.</li> <li>• The use of waterless dust suppression means.</li> <li>• Cover all stockpiles with plastic to minimise windblown dust.</li> <li>• Dust protection masks should be provided to workers</li> </ul>	Contractor
Service Infrastructure	Loss of Services	<ul style="list-style-type: none"> <li>• Contractors to identify all municipal Infrastructure service lines.</li> <li>• Clearly demarcate such services to avoid damage and interruption of services.</li> </ul>	Contractor
Storage of Building Materials	Injury, loss of life, visual and soil contamination	<ul style="list-style-type: none"> <li>• All building materials to be properly stored on site in a safe manner.</li> <li>• All material be clearly</li> </ul>	Contractor

		demarcated with demarcation tape.	
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### 7.3. Maintenance and Operation Phase of Project

During the maintenance and operation phase of the project the proponent and appointed contractor of the time should perform the following Management Requirements / Actions.

Feature	Impact	Management Requirements / Actions	Responsible Entity
Environmental Awareness training	Lack of EMP awareness and the implications thereof	<ul style="list-style-type: none"> <li>All contractors appointed for maintenance work on the respective streets must ensure that all personnel are aware of necessary health, safety and environmental considerations applicable to their respective work.</li> </ul>	Proponent, Environmental Control Officer and Contractor
Dust	Health Impacts and Nuisance	<ul style="list-style-type: none"> <li>Should dust levels become significant dust suppression techniques should be applied.</li> <li>Waterless dust suppression means should be utilised</li> </ul>	Contractor

		within areas experiencing water scarcity.	
General Cleanliness	Visual & Social Impact	• Regular check-ups to see whether the site is and socially acceptable manner.	Environmental Control Officer and Proponent
Visual apparency of Structures	Visual & Social Impact	• Periodic renovation and painting of structures and walls.	Proponent

## 8. CONCLUSION

It is our opinion that if the above EMP is incorporated and used as a guideline in the awareness training and day to day activities on site, it will as a matter of fact serve its purpose in terms of mitigating and limiting potential negative impact.

The EMP should be made available to all the different role-players involved on the project and should form the basis of the planning and design phase to ensure compliance throughout the project.