

ENVIRONMENTAL MANAGEMENT PLAN FOR THE:

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

## **APP-007371**


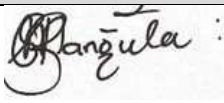
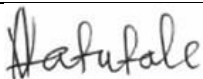
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<b>Title</b>	Environmental Management Plan for the: Subdivision Of the Remainder of Portion B of the Lüderitz Town and Townlands No. 11 Into Portions A, B and Remainder, Rezoning of Portion B from 'Undetermined' to 'Street' (Street Creation), Lüderitz, Karas Region		
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## ABBREVIATIONS

<b>AIDS</b>	Acquired Immuno-Deficiency Syndrome
<b>DEA</b>	Department of Environmental Affairs
<b>DEAF</b>	Department of Environmental Affairs and Forestry
<b>DESR</b>	Draft Environmental Scoping Report
<b>EA</b>	Environmental Assessment
<b>ECC</b>	Environmental Clearance Certificate
<b>ECO</b>	Environmental Control Officer
<b>EIA</b>	Environmental Impact Assessment
<b>EMA</b>	Environmental Management Act
<b>EMP</b>	Environmental Management Plan
<b>FESR</b>	Final Environmental Scoping Report
<b>GG</b>	Government Gazette
<b>GIS</b>	Geographic Information System
<b>GN</b>	Government Notice
<b>GPS</b>	Global Positioning System
<b>HIV</b>	Human Immunodeficiency Virus
<b>I&amp;APs</b>	Interested and Affected Parties
<b>MET</b>	Ministry of Environment and Tourism
<b>MEFT</b>	Ministry of Environment, Forestry and Tourism
<b>mamsl</b>	Metres above mean sea level
<b>NHE</b>	National Housing Enterprise
<b>NHCN</b>	National Heritage Council of Namibia
<b>PPP</b>	Public Participation Process
<b>PR</b>	Proponent's Representative
<b>Reg.</b>	Regulation
<b>S</b>	Section
<b>TB</b>	Tuberculosis

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## 1. Introduction

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

- **SUBDIVISION OF THE REMAINDER OF PORTION B OF THE LÜDERITZ TOWN AND TOWNLANDS NO. 11 INTO PORTION A, PORTION B AND REMAINDER OF PORTION B OF THE LÜDERITZ TOWN AND TOWNLANDS NO. 11.**
- **REZONING THE PROPOSED PORTION A FROM 'UNDETERMINED' TO 'RESIDENTIAL 2' WITH A DENSITY OF 1:150.**
- **REZONING OF THE PROPOSED PORTION B FROM 'UNDETERMINED' TO 'STREET'.**
- **ALTERATION OF THE BOUNDARIES OF LÜDERITZ PROPER TO INCLUDE PORTION A AND B.**

The 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).

An Environmental Management Plan (EMP) is one of the most important outputs of the EIA process as it synthesises all the proposed mitigation and monitoring actions, set to a timeline and with specific assigned responsibilities. This EMP details the mitigation and monitoring actions to be implemented during the following phases of these developments:

- **Planning and Design** – the period, prior to construction, during which preliminary legislative and administrative arrangements, necessary for the preparation of erven, are made and engineering designs are carried out. The preparation of construction tender documents forms part of this phase;
- **Construction** – the period during which the proponent, having dealt with the necessary legislative and administrative arrangements, appoints a contractor for the development of services infrastructure and construction of the road to service the development as well as any other construction process(s) within the development areas;
- **Operation and Maintenance** – the period during which the services infrastructure will be fully functional and maintained.

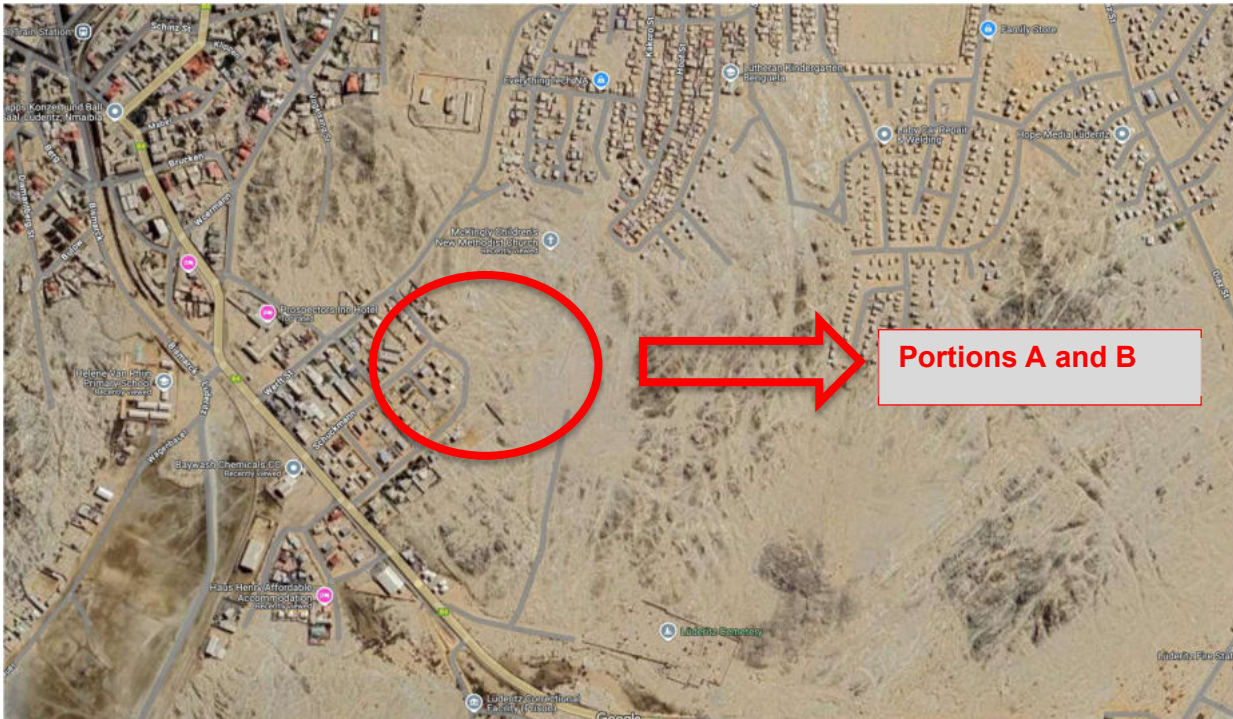
It should be noted that to date, no engineering designs have been carried out for the development of the infrastructure associated with this development.

The decommissioning of this development is not envisaged; however in the event that this should be considered some recommendations have been outlined in Table 10.

## 2. Proposed Development

### 2.1 Locality and Size

The proposed subdivided Portions A and B are located along Schuckmann Street, Lüderitz Proper. Portion A measures 1000m<sup>2</sup> in extent. The proposed Portion B has a width of 10m wide.



**Figure 1: Locality of the proposed subdivided Portions A and B**

### 2.2 Topography

The proposed Portions A and B, along with the surrounding area, have a generally gentle slope, with elevations ranging from 15m to 36m above sea level. This results in a gradient of approximately 1:100 (about 1%), making the site suitable for development with natural drainage.

### 2.3 Current Land Use and Zoning

The proposed Portions A and B are currently zoned “Undetermined” and are vacant.

### 2.4 Surrounding Land Uses

The respective properties are located in an area surrounded by a variety of zonings, including Undetermined, Residential 1, Residential 2, Residential 3, Public and Private Open Space, Parastatal, Light Industrial, and General Business. While the properties lie within a predominantly residential area, the immediate surroundings reflect a mixed-use character.

Notable nearby establishments include Coastways service station, Baywash Chemicals CC, Metro Lüderitz, Haus Henry Affordable Accommodation, Oars Guesthouse,

Villelodge Accommodation, TrenTyre Lüderitz, Prospectors Inn Hotel, McKingly Children's New Methodist Church and Helene Van Rhijn Primary School, all of which contribute to the area's diverse land-use pattern.

## **2.5 Existing Infrastructure and Access**

### *2.5.1 Access*

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

### *2.5.2 Water, Sewer, and Electricity*

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

## **2.6 Conditions of Title**

The conditions of title for the Remainder of Portion B of Lüderitz Town and Townlands No. 11 are attached under Annexure A. It should be noted that there are no restrictions or servitudes registered against the subject portion that would prohibit the proposed development.

## **2.7 Development Proposal**

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

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

High-density developments increase the efficiency with which municipal services can be provided, create economies of scale, and preserve the surrounding natural environment. The establishment of the proposed land use adds to the diversity in the neighbourhood, creating a mixed land use neighbourhood.

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

Furthermore, the proposed development will benefit not only the owner of the property, but will benefit the Lüderitz Town Council, through the collection of property tax from the

general increase in land values on Portion A. The creation of a street on the proposed Portion B will not only benefit the owners of Portion A but will also benefit the owners of Portions 689 and 690, Lüderitz Proper, as they currently do not have access to a registered street.

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

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

As the proposed Portion A currently does not have access to a formal street, Rocky Bay Investment CC will be required to construct a new street on Portion B at their own cost, which has triggered an EIA as per the Environmental Management Act No. 7 of 2007.

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

**Table 1: Recommended size for the proposed Portion A**

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

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

**Table 2: Extract from Table B of the Lüderitz Zoning Scheme**

ZONE	MAP REFERENCE	PRIMARY USE	SPECIAL USE	PERSONAL CONSENT
Residential 2	Orange hatch (45° left)	Dwelling house/s, townhouses, accommodation establishment, guest house.	Places of instruction, place of worship, institutional buildings, holiday accommodation, day care center	Resident Occupation

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

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

**Table 3: Portion Size, Current and Proposed Zoning, and Land Use**

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

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

Table 4 below outlines the number of units, coverage and parking calculations that will apply to the the proposed subdivided Portion A, under the 'Residential 2' zoning.

**Table 4: Bulk, Coverage and Parking Calculations**

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

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

The proposed Portion B is 10m wide, in line with the Ministry of Regional and Local Government, Housing and Rural Development (now the Ministry of Urban and Rural Development) Town Planning Standards and Urban Design Guidelines for Principal Layout Plans. The Guidelines allow for a minimum street width of 10m for vacant land, comprising 6m for vehicular traffic and 4m for pedestrians and services required within the street reserve.

### 3. Roles and Responsibilities

The proponent (National Housing Enterprise) is ultimately responsible for the implementation of the EMP, from the planning and design phase to the decommissioning phase (if these developments are in future decommissioned) of these developments. The proponent will delegate this responsibility as the project progresses through its life cycle. The delegated responsibility for the effective implementation of this EMP will rest on the following key individuals:

- Proponent's Representative.
- Environmental Control Officer; and
- Contractor (Construction and Operations and Maintenance).

### 3.1. Proponents Representative

The National Housing Enterprise should assign the responsibility of managing all aspects of this development for all development phases (including all contracts for work outsourced) to a designated member of staff, referred to in this EMP as the Proponent's Representative (PR). The National Housing Enterprise may decide to assign this role to one person for the full duration of these developments, or may assign a different PR to each of the development phases – i.e. one for the planning and design phase, one for the construction phase and one for the operation and maintenance phase. The PR's responsibilities are as follows:

**Table 5: PR's responsibilities**

<b>Responsibility</b>	<b>Project Phase</b>
Making sure that the necessary approvals and permissions laid out in Table 7 are obtained/adhered to.	Throughout the lifecycle of these developments
Making sure that the relevant provisions detailed in Table 8 are addressed during planning and design phase.	Planning and design phase
Monitoring the implementation of the EMP monthly	<ul style="list-style-type: none"> <li>• Construction</li> <li>• Operation and maintenance</li> </ul>
Suspending/evicting individuals and/or equipment not complying with the EMP	<ul style="list-style-type: none"> <li>• Construction</li> <li>• Operation and maintenance</li> </ul>
Issuing fines for contravening EMP provisions	<ul style="list-style-type: none"> <li>• Construction</li> <li>• Operation and maintenance</li> </ul>

### 3.2. Environmental Control Officer

The PR should assign the responsibility of overseeing the implementation of the whole EMP on the ground during the construction and operation and maintenance phases to an independent external consultant, referred to in this EMP as the Environmental Control Officer (ECO). The PR/ National Housing Enterprise may decide to assign this role to one person for both phases and may assign a different ECO for each phase. The ECO will have the following responsibilities during the construction and operation and maintenance phases of these developments:

- Management and facilitation of communication between the CR, the contractors, and Interested and Affected Parties (I&APs) with regard to this EMP;
- Conducting site inspections (recommended minimum frequency is weekly) of all construction and/or infrastructure maintenance areas with respect to the implementation of this EMP (audit the implementation of the EMP);
- Assisting the Contractor in finding solutions with respect to matters pertaining to the implementation of this EMP;
- Advising the PR on the removal of person(s) and/or equipment not complying with the provisions of this EMP;
- Making recommendations to the PR with respect to the issuing of fines for contraventions of the EMP; and
- Undertaking an annual review and bi-annual audit of the EMP and

recommending additions and/or changes to this document.

### **3.3. Contractor**

Contractors are automatically responsible for implementing all provisions contained within the relevant chapters of this EMP. Contractors will be responsible for the implementation of this EMP applicable to any work outsourced to subcontractors. **Table 8** applies to contractors appointed during the construction phase and **Table 9** to those appointed during the operation and maintenance phase. To ensure effective environmental management, the aforementioned chapters should be included in the applicable contracts for outsourced construction, operation, and maintenance work.

The tables in the following chapter (Chapter 4) detail the management measures associated with the roles and responsibilities that have been laid out in this chapter.

## **4. Management Actions**

The aim of the management actions in this chapter of the EMP is to avoid potential impacts where possible. Where impacts cannot be avoided, measures are provided to reduce the significance of these impacts.

The following tables provide the management actions recommended to manage the potential impacts rated in the scoping-level EA conducted for these developments. These management actions have been organised temporally according to project phase:

- Applicable legislation (Table 6);
- Planning and design phase management actions (Table 7);
- Construction phase management actions (Table 8);
- Operation and maintenance phase management actions (Table 9); and
- Decommissioning phase management actions (Table 10).
- The proponent should assess these commitments in detail and should acknowledge their commitment to the specific management actions detailed in the tables below.

### **4.1. Assumptions and Limitations**

This EMP has been drafted with the acknowledgment of the following assumptions and limitations:

- This EMP has been drafted based on the scoping-level Environmental Assessment (EA) conducted for the proposed development. Kamau Town Planning and Development Specialists will not be held responsible for the potential consequences that may result from any alterations to the abovementioned layout.

### **4.2. Applicable Legislation**

Legal provisions that have relevance to various aspects of these developments are listed in Table 6 below.

**Table 6: Legislation applicable to proposed development**

<b>Legislation/Policy</b>	<b>Relevant Provision</b>	<b>Relevance to Project</b>
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.	The following listed activities are triggered by the proposed development:  Activity 5.1 (d) (Land Use and Development) Activity 8.8 (Water resource developments) Activity 10.1 (a) Infrastructure 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.
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	The pollution of water resources should be

<b>Legislation/Policy</b>	<b>Relevant Provision</b>	<b>Relevance to Project</b>
	underground and surface water bodies.	avoided during construction and operation of the development.
The Ministry of Environment, Forestry and Tourism (MEFT) Policy on HIV & AIDS	MEFT 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.
Township and Division of Land Ordinance 11 of 1963	The Townships and Division of Land Ordinance regulates subdivisions of portions of land falling within a Local Authority area.	In terms of Section 19 such applications are to be submitted to NAMPAB and Townships Board respectively.
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"> <li>• Section 3.1 deals with width of proclaimed roads and road reserve boundaries</li> <li>• Section 27.1 is concerned with the control of traffic on urban trunk and main roads</li> <li>• Section 36.1 regulates rails, tracks, bridges, wires, cables, subways or culverts across or under proclaimed roads</li> <li>• Section 37.1 deals with Infringements and obstructions on and</li> </ul>	Adhere to all applicable provisions of the Roads Ordinance.

<b>Legislation/Policy</b>	<b>Relevant Provision</b>	<b>Relevance to Project</b>
	interference with proclaimed roads.	
Public and Environmental Health Act of 2015	This Act (GG 5740) provides a framework for a structured uniform public and environmental health system in Namibia. It covers notification, prevention and control of diseases and sexually transmitted infections; maternal, ante-natal and neo-natal care; water and food supplies; infant nutrition; waste management; health nuisances; public and environmental health planning and reporting. It repeals the Public Health Act 36 of 1919 (SA GG 979).	Contractors and users of the proposed development are to comply with these legal requirements.
Nature Conservation Ordinance no. 4 of 1975	Chapter 6 provides for legislation regarding the protection of indigenous plants.	Indigenous and protected plants must be managed within the legal confines.
Water Quality Guidelines for Drinking Water and Wastewater Treatment	Details specific quantities in terms of water quality determinants, which wastewater should be treated to before being discharged into the environment	These guidelines are to be applied when dealing with water and waste treatment.
Environmental Assessment Policy of Namibia (1995)	The Policy seeks to ensure that the environmental consequences of development projects and policies are considered, understood and incorporated into the planning process, and that the term ENVIRONMENT is broadly interpreted to include biophysical, social, economic, cultural, historical and political components.	This EIA considers this term of Environment
Water Resources Management Act No. 11 of 2013	Part 12 deals with the control and protection of groundwater  Part 13 deals with water pollution control	The pollution of water resources should be avoided during construction and operation of the development. Should water need to be abstracted, a water abstraction permit will be required from the Ministry of Water, Agriculture and Forestry.
Forest Act 12 of 2001 and Forest Regulations of 2015	To provide for the establishment of a Forestry Council and the appointment of certain officials; to consolidate the laws relating	Protected tree and plant species as per the Forest Act No 12 of 2001 and Forest Regulations of 2015

Legislation/Policy	Relevant Provision	Relevance to Project
	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.	may not be removed without a permit from the Department of Forestry.
Atmospheric Pollution Prevention Ordinance No 45 of 1965	Part II - control of noxious or offensive gases, Part III - atmospheric pollution by smoke, Part IV - dust control, and Part V - air pollution by fumes emitted by vehicles.	The development should consider the provisions outlined in the act. The proponent should apply for an Air Emissions permit from the Ministry of Health and Social Services (if needed).
Hazardous Substance Ordinance 14 of 1974	To provide for the control of substances which may cause injury or ill-health to or death of human beings by reason of their toxic, corrosive, irritant, strongly sensitising 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.

### 4.3. Planning and Design Phase

The CR should ensure that the management actions detailed below should be adhered

to during the period before the construction of the development starts.

**Table 7: Planning and design management actions**

<b>Aspect</b>	<b>Management Actions</b>
Visual Impacts	<ul style="list-style-type: none"> <li>• It is recommended that more 'green' technologies be implemented within the architectural designs and building materials of the development where possible to minimise the visual prominence of such a development within the more natural surrounding landscape.</li> <li>• Natural colours and building materials such as wood and stone should be incorporated as well as the use of indigenous vegetation to help beautify the development.               <ul style="list-style-type: none"> <li>◦ Visual pollutants can further be prevented through mitigations (i.e. keep existing trees, introduce tall indigenous trees; keep structures unpainted and minimising large advertising billboards).</li> </ul> </li> </ul>
Stormwater	<ul style="list-style-type: none"> <li>• Stormwater runoff should be accommodated within the street creation to ensure that the natural flow of water is not disturbed.</li> </ul>
Existing Service Infrastructure	<ul style="list-style-type: none"> <li>• It is recommended that the subject area should be connected to the existing services.</li> <li>• An investigation by an engineer is to be done to determine whether the existing services would be sufficient for the additional number of portions.</li> </ul>
Flora and Fauna (Biodiversity)	<ul style="list-style-type: none"> <li>• Do not clear cut the entire development site, but rather keep the few individual trees/shrubs not directly affecting the developments as part of the landscaping.</li> <li>• Protected trees are not to be removed without a valid permit from the Department of Forestry.</li> </ul>

#### 4.4. Construction Phase

The management actions listed in Table 8 apply during the construction phase. This table may be used as a guide when developing EMPs for other construction activities within these development areas.

**Table 8: Construction phase management actions**

<b>Environmental Feature</b>	<b>Impact</b>	<b>Management Actions</b>	<b>Responsible Person</b>
EMP training	Lack of EMP awareness and the implications thereof.	<p>All construction workers are to undergo EMP training that should include as a minimum the following:</p> <ul style="list-style-type: none"> <li>• Explanation of the importance of complying with the EMP.</li> <li>• Discussion of the potential environmental impacts of construction activities.</li> <li>• Employees' roles and responsibilities, including emergency preparedness.</li> <li>• Explanation of the mitigation</li> </ul>	Contractor, CR

Environmental Feature	Impact	Management Actions	Responsible Person
		measures that must be implemented when work groups carry out their respective activities.	
Conservation of vegetation	Loss of biodiversity	<ul style="list-style-type: none"> <li>• The layout and development design should incorporate existing trees<sup>1</sup>.</li> <li>• The Contractor should compile a Plant Management Plan which should include the following as a minimum: <ul style="list-style-type: none"> <li>○ Trees to be preserved should be marked with paint (or other means to be readily visible) and protected.</li> <li>○ Prevent the destruction of protected and endemic plant species. If trees with stem diameter &gt; 20mm be found within the development site, it should be conserved and be made part of the development.</li> <li>○ Trees, which are impossible to conserve, need to be identified and.</li> <li>○ The Contractor should apply to the local authority for a permit to remove these trees (prior to removing them).</li> <li>○ Special protection should be accorded to the protected endemic species, which are to be found within the development area (As per the Forest Act 12 of 2001 and Forest Regulations of 2015).</li> <li>○ Each tree that is removed needs to be replaced with an indigenous tree species after construction.</li> <li>○ Some of these trees can be obtained at the National Botanical Research Institute (NBRI) or at a commercial nursery.</li> </ul> </li> <li>• Only a limited width +/- 5 m on the side of roads may be</li> </ul>	Contractor

<sup>1</sup> a “tree” is defined as an indigenous woody perennial plant with a trunk diameter ≥150 mm.

Environmental Feature	Impact	Management Actions	Responsible Person
		<p>partially cleared of vegetation.</p> <ul style="list-style-type: none"> <li>• Workers are prohibited from collecting wood or other plant products on or near work sites.</li> <li>• No alien species may be planted on or near work areas.</li> </ul>	
Lay-down areas and materials camp	Loss of biodiversity	<p>Suitable locations for the contractors lay-down areas and materials camp should be identified with the assistance of the PR and the following should be considered in selecting these sites:</p> <ul style="list-style-type: none"> <li>• The areas designated for the services infrastructure should be used as far possible.</li> <li>• Second option should be degraded land.</li> <li>• Avoid sensitive areas (e.g. rivers/drainage lines).</li> </ul>	Contractor and PR
Hazardous waste	Contamination of surface and groundwater sources.	<ul style="list-style-type: none"> <li>• All heavy construction vehicles and equipment on site should be provided with a drip tray.</li> <li>• All heavy construction vehicles should be maintained regularly to prevent oil leakages.</li> <li>• Maintenance and washing of construction vehicles should take place only at a designated workshop area and should not take place on open soil.</li> </ul>	Contractor
Water, Sewage, and grey water	Contamination of surface and groundwater sources and water wasting	<ul style="list-style-type: none"> <li>• The wash water (grey water) collected from the cleaning of equipment on-site should not be left standing for long periods of time as this promotes parasite and bacterial proliferation.</li> <li>• Grey water should be recycled: <ul style="list-style-type: none"> <li>○ Used for dust suppression.</li> <li>○ Used to water a vegetable garden, or to support a small nursery.</li> <li>○ Used (reused) to clean equipment.</li> </ul> </li> <li>• Grey water that is not recycled should be removed on a regular basis.</li> <li>• No dumping of waste products of any kind in or near water bodies.</li> </ul>	• Contractor

Environmental Feature	Impact	Management Actions	Responsible Person
		<ul style="list-style-type: none"> <li>• Heavy construction vehicles should be kept out of any water bodies and the movement of construction vehicles should be limited where possible to the existing roads and tracks.</li> <li>• Ensure that oil/ fuel spillages from construction vehicles and machinery are minimised and that where these occur, that they are appropriately dealt with.</li> <li>• Drip trays must be placed underneath construction vehicles when not in use to contain all oil that might be leaking from these vehicles.</li> <li>• Contaminated runoff from the construction sites should be prevented from entering the surface and ground water bodies.</li> <li>• All materials on the construction site should be properly stored.</li> <li>• Construction workers should be given ablution facilities at the construction sites that are located at least 30 m away from any surface water and ground water resources and should be regularly serviced.</li> <li>• 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.</li> </ul>	
General waste	Visual impact and soil contamination	<ul style="list-style-type: none"> <li>• The construction site should be always kept tidy.</li> <li>• All domestic and general construction waste produced daily should be cleaned and contained daily.</li> <li>• No waste may be buried or burned.</li> <li>• Waste containers (bins) should be emptied regularly and removed from site to a recognised (municipal) waste</li> </ul>	Contractor

Environmental Feature	Impact	Management Actions	Responsible Person
		<p>disposal site.</p> <ul style="list-style-type: none"> <li>• All recyclable waste needs to be taken to the nearest recycling depot where practical.</li> <li>• Enough separate bins for hazardous and domestic/general waste must be provided on site. These should be clearly marked as such.</li> <li>• Construction labourers should be sensitised to dispose of waste in a responsible manner and not to litter.</li> <li>• No waste may remain on site after the completion of the project.</li> <li>• Strictly, no burning of waste on the site or at the disposal site is allowed as it possess environmental and public health impacts;</li> </ul>	
Topsoil	Loss of topsoil and associated opportunity costs	<ul style="list-style-type: none"> <li>• When excavations are carried out, topsoil<sup>2</sup> should be stockpiled in a demarcated area.</li> <li>• Stockpiled topsoil should be used to rehabilitate post-construction degraded areas and/or other nearby degraded areas if such an area is located a reasonable distance from the stockpile.</li> </ul>	Contractor
Rehabilitation	Visual impact	<ul style="list-style-type: none"> <li>• Upon completion of the construction phase consultations should be held with the local community/property owner(s) regarding the post construction use of remaining excavated areas (if applicable).</li> <li>• If no post-construction uses are requested, all excavated/degraded areas need to be rehabilitated as follows: <ul style="list-style-type: none"> <li>○ Excavated areas may only be backfilled with clean or inert fill. No material of hazardous nature (e.g. sand removed with an oil spill) may be</li> </ul> </li> </ul>	Contractor, CR

<sup>2</sup> Topsoil is defined here as the top 150mm of surface material, which accounts for the seedbank.  
Environmental Management Plan for the Proposed Development in Lüderitz, Karas Region

Environmental Feature	Impact	Management Actions	Responsible Person
		<p>dumped as backfill.</p> <ul style="list-style-type: none"> <li>○ Rehabilitated excavated areas need to match the contours of the existing landscape.</li> <li>○ The rehabilitated area should not be higher (or lower) than nearby drainage channels. This ensures the efficiency of re-vegetation and reduces the chances of potential erosion.</li> <li>○ Topsoil is to be spread across excavated areas evenly.</li> <li>○ Deep ripping of areas to be rehabilitated is required, not just simple scarification, to enable rip lines to hold water after heavy rainfall.</li> <li>○ Ripping should be done along slopes, not up and down a slope, which could lead to enhanced erosion.</li> </ul>	
Road safety	Injury or loss of life	<ul style="list-style-type: none"> <li>● Demarcate roads to be used by construction vehicles clearly.</li> <li>● Off-road driving should not be allowed.</li> <li>● All vehicles that transport materials to and from the site must be roadworthy.</li> <li>● Drivers that transport materials should have a valid driver's license and should adhere to all traffic rules.</li> <li>● Loads upon vehicles should be properly secured to avoid items falling off the vehicle.</li> </ul>	Contractor
Safety around work sites	Injury or loss of life	<ul style="list-style-type: none"> <li>● Excavations should be left open for the shortest time possible.</li> <li>● Excavate short lengths of trenches and box areas for services or foundations in a manner that will not leave the trench unattended for more than 24 hours.</li> <li>● Demarcate excavated areas and topsoil stockpiles with danger tape.</li> <li>● All building materials and equipment are to be stored only within set out and demarcated work areas.</li> </ul>	Contractor

<b>Environmental Feature</b>	<b>Impact</b>	<b>Management Actions</b>	<b>Responsible Person</b>
		<ul style="list-style-type: none"> <li>• Comply with all waste related management actions stated above in this table.</li> </ul>	
Ablutions	Noncompliance with Health and Safety Regulations	<ul style="list-style-type: none"> <li>• Separate toilets should be available for men and women and should clearly be indicated as such.</li> <li>• Portable toilets (i.e. easily transportable) should be available at every construction site: <ul style="list-style-type: none"> <li>○ 1 toilet for every 15 females.</li> <li>○ 1 toilet for every 30 males.</li> <li>○ Sewage needs to be removed on a regular basis to an approved (municipal) sewage disposal site in Windhoek.</li> <li>○ Alternatively, sewage may be pumped into sealable containers and stored until it can be removed.</li> <li>○ Workers responsible for cleaning the toilets should be provided with environmentally friendly detergents, latex gloves, and masks.</li> </ul> </li> </ul>	Contractor
Open fires	Injury or loss of life	<ul style="list-style-type: none"> <li>• No open fires may be made anywhere on site.</li> </ul>	Contractor
General health and safety	Injury or loss of life	<ul style="list-style-type: none"> <li>• A fully stocked first aid kit should permanently be available on-site as well as an adequately trained member of staff capable of administering first aid.</li> <li>• All workers should have access to the relevant personal protective equipment (PPE).</li> <li>• Sufficient potable water reserves should be always available to workers.</li> <li>• No person should be allowed to smoke close to fuel storage facilities or portable toilets (if toilets are chemical toilets – the chemicals are flammable).</li> <li>• No workers should be allowed to drink alcohol during work hours.</li> <li>• No workers should be allowed on site if under the influence of alcohol.</li> <li>• Building rubble and domestic</li> </ul>	Contractor

Environmental Feature	Impact	Management Actions	Responsible Person
		<p>waste should be stored in skips.</p> <ul style="list-style-type: none"> <li>• Condoms should be accessible/ available to all construction workers.</li> <li>• Access to Antiretroviral medication should be facilitated.</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 (e.g. lignosulphonate products such as Dustex) should be considered.</li> <li>• Cover any stockpiles with plastic to minimise windblown dust.</li> <li>• Dust protection masks should be provided to workers if they complain about dust.</li> <li>• Vehicles travelling to and from the construction site must adhere to the speed limits to avoid producing excessive dust. A speed limit of 40 km/hr should be set for all vehicles travelling over exposed areas.</li> </ul>	Contractor
Noise	Nuisance impacts	<p>Work hours should be restricted to between 08h00 and 17h00 and 7:30 – 13:00 on Saturdays where construction involving the use of heavy equipment, power tools and the movement of heavy vehicles is less than 500 m from residential areas. If an exception to this provision is required, all residents within the 500 m radius should be given 1 week's written notice.</p> <ul style="list-style-type: none"> <li>• Provide ear plugs and earmuffs to staff undertaking the noisy activity or working within proximity thereof or alternatively, all construction workers should be equipped with ear protection equipment.</li> </ul>	Contractor

<b>Environmental Feature</b>	<b>Impact</b>	<b>Management Actions</b>	<b>Responsible Person</b>
Recruitment of labourers	Negative conflict regarding recruitment	<p>The Contractor should adhere to the below provision as a minimum for the recruitment of labour:</p> <ul style="list-style-type: none"> <li>• Adhere to the legal provisions in the Labour Act for the recruitment of labour (target percentages for gender balance, optimal use of local labour and SME's, etc.).</li> <li>• Recruitment should not take place at construction sites.</li> <li>• Ensure that all sub-contractors are aware of recommended recruitment procedures and discourage any recruitment of labour outside these agreed upon procedures.</li> <li>• Contractors should give preference in terms of recruitment of subcontractors and individual labourers to those who are qualified and from the Windhoek project area and only then look to surrounding towns.</li> <li>• Clearly explain to all jobseekers the terms and conditions of their respective employment contracts (e.g. period of employment etc.) – make use of interpreters where necessary.</li> </ul>	Contractor
Communication plan	Negative conflict with I&APs	<p>The Contractor or proponent should draft a Communication Plan, which should outline as a minimum the following:</p> <ul style="list-style-type: none"> <li>• How Interested and Affected Parties (I&amp;APs), who require ongoing communication for the duration of the construction period, will be identified and recorded and who will manage and update these records.</li> <li>• How these I&amp;APs will be consulted on an ongoing basis.</li> <li>• Make provision for grievance mechanisms – i.e. how concerns can be lodged/recorded and how feedback will be delivered as well as further steps of arbitration in the event that feedback is deemed</li> </ul>	Contractor

Environmental Feature	Impact	Management Actions	Responsible Person
General communication	Negative conflict with I&APs	<p>unsatisfactory.</p> <ul style="list-style-type: none"> <li>• The PR must appoint an ECO to liaise between the Contractor, I&amp;APs, Developer.</li> <li>• The Contractor shall at every monthly site meeting report on the status of the implementation of all provisions of the EMP.</li> <li>• The Contractor should implement the EMP awareness training as stipulated above in this table.</li> <li>• The Contractor must list the I&amp;APs of the project and their contact details with whom ongoing communication would be required for the duration of the contract. This list, together with the Communication Plan must be agreed upon and given to the PR before construction commences.</li> <li>• The Communication Plan, once agreed upon by the Developer, shall be legally binding.</li> <li>• All communication with the I&amp;APs must take place through the ECO.</li> <li>• A copy of the EMP must be available at the site office and should be accessible to all I&amp;APs.</li> <li>• Key representatives from the abovementioned list need to be invited to attend monthly site meetings to raise any concerns and issues regarding project progress.</li> <li>• The Contractor should liaise with the Developer regarding all issues related to community consultation and negotiation before construction commences.</li> <li>• A procedure should be put in place to ensure that concerns raised have been followed-up and addressed.</li> <li>• All people on the I&amp;APs list should be informed about the availability of the complaints register and associated</li> </ul>	Contractor, ECO, CR

Environmental Feature	Impact	Management Actions	Responsible Person
		grievance mechanisms in writing by the PR prior to the commencement of construction activities.	
Archaeology	Loss of heritage resources	<ul style="list-style-type: none"> <li>• Should a heritage site or archaeological site be uncovered or discovered during the construction phase of the project, a “chance find” procedure should be applied in the order they appear below:               <ul style="list-style-type: none"> <li>○ If operating machinery or equipment, stop work;</li> <li>○ Demarcate the site with danger tape;</li> <li>○ Determine GPS position if possible; ○ Report findings to the construction foreman;</li> <li>○ Report findings, site location and actions taken to superintendent;</li> <li>○ Cease any works in immediate vicinity;</li> <li>○ Visit site and determine whether work can proceed without damage to findings;</li> <li>○ Determine and demarcate exclusion boundary;</li> <li>○ Site location and details to be added to the project’s Geographic Information System (GIS) for field confirmation by archaeologist;</li> <li>○ Inspect site and confirm addition to project GIS;</li> <li>○ Advise the National Heritage Council of Namibia (NHCN) and request written permission to remove findings from work area; and</li> <li>○ Recovery, packaging and labelling of findings for transfer to National Museum.</li> </ul> </li> <li>• Should human remains be found, the following actions will be required:               <ul style="list-style-type: none"> <li>○ Apply the chance find procedure as described above;</li> <li>○ Schedule a field inspection with an archaeologist to</li> </ul> </li> </ul>	• Contractor

Environmental Feature	Impact	Management Actions	Responsible Person
		<p>confirm that remains are human;</p> <ul style="list-style-type: none"> <li>○ Advise and liaise with the NHCN and Police; and</li> <li>○ Remains will be recovered and removed either to the National Museum or the National Forensic Laboratory.</li> </ul>	

#### 4.5. Operation and Maintenance Phase

The management actions included in Table 9 below apply during the operation and maintenance phase of these developments.

**Table 9: Operation and maintenance management actions**

Environmental Feature	Impact	Management Actions	Person Responsible
EMP training	Lack of EMP awareness and the implications thereof	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.	Contractor
Water	Surface and groundwater contamination	Ensure that surface run-off water accumulating on-site are channelled and captured through a proper storm water management system to be treated in an appropriate manner before disposal into the environment.	Proponent, Contractor,
Aesthetics	Visual impacts	<p>The proponent should consult with a view to incorporate the relevant local/national/international development guidelines which addresses the following:</p> <ul style="list-style-type: none"> <li>• The incorporation of indigenous vegetation into the development.</li> <li>• To mark the area with appropriate road warning signs (e.g. the road curves to the left/right)</li> <li>• 'green' technologies should be implemented within the architectural designs and building materials of the development where possible to minimise the visual prominence of such a development within the more natural surrounding landscape.</li> <li>• keep existing trees, introduce tall indigenous trees; keep structures unpainted and minimising large advertising billboards.</li> </ul>	• Proponent

<b>Environmental Feature</b>	<b>Impact</b>	<b>Management Actions</b>	<b>Person Responsible</b>
		<ul style="list-style-type: none"> <li>No illegal dumping of waste should be allowed.</li> </ul>	
Noise	Nuisance impacts	<p>No activity having a potential noise impact should be allowed after 18:00 hours if possible.</p> <ul style="list-style-type: none"> <li>Do not allow commercial activities that generate excessive noise levels.</li> <li>Continuous monitoring of noise levels should be conducted to make sure the noise levels does not exceed acceptable limits.</li> </ul>	Proponent
Socio-Economic	Social Impacts	The local community be consulted in terms of possible job creation opportunities and must be given priority if unspecialised job vacancies are available.	Proponent

#### 4.6. Decommissioning Phase

The decommissioning of these developments is not foreseen as the intended development is envisaged to be permanent. If this infrastructure development is decommissioned the following management actions should apply.

**Table 10: Decommissioning phase management actions**

<b>Environmental Feature</b>	<b>Management Actions</b>
Decommissioning activity	Many of the mitigation measures prescribed for construction activity for these developments (Table 8 above) would be applicable to some of the decommissioning activities. These should be adhered to where applicable.

#### 5. Conclusion

The management actions included in this report aim to assist in the avoidance, management and/or mitigation of potential impacts on the environment that may result from the proposed activities. Should the measures recommended in this EMP be implemented and monitored, Kamau Town Planning and Development Specialists is confident that the risks identified in the FESR can be reduced to acceptable levels.

## 6. References

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