













ECC-111-307-REP-07-D

# ENVIRONMENTAL AND SOCIAL IMPACT ASSESSEMENT REPORT

**Erf 4747 SWAKOPMUND, ERONGO REGION, NAMIBIA** 

PREPARED FOR



JANUARY 2021

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## TITLE AND APPROVAL PAGE

Project Name: Development of Residential & Retail (Including Tourism) Activities on Erf 4747 In

Swakopmund, Erongo Region

Project Number ECC-111-307-REP-07-D

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#### **EXECUTIVE SUMMARY**

#### **INTRODUCTION**

This Environmental and Social Impact Assessment (ESIA) report presents the findings of an ESIA undertaken for the proposed development on Erf 4747 in Swakopmund, Erongo region by Lighthouse Property Investment Trust. The ESIA and this report has been undertaken in accordance with the requirements of the Environmental Management Act, 2007 (Act No.7 of 2007) and the Environmental Impact Assessment Regulation, 2007 (No. 30 of 2011) gazetted under the Environmental Management Act, (EMA), 2007 (Act No. 7 of 2007).

#### PROPOSED PROJECT OVERVIEW

Lighthouse Property Investment Trust proposes to establish a residential and commercial development, with tourism activities on Erf 4747 located within the heritage area of Swakopmund. The property is owned by the proponent (Lighthouse Property Investment Trust). The development will be established on a site where the old swimming used to be, in the vicinity of the mole beachfront, Swakopmund Namibia. The area has significant tourism potential which will expose tourists to additional amenities within this node of the town. The proposed development will generate income for the local community and open-up broader economic opportunities.

The proposed project has been subject to a process of design evolution, informed by both consultation and an iterative environmental assessment. During design development, alternatives considered included architectural amendments to the building's design, height alterations and the possible inclusion of another lighthouse on the proposed building.

The proposed development will take approximately three years to construct. The development will entirely consist of land-based construction. Approximately 2500-3000 jobs will be created to construct the development all will be sourced from the local and regional communities. The scale of the development will necessitate upgrades and expansion to domestic services for example, electricity, water, sewage and emergency services. The proponent has entered into a development agreement with the local Swakopmund Municipality to upgrade all services that may be required to ensure compliance to local civil engineering specifications. This agreement is still in effect and legally binding.

As part of this environmental clearance certificate application, an Environmental Impact Assessment (ESIA) has been undertaken to satisfy the requirements of the Environmental Management Act, No. 7 of 2007. This environmental assessment report and Environmental Management Plan (EMP) shall be submitted to the relevant competent authority as part of the application for the environmental clearance certificate.

The assessment has been carried out for the establishment of a mixed-use development consisting of residential and commercial activities on Erf 4747. The proposed development intends to have the following elements:

- A retail footprint of 140 m²;
- Restaurants of 1519 m<sup>2</sup>;
- A residential footprint of 16 400m<sup>2</sup>;
- Outside public amenities, including jungle gyms & splash pad and play park area as well as beach showers within the play park;
- Inside public amenities, including a 140 m² (male and female) public ablution space, incorporating changing rooms with showers, toilets and lockers;
- Multi-level tenant parking for 233 vehicles as per the town planning scheme requirements;
- A new Erongo Red substation;
- Upgrading to the existing municipal walkways or boardwalk where applicable; and

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Landscaping where applicable.

The proposed development will be located on an open Erf on the corner of Theo Ben Gurirab Avenue and Strand Street and within the historic central business district of Swakopmund. The area is defined as a 'special urban design area', bordered to its west by the riverine nature zone and public access and recreation zone as per the Swakopmund Structure Map, 2019.

The assessment was undertaken using a methodology developed by Environmental Compliance Consultancy (ECC), which is based on the International Finance Corporation (IFC) standard for impact assessments. Through the assessment process, a review of the site and surrounding environment was completed by undertaking desktop reviews and verification of site data. The assessment conducted is only for tourism activities as a described listed activity in the regulations of 2012.

Regardless of the nature and scale of the project, limited biophysical impacts were identified in this assessment, as the site is disturbed to a large extent. A few patches of mature palm trees are still present on site and will be incorporated into the layout of the development.

Social impacts were assessed to be of greater value pertaining to this project. The key receiving environmental and social features in the study area are the soil, air quality, local businesses, local residents and community and the tourism industry.

Local businesses in the surrounding area (500m from the site boundary) for the proposed development include the Strand hotel, the museum, and the craft market. Local service-rendering buildings in the surrounding area include the Altes Amtgericht (used as municipal offices), the magistrate's court, the lighthouse, and the statehouse. Local residents and community within 500m of the site boundary include the upmarket condominium north of the site, the two residential complexes north east and east of the site.

Residents surrounding the project site currently have views of the sea with low-level buildings surrounding it. The landscape character is mixed between residential, commercial and institutional due to the magistrate's court, statehouse and the Altes Amtsgericht in close proximity to the project site. The Seascape character is dominated by the Strand hotel, the museum, the mole beachfront and the boardwalk/promenade, and the condominiums north of the project site.

The lighthouse is a dominating feature of Swakopmund and contributes to the sense of identity of the town. This feature is displayed on the municipality's coat of arms. The mole beachfront is the only safe swimming spot and remain a popular attraction for recreational activities for local residents, the community as well as tourists.

A Cumulative Impact Assessment (CIA) was undertaken to identify intra and inter-project related impacts:

- Intra-project cumulative impacts: Cumulative impacts that occur within the proposed project;
- **Inter-project cumulative impacts:** Cumulative impacts that occur as a result of the proposed project in combination with other projects, which is split into two:
  - o Cumulative impacts with existing projects; and
  - o Cumulative impacts with future projects.

The CIA considered past, present and realistically defined future projects, which were identified through a desk-based investigation.

There is potential for some Intra-project cumulative Impact Interactions to occur during the construction works. The majority of the interactions would likely arise from activities such as noise and vibration from construction plant and vehicles, dust from plant and vehicles, and the visual impact of the works. In terms of inter-project cumulative impacts, consideration was given to defined current and future projects within the bounds of the local authority which predicts that mainly socio-economic benefits will be produced from the extension of demand for local labour,

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supplies, material, machinery and plant equipment. There could be construction of ablution blocks at the same time as this development. If so, it will be the responsibility of both developers to collectively manage all impacts emanating from the proposed development on Erf 4747 and the planned construction of the municipal ablution blocks north of Erf 4747 to reduce the level of significance on receptors.

A precautionary assessment approach has been applied; therefore, with the application of best practice and additional mitigation measures, the predicted impacts may be less severe. Key mitigation will be the sequencing and scheduling of construction activities; applying soft starts to machinery and equipment; applying dust suppression techniques; and implementing traffic management and calming measures. In addition, a range of monitoring will be undertaken including but not limited to, noise monitoring. Through the application of the EIA methodology presented in Section 2 the conclusion of the assessment is that with additional mitigation measures during the operational phase, the significance of effect is expected to be minor. No additional studies are considered necessary to further assess this impact.

This study has assessed potential, likely and identified impacts. It was determined that the likely effects did not fall outside the parameters of acceptable change and are unlikely to be significant in the decision-making process. This is based on the predicted magnitude of change from the baseline environment.

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#### **DEFINITIONS AND ABBREVIATIONS**

ALARP As Low as Reasonably Practicable

CBD Central Business District

DEA Directorate of Environmental Affairs

ECC Environmental Compliance Consultancy

EMP Environmental Management Plan

ESIA Environmental Impact Assessment

ESIA Environmental Social Impact Assessment

GDP Gross Domestic Product

GRN Government of the Republic of Namibia

HIV/AIDS Human Immunodeficiency Virus / Acquired Immunodeficiency Syndrome

I&APs Interested and affected parties

IFC International Finance Cooperation

KVA Kilo Volt Ampere m² Square Meter

MAWLR Ministry of Agriculture, Water and Land Reform

MEFT Ministry of Environment, Forestry and Tourism

MME Ministry of Mines and Energy

MoHSS Ministry of Health and Social Services

NDP5 Fifth National Development Plan

NSA Namibian Statistics Agency
NTS Non-Technical Summary

PPE Personal Protective Equipment

SEA Strategic Environmental Assessment

TB Tuberculosis

WHO World Health Organization

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## 1 INTRODUCTION

#### 1.1 Purpose of this Report

The purpose of this report is to present the findings of the Environmental and Social Impact Assessment (ESIA) that was undertaken for the proposed project. The proposed project entails development activities on Erf 4747 for the purpose of operating a residential and commercial development, with tourism activities, which are described in detail throughout the report.

The assessment has been undertaken in terms of the requirements of the Environmental Impact Assessment Regulations, No. 30 of 2012, gazetted under the Environmental Management Act, No.7 of 2007 (referred to herein as the ESIA Regulations).

ECCs terms of reference for this assessment was to strictly address potential environmental and social impacts, whether positive or negative, and their relative significance, and explore alternatives for technical recommendations and identify appropriate mitigation measures for the Swakopmund Erf 4747 development.

This ESIA report and associated appendices will be submitted to the relevant competent authorities, MEFT and Interested and Affected Parties (I&APs) for public review public and stakeholder comment. Comments have been considered and incorporated into this ESIA report where they have been deemed to be material to the decision - making process or enhanced the ESIA and EIA report. An Addendum report and associated appendices will accompany this ESIA report. The Addendum report collates all comments received during the I&AP public review period and provides responses from the proponent and ECC for all comments.

#### 1.2 BACKGROUND OF THE PROPOSED PROJECT

Swakopmund is a coastal town located in the central part of the Namibian coastline. The town is a key tourist destination due to its diverse attractions offering and unique German inspired building architecture. The tourism industry is expected to regain momentum with the resumption of international travel between countries, with travel bans lifted in a phased manner. The tourism industry has been challenged adversely by the Covid-19 pandemic's effect on the freedom of movement, both domestically and internationally thereby creating a negative growth effect.

Lighthouse Investment Property Trust proposes to develop the area for a residential and commercial development, with tourism activities either in the form of a hotel and or residential units (refer to Figure 1).

The proposed development comprises the following:

- A retail footprint (multiple outlets) of 140 m<sup>2</sup>;
- Restaurants (maximum 3 varieties) of 1519 m<sup>2</sup>;
- A residential footprint of 16 400m<sup>2</sup>;
- Outside public amenities, including jungle gyms, splash pad and play park area as well as beach showers within the play park;
- Inside public amenities, including a 140 m² (male and female) public ablution space, incorporating changing rooms with showers, toilets and lockers;
- Multi-level tenant parking for 233 vehicles;
- Upgrade the existing Erongo Red Substation on site;
- Upgrading of the existing municipal walkways/ boardwalk where applicable, and
- Landscaping (including examining the grown palm trees and possibly transplanting them onto a different area within the site).

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The Erf is directly surrounded by open municipal land and comprises a public play park to the south, the mole promenade on the west and public parking to the north and Strand Street to the east.

#### 1.3 PHILOSOPHY AND BENEFITS OF THE PROPOSED PROJECT

The aim for the development of the project is to support and facilitate the growth of the local community and economy, and provide facilities which strengthen community relationships, hence the reason why the current location was chosen. The Mole is an area where the Swakopmund community from all walks of life converge upon to enjoy its amenities.

The proposed development aims to:

- Uplift the currently underutilised Erf and surrounding municipal area;
- Generate revenue and economic stimulus to the business and expand the tourism industry of Swakopmund;
- Provide a multipurpose, recreational and lifestyle facility for all community members of Swakopmund, the broader Namibian community, international and domestic tourists.

The project will offer a range of social and commercial benefits, which include but are not limited to the following:

- Providing tourism facilities (under one roof in a popular recreational spot with supporting ablution facilities for beachgoers) which will attract and retain tourists in Swakopmund thereby supporting economic growth increased bed occupancy and spending;
- Improving local bulk services including water supply, sewerage handling and treatment and electricity;
- generate job opportunities for the local community. The proponent has estimated that approximately 3000 direct and indirect employment opportunities could be created during the construction phase.
- Encouraging and supporting local investment;
- Increasing demand for secondary services such as catering and cleaning, thereby providing additional employment opportunities; and
- Increasing property values

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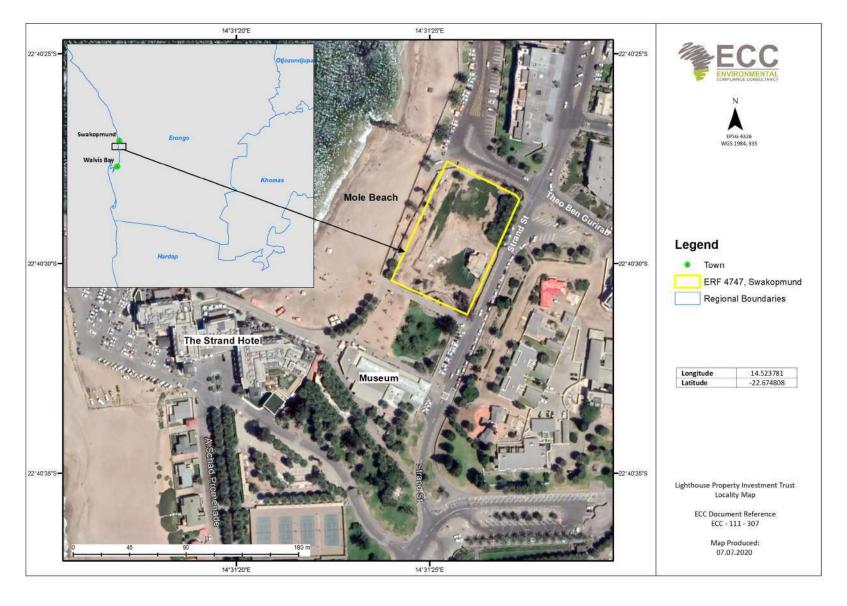


FIGURE 1 - LOCALITY OF THE PROJECT SITE

#### 1.4 Scope of Work

The assessment report has been prepared by ECC. ECC's terms of reference for the assessment is strictly to address potential effects, whether positive or negative and their relative significance, explore alternatives for technical recommendations and identify appropriate mitigation measures.

This report provides information to the public and stakeholders to aid in the decision-making process for the proposed project. The objectives are to:

- Provide a description of the proposed activity and the site on which the activity is to be undertaken;
- Provide a description of the environment that may be affected by the activity;
- Identify the laws and guidelines that have been considered in the assessment and preparation of this report;
- Provide details of the public consultation process;
- Describe the need and desirability of the activity;
- Provide a high level of environmental and social impact assessment on feasible alternatives that were considered; and
- Report the assessment findings, identifying the significance of effects, including cumulative effects.

In addition to the environmental assessment, an EMP is also required in terms of the Environmental Management Act, No. 7 of 2007. An EMP has been developed to provide a management framework for the planning and implementation of the development. The EMP provides development standards and arrangements to ensure that the potential environmental and social impacts are mitigated, prevented, minimised and/or enhanced as far as reasonably practicable, and that statutory requirements and other legal obligations are fulfilled.

The report, plus impact assessment, supported by specialist studies and appendices, will be submitted to the relevant competent authorities and the Directorate of Environmental Affairs (DEA) at the Ministry of Environment, Forestry and Tourism (MEFT) for review as part of the application for environmental clearance certificate.

## 1.5 ENVIRONMENTAL CONSULTANCY

ECC, a Namibian consultancy (registration number Close Corporation 2013/11401), has prepared this scoping report and impact assessment on behalf of the proponent. ECC operates exclusively in the environmental, social, health and safety fields for clients across Southern Africa, in both the public and private sectors.

ECC is independent of the proponent and has no vested or financial interest in the proposed project, except for fair remuneration for professional services rendered. The CVs of the authors of this report are contained in Appendix D.

All compliance and regulatory requirements regarding this ESIA report should be forwarded by email or posted to the following address:

**Environmental Compliance Consultancy** 

PO BOX 91193 Klein Windhoek, Namibia Tel: +264 81 669 7608

Email: info@eccenvironmental.com



## 1.6 Environmental Requirements

The Environmental Management Act, No. 7 of 2007 stipulates that an environmental clearance certificate is required to undertake listed activities in terms of the Act and its regulations. Listed activities triggered by the proposed project in terms of the Environmental Management Act, No. 7 of 2007 and its regulations are as follows:

TABLE 1 - LISTED ACTIVITIES AND RELEVANCE TO THE PROPOSED DEVELOPMENT

LISTED ACTIVITY	ESIA SCREENING FINDING	
WASTE MANAGEMENT, TREATMENT, HANDLING AND DISPOSAL ACTIVITIES  (2.1) The construction of facilities for waste sites, treatment of waste and disposal of waste.  (2.3) The import, processing, use and recycling, temporary storage, transit, or export of waste	construction and domestic waste shall be generated dur construction and operations of the project, which shall collected and removed from the site for re-use, recycli or final disposal at an appropriate landfill site.	
TOURISM DEVELOPMENT ACTIVITIES  (6) The construction of resorts, lodges, hotels or other tourism and hospitality facilities	The proposed project development is for the establishment of a mixed-use building structure focusing on tourism and hospitality activities which may include a hotel and all other associated infrastructure and supporting amenities.	

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#### 2 APPROACH TO THE IMPACT ASSESSMENT

#### 2.1 PURPOSE OF THE ENVIRONMENTAL IMPACT ASSESSMENT

The ESIA process in Namibia is governed and controlled by the Environmental Management Act, No. 7 of 2007 and its regulations, No. 30 of 2012, which is administered by the Office of the Environmental Commissioner within the MEFT.

The aim of this preliminary assessment is to identify, predict, evaluate and mitigate the potential impacts of the proposed project on the natural and human receiving environments, scope the available data and identify the gaps that need to be filled. The assessment process helps to determine the spatial and temporal scope and identify the assessment methodology which is most applicable for use. In addition, the assessment process and subsequent reports are to apply the principles of environmental management to the proposed activities; reduce the negative and increase the positive impacts arising from the project; provide an opportunity for the public to consider the environmental impacts of the proposed project through meaningful consultation; and to provide a vehicle to present the findings of the assessment process to competent authorities for decision making.

#### 2.2 THE ASSESSMENT PROCESS.

The ESIA methodology applied to this assessment has been developed using the IFC standards and models, in particular, Performance Standard 1: 'Assessment and management of environmental and social risks and impacts' which establishes the importance of (IFC, 2012; 2017):

- Integrated assessment to identify the environmental and social impacts, risks, and opportunities of projects;
- Effective community engagement through disclosure of project-related information and consultation with local communities on matters that directly affect them; and
- The client's management of environmental and social performance throughout the life of the project.

Furthermore, the Namibian Draft Procedures and Guidance for ESIA and EMP (GRN, 2008) as well as the international and national best practice documents to our disposal and over 25 years of combined ESIA experience, were also drawn upon in the assessment process.

An impact assessment is a formal process in which the effects of certain types of development on the biophysical, social and economic environments are identified, assessed and reported so that the effects can be taken into account when considering whether to grant development consent or to provide financial support. Final mitigation measures and recommendations are based on the cumulative experience of the consulting team and the client, taking into consideration the potential environmental and social impacts. The process followed through the basic assessment is illustrated in figure 2 and detailed further in the following sections.

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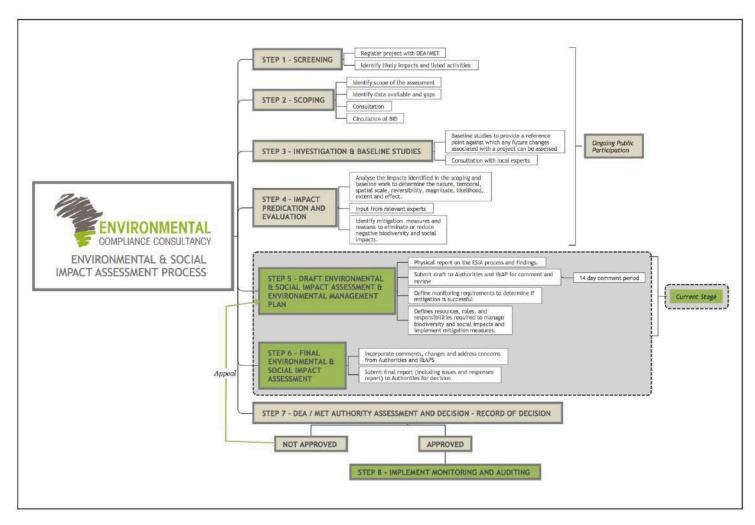


Figure 2 - ECC SCOPING PROCESS

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#### 2.3 METHODOLOGY FOR THE IMPACT ASSESSMENT

Desktop studies on the national database are undertaken as part of the scoping stage to get information on the current status of the receiving environment. This provides a baseline where changes that occur as a result of the proposed project can be measured. This is verified through site data collection.

The environmental and social topics that may be affected by the proposed project are described in this section. The baseline focuses on receptors, which could be affected by the proposed project.

## 2.4 SCREENING OF THE PROPOSED PROJECT

The first stages of the ESIA process are to register the project with the competent authority and undertake a screening exercise. The project has been registered on the Ministry of Environment, Forestry and Tourism's online portal. The registration number is APP – 001690.

The screening exercise determines whether the proposed project is considered as a Listed Activity in terms of the Environmental Management Act, No. 7 of 2007 and associated regulations, and if significant impacts may arise. The location, scale and duration of project activities will be considered against the receiving environment.

It was concluded that an ESIA (e.g. assessment report and EMP) is required, as the proposed inclusion of tourism activities within the scope of the project is considered as a listed activity and there may be potential for impacts to occur.

#### 2.5 Scoping of the Environmental Assessment

The purpose of the scoping stage in the ESIA process is to identify the scope of assessment, undertake a high-level assessment to identify potential impacts (with the assistance of community inputs), and confirm if further investigation is required to assign the severity of potential significant effects and allocate appropriate mitigation.

#### 2.6 BASELINE STUDIES

Baseline studies are undertaken as part of the scoping stage, which involves collecting all pertinent information from the current status of the receiving environment. This provides a baseline against which changes that occur as a result of the proposed project can be measured.

For the proposed project, baseline information was obtained through a desktop study, focussing on receptors that could be affected by the proposed project, and a heritage assessment. The baseline information is covered in Section 5.

A robust baseline is required in order to provide a reference point against which any future changes associated with a project can be assessed, and it allows for suitable mitigation and monitoring actions to be identified.

The existing environment and social baseline for the proposed project were collected through various methods:

- Desk-top studies
- Consultation with stakeholders, and
- Engagement with Interested and Affected Parties (I&APs).

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#### 2.7 FSIA CONSULTATION

Public participation and consultation are a requirement in terms of Section 21 of the Environmental Management Act, No. 7 of 2007 and its regulations for a project that requires an environmental clearance certificate. Consultation is a compulsory and critical component in the ESIA process, aimed at achieving transparent decision-making, and can provide many benefits.

The objectives of the stakeholder engagement process are to:

- Provide information on the project to I&APs: introduce the overall concept and plan
- Clarify responsibility and regulating authorities;
- Listen to and understand community issues, concerns and questions;
- Explain the process of the ESIA and timeframes involved; and
- Establish a platform for ongoing consultation.

#### 2.7.1 Interested and affected parties

All relevant authoritative bodies were identified and listed as I&APs, as well as organisations and individuals with an implied interest. Other I&APs were identified through invitations such as the newspaper advertisements and site notices. To all of these stakeholders a formal letter was sent via e-mail. The letter and the list of registered I&APs are provided in Appendix C.1. Consultation with I&APs is on-going and the review of this report is part of the consultation process.

#### 2.7.2 Non-Technical Summary

The Non-Technical Summary (NTS) presents a high-level description of the proposed project; sets out the ESIA process and when and how consultation is undertaken. The contact details for further enquiries are made available to all registered I&APS and the NTS can be found in Appendix B.

#### 2.7.3 Newspaper advertisements

Notices regarding the proposed project and associated activities were circulated in two newspapers namely the 'Namibian' and on the 06<sup>th</sup> and the 13<sup>th</sup> of August 2020 and in the 'Informante' on the 06<sup>th</sup> and the 13<sup>th</sup> of August 2020. The purpose of this was to commence the consultation process and enable I&APs to register an interest with the project. The adverts can be found in Appendix C.2. Further to this ECC advertised in the Namib Times on the 9<sup>th</sup> October informing I&APs about the upcoming review period, an email informing of the review period was also sent to all registered I&APs.

#### 2.7.4 SITE NOTICES

A site notice ensures neighbouring properties and stakeholders are made aware of the proposed project and provide contact details of the assessment practitioner whom I&APs can engage with on the project. The notice was set up on the property as illustrated below. Notices were placed on site on the 10<sup>th</sup> of August 2020.

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FIGURE 3 - SITE NOTICES PLACED ON SITE BOUNDARY

The walkway was selected in order to ensure the highest exposure to I&APs, given this is a very popular walkway this site was selected for the site notice.

An additional notice was placed on the municipal offices notice board during the week of the 10<sup>th</sup> of August. See below.



FIGURE 4 - SITE NOTICES PLACED AT THE MUNICIPALITY

## 2.7.5 CONSULTATION FEEDBACK

The I&APs were encouraged to provide constructive input during the consultation process, which is ongoing at present.

The public review of the preliminary assessment report was conducted during the period of the 13<sup>th</sup> October 2020 – 28<sup>th</sup> of October 2020. This review period was initiated by another advert published in the Namib Times newspaper on the 9<sup>th</sup> of October 2020. The comments received from this public review period is listed in an addendum report and presented to Government as part of the final documents submitted for a record of decision about the project. The final reports will also be made available to I&APs.

#### AESTHETIC APPROVAL APPLICATION TO THE LOCAL COUNCIL BY THE PROPONENT

The following is not related to this impact assessment, however, is mentioned in order to give the reader clarity about the aesthetic approval.

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Aesthetic approval submissions were submitted to the Swakopmund aesthetic committee on three separate occasions in tandem with prior public consultations. The relevant dates on which this was conducted are as follows: 22 November 2017, 20 February 2019 and 30 August 2019. These submissions were for purposes of seeking council approval for the design of the building. The proponent received approval from the aesthetic committee in June 2020.

These submissions with their public engagement regime, do not constitute an ESIA process in any way.

The current ESIA, although referring to these processes undertaken independently in the past, do not in any way transfer the comments made by the public on those occasions into this assessment for the sake of deriving at a conclusion. The current ESIA is only concerned with tourism related activities stemming from the erection and operation of the proposed building on Erf 4747 and only references these activities by way of a historical overview of the perceived sensitivity of Erf 4747.

These submissions were undertaken by the Lighthouse Property Investment Trust and Chamberlain and Associates. Aesthetic approval is dictated by the Swakopmund Municipal guidelines for proposed projects within the historic CBD area. Feedback from those consultations highlighted design aspects of the proposed building that needed to be re-considered as well as queries related to the legality of the process followed to amend the town planning scheme.

The most prominent aspects identified are listed below.

- 1. Primary issue was the height and overall design of the building;
  - a. The perceived miss alignment with the social culture of the area;
  - b. The dominant German architecture of buildings; and
  - c. Unobstructed beachfront views from Strand Street (even across the disturbed site).
- 2. The perceived shadow effect cast onto the surrounding buildings south and east of the proposed building.

#### FEEDBACK FROM PUBLIC REVIEW ON THIS PRELIMINARY ASSESSMENT REPORT

All comments received from this review process are captured in an addendum report and attached as an appendix to the final assessment report. The review period was provided to registered I&APs to review the preliminary report and appendices and provide written comments to ECC pertaining to the assessment. The regulations (2012) of the Environmental Management Act (2007) make provision for a minimum 7-day review period; however, ECC extended the review period for this project to give I&APs more time for their review, therefore the period ended on the 28<sup>th</sup> October 2020.

The assessment report was made available electronically on ECCs website and in hard copy by the Swakopmund Scientific Society at the Sam Cohen Library for review by its members and the public from the 22<sup>nd</sup> of October 2020. The extended review period was necessitated by the past Covid-19 restrictions on travel and public face to face gatherings as well as the uncertainty surrounding the relaxation of free movement nationally. The comments received from the extended public review period on the draft assessment report and specialist study and the responses to the comments made are presented in an addendum report.

#### 2.7.6 Breakdown of Participation and Issues Raised

A visual representation summarising the main issues raised throughout the public consultation phase is presented in figure 5.

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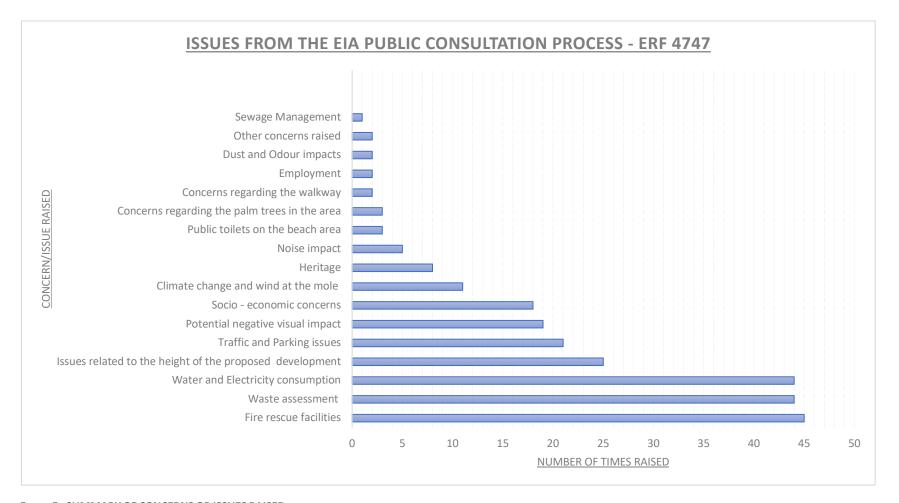


FIGURE 5 - SUMMARY OF CONCERNS OR ISSUES RAISED

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#### 2.8 DRAFT ESIA AND EMP

The ESIA report documents the findings of the assessment process, provides stakeholders with an opportunity to comment and continued consultation and forms part of the environmental clearance application. The EMP provides measures to manage the environmental and social impacts of the proposed project and outlines specific roles and responsibilities to fulfil the plan.

The draft ESIA report was issued to stakeholders and I&APs for a further consultation for a period of 7 days, meeting the mandatory requirement of 7 days as set out in the Environmental Management Act of 2007, including the Environmental Impact Assessment Regulations, No. 30 of 2012. The aim of this stage is to ensure all stakeholders and I&APs have the opportunity to provide final comments on the assessment process, the findings and register their comments and or concerns.

#### 2.9 FINAL ESIA AND EMP

All comments received during the I&AP review period was collated in an addendum report as an annexure to the ESIA report. All comments were responded to either through providing an explanation or further information in the response table, or sign posting where information exists, or new information has been included in the ESIA report or appendices. Comments were considered and where they were deemed to be material to the decision making or enhance the ESIA has been incorporated into the ESIA report.

The final ESIA report and associated appendices are available to all stakeholders on the ECC website www.eccenvironmental.com. All I&APs will be informed via email.

The ESIA report and appendices was formally submitted to the Office of the Environmental Commissioner, DEA as part of the application to for an environmental clearance certificate.

#### 2.10 AUTHORITY ASSESSMENT AND DECISION MAKING

The Environmental Commissioner in consultation with other relevant competent authorities will assess the findings of the ESIA. Upon review, the Environmental Commissioner will revert to the proponent with a record of decision.

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## 3 REGULATORY FRAMEWORK

This chapter outlines the regulatory framework applicable to the proposed project.

## 3.1 NATIONAL LEGISLATION

TABLE 2 - LEGAL COMPLIANCE

NATIONAL REGULATORY REGIME	SUMMARY	APPLICABILITY TO THE PROJECT
Constitution of the Republic of Namibia of 1990	The constitution clearly defines the country's overarching position in relation to the well-being of Namibians, sustainable development and environmental management. The constitution refers that the state shall actively promote and maintain the welfare of the people by adopting policies aimed at the following:  "Maintenance of ecosystems, essential ecological processes and biological diversity of Namibia and utilization of living natural resources on a sustainable basis for the benefit of all Namibians, both present, and future; in particular, the Government shall provide measures against the dumping or recycling of foreign nuclear and toxic waste on Namibian territory."	The proponent is committed to engage with the local community for the proposed project. The proposed project will create local jobs as well as exploring ways of finding beneficial opportunities that could contribute to the Namibian economy.
Environmental Management Act, No. 7 of 2007 and its regulations, including the Environmental Impact Assessment Regulations, No. 30 of 2012	The Act aims to promote sustainable management of the environment and the use of natural resources by establishing principles for decision-making on matters affecting the environment.  It sets the principles of environmental management as well as the functions and powers of the Minister. The Act requires certain activities to obtain an environmental clearance certificate prior to project development. The Act states an ESIA may be undertaken and submitted as part of the environmental clearance certificate application.  The MEFT is responsible for the	This preliminary assessment report documents the findings of the environmental assessment undertaken for the proposed project, which will form part of the environmental clearance application. The assessment and report have been undertaken in line with the requirements under the Act and associated regulations.

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NATIONAL		
REGULATORY	SUMMARY	APPLICABILITY TO THE PROJECT
REGIME		
	protection and management of Namibia's natural environment. The Department of Environmental Affairs under the MEFT is responsible for the administration of the ESIA process.	
Soil Conservation Act, No. 76 of 1969 and the Soil Conservation Amendment Act, No. 38 of 1971	Makes provision for the prevention and control of soil erosion and the protection, improvement and the conservation, improvement and manner of use of the soil and vegetation.	Minimum vegetation disturbance/ relocation will occur on site, there is potential to remove and disturb soil. The construction methods and final design have been considered in the design of the proposed project. Measures in the EMP set out methods to avoid soil erosion from the site onto the beach landscape adjacent and Strand Street to its east.
National Heritage Act, No. 27 of 2004	The Act provides provision of the protection and conservation of places and objects with heritage significance.  Section 55 compels companies to report any archaeological findings to the National Heritage Council after which a heritage permit needs to be issued	There is no known potential for heritage objects to be found on site.  The Heritage Assessment Report for the site is included in this report and can be found in Appendix E.
Labour Act, No. 11 of 2007	The Labour Act, No. 11 of 2007 (Regulations relating to the Occupational Health and Safety provisions of Employees at Work promulgated in terms of Section 101 of the Labour Act, No. 6 of 1992 - GN156, GG 1617 of 1 August 1997)	The proposed project will comply with stringent health and safety policies, including the compulsory use of specific PPE in designated areas to ensure adequate protection against health and safety risks. Proper storage and labelling of hazardous substances are required, if used. The project will ensure employees in charge of and working with hazardous substances are aware of the specific hazardous substances in order not to compromise worker and environment safety.
Draft Pollution Control; and Waste Management Bill (1999)	The Bill amalgamates a variety of legislative frameworks in Namibia, regulating pollution in different sectors of the economy.  The Bill promotes sustainable	Although not enacted, the Bill has been applied to the ESIA to ensure any activities potentially giving rise to pollution are minimized as far as reasonably practicable and obligations are adhered to.

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NATIONAL REGULATORY REGIME	SUMMARY	APPLICABILITY TO THE PROJECT
	development, to provide for the prevention and regulation of the discharges of pollution.	
Town Planning Ordinance 18 of 1954 (definition has been amended by Ord.13 of 1970) and the amendment scheme N0.61.	A Town Planning Scheme is a statutory document that for its general purpose coordinated and developed for a local authority area. The Town Planning Scheme contains provisions for regulating, restricting or prohibiting the development of the area to which the scheme applies and generally for carrying out any of the objects for which the scheme allows. The scheme allocates real rights to properties and provides a set of rules under which the right of use can be carried out.	The scheme allows for an ESIA to be undertaken for new mixed-use developments in general and developments in the CBD. The project operates under the ambit of the amended town planning scheme No 61, as advertised in government gazette 15 May 2017, approved by the then Minister of Urban and rural Development on the 06 <sup>th</sup> October 2017 and formally Gazetted in November 2017. The maximum building height of 16 metres was extended to 40 metres.  The town planning scheme does not make any mention of the Lighthouse nor any mention of specific height restrictions regarding erfs in the vicinity of the Lighthouse and its focal plane.

The following laws are applicable to the project and will be complied with;

- The Labour Act, 2007 (Act No. 11 of 2007); and
- The Labour Act, 1992: Regulations relating to the health and safety of employees at work.

The proponent will develop a specific Safety Management and Emergency Response Plan for the construction and operation of the proposed development independently to the ESIA that will be in place prior to construction. This plan will contain firefighting standard operating procedures.

## 3.2 OTHER REGULATORY FRAMEWORKS

TABLE 3 - OTHER REGULATORY FRAMEWORKS AND THEIR APPLICABILITY TO THE PROJECT

NATIONAL REGULATORY REGIME	SUMMARY	APPLICABILITY TO THE PROJECT
Vision 2030	Vision 2030 sets out the nation's development programs and strategies to achieve its national objectives. It sets out eight themes to realize the country's long-term vision.  Vision 2030 states that the overall goal	The planned project shall meet the objectives of Vision 2030 and shall contribute to the overall development of the country while building capacity in the local communities.

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NATIONAL	SUMMARY	APPLICABILITY TO THE PROJECT
REGULATORY		
REGIME		
	of the vision is to improve the quality of	
	life of the Namibian people to a level in	
	line with the developed world.	
Fifth National	The NDP5 is the fifth in the series of	The planned project supports meeting the
Development Plan	seven five-year national development	objectives of the NDP5 through creating
(NDP5)	plans that outline the objectives and	opportunities for tourism domestically.
	aspiration of Namibia's long-term vision as expressed in Vision 2030. The NDP5	
	is structured on five pillars: economic	
	progression, social transformation,	
	environmental sustainability and good	
	governance. Under the social	
	transformation pillar is the goal of	
	improved education.	
	A desired outcome of NDP5 is to have a	
	diversified and competitive tourism	
	sector with increased number of	
	tourists from 1.4 million in 2015 to 1.8 million in 2021/22. With the current	
	Covid-19 restrictions on tourism travel	
	into the country the figures presented	
	in the NDP 5 would most probably not	
	be achieved.	
National Policy on	Provides a framework for the	The proposed project aligns with the
Tourism for	mobilisation of tourism resources to	policy; in particular, the development
Namibia	realise long term national goals defined	provides competitive tourism amenities
	in Vision 2030 and the more specific	and services, creating a competitive
	targets of the NDP, namely, sustained	business environment that is market
	economic growth, employment	driven and meets international standards.
	creation, reduced inequalities in income, gender as well as between the	
	various regions, reduced poverty and	
	the promotion of economic	
	empowerment.	
	2	

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## 3.3 OTHER STRATEGIC DOCUMENTS

Other strategic documents which were used to guide the ESIA are listed in Table 4 below.

TABLE 4: OTHER STRATEGIC DOCUMENTS

NATIONAL	SUMMARY	APPLICABILITY TO THE PROJECT
REGULATORY		
REGIME		
Strategic Environmental Assessment for the Erongo and Kunene Regions, 2007	This Strategic Environmental Assessment (SEA) was undertaken for the coastal zones of Namibia to support and inform the decision-making processes affecting biodiversity conservation and sustainable coastal development (DHI Water and Environment, 2007). It provides management guidelines on activities to be conducted in the coastal environs of Namibia	The SEA states that tourism facilities are to "minimise their impact on the environment in terms of both resource utilisation and visual impact". The visual impact is the only aspect applicable to this development. None-the-less, "with mechanisms such as ESIAs to assure this". New tourism developments, in particular, are to be "designed in such a way that they are unobtrusive, environmentally sympathetic and, as far as possible, enhance rather than detract from the visual impression of the environment."  This ESIA report is compliant with the SEA which stipulates ESIAs for tourist and accommodation developments.
Swakopmund Tourism growth and development strategy	Strategic vision: "Swakopmund is the leading destination for holiday tourists in Namibia offering a range of unique and diverse attractions, facilities and activities".  The strategy's focus areas are:  • Enhancing cooperation between stakeholders  • Enhancement of the tourism related environment  • Development of the tourism industry  • Marketing Swakopmund as the preferred tourist destination	The proposed project aligns with the strategy relating to the enhancement, development and marketing of the town as a preferred tourism destination.
Local Economic Development Strategy for the Municipality of Swakopmund 2019-2023	This strategy aims to develop Swakopmund as the leading location for investors and tourists through the mobilization of medium and larger scale business opportunities as one of the priority categories defined under this strategy.  Listed priority activity no 5: Development of beach areas based on existing plans.	The project will assist the municipality of Swakopmund to realize their vision of transforming the town into a preferred and sustainable investment location.  The project fulfills priority activity 5 under this strategic document.  The project will also contribute significantly to the local economy

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NATIONAL REGULATORY REGIME	SUMMARY	APPLICABILITY TO THE PROJECT
TECHNIE TO THE TECHNIE		during construction and its operations.

#### 3.4 Environmental Management

Lighthouse Property Investment Trust personnel are committed to environmental management principles and to conduct all construction activities in such a way as to minimize any adverse impact upon the natural and social environments, to ensure compliance with all applicable laws and to aim for continuous improvements. This will be achieved through compliance to the EMP by all personnel, coupled with effective control and mitigation measures.

## 3.5 PERMITS AND ECO AWARDS

No further permits are required for the operations of the development apart from the various compliance certificates for upgrade works to bulk infrastructure as referred to in the development agreement between the proponent and the local authority, and fitness certificates issued by the local municipality to operate the building once construction is completed.

Above and beyond compliance is the well renowned 'Eco Awards Namibia'. This is an alliance of private sector and government organisations that runs a sustainable tourism certification programme. It is a mark of distinction for accommodation establishments that are planned and managed according to eco-friendly principles. ECC encourages our tourism clients to participate in the Eco Awards programme. The self-assessment is included in **Appendix F.** 

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#### 4 PROJECT DESCRIPTION

#### 4.1 NEED FOR THE PROPOSED PROJECT

Namibia is among the prime tourist destinations in Africa. The Namibian travel and tourism industry (direct impacts) generated 44,729 jobs or 6.5% of total employment in 2015 and contributed N\$5.2 billion to the Namibian Gross Domestic Production (GDP) (this represented 3.5% of overall GDP), (Namibian Tourism Board, 2016). In pre-Covid19 years, more than one million tourists flocked to the country's national parks and other tourist destinations each year, including Swakopmund. In response to this pattern, lodges and hotels have increased substantially in the three coastal nodes to cater to the new emerging interests as well as accommodate tourists from all over the world. Tourism also represents the fastest growing sector in Namibia (National Policy on Prospecting and Mining in Protected areas, 2018) and should be supported at local and national levels.

As a renowned tourism destination, the Swakopmund economy is heavily reliant on its extensive tourism offering. This reliance has been challenged in recent times due to the economic slump caused by the current COVID-19 pandemic, and the imposed lockdown applied to the Erongo Region.

According to Pohamba Shifeta, Minister of Environment, Forestry and Tourism (Xinhuanet.com, 2020) there is a need for both government and the private sector to realign efforts to ensure that Namibia regains its position as a tourism destination of choice. The proposed development has the potential to improve the current site and contribute to the Swakopmund community and economy at a local and regional level.

#### 4.1.1 DEVELOPMENT PROCESS FOLLOWED TO DATE

Table 5 below outlines the development stages the proposed development has gone through to date as well as the next step in terms of council approval.

TABLE 5 - THE DEVELOPMENT PROCESS FOLLOWED TO DATE

PROCESS	STATUS
1. Aesthetic approval	Granted 12-Jun-2019 (Municipal letter received 2nd June) – (decision was made at council meeting 26 March 2020) Ratified at May council meeting hence they could only issue in June.
1.1 Approval from State house	Approval was granted from State house. Appendix L
2.Heritage consent	First Submission to NHC done on 11th of June 2020. The proponent received writing from NHC on the 6th November declining the submission.
3. Environmental Clearance	Pending record of decision from MEFT, after submission.
4. Municipal approval (based on engineering drawings)	Date pending.

#### 4.2 ENTRANCE TO BUILDING

Access to the onsite parking will be via the existing parking lot to the north of the site. Pedestrian access to the building is granted from all sides of the building. Most restaurants are located on the western side of the

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building, and access can be obtained from all side entrances to these amenities. The promenade walkway will also give access to the building by pedestrians.

#### 4.3 PARKING SPACE CONSIDERATIONS

Traffic growth in the mole area will increase as a result of the establishment of the building. At this stage it is unclear how many vehicles will be present in and around the project site. It is expected that road traffic on Strand Street, Theo Ben Gurirab Avenue and Koch Street will increase. It is anticipated that the operational phase will add additional traffic on these streets both during daylight hours and at night.

A total of 233 parking spaces have been incorporated into the design. The existing on-street parking off of Strand Street in front of the playpark will be kept intact and accessible as street parking space, while additional on-street parking will be developed across the length of the building on Strand Street. See below diagram sketch of the proposed street parking. Within the building two floors including the basement will provide parking for approximately 233 vehicles. See geotechnical study done for the site in Appendix K.

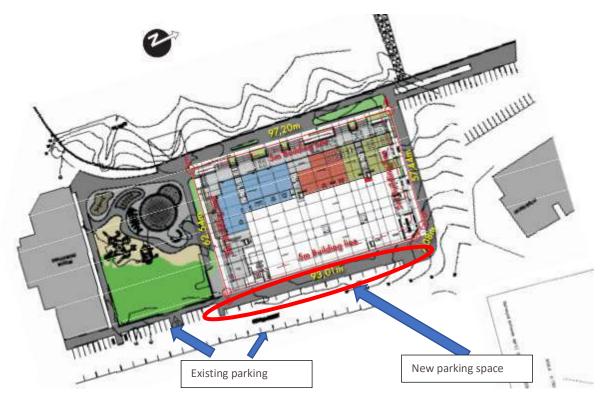


FIGURE 6 - DIAGRAM INDICATING ON-STREET PARKING SPACES OUTSIDE THE BUILDING

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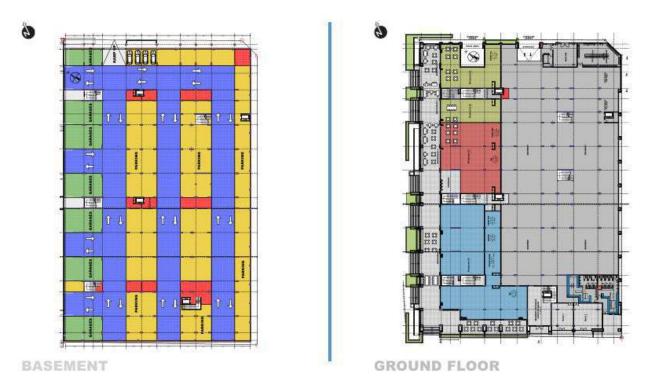


FIGURE 7 - BASEMENT AND GROUND FLOOR PARKING SPACES

#### 4.4 ALTERNATIVES

The proposed project has been subject to a process of design evolution changes (2017-2019), informed by stakeholder consultation with the municipality, and community inputs. In terms of the Environmental Management Act, No. 7 of 2007 and its regulations, alternatives considered should be analysed and presented in the assessment and ESIA report. This requirement ensures that during the design evolution and decision-making process, potential environmental and social impacts, costs, and technical feasibility are considered, which leads to the best option(s) being identified.

#### 4.4.1 ALTERNATIVES CONSIDERED

Three features of the project were put through an alternatives analysis, these are:

- 1. The colour scheme of the building;
- 2. Height of the building; and
- 3. Other design components of the building.

These features are presented in this section.

#### 4.4.2 COLOUR SCHEME OF THE BUILDING (PREFERRED OPTION)

The transitional paint colour scheme is the preferred alternative for this feature. It is similar to the existing colour schemes found on established buildings within the greater heritage area. See figure 8 below of an artist's impression of the building illustrating this option.

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FIGURE 8 - COLOUR SCHEME TO BE USED ON BUILDING EXTERIOR APPROVED BY THE LOCAL COUNCIL (SOURCE: CHAMBERLAIN AND ASSOCIATES, 2019)

Figure 9 illustrates the colour palette similarities of existing buildings in the greater Historic CBD area within which the proposed building is also located. The roof will have the same colour as that of Strand Hotel.



FIGURE 9 - SIMILAR COLOUR SCHEMES ON EXISTING BUILDINGS IN THE VICINITY (SOURCE: CHAMBERLAIN AND ASSOCIATES, 2019) CONTINUATION - COLOUR SCHEME OF THE BUILDING (NOT - PREFERRED OPTION)

The colour scheme proposed in 2017 for the building as presented below is not preferred due to the following reason. The colour palette chosen and submitted for council approval was not a perfect fit for the building considering the baseline colour ranges in the broader heritage area surrounding the project site. See images below of the initial visual renditions submitted in 2017.





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#### FIGURE 10 - INITIAL COLOUR SCHEME CHOSEN (NOT-PREFERRED OPTION) (SOURCE: CHAMBERLAIN AND ASSOCIATES. 2017)

#### 4.4.3 HEIGHT OF THE BUILDING

Erf 4747 is zoned as general business as per the town planning scheme NO. 61, with an allowable height per structure restricted to 40m above natural ground level and unlimited bulk. The proposed building underwent height changes throughout consultations and is described in this section.

#### INITIAL HEIGHT OF THE BUILDING (NON-PREFERRED OPTION)

The initial height of the proposed building in 2017 was 39.150 m above natural ground level. This height was within the 40m allowable height restriction however it dwarfed other buildings in the area as well as the lighthouse and penetrated the skyline excessively. Public resistance against its height was also a determining factor in the redesign of this feature.

#### ALTERNATIVE HEIGHT DESIGN FOR THE BUILDING (PREFERRED OPTION)

The proposed building was re-designed and achieved a height above natural ground level of 30m, 10m below the maximum allowable height after the redesign. See figures 11 and 12 that illustrate the height of the building in comparison with other skyline infrastructure, especially the focal lighthouse structure. The total height is lower than the peak of the lighthouse tower positioned to the far left of the diagram below.

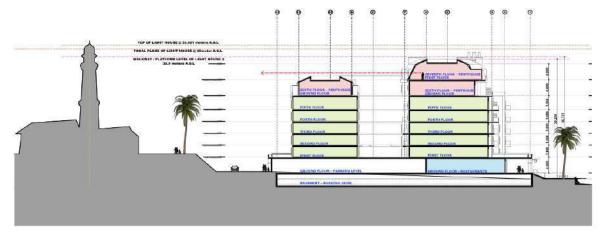


FIGURE 11 - ADJUSTED HEIGHT OF THE PROPOSED BUILDING (SOURCE: CHAMBERLAIN AND ASSOCIATES, 2019)

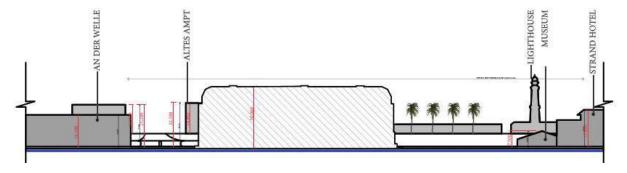


FIGURE 12 - SKYLINE DIAGRAM OF ADJUSTED BUILDING HEIGHT IN RELATION TO OTHER BUILDINGS IN THE GREATER AREA (SOURCE: CHAMBERLAIN AND ASSOCIATES, 2019).

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#### 4.4.4 OTHER DESIGN COMPONENTS OF THE BUILDING CONSIDERED

The August 2019 design compilation for the building drew from architectural examples available in the immediate vicinity as is illustrated in the figure collage 13 below. The concepts of balcony recesses popped boxes on the façade of the building, the roof caps and balustrades are all reminiscent of the existing architectural landscape and have been incorporated into the redesign.



FIGURE 13 - OTHER DESIGN COMPONENTS OF THE BUILDING

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#### 4.4.5 A PROPOSED LIGHTHOUSE

In February 2017 a second design was submitted which incorporated a specific change recommended from consultations between the proponent and Namport regarding the perceived interference of the building with the functional integrity of the existing lighthouse. The proponent agreed to incorporate a lighthouse structure onto the roof of the building as is seen in figure 14. This design lowered its initial height from 39.1m to 30m but altered its façade and colour scheme to match that of the preferred option detailed in section 4.4.2. This design was not accepted by the aesthetic committee.



FIGURE 14 - LIGHTHOUSE INCLUDED IN THIS DESIGN

The final design of the building therefore excludes the proposed lighthouse attached to it. Consultations between Namport, the municipality of Swakopmund and the proponent resolved that this development should not include any aspect of the existing lighthouse and its functioning.

#### 4.4.6 FINAL DESIGN

The August 2019 concept for the development was informed by consultative inputs from the local authority, Namport, as well as the residents of Swakopmund. Aspects that were changed were the height and colour scheme of the building, the lighthouse and individual components i.e., balustrades, roof caps, popped boxes, and balcony recesses, planter boxes on ground level to fit in with the surrounding architecture in the immediate area as guided by the Swakopmund Structure Plan.

The additional lighthouse was removed at the request of the aesthetics committee, which saw the design approved in June 2020. **Appendix H** contains the aesthetic approval granted by the aesthetic committee.



FIGURE 15 - ARTISTS IMPRESSION OF THE PREFERRED OPTION FOR THE BUILDING'S DESIGN CONCEPT

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#### 4.4.7 Proposed project schedule

The construction and development of the proposed project is anticipated to commence once all approvals are in place and will last for a period of 30 months.

#### 4.4.8 Workers and accommodation

The project expects to create approximately 2500 – 3000 employment opportunities during the construction phase over a 30-month period. Preference will be given to workers who come from Swakopmund and Walvis Bay. Once the project moves into operation, it is anticipated that up to 300 people will be permanently employed on site. As workers will be sourced locally, there will be no need for workers accommodation, nor it is anticipated that there would be an influx of additional workers requiring accommodation.

#### 4.5 RESOURCE AND WASTE MANAGEMENT

Water will be required for various uses including human consumption and for construction and operation activities. Water will be sourced from local municipal connections.

#### 4.5.1 WATER DEMAND DURING CONSTRUCTION

It is anticipated that the project will consume on average approximately 63 000 liters of water per day based on the number of functional units within the building during the operational phase. Water demand for the construction phase is anticipated to be less than the operational per day average as stated above.

#### 4.5.2 ENERGY DEMAND

The existing 300 kVA power supply to the swimming pool substation on Erf 4747 will be upgraded to a 900-kVA capacity. It is estimated that the proposed development will make use of approximately 48% of the total capacity. The remainder will feed energy requirements of the surrounding area. The upgrade of the existing substation is supported by Erongo Red.

#### 4.5.3 SOLID WASTE MANAGEMENT

During operations, solid waste will be managed in line with the principles of the waste hierarchy for waste prevention, re-use, recycle or compost, energy recovery, and disposal. Waste minimisation and recycling is preferred to waste treatment and disposal (National Solid Waste Management Strategy, MET 2019).

Solid waste will be collected in separate categorized bins, no chemical or hazardous waste will be produced. A collection area will be organised on site, non-organic waste will be collected by a refuse truck and waste will be disposed of at the local landfill site weekly.

The Municipal Council of Swakopmund, under section 94(1)(c) of the Local Authorities Act, 1992 (Act 23 of 1992) make the following regulations in relation to the provision, regulation and control for the removal of domestic refuse.

- 1. Every occupier of a dwelling, public building or any other premises shall,
- (a) Apply to the Council in writing for the removal of refuse from such premises.
- (b) As soon as possible, after receipt of the application referred to in sub-regulation (a), Council shall provide the occupier with such numbers of refuse containers it deems sufficient for the proper storage of refuse.

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(For the purpose of regulation (b), a refuse container will be a SABS approved (SABS 1494), 240litre, Polyethylene, two wheeled, mobile refuse containers (MGB 240), internationally known as the "Otto Bin".)

The proponent shall adhere to this application process to service the site's waste disposal requirements.

#### 4.5.4 SEWAGE WASTE MANAGEMENT

The proponent will ensure that portable toilet systems are provided for the contractor during the construction phase. No waste shall be discharged into the environment or into the local municipal sewage reticulation system.

During the operational phase, sewage waste will be relayed into the municipal sewage reticulation system. The project must comply with all municipal regulations regarding disposal volumes and connection specifications. It is anticipated that an average of approximately 58 000 litres of sewage waste per day will be produced from the project. The proponent has confirmed that the engineering design reports which contained these figures where submitted to the local authority and subsequent agreement was reached.

## 4.5.5 BULK SERVICES

The development agreement signed between the proponent and the local authority provides for the upgrading of all related bulk infrastructure to service the required needs of the project as needed and is the responsibility of the proponent, including costs and labour. Bulk services infrastructure in the immediate vicinity will thus be upgraded by the proponent to enhance service delivery in this zone.

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### 5 ENVIRONMENTAL AND SOCIAL BASELINE

#### 5.1 Introduction

The environmental and socio-economic baseline is provided in this chapter. This section provides an overview of the existing biophysical and social environment through the analysis of the available information. Desktop studies followed by site verification on the national database are undertaken as part of the scoping process to get information about the current status of the receiving environment. This provides a baseline where changes that occur as a result of the proposed project can be measured.

#### 5.2 Baseline of the built environment and land-use

The area has strong tourism potential, because of its unique landscape, proximity to the beach and overall recreational appeal. National tourism activities have declined significantly due the Covid-19 pandemic. This has significantly impacted Namibia and Swakopmund's tourism sector, adversely impacting on the socioeconomic conditions of communities reliant on this sector.

The Swakopmund economy has a limited employment diversification portfolio. The town is mainly dependant on tourism, i.e., any drawback in this sector will have serious effects on the local economy at large and on employment (Development Consultants for Southern Africa, 2019).

Within the Erongo region, mining plays a predominate role in the economy. Mining contribution to GDP is recorded at 8.8% and remains the most important taxpayer as well as foreign exchange earner. It is a significant employer and skills developer, and therefore has significant share in the social and economic development of Namibia (National Policy on Prospecting and Mining in Protected Areas, 2018).

#### 5.2.1 THE PROJECT SITE AND LOCATION

Erf 4747 is located on the corner of Theo Ben Gurirab Street within the popular mole beachfront area. The site is also located within the old Historic Central Business District (CBD). There are no direct neighbours to the property as it is bordered by roads. However, the closest neighbours in terms of approximate proximity and direction are:

- 101 m north of the site the upmarket condominiums are situated;
- 123 m south of the site the museum is situated;
- 135 m east of the site the Altes Amtsgericght is situated;
- 144 m south, south east of the site the lighthouse is situated;
- 160 m southeast of the site the magistrates court is situated; and
- Approximately 248 m south of the site the craft market is located.

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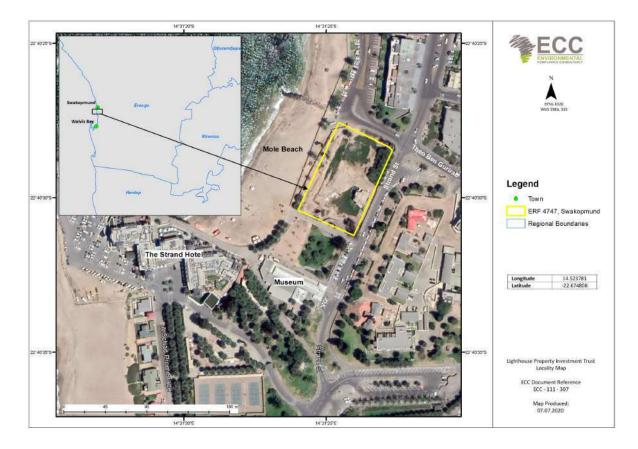


FIGURE 16 - PROJECT LOCATION

# 5.3 SITE AND SURROUNDING ENVIRONMENT

Erf 4747 is located centrally in the historic CBD area. It is strategically located on the beachfront of the mole, bordered by a park to the south and upmarket condominiums to its north. Directly east of the project site the magistrate's court is situated and shares that land with Statehouse. Further north east of the Statehouse property, an adjacent property called the Altes Amtsgericght building is located on, which is registered as a heritage building. Directly opposite the Altes Amtsgericght (northward) an apartment building is located that caters for holiday makers and permanent residents. The Strand Hotel is located south west from the project site on the embankment.

Figure 17 below illustrates the location of Erf 4747 in relation to surrounding infrastructure.

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FIGURE 17 - AERIAL VIEW NORTH-EAST FROM ERF 4747

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#### 5.4 SIMILAR FACILITIES IN SWAKOPMUND

The development will essentially provide amenities aimed at the tourism market and compete with existing amenities in Swakopmund providing near similar consumer products or services. These amenities have a shared receptor base and will continue to affect these shared receptors with a wider choice. The proposed project will introduce amenities that already exist within the immediate environment and beyond i.e., Strand hotel possesses a public spa and wellness centre and seven other spa's and wellness centers can be found within a 10km radius of the proposed project.

The use of these facilities cumulatively will depend on external factors like:

- Distance to the amenity;
- Convenient access to the amenity (road conditions and traffic); and
- Safe and convenient parking at the amenity.

#### Internal factors are:

- Pricing of products and services offered;
- Safety of facility within which products and services are located; and
- Aesthetic appeal of the facility within which the products and services are located.

#### 5.5 THE LIGHTHOUSE

The Swakopmund lighthouse is a functional Aid to Navigation (AtoN) beacon used by sea farers as a visual orientation tool to navigate the offshore waters past the town and onwards to Walvis Bay by large vessels. The lighthouse stands at 35m tall and casts a beam of 35km out to sea. This means ships and smaller vessels alike can spot the beam around 35km from the shore, while smaller vessels use it to navigate closer to the mole. In addition and supplementary to the light beam, the lighthouse was retrofitted with various analog and digital navigational systems as well, which include the following.

- A radio beacon was added in 1940;
- The light was automated in 1956;
- The lantern and a more powerful light were installed in 1982; and
- The storeroom and the two dwellings that were the lighthouse keepers' accommodation, were expanded. Today they house a restaurant.

Factual aspects to consider (Swanepoel, 2018):

- Erf 4747 falls within the conservation zone;
- Erf 4747 also falls within the lighthouse area of use;
- The town planning scheme does not make any mention of the lighthouse or any mention of specific height restrictions regarding erven in the vicinity of the lighthouse and its focal plane;
- The development was designed to ensure that it falls within the maximum height requirements of the amended town planning scheme;
- The current design of the development was at a height of 40 meters, and subsequently relaxed to a height of 30 meters;
- the Lighthouse falls under the control of Namport; and
- the architects of the development indicated that at a revised design with a maximum building height of 33 metres, the development:

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- Might not compromise the night mark in any way and it continue to serve as an AtoN; and
- o It partially obstructs the daymark as depicted by the red cone below.

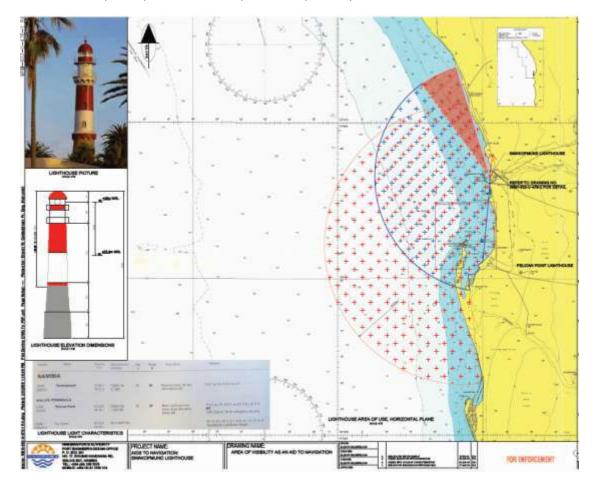


FIGURE 18 - AREA OF INFLUENCE FROM THE DAY MARK (MARKED IN BLUE) WITH THE POSSIBLE OBSTRUCTION INDICATE IN RED TO THE NORTH OF THE LIGHTHOUSE

From the study done, it is clear that only a partial segment of the day mark on the lighthouse will be obstructed by a building with a 30-meter height. The night mark (light beam) will not be obstructed in any way and will continue to function (Swanepoel, 2018). In addition, it must be highlighted that while the International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA) guidelines state that a lighthouse "may" act as a daymark, they do not specify that it "must" act as a daymark.

# 5.6 TRAFFIC

The proposed development will add additional traffic flow onto the municipal road network surrounding the development with strand street east of the project site potentially experiencing the bulk of traffic flow. It is widely accepted that traffic numbers increase considerably around the museum and Erf 4747 on weekends and during school and public holiday periods. However, upon further enquiry from the Municipality of Swakopmund to ascertain specific traffic count figures for the Mole area, it was found that no such figures exist that could be used as baseline conditions for this assessment.

In the absence of detailed traffic information for the Mole area, the proponent has resolved to commission a traffic impact assessment which will focus on annotating the baseline conditions of traffic flow prior to the implementation of the proposed development, throughout the construction phase and post construction. The

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assessment will also provide measures to mitigate any potentially significant impacts that may be predicted to occur as a result of the proposed development.

The complete terms of reference for the traffic impact assessment study can be found in Appendix J.

#### 5.7 CLIMATE

The proposed site is within the Namib Desert climatic zone, with nearly no rainfall throughout the year. Swakopmund climate is characterised by mild summers and cool winters with the mean temperatures ranging between 10°C and 24°C. Fog is the most common precipitation within the project site, with over 100 days of fog events per year (Goudie A., et al 2015).

Wind can occur any time of the day, with the predominant winds from the W-SSW, NW-NNE and NE-E with some seasonal variations in wind speed and direction (Mendelsohn et al., 2002). Most fog is prevalent during mornings and evenings and dissipates as the day heats up. This is an important determining factor for outdoor activities during daytime hours within the town.

Mild temperatures are predominant at the coast, averaging less than 20°C; the hottest month is February, and the coldest month is August (Namibia's Coast, 2012).

The prevailing wind recorded in Swakopmund is from the southwest and onshore with an average speed of 7.4 km/P (Figure 15). The occurrence of this wind pattern is caused by the South Atlantic anticyclone high pressure cell that descends to the surface of the Atlantic Ocean with a high degree of wind strength released in an anticlockwise motion in a northerly direction and powers the Benguela Current up the Namibian coastline.

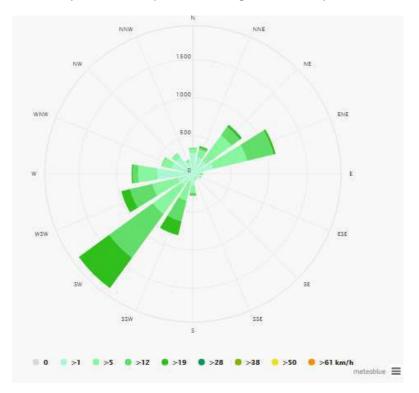


FIGURE 19 - WIND DIRECTION AND SPEED FROM THE SWAKOPMUND WEATHER STATION, ERONGO REGION

#### 5.8 GEOLOGY

Swakopmund is located on Cenozoic fluvio-marine and alluvial deposits (soils) nestled on top of the Precambrian Damara sequence rocks and intruded by Karoo-age dolerite dykes (Bulley, 1986). The project site

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engineers should be mindful of the geological composition of the site and foundation excavations and services trenches should preferably avoid zones of weathered or fractured rocks (isolated pockets) adjacent to dolerite dykes. This will prevent differential settlement of building foundations (Bulley, 1986).

Deeper founding levels (on competent bedrock material) or widened strip footings should therefore be considered for shopping centres, schools and blocks of flats in Swakopmund (Bulley, 1986).

#### 5.9 Hydrology

Groundwater conditions in Swakopmund are relatively stable due to the low rainfall groundwater is shallow and the water table can be intercepted between 1-5m below the surface. Rare zones of seepage or shallow water table however occurs e.g., on Strand Street, and this should be taken into account prior to the construction of buildings (Bulley, 1986).

#### 5.10 SOIL

The project site comprises of Petric Calcisols soil formations, old crystalline rocks that form the basement to the Permo-Triassic Karoo Sequence and the young deposits of the Namib Desert. The crystalline basement consists of rocks of Abbabis Metamorphic Complex and Swakop Groups of the Damara Sequence (Schreiber, 1996).

#### 5.11 FAUNA AND FLORA SPECIES

The project site is a disturbed site with some established palm trees. No endemic, threatened, or rare fauna and flora species occur on the proposed site.

#### 5.12 SOCIO-ECONOMIC BASELINE

Namibia's GDP is recorded at 14 billion US Dollars as at 2019 (Plecher, 2020). The development of the services sector, which directly includes tourism-related products and services have created a significant positive impact on domestic and national economic growth levels; employment; and local and regional development. Examples of this are the continued development of small and medium sized tourism-based accommodation developments throughout the country as well as the large-scale tourism developments and eco-tourism with a strong focus on wildlife marketing.

#### 5.12.1 DEMOGRAPHIC PROFILE

Namibia is one of the least densely populated countries in the world, with a population of 2.5 million. Life expectancy is 65 years and expected years at schooling is 11.7 (National Planning Commission, 2017). Namibia's population is expected to increase from an estimated 2.11 million in 2011 to 3.44 million by 2041 (63%). It is predicted that urbanisation will continue, with an increase from 43% population in urban areas in 2011 to 67% in 2041. The populations of Khomas and Erongo are projected to increase the most with over a third of Namibia's population to live in these two regions (Namibia Statistics Agency, 2011). In Erongo region, Swakopmund and Walvis Bay are the main towns expected to have an increase in urbanisation, mostly due to economic activities resulting from mining, tourism and the fishing industry.

In the 2011 Census, the population of the Erongo Region was 150 809, with a growth rate of 28.6% since 2001. The population of Namibia has been growing steadily; the population growth rate between 2001 and 2011 (the two census) was 1.4%, with urban areas growing quicker than rural areas. The highest growth rate in Namibia was recorded in the Erongo region (3.4%). This was mainly influenced by in-migration; more than 40% of residents in these regions were born elsewhere. Situated in the central Namib Desert, Swakopmund is a

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fourth-largest populated town in Namibia and the capital of the Erongo region administrative district with 44 725 inhabitants (Namibia Statistics Agency, 2011).

#### 5.12.2 GOVERNANCE

Namibia has achieved the level of 'medium human development' and ranks 125th on the Human Development Index out of 188 countries (National Planning Commission, 2017). Namibia is divided in 14 regions, subdivided by 121 constituencies. Each region has a regional council, elected during regional elections per constituency. Towns are governed through local authorities, in the form of municipalities.

The Namibian constitution provides for the establishment of Local authorities by laws under the Municipal Ordinance, 1963 (Ordinance 13 of 1963) and the Local Authorities Act, No. 23 of 1992. As such the Local Authorities have the power to pass by-laws for the effective administration of their Municipalities and Communities.

#### 5.12.3 EMPLOYMENT

Unemployment rates in Namibia, particularly among the youth, are high with approximately 44.79 % of all people unemployed in 2018. In terms of employment by occupation, it is demonstrated that skilled agricultural or fishery workers made up the largest occupational group in Namibia with 46.5%, followed by the category 'elementary occupation' (18.7%) and then service workers (12.5%).

#### 5.12.4 ECONOMIC ACTIVITIES

Tourism is an important sector in Namibia. It is the third largest contributor to the country's GDP; it generates a significant number of jobs and is a valuable foreign exchange earner for the economy. In 2012, the World Travel and Tourism Council estimated the total contribution of travel and tourism to Namibia's GDP to be 20.5% and that 27% of all employment was generated through this sector (MET, 2016). The Namibian state has long recognised and prioritised tourism development in various legislative and policy documents as a result.

Since 2016, Namibia recorded slow economic growth, registering an estimated growth of only 1.1% in 2016. The primary and secondary industries contracted by 2.0 and 7.8% respectively. During 2017 the economy contracted by 1.7, 0.7 and 1.9% in the first, second and third quarters respectively (NSA, 2018). Despite the more positive expectations, the economy retracted to an average growth of not more than 1% annually since 2017.

The tourism and mining sectors in the Erongo Region provide most of the employment opportunities.

#### 5.13 CULTURAL HERITAGE

The mole enjoys the highest possible rating (Grade A) for historical structures in Swakopmund. Any development must be submitted to the National Heritage Council for evaluation (Erongo, 2019). An application was submitted to the National Heritage Council on the 21<sup>st</sup> August 2020 for a record of decision on the actual heritage value of the site.

A review of the National Heritage Council database as well as desktop-based heritage opinion by Dr Andreas Vogt was conducted and concluded that no known heritage finds are present in the project area. The heritage value of the site in comparison with other known heritage buildings in the broader Historic CBD is considered low. The non-clustered character of the other heritage buildings in the area does not exert a direct influence on the site itself (pers. comms. Dr Vogt, 2020).

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#### 5.13.1 Heritage review of the site (Erf 4747)

Swakopmund was originally established with the intent of being a harbor town by the German colonial authorities, who avoided the British annexed Walvis Bay harbour, albeit a short-lived reality which spanned from 1892 to 1904, with the construction of a wave breaker (jetty system) to ease the import and export of goods, and people to and from the town, which underwent multiple refurbishments and ultimately abandoned.

According to Dr. Vogt, the only noteworthy, but not historical building on this site was the old Badehaus, which served as a functional building. This building was removed with little community protest and replaced with an Olympic sized public swimming pool after 1971. This development was also demolished with little protest from the community. Both the Badehaus and swimming pool were never included in the Swakopmund heritage register compiled in 1986. The swimming pool was also a functional building, with no historical or symbolical relevance (Vogt, 2020).

The public and the authorities at the time, probably all agreed that the new swimming pool (also controversial in the beginning) ultimately added significantly more value to Swakopmund as a tourist destination (Vogt, 2020). It is believed that the residents of Swakopmund resolved to turn the town into a recreational destination for tourists in the 1920 after multiple community meetings were held (per comms, Dr. Vogt, 2020).

An explanation of the wider heritage context of Erf 4747 within the mole basin area is given below as taken from the assessment of Dr. Vogt.

There are a few historical buildings defining the heritage context of the mole basin: The narrower context is supplied by the following:

- The lighthouse (1903/10)
- The mole (1900-3)
- Former customs shed (today Swakopmund Museum)
- Former Vierkantvilla (trans located app. 2000)

As these were functional building structures with very little architectural finesse, they only influence their surroundings marginally. Their bearing on the design of a new residential and retail development would be near to zero.

The wider context comprises:

- The Bezirksamt (Presidential Palace) (1901)
- Altes Amtsgericht (1905)
- Kabelmesse (1899)

According to Dr Vogt, although all of them (listed above) constitute fine examples of German colonial architecture, their existence would also have near zero influence on the new residential and retail development, since there is no direct visual contact between these buildings and the new development. Although, as has been shown above, the heritage value of Erf 4747 is relatively low, there is one aspect that should be considered, namely the height of the development to be established. To this end recommendations are supplied by Dr. Vogt. See Appendix I.

Figure 20 depicts the location of Erf 4747 relative to other heritage sites in the area with a rating. Figure 21 outlines the broader conservation area within which the proposed project is located.

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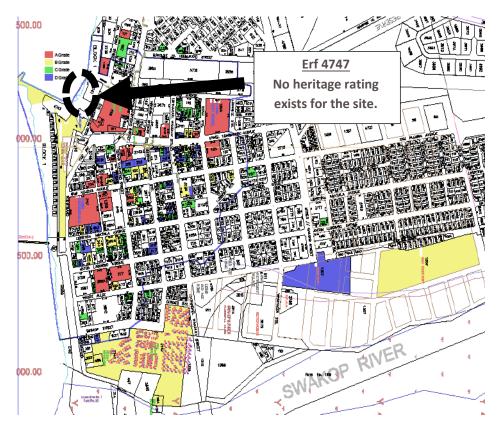


FIGURE 20 - ERF 4747 IN RELATION TO OTHER HERITAGE RELATED BUILDINGS IN THE CBD AREA. SOURCE: AESTHETIC APPROVAL GUIDELINES FOR SWAKOPMUND



FIGURE 21 - BOUNDARIES OF CONSERVATION AREA WITHIN WHICH THE PROJECT LOCATION IS SITED.

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#### 6 IDENTIFICATION AND EVALUATION OF IMPACTS

The key stage of the ESIA process is the impact prediction and evaluation stage. This stage is the process of bringing together project characteristics with the baseline environmental characteristics and ensuring all potentially significant environmental and social impacts are identified and assessed. Impact prediction and evaluation involve envisaging the possible changes to the environment as a result of the proposed project. The recognized methodology was applied to determine the magnitude of impact and whether or not the impact was considered significant and thus warrant further investigation. The assessment considers all stages of the project's life cycle that is scoped into the assessment and is presented in this report. It is an iterative process that commences at project inception and runs through to the final design and project implementation (construction and operations). The impact prediction and evaluation stage were undertaken in June and July 2020 and the preliminary findings of the assessment are presented in this document.

#### 6.1 Introduction

Chapter 2 provides an overview of the approach used in this ESIA process and details each of the steps undertaken to date. This chapter outlines the methods followed to identify and evaluate the impacts arising from the proposed project it includes the following:

- Details on the assessment guidance used to assess impacts;
- Lists the limitations, uncertainties and assumptions with regards to the assessment methodology;
- Details how impacts were identified and evaluated, and how the level of significance was derived; and
- Details how mitigation was applied in the assessment and how additional mitigation was identified.
- Details the Cumulative Impact Assessment (CIA) method.

#### 6.2 ASSESSMENT GUIDANCE

The principal documents used to inform the assessment method are:

- International Finance Corporation standards and models, in particular Performance Standard 1,
   'Assessment and management of environmental and social risks and impacts' (International Finance Corporation, 2017) (International Finance Corporation, 2012);
- International Finance Corporation CIA and Management Good Practice Handbook (International Finance Corporation, 2013); and
- Namibian Draft Procedures and Guidance for ESIA and EMP (Republic of Namibia, 2008).

#### 6.3 LIMITATIONS, UNCERTAINTIES AND ASSUMPTIONS

The following limitations and uncertainties associated with the assessment methodology were observed:

- Topic specific assessment guidance has not been developed in Namibia. A generic assessment methodology was applied to all topics using IFC guidance and professional judgement;
- International Finance Corporation CIA and Management Good Practice Handbook (International Finance Corporation, 2013) and,
- Namibian Draft Procedures and Guidance for EIA and EMP (Republic of Namibia, 2008).

A number of limitations and uncertainties were acknowledged during the ESIA process. In line with EIA best practice, assumptions have been made based on realistic worst-case scenarios, thereby ensuring that the worst-case potential environmental impacts are identified and assessed. Table 5 below contains the assumptions and uncertainties identified during the assessment process. Table 5 below contains the assumptions and uncertainties identified during the assessment process.

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TABLE 6: SUMMARY OF LIMITATIONS, UNCERTAINTIES AND ASSUMPTION OF THE ESIA PROCESS

LIMITATION / UNCERTAINTY	ASSUMPTION
Program of activities	Activities involving excavations, preparation of the terrain and
	general earthworks, construction and eventual operations. It is
	assumed that construction activities will span a period of 30 months.
	Operations are planned to commence immediately thereafter.
Agreements	It is assumed that all agreements regarding connections to existing
	infrastructure and the necessary upgrade thereof, the use of facilities
	and support services are in place prior to the commencement of the
	project as per the development agreement between the
	Swakopmund council and proponent.
Tourism sector revival timeframe	The global impact of travel restrictions between countries has
pending the outcome of the	essentially halted international tourism. Namibia has felt the impact
Covid-19 pandemic.	and it is unknown when and under what conditions international
	travel may resume.
Anthropological Assessment of	The social assessment for this project is not meant to be viewed as
the site	an anthropologic assessment into the intricacies of cultural dynamics
	and its association with known landforms, buildings or other objects
	or activities, in this case, Erf 4747.
Wind dynamics including	It is assumed that the proponent's technical and architectural teams
modification of wind patterns	have considered general wind dynamics along the coastline and the
after building constructed	potential effects (if any) of the development on normal wind
	patterns during the design phases of the development, and therefore not considered further.
Property values	It is uncertain how the development will affect existing property
Troporty values	values in and around the CBD area based on the current uncertainty
	within the local and global economic markets. Increased property
	values are expected to occur as a result of the development. A
	market study may be needed to assess this in detail.
Other projects	It is known to the consultant that other capital projects are planned
	within the municipal area. This has been incorporated into the
	cumulative impact assessment chapter of this report. However, only
	a qualitative assessment could be done due to a lack of information
	on scheduling information for all other projects.

Where uncertainties exist, a cautious approach has been applied, allowing the worst-case scenario for potential impacts to be identified.

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# ESIA REPORT Erf 4747, DEVELOPMENT, SWAKOPMUND

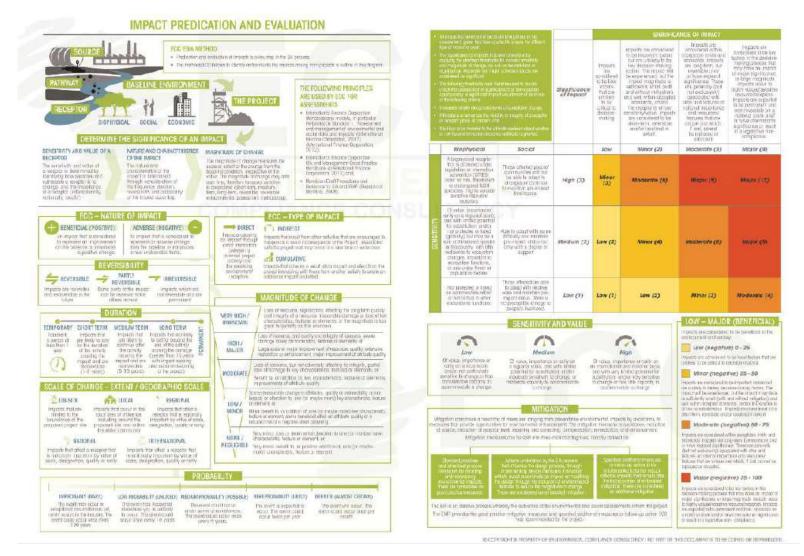


FIGURE 22 - ECCS IMPACT PREDICTION AND EVALUATION METHODOLOGY

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#### 6.4 CUMULATIVE IMPACTS

#### 6.4.1 CUMULATIVE IMPACT ASSESSMENT METHOD

Cumulative impacts may arise as a result of other project activities or the combination of two or more projects in the project area. The Cumulative Impact Assessment (CIA) has been undertaken by applying the IFC CIA Good Practice Handbook (International Finance Corporation, 2013), which recommended a rapid CIA is undertaken. A rapid CIA takes into consideration the challenges associated with a good CIA process, which includes lack of basic baseline data, uncertainty associated with anticipated development, limited government capacity, and absence of strategic regional, sectoral or integrated resource planning schemes.

The five-step rapid CIA process has been followed:

- Step 1: Scoping Determine spatial and temporal boundaries;
- Step 2: Scoping Identify valued environmental and social receptors and identify reasonably foreseeable developments;
- Step 3: Determine present condition of valued environmental and social receptors (the baseline);
- Step 4: Evaluation of the significance of the cumulative impacts; and
- Step 5: Identification of mitigation measures to avoid or reduce cumulative impacts.

The following information has been applied to the assessment in line with the above steps and IFC Guidance:

- The spatial and temporal boundaries of the CIA are the extent of the site boundaries and the duration
  of the decline development and operation phases of the proposed project (up to months from the
  date of commencement);
- Valued environmental and social receptors that may be affected are those presented in Chapter 5. No additional ones have been identified through this CIA;
- The predicted future conditions of common environmental receptors have been taken into consideration in the assessment;
- The assessment findings presented in Chapter 7 have been applied to the CIA in combination with professional judgment and published environmental assessment reports; and
- A review of mitigation and monitoring measures has been undertaken, with any additional ones identified.

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# 7 IMPACT ASSESSMENT FINDINGS AND PROPOSED MITIGATION MANAGEMENT MEASURES PROVIDED

#### 7.1 Introduction

This chapter illustrates the envisioned impacts that could potentially occur as a result of the proposed development. The impacts identified herein were derived at from applying the ESIA methodology for impact assessments as well as the professional experience base within ECC. These impacts are not considered exhaustive but are provided as guideline for the public review process. All additional impacts identified throughout the public review period by I&APs will be considered and incorporated into the final assessment report.

This chapter presents the findings of the ESIA for the proposed project as per the ESIA process, scope and methodology set out in Chapter 2 and Chapter 6. A range of potential significant impacts have been identified that may arise as a result of the proposed project. The aim of this section of the report is to focus on the significant impacts that may arise from this list. This chapter therefore only considers the significant impacts and or those that may have specific interest to the community and stakeholders. A summary of impacts that are not considered significant is discussed in Section 7.2.

Impacts that are considered significant or those of interest to the community and stakeholders are as follows:

- Socio-economic: Direct and Indirect Employment; and
- Social: The need for the project and its potential to impact the historical feel of the town.

For each potential significant or sensitive impact, a summary is provided which includes the activity that would cause an impact; the potential impacts; embedded or best practice mitigation (stated where required / available); the sensitivity of receptor that would be impacted; the severity, duration and probability of impacts; the significance of impacts before mitigation and after mitigation measures are applied.

#### 7.2 IMPACTS NOT CONSIDERED SIGNIFICANT

As a result of an iterative development process, mitigation has been incorporated and embedded into the project, thereby designing out potential environmental and social impacts or reducing the potential impact so that it is not significant. Best practice has also played a role in avoiding or reducing potential impacts. The EMP provides best practice measures, management and monitoring for all impacts.

Impacts that have been assessed as not being significant are summarised in table 6 below and not discussed further.

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TABLE 7 - SUMMARY OF NON-SIGNIFICANT POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS

ENVIRONMENT OR SOCIAL TOPIC	POTENTIAL IMPACT	SUMMARY OF ASSESSMENT FINDINGS
Waste management	Visitor experience to the beachfront area.	Waste items and litter on the site and surrounding pedestrian sidewalks, park and parking lots.  The proponent will develop a waste management plan to counter the impact of waste dispersal on and surrounding the site. Details are contained in the EMP.
Increased people/foot traffic in the immediate vicinity.	Increased footfall in the project area and surrounding vicinity.	Potential risk of negative social interactions to occur between the workforce and the public. An internal Health and Safety Management Plan will be developed by the client to addresses this topic and mitigation measures provided.
Air Quality	The operations of the proposed project building may discharge air pollution.	During operation, excavation activities will discharge some form of air pollution into the atmosphere and marginally affect the ambient air quality of the vicinity. Power efficient tools/machinery should be used.  Dust has been included in the assessment, due to the risk it poses during construction and mitigation measures are assigned to it in the EMP.
Climate change adaptation	The potential for climate change to impact the proposed project – i.e., sea level rises and storm surges.	The proposed project building will not be adversely affected by potential climate change impacts due to sea-level rises which are predicted to be 6-25cm up to year 2030 (Robertson, Jarvis, Mendelsohn, & Swart, 2012) compared to the site elevation of 9-12m above sea level.
Climate change cause / contribute to	The proposed project contributing to climate change through the emissions of Green House Gasses.	The proposed project is considered to be of a medium size, with construction envisioned to be completed after 30 months from inception. The proposed project will implement energy efficiency technologies and will be built to consider that.

# 7.3 SCOPING ASSESSMENT FINDINGS

This section sets out the findings of the scoping assessment phase. Activities that could be the source of an impact have been listed, followed by receptors that could be affected. The pathway between the source and the receptor has been identified where both are present. Where an activity and or receptor has not been identified, an impact is unlikely, thus no further assessment or justification is provided. Where the activity, receptor and pathway have been identified, a justification has been provided documenting if further assessment is required or not required.

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Due to the nature and localised scale of the project, and the environmental context, the potential environmental risks are limited and unlikely to be significant whilst the social effects present a greater significance. The only area where uncertainty remained during the scoping phase was the potential cumulative effects on human receptors from the predicted use of the building and correlating impact on the area's sense of place.

The receptors are a sector of the local resident population who have become accustomed to enjoying ocean views without any obstructions from this (proposed development site) vantage point as well as functional outdoor use of the space prior to its closure to those living in close proximity to the site.

#### 7.4 SOCIO-ECONOMIC ENVIRONMENT

The term socio-economic impact assessment embraces both social impacts and economic impacts. Economic impacts include issues such as employment, changes in economic activity, and increased expenditure. The significant economic impact or impact that holds specific interest to the community and stakeholders is employment creation and is summarised in this section.

#### 7.4.1 EMPLOYMENT

Whilst Namibia has a high unemployment rate, the Erongo Region has one of the highest employment rates in Namibia. In Swakopmund, the majority of employment is through the tourism sector, which to a large degree is already developed, but socially not diverse. Mining in the Erongo region also employs a large number of local residents. The national value and sensitivity of employment is considered to be high as it is of importance to the country and the local economy.

#### DIRECT EMPLOYMENT: CONSTRUCTION

Approximately 2500-3000 jobs will be generated during the construction phase. The proponent will employ local people wherever possible and feasible to fulfil the roles. Construction work will take approximately 30 months; the beneficial impact of creating 2500-3000 temporary jobs will result in a temporary impact with a low magnitude of change. A minor beneficial impact on the community and economy is therefore expected.

#### **DIRECT EMPLOYMENT: OPERATION**

Approximately 300 permanent jobs (skilled and semi-skilled) will be created in the operational stage as a direct result of the project, with the anticipated creation of downstream jobs such as goods services, and contractor works expected throughout the lifespan of the project. The magnitude of change during operation is considered as low but has long term effects thereby resulting in a minor beneficial impact on the community and economy.

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#### SUMMARY OF EMPLOYMENT IMPACTS

TABLE 8: - SUMMARY OF IMPACTS TO LOCAL ECONOMY

Activity	Receptor	Impact	Nature of impact	Value & Sensitivity	Magnitude of change	Significance of impact
Construction works - general	<ul><li>Community</li><li>Job seekers</li><li>Local economy</li></ul>	Creation of 2500-3000 jobs over a 30- month period	Beneficial Direct Partially Reversible Regional Short Term Reversible	Medium	Minor	Beneficial Minor (9)
Operations of the proposed project	<ul><li>Community</li><li>Job seekers</li><li>Local</li><li>economy</li></ul>	Creation of 300 jobs	Beneficial Direct Irreversible Regional Long Term Reversible	Medium	Minor	Beneficial Minor (9)
Downstream economic injection (multiplier effect)	- Local economy (goods and services trade businesses)	Financial injection into goods and services trading businesses in the local economy	Beneficial Indirect Partially Reversible Local Long Term Reversible	Medium	Minor	Beneficial Minor (9)

# 7.5 SOCIAL ENVIRONMENT

#### 7.5.1 Noise impacts from the construction phase

Construction activities and related traffic in the vicinity will increase noise levels emanating from the site. The duration of construction activities is envisioned to last for 30 months and would therefore exert an impact on visitors to amenities neighbouring the development site. The main sources of noise will be from:

- Construction vehicles moving on site;
- Limited demolition activities;
- Earthwork activities; and
- General construction activities such as drilling and loading and unloading material.

Human receptors surrounding the proposed development site are those that will be most likely affected by the construction works. Receptors within 200m of the site boundary fence of the proposed development will most likely also experience disruption from noise, however noise will reduce the further away from the site the receptor is. Receptors within the 200m radius of the proposed project site includes the residents of the An der Welle complex north of Erf 4747, which does not have a daily occupancy rate of 100%. This accommodation complex consists mostly of holiday units and far less of residential units.

TABLE 9: NOISE IMPACTS FROM THE CONSTRUCTION ACTIVITIES

A	Activity	Receptor	Impact	Nature of impact	Value & Sensitivity	Magnitude of change	Significance of impact
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Activity	Receptor	Impact	Nature of impact	Value & Sensitivity	Magnitude of change	Significance of impact
Construction activities and increased traffic	- Local residents surrounding the project site: Noise levels increasing from ambient noise levels	The local residents surrounding the proposed project site daily are likely to experience an increase in noise levels due to general construction activities, and local residents utilising the Strand Street along the site are also likely to experience an increase in noise due to increased traffic levels. Severance to traffic flow and increase in driver stress, which may lead to accidents.	Adverse Direct reversible Moderate Short-term local Possible	High	Moderate	Moderate (6)

#### 7.5.2 Sense of Place: Sensitive receptors

The town of Swakopmund is dominated by a culture of tourism and its economy and regional identity is directly linked to the monetization of this sector. The local residents surrounding the proposed project site are likely to experience an increase in noise levels due to the operations of the development, and residents along the major access route to the site are also likely to see an increase in noise due to increased traffic levels.

The proposed development on Erf 4747 will modify the visual landscape of the mole area. The ocean view from Strand Street will be obstructed by the height and width of the building to a degree. Residents and tourists alike have become accustomed to experiencing unobstructed ocean views intermittently from the strand street vantage point. Historically, this site had infrastructure built on it, therefore it cannot be assigned as a pristine and undisturbed area. Nevertheless, factors that were considered were the access criteria (public space) to the operational building, the allowable use of the building, the land-based access via (around and through) the building to the beach area and the predicted visual impact caused by the building. These factors contribute to the sense of place of the site and are assessed in table 19 below. The tourism spectrum of the mole area is expected to be amplified with the addition of this structure, which dovetails with the vision of the local economic development strategy adopted by the Swakopmund council to enhance the beachfront area and develop Swakopmund as the preferred tourist destination in Namibia.

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TABLE 10: IMPACT ASSESSMENT OF THE PROJECT ON SENSE OF PLACE

Activity	Receptor	Impact	Nature of impact	Value & Sensitivity	Magnitude of change	Significance of impact
Historical feel of the town tied to its sense of place	- Community (beach goers i.e., domestic and international tourists)	Modified landscape impacting on the mole's sense of place perception	Adverse Direct Partly- reversible Negligible Moderate Medium- term Local Possible	Low	Moderate	Minor (3)

The impact will be experienced, but its magnitude is sufficiently small (with and without mitigation) and well within accepted standards. The receptor is of low sensitivity/value because of its non-vulnerability and its established tolerance to change.

#### 7.5.3 Traffic impacts from construction activities

During construction, increased traffic to and from the project site may disrupt normal traffic flow by residents and the community alike. Severance to local residents will be felt as the need to find alternative routes through the area may be necessitated, increasing traffic flow times and potentially causing some form of confusion on the roads which may then cause accidents. The developer is responsible for ensuring a practical traffic management plan is implemented to manage the potential effects on traffic conditions surrounding the site so as to reduce the level of significance on sensitive receptors. A traffic impact assessment is also recommended to determine baseline conditions and suitable mitigation measures to manage traffic related impacts.

TABLE 11: IMPACT ASSESSMENT OF THE PROJECT ON TRAFFIC

Activity	Receptor	Impact	Nature of impact	Value & Sensitivity	Magnitude of change	Significance of impact
Traffic flow (community and local residents)	<ul><li>Community</li><li>Local</li><li>residents</li><li>Visitors to the area</li></ul>	Disruption to normal traffic flow from pre- construction baseline conditions	Adverse Direct Partly- reversible Negligible Moderate Short-term Local Likely	High	Moderate	Minor (4)

# 7.5.4 VISUAL IMPACTS ASSOCIATED WITH THE PROPOSED DEVELOPMENT

Based on the viewshed diagrams below, the building can be seen at a distance of about 150 metres away from an observation height of 2m and above, above ground level. The visual sphere is represented in red. The viewshed analysis was based on the height specifications as represented in figure 23 below.

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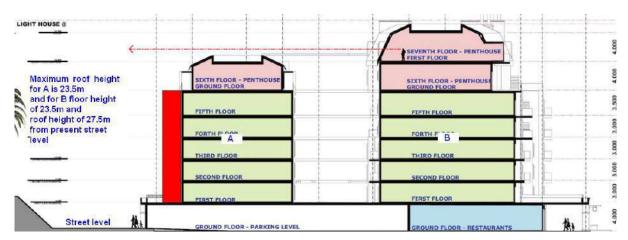


FIGURE 23 - ROOF HEIGHT FROM GROUND LEVEL

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FIGURE 24 - VIEWSHED OF BUILDING IN AN EASTERLY DIRECTION FROM AN AERIAL PERSPECTIVE

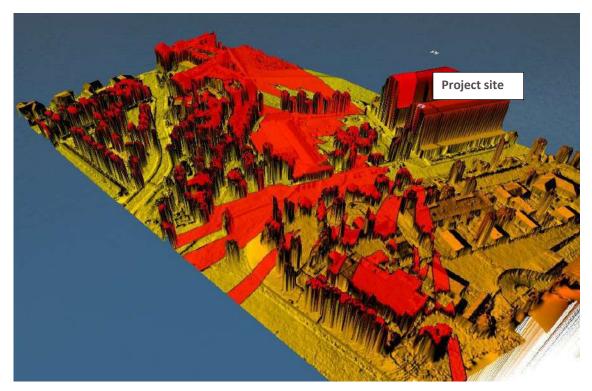


FIGURE 25 - VIEWSHED OF BUILDING FROM A NORTH EASTERLY VANTAGE POINT



#### **CONSTRUCTION PHASE:**

Erf 4747 is already barricaded by a corrugated steel fence, which effectively hide the barren scenery inside the Erf. Construction machinery, tall and elongated plant equipment (i.e., cranes) and construction vehicles will penetrate the horizon and over and above the top of the fence. This will cause a visual disturbance to onlookers and motorists passing the site. The impact will be localised and remanded to the site alone. As the building develops higher with each new floor level constructed the visual sphere will broaden and extend farther away from the site.

#### **OPERATIONAL PHASE:**

After construction has ended, the completed building will remain as a permanent feature in the seascape of the Mole basin. The visual amenity of the building will fit in with the surrounding architecture on buildings in the same vicinity. However, the size of the building and its height will introduce a new visual component in an area that is characteristically modest in terms of size and density.

**TABLE 12: SUMMARY OF POTENTIAL VISUAL IMPACTS** 

Activity	Receptor	Impact	Nature of impact	Value & Sensitivity	Magnitude of change	Significance of impact
Construction of the proposed development	<ul><li>Community</li><li>Local residents</li><li>Visitors to the area</li></ul>	Disruption to normal visual baseline conditions of the seascape	Adverse Direct Reversible Negligible Moderate Short-term Local Likely	Medium	Moderate	Minor (4)
Operation of the proposed development	<ul><li>Community</li><li>Local residents</li><li>Visitors to the area</li></ul>	Disruption to normal visual baseline conditions of the seascape	Adverse Direct Reversible Negligible Moderate Short-term Local Likely	Medium	Moderate	Minor (4)

#### 7.5.5 Shadow effect simulation findings on the surrounding environment

A shadow simulation was conducted bi-monthly from February 2019 to December 2019 by Chamberlain and Associates to map the exact shadow pattern cast throughout the year by the proposed building. The results of which are displayed in the simulation report in **Appendix G.** Shadow recordings were made on three different time stamps (morning, noon and afternoon) per 24 hours for every 2<sup>nd</sup> month ending in December 2019.

Based on the images generated throughout the assessment period it is evident that shadows will be cast on the surrounding area because of the height of the building. However, the directional influence of casted shadow overlays is mostly toward a west and south westerly direction and not east as was generally perceived. The farthest point in a westerly direction the shadow travels is the shoreline. This shadow overlay across the beach area is concentrated to morning hours only with the greatest overlay distance recorded between 08:47-08:59 AM for this time stamp. As noon approaches, the shadow overlay retracts to the south side of the building with a very short overlay onto the open park area next to it. By afternoon (between 15:59 -16:59 PM)

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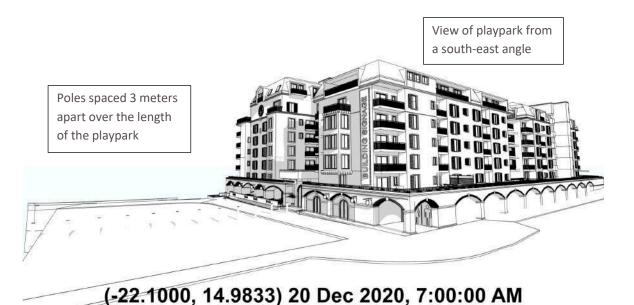
the shadow overlay from the building covers a portion of Strand street, the immediate four-way intersection between Strand street and Theo Ben Gurirab street, as well as the entrance to the seaside parking lot leading from Theo Ben Gurirab Street to the condominiums located north of the proposed building.

#### 7.5.6 SHADOW SIMULATION OF EFFECTS ON PLAYPARK SOUTH OF THE PROPOSED DEVELOPMENT

The below screenshots were taken from a desktop shadow simulation software tool by the architects to map the movement of the buildings casted shadow over the playpark. Shadow studies allows one to view an entire project or part thereof in a real-life situation by choosing a geographic location and defining the time period over which you wish to examine lighting and shadow casting. The ARCHICAD software uses the Solar Position Algorithm from the National Renewable Energy Laboratory (USA) to calculate the solar zenith and azimuth angles. The set of data charts are categorised into summer months represented by December and winter months represented by June.



# (-22.1000, 14.9833) 20 Dec 2020, 1:00:00 PM





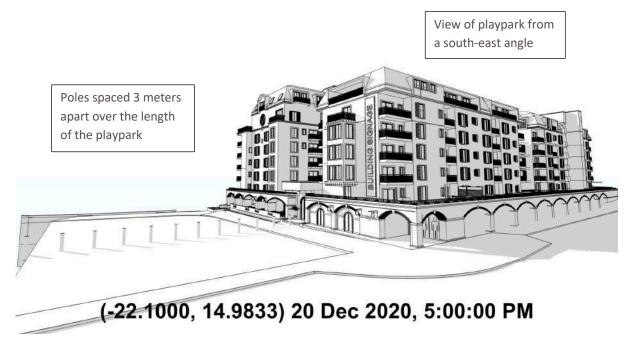
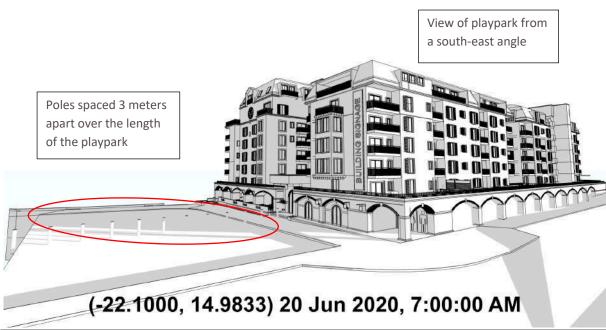


FIGURE 26 - SHADOW SIMULATION AT 3 DIFFERENT TIMESTAMPS IN DECEMBER (REPRESENTING THE SUMMER MONTHS)

#### INTERPRETATION OF DATA

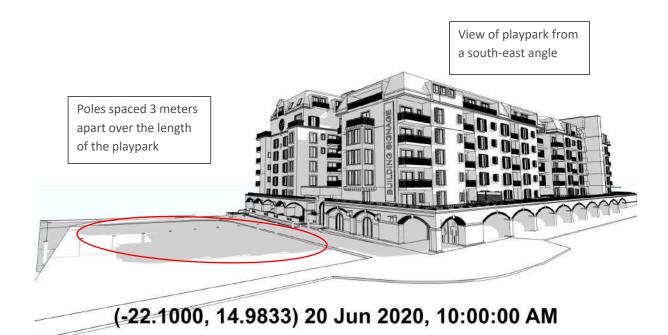
From the images above it is clear that during summer months, the playpark will not be cast in any shadow overlay caused by the proposed development. The month of December is a representative sample of baseline conditions for the entire summer season and its results are therefore accepted.

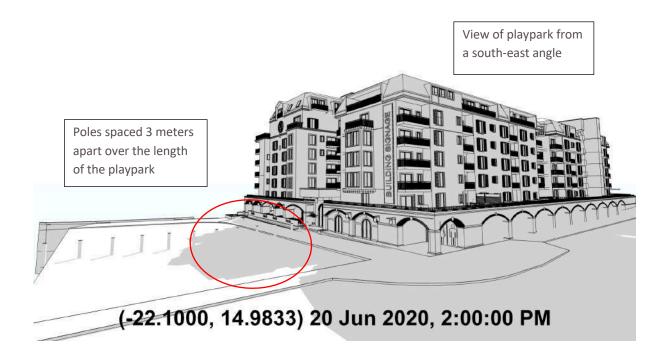
# REPRESENTATIVE SAMPLE FOR WINTER MONTHS



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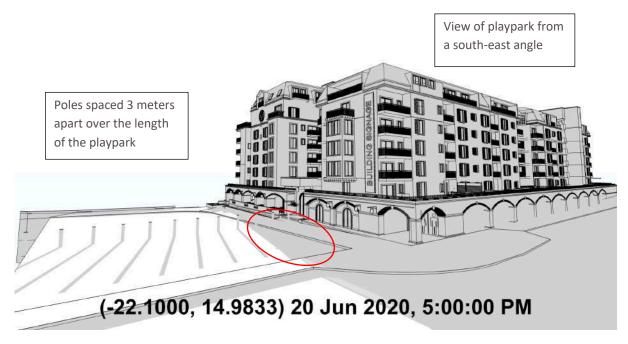


FIGURE 27 - SHADOW SIMULATION AT FOUR DIFFERENT TIME STAMPS IN JUNE (REPRESENTING WINTER MONTHS)

#### INTERPRETATION OF DATA

From the simulations shown above it is clear that during winter months, the playpark will be cast in shadow overlays caused by the proposed development. The furthest shadow overlay occurs at 7AM in the morning, while at 2PM the shadow has retracted to about 18 meters from the side of the building and at 5PM only covering a very small edge of the playpark in the southeast corner. The month of June is a representative sample of baseline conditions for the entire summer season and its results are therefore accepted. It is important to note that outside baseline conditions during this season is characterised by strong east winds.

TABLE 13: IMPACTS FROM SHADOW EFFECTS AROUND THE BUILDING AND ON THE PLAYPARK

Activity	Receptor	Impact	Nature of impact	Value & Sensitivity	Magnitude of change	Significance of impact
Shadow trajectory for the playpark (Summer months)	– Visitors to the playpark	Perceived shadow overlay on beach, south and east of the site	Adverse Indirect Non- reversible Negligible Moderate Permanent Local Possible	Low	Low	Low (1)
Shadow trajectory for the playpark (Summer months)	– Visitors to the playpark	Perceived shadow overlay on beach, south and east of the site	Adverse Direct Non- reversible Negligible Moderate Permanent	Minor	Low	Low (2)

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А	ctivity	Receptor	Impact	Nature of impact	Value & Sensitivity	Magnitude of change	Significance of impact
				Local Possible			
trajec	hadow ctory (over 2-month eriod)	- Community (beach goers and visitors to any of the amenities surrounding the site	Perceived shadow overlay on beach, south and east of the site	Adverse Direct Non- reversible Negligible Moderate Permanent Local Possible	Medium	Low	Minor (4)

TABLE 14: SUN SIMULATION RESULTS FOR A 12 MONTH PERIOD

MONTH	TIME	DIAGRAM (SIMULATION RESULT)
February	AM	ERF 4747 SWAKOPMUND SUN STUDY - FEBRUARY  (-22.9833, 14.6000) 20 Feb 2019, 8:57:00 AM
	NOON	ERF 4747 SWAKOPMUND SUN STUDY - FEBRUARY [-22.9833, 14.6000) 20 Feb 2019, 11:57:00 AM
	MID- DAY	ERF 4747 SWAKOPMUND SUN STUDY - FEBRUARY (-22.9833, 14.6000) 20 Feb 2019, 1:57:00 PM

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MONTH	TIME	DIAGRAM (SIMULATION RESULT)
	PM	(-22.9833, 14.6000) 20 Feb 2019, 3:57:00 PM
April	AM	(-22.9833, 14.6000) 20 Apr 2019, 8:52:00 AM
	NOON	ERF 4747 SWAKOPMUND SUR STUDY - APRIL  (-22.9833, 14.6000) 20 Apr 2019, 11:52:00 AM
	MID- DAY	(-22.9833, 14.6000) 20 Apr 2019, 1:52:00 PM
	PM	(-22.9833, 14.6000) 20 Apr 2019, 3:52:00 PM
June	AM	ERF 4747 SWAKOPMUND SUN STUDY - JUNE  (-22.9833, 14.6000) 20 Jun 2019, 8:47:00 AM

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MONTH	TIME	DIAGRAM (SIMULATION RESULT)			
	NOON	ERF 4747 SWAKOPMUND SUN STUDY - JUNE			
		(-22.9833, 14.6000) 20 Jun 2019, 11:47:00 AM			
	MID-	ERF 4747 SWAKOPMUND SUN STUDY - JUNE			
	DAY				
		(-22.9833, 14.6000) 20 Jun 2019, 1:47:00 PM			
	PM	ERF 4747 SWAKOPMUND			
		SUN STUDY - JUNE			
		(-22.9833, 14.6000) 20 Jun 2019, 3:47:00 PM			
August	AM	(-22.9833, 14.6000) 20 Aug 2019, 8:58:00 AM			
	NOON	ERF 4747 SWAKOPMUND SUN STUDY - AUGUST			
		(-22.9833, 14.6000) 20 Aug 2019, 11:58:00 AM			
	MID-	ERF 4747 SWAKOPMUND			
	DAY				
		(-22.9833, 14.6000) 20 Aug 2019, 1:58:00 PM			
		Description of the state of the			

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MONTH	TIME	DIAGRAM (SIMULATION RESULT)
	PM	ERF 4747 SWAKOPMUND SUN STUDY - AUGUST
		(-22.9833, 14.6000) 20 Aug 2019, 3:58:00 PM
October	AM	ERF 4747 SWAKOPMUND SUN STUDY - OCTOBER
	NOON	(-22.9833, 14.6000) 20 Oct 2019, 9:01:00 AM ERF 4747 SWAKOPMUND
	NOON	SUN STUDY - OCTOBER
		(-22.9833, 14.6000) 20 Oct 2019, 12:01:00 PM
	MID- DAY	ERF 4747 SWAKOPMUND SUN STUDY - OCTOBER  (-22.9833, 14.6000) 20 Oct 2019, 2:01:00 PM
	PM	ERF 4747 SWAKOPMUND SUM STUDY - OCTOBER
		(-22.9833, 14.6000) 20 Oct 2019, 4:01:00 PM
December	AM	ERF 4747 SWAKOPMUND SUN STUDY - DECEMBER
		(-22.9833, 14.6000) 20 Dec 2019 at 08:49:00

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MONTH	TIME	DIAGRAM (SIMULATION RESULT)		
	MID-	ERF 4747 SWAKOPMUND SUN STUDY - DECEMBER		
	DAY			
		(-22.9833, 14.6000) 20 Dec 2019 at 13:09:00		
	PM	ERF 4747 SWAKOPMUND SUN STUDY - DECEMBER		
		(-22.9833, 14.6000) 20 Dec 2019 at 16:59:00		

#### 7.6 FURTHER CONSIDERATION: CUMULATIVE IMPACTS

The EIA Regulations clearly states that cumulative impacts should be considered as part of the EIA for a proposed project. Good practice requires that, as a minimum, cumulative impacts are assessed during the ESIA process.

Cumulative impacts can arise when a single resource or receptor is affected by more than one impact from the proposed project. For example, a local resident could be affected by noise from construction vehicles and dust from ground excavation during the construction stage. In isolation, the impacts of noise and dust may be insignificant, however when combined, the impacts on the local resident may result in a significant impact. **This is termed 'Intra- Project Cumulative Impacts'.** 

Cumulative impacts may also arise as a result of the combination of two or more projects. A receptor could be impacted by similar types of impact from different developments or a receptor could be impacted by different types of impact from different developments. This could occur at the same time or at different times. **This is termed Inter- Project Cumulative Impacts**. An example of this is as follows; noise generated during the construction stage of the proposed project may not cause a significant effect in isolation; however, a sensitive receptor (e.g., local resident) may be significantly impacted when noise from the proposed project is combined with noise generated from other projects. These projects could be future projects or existing projects which may have ongoing influences on the environment in the future and are expected to interact with the same environmental and social receptors as the proposed project (International Finance Corporation, 2013).

Cumulative impacts have a wide temporal and spatial scope, and are not restricted to a local area nor need to happen at the same time. It is therefore, crucial to identify a suitable study and assessment area, as well as a timeframe to assess. Cumulative impacts can also be vast and complicated; therefore it is important to focus on the significant impacts.

The six-step rapid CIA process has been followed:

- Step 1: Scoping determine spatial and temporal boundaries;
- Step 2: Scoping identify valued environmental and social receptors and identify reasonably foreseeable developments;
- Step 3: Determine present condition of valued environmental and social receptors (the baseline);

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- Step 4: Assessment of cumulative impacts and evaluation of the significance of the cumulative impacts; and
- Step 5: Identification of mitigation measures to avoid or reduce cumulative impacts.

#### 7.6.1 Intra-Project Cumulative Impacts

The proposed project may result in a receptor or resource being affected by more than one impact arising from same activity and the impacts will act together to result in a combined effect. Whilst this type of CIA is not considered in the IFC assessment guidance, it is an internationally widely accepted method to ensure potential combined impacts of a development are understood and mitigated, which may be missed from the 'general' assessment.

An example of an intra-project cumulative impact within the proposed project is as follows:

During the construction phase, there will be noisy activities such as ground excavation which could generate dust. A site boundary fence would be erected, plant and machinery will be distributed across the site, and construction traffic will access the site via the local roads. If all of these activities were undertaken at the same time, a local resident living or working opposite the site would be exposed to an increase in noise levels, dust, and, views may be altered from a semi- open green space to a construction site. It may be a nuisance due to increased traffic obscuring normal traffic routes.

The cumulative impacts that may arise as a result of the proposed project are provided in Table 14 and Table 15. The impacts in the second column ('Impacts') are those presented in Sections 7.4 to 7.5, which includes embedded and best practice mitigation. The significance of the potential cumulative impacts (third column) has been identified using the assessment methodology presented in Chapter 6 and the significance matrix as well as professional judgment. These impacts include embedded and best practice mitigation that has already been identified in the assessment. Mitigation that has been identified through the assessment is listed in the last column to demonstrate the measures the project is taking to minimize the impacts as much as possible. Any additional mitigation is discussed after the tables.

During operations, the assessment has identified that there is potential to cause moderate impacts on the local residents and community. The majority of these impacts are surrounding the changes to the local developed environment and the perception of the impact from person to person. Humans are adaptable and therefore the severity of these impacts will reduce over time as residents become accustomed to their new surroundings. Environmental monitoring will be undertaken through the construction and operational phases of the proposed project.

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TABLE 15: INTRA-PROJECT CUMULATIVE IMPACTS ASSESSMENT TABLE

RECEPTOR		IMPACTS	SIGNIFICANCE OF IMPACT	IMPACT MANAGEMENT	
Local residents and local community surrounding the project site.	Activity: Increased traffic and general construction activities both resulting in increased noise levels and generation of dust from the project site.  Impact: Local resident's amenity affected.	Activity: Increase in construction traffic and to the local flow of traffic movement.  Impact: Severance to local residents, increased travel times on affected roads (Strand street and Theo Ben Gurirab Avenue) and increased driver stress.	Activity & Impact: Introduction of construction plant equipment, machinery, construction vehicles causing a visual impact to local residents and the community.  Impact: Local resident's sense of place will be altered.		Traffic calming measures and road detours, design of the development, soft landscaping, new and upgraded facilities, downscale major noise generating activities during the festive holiday period, seize construction during the builder's holiday period.
	MINOR ADVERSE SIGNIFICANCE	MODERATE ADVERSE SIGNIFICANCE	MODERATE ADVERSE SIGNIFICANCE		
Tourism Industry (visitors to the beachfront and museum)	Activity: Increased noise background levels due expected to increased traffic on Strand Street.  Impact: Heightened nuisance effect on the local community and visitors to the beachfront and museum, local tourism amenity and sense of place affected.	Activity: General construction site and visible machinery, plant equipment, trucks, etc.  Impact: The Mole's seascape character altered and impact visitor amenity.	Activity: Excavations and earthmoving works causing solid particles (dusts) to become airborne and deposited outside construction site.  Impact: Nuisance and health issues (potentially)	Moderate	Restricted hours, traffic calming measures, defined routes to and from the site, maintain boundary fence, soften boundary fence with graphic visuals, scheduling of noisy activities, notice to community prior to noisy activities, dust suppression techniques, shielding of scaffolding with nets, avoid certain activities during high wind periods, avoid work during public holidays, seize earthworks and scale down ancillary works during the festive season.
	MINOR ADVERSE SIGNIFICANCE	MODERATE ADVERSE SIGNIFICANCE	LOW ADVERSE SIGNIFICANCE		

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# ESIA REPORT Erf 4747, DEVELOPMENT, SWAKOPMUND

RECEPTOR	IMPACTS	SIGNIFICANCE OF IMPACT	IMPACT MANAGEMENT
The museum, craft market and street café in front of the Museum	Activity: Construction activities on the proposed project site. Noise and dust generated.  Impact: Potential reduction of patron visits to amenities and thereby reduced revenue.  MINOR ADVERSE SIGNIFICANCE	Minor	Continued access along southern and western site boundary fence on the boardwalk, scheduling of noisy activities in collaboration tourism establishment's visitor times to avoid peak times and good housekeeping around the site.

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The local residents and community are likely to be moderately impacted on as a result of the combined impacts of the proposed project. The construction phase is expected to last for 30 months. During construction an environmental and social manager will be available to consult with and deal directly with concerns and complaints raised. The environmental and social manager will work with the community to manage impacts from the proposed development during both construction and operation.

During construction, the craft market, the street café and the Museum are likely to experience minor adverse impacts. Whilst the nature of the impacts will be of a short duration and the businesses will likely see long term benefits when the proposed project becomes operational, the proponent and the developer will work together to identify further mitigation measures that would reduce the significance of the impact on these receptors even further.

#### 7.6.2 Inter Project Cumulative Impacts

There exists a greater potential for cumulative socio-economic effects when the proposed development is considered in conjunction with the construction of other planned and reasonably defined projects within the greater Swakopmund townlands, managed by the Swakopmund Municipality.

The shared receptor base (local residents and community) for this development and those planned will continue to be affected in the medium term as these projects are developed. The following projects have been identified to be implemented in Swakopmund:

#### 1. Projects in close proximity to the proposed development:

 The proposed development of a one-storey ablution block structure north of Erf 4747 to the value of N\$ 3 300 000. Implementation date unknown.

#### 2. Projects further away from the proposed development:

- The proposed development of road networks on Portion 180 and 181 of Remainder of Portion B of Swakopmund Town and Townlands No. 41 (adjacent to Maturura, Mile 4 and Vineta). Currently considered for environmental clearance.
- Various housing developments in low-income neighbourhoods (i.e., DRC) as well as bulk services infrastructure developments throughout the Swakopmund municipal area to the value of N\$ 278 000 000 for the 2019/2020 financial year. Two strategic planning documents have been commissioned by the local authority for this purpose. These are:
  - o The Master Infrastructure Plan (MIP): The tender was advertised; and
  - The Coastal Sensitivity Plan (CSP): The tender was advertised.

The strategic frameworks that these documents will provide will aid targeted development and upgrading of bulk services networks throughout Swakopmund, including the mole area. A point of concern has always been the outdated water, storm water and sewage reticulation systems in Swakopmund that cannot function optimally at an occupancy rate of more than 100% during holiday periods. Therefore, the combined socioeconomic benefits of an upgraded services network will greatly enhance the livelihoods of residents and the community alike.

The identified cumulative impacts for this development:

- Socio-economic benefit to local residents and the community from an investment of N\$350 000 000 from the proposed development, as well as a N\$278 000 000 bulk services and housing development investment by the municipality including the beachfront ablution blocks north of Erf 4747; and
- The additional load on the current services of Swakopmund.

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TABLE 16: INTER-PROJECT CUMULATIVE IMPACTS FOR PROJECTS IN THE DIRECT VICINITY OF THE PROPOSED DEVELOPMENT

RECEPTOR	PROPOSED PROJECT ACTIVITY	PROPOSED PROJECT POTENTIAL IMPACT	OTHER PROJECTS	SIGNIFICANCE OF COMBINED IMPACT	SIGNIFICANCE OF COMBINED IMPACT AFTER ADDITIONAL MITIGATION	IMPACT MANAGEMENT
<ul><li>Local residents</li><li>community</li></ul>	General construction work onsite and movement of construction vehicles and machinery	Noise and Vibration	Municipal ablution blocks immediately north of erf 4747 (implementation date and construction method is unknown)	Adverse (Minor)	Adverse (Minor)	Restricted hours, traffic calming measures, defined routes to and
<ul><li>Local residents</li><li>community</li></ul>	General construction work onsite and movement of construction vehicles and machinery as well as foundation excavations	Dust nuisance and related health effects	Municipal ablution blocks immediately north of erf 4747 (implementation date and construction method is unknown)	Adverse (Minor)	Adverse (Minor)	from the site, maintain boundary fence, soften boundary fence with graphic visuals, scheduling of noisy activities, notice to community prior to noisy activities, dust
<ul><li>Local residents</li><li>community</li></ul>	Increase movement of construction, staff and supplier vehicles in the area	Traffic alteration and necessary rerouting of traffic and increased stress on drivers	Municipal ablution blocks immediately north of erf 4747 (implementation date and construction method is unknown)	Adverse (Minor)	Adverse (Minor)	suppression techniques, shielding of scaffolding with nets, avoid certain activities during high
<ul><li>Local residents</li><li>community</li></ul>	Barricading around the project site as well as the visibility of construction plant equipment and plant at heights above the barricade	Visual disturbance to local residents and the community	Municipal ablution blocks immediately north of erf 4747 (implementation date and construction method is unknown)	Adverse (Minor)	Adverse (Minor)	wind periods, avoid work during public holidays, seize earthworks and scale down ancillary works during the festive season.
<ul><li>Local residents</li><li>community</li></ul>	Establishment of the proposed building on Erf 4747	Loss of sense of place	Municipal ablution blocks immediately north of erf 4747 (implementation date and construction method is unknown)	Adverse (Low)	Adverse (Low)	Maintain the appropriate design standards for both buildings

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## ESIA REPORT Erf 4747, DEVELOPMENT, SWAKOPMUND

RECEPTOR	PROPOSED PROJECT ACTIVITY	PROPOSED PROJECT POTENTIAL IMPACT	OTHER PROJECTS	SIGNIFICANCE OF COMBINED IMPACT	SIGNIFICANCE OF COMBINED IMPACT AFTER ADDITIONAL MITIGATION	IMPACT MANAGEMENT
Municipal services infrastructure	Waste generation and the management thereof	Over supply of waste material into non-upgraded sewage waste reticulation systems in the CBD area.	Municipal ablution blocks immediately north of erf 4747 (implementation date and construction method is unknown	Adverse (Moderate)	Adverse (Minor)	Timely implementation of the upgrade to the CBD waste and water reticulation systems through the recommendations of the Master Infrastructure Plan.
<ul><li>Local residents</li><li>community</li></ul>	Establishment of the proposed building on Erf 4747	Combined socio- economic benefits	Municipal ablution blocks immediately north of erf 4747 (implementation date and construction method is unknown)	Beneficial (Minor)	Beneficial (Minor)	Developers to Invest in the local economy through labour onboarding, procurement and corporate social initiatives
– Local residents – community	Establishment of the proposed building on Erf 4747	Combined socio- economic benefits	Other bulk infrastructure and housing development projects in Swakopmund commissioned by the Swakopmund municipality	Beneficial (Minor)	Beneficial (Minor)	Developers to Invest in the local economy through labour onboarding, procurement and corporate social initiatives

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The combined adverse inter-project impacts on the identified receptors cannot be easily quantified mainly due to the lack of other project schedule information. A qualitative approach was then used to assess the possible combined effects that may arise should the proposed development coincide with the potential other projects identified. The other bulk infrastructure and housing projects to be developed in Swakopmund fall outside the temporal boundary of the proposed development on Erf 4747, hence the physical impacts from the two projects do not overlap. However, the socio-economic benefits on their shared receptor base are linked.

The combined beneficial socio-economic cumulative impact will be experienced by the shared receptor base for both projects. Should the two projects develop simultaneously, the local economy will experience an increase in downstream spending from both personnel and business aspects.

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#### 8 ENVIRONMENTAL MANAGEMENT PLAN

An EMP provides management options to ensure the impacts of the proposed project are minimised. An EMP is a tool used to take pro-active action by addressing potential problems before they occur. This should limit the corrective measures needed, although additional mitigation measures might be included if necessary.

The management measures should be adhered to during all stages of the construction activities of the lodge. All persons involved and partaking in the proposed activities should be made aware of the measures outlined in the EMP to ensure activities are conducted in an environmentally sound manner.

The objectives of the EMP are:

- To include all components of the development and operations of the project;
- To prescribe the best practicable control methods to lessen the environmental impacts associated with the project;
- To monitor and audit the performance of operational personnel in applying such controls; and
- To ensure that appropriate environmental training is provided to responsible operational personnel.

The draft EMP is provided in Appendix A.

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#### 9 CONCLUSION

This environmental and social impact assessment undertaken for the proposed project, followed ECC's ESIA methodology to identify if there is potential for significant effects to occur as a result of the proposed project.

All other social and environmental receptors were scoped out as requiring further assessment as it was unlikely that there would be significant effects. Through further analysis and identification of mitigation and management methods, the assessment concludes that the likely significance of effects on visual amenity is expected to be minor, although the perceived effects may be regarded in more serious light by some residents.

Comments and or additional impacts identified by the I&APs through public review process was incorporated into the assessment report.

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## 11 APPENDIX A – EMP

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ECC- ECC-111-307-REP-10-D

# **ENVIRONMENTAL MANAGEMENT PLAN**

DEVELOPMENT OF RESIDENTIAL & RETAIL (INCLUDING TOURISM) ACTIVITIES ON ERF 4747 IN SWAKOPMUND, ERONGO REGION, NAMIBIA

PREPARED FOR



JANUARY 2021



## **TITLE AND APPROVAL PAGE**

Project Name: Development of residential & retail (including tourism) activities on

Erf 4747 in Swakopmund, Erongo Region, Namibia

Project Number: ECC-111-307-REP-10-A

Client Name: Lighthouse Property Investment Trust
Authors: Lester Harker and Jessica Bezuidenhout

Ministry Reference: APP – 001690

**Status of Report:** Final submitted to the government

Date of issue: January 2021

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Please note at ECC we care about lessening our footprint on the environment, therefore all documents are printed double-sided.



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## **DEFINITIONS AND ABBREVIATIONS**

dB Decibels

ECC Environmental Compliance Consultancy
EIA Environmental Impact Assessment
EMP Environmental Management Plan
EPL Exclusive Prospecting Licence

Hz Hertz

I&APs Interested and affected parties

kHz Kilohertz kPa Kilopascal SL Sound Level



#### 1 INTRODUCTION

#### 1.1 PROJECT BACKGROUND

Environmental Compliance Consultancy (ECC) was engaged by Lighthouse Property Investment Trust and to compile an Environmental Management Plant (EMP) in accordance with the Environmental Management Act, No. 7 of 2007. The purpose of this EMP is to support the development activities on Erf 4747 for the purposes of constructing a residential and commercial development, with tourism activities. The proposed project is located on erf 4747 within the historical CB of Swakopmund which is owned by the proponent. The site location is set out in Figure 1 below.

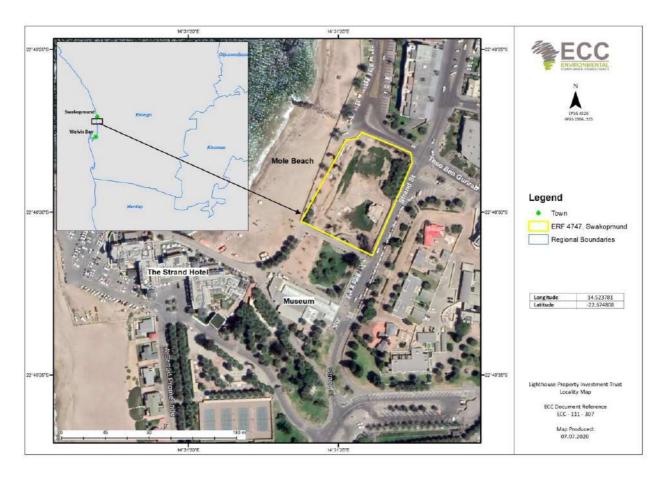


FIGURE 1 – LOCATION OF THE PROPOSED DEVELOPMENT, SWAKOPMUND

Lighthouse Investment Property Trust proposes to develop the area for use as a residential and commercial development, with tourism activities either in the form of a hotel and or residential units (refer to Figure 1).

The proposed development comprises the following:

- A retail footprint (multiple outlets) of 140 m<sup>2</sup>;
- Restaurants (maximum 3 varieties) of 1519 m<sup>2</sup>;
- A residential footprint of 16 400m<sup>2</sup>;
- Outside public amenities, including jungle gyms, splash pad and play park area as well as beach showers within the play park;



- Inside public amenities, including a 140 m² (male & female) public ablution space, incorporating changing rooms with showers, toilets and lockers;
- Multi-level tenant parking for 233 vehicles;
- Upgrade the existing Erongo Red Substation on site;
- Upgrading of the existing municipal walkways/ boardwalk where applicable, and
- Landscaping (including examining the grown palm trees and possibly transplanting them onto a different area within the site).

Erf 4747 is surrounded by open municipal land and comprises a public play park to the south, the mole promenade on the west and public parking to the north and Strand Street to the east.

The proposed development is expected to generate income and job opportunities for the local community. It is estimated that approximately 3000 direct and indirect employment opportunities could be created during the construction phase.

#### 1.2 ENVIRONMENTAL REGULATORY REQUIREMENTS

In terms of the Environmental Impact Assessment (EIA) Regulations and the Environmental Management Act, No. 7 of 2007, the proposed development qualifies as a listed activity. Therefore, an application for an environmental clearance certificate is to be submitted to the Directorate of Environmental Affairs. An Environmental Scoping Report and EMP are required to be submitted as part of the application process, as well as to support the decision-making process. This report presents the EMP and has been undertaken in terms of the requirements of the act and its regulations.

#### 1.3 PURPOSE AND SCOPE OF THIS REPORT

The purpose of this EMP is to provide a management framework for the proposed activities so that the potential environmental impacts identified through the scoping process are avoided, minimised and mitigated as far as reasonably practicable, and that statutory requirements and other legal obligations are fulfilled.

This EMP also presents protocols, procedures, roles and responsibilities to ensure the management arrangements are appropriately and effectively implemented. This EMP forms an appendix to the environmental assessment report and has been based on the findings of the assessment; therefore, the environmental assessment report should be referred to for further information on the proposed project, assessment methodology, applicable legislation, and assessment findings.

This EMP is a live document and shall be reviewed at predetermined intervals, and or updated when the scope of works alters, or when further data or information can be added. All personnel working on the project will be legally required to comply with the standards set out in this EMP.

The scope of this EMP includes all construction and operational activities carried out.

#### 1.4 MANAGEMENT OF THIS EMP

The proponent, Lighthouse Property Investment Trust will hold the environmental clearance certificate for the proposed project and will be responsible for the implementation and management of this EMP. The implementation and management of this EMP and thus the monitoring of compliance shall be undertaken through daily duties and activities and monthly inspections.



#### 1.5 LIMITATIONS, UNCERTAINTIES AND ASSUMPTIONS OF THIS EMP

This EMP does not include measures for compliance with statutory occupational health and safety requirement, which includes the component, fire safety management. This will be provided in the overall Health and Safety Management Plan (HSMP) to be developed by the proponent.

Where there is any conflict between the provisions of this EMP and any contractor's obligations under their respective contracts, including statutory requirements (such as licences, project approval conditions, permits, standards, guidelines, and relevant laws), the contract and statutory requirements are to take precedence.

The information contained in this EMP has been based on the project description as provided in the environmental scoping report. Where the design or construction methods alter, this EMP may require updating and potential further assessment to be undertaken.

#### 1.6 Environmental Consultancy

Environmental Compliance Consultancy (ECC), a Namibian consultancy with registration number 2013/11401, has prepared this EMP on behalf of the proponent. ECC operates exclusively in the environmental, social, health and safety fields for clients across southern Africa, in the public and private sectors. ECC is independent of the proponent and has no vested or financial interest in the proposed project, except for fair remuneration for professional services rendered.

All compliance and regulatory requirements regarding this document should be forwarded by email or posted to the following address:

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#### 2 PROJECT MANAGEMENT PERSONNEL

This EMP provides measures, guidelines, and procedures for managing and mitigating potential environmental impacts. The EMP also indicates monitoring and reporting requirements and sets responsibilities for those carrying out management and mitigation measures. Lighthouse Property Investment Trust shall provide a project team to oversee activities and responsibilities.

#### 2.1 Organisational Structure, Roles, and Responsibilities

The proponent shall be responsible for:

- Ensuring all members of the project team, including contractors, comply with the procedures set out in this EMP;
- Ensuring that all persons are provided with sufficient training, supervision, and instruction to fulfil this requirement; and
- Ensuring that any person's allocated specific environmental responsibilities are notified of their appointment and confirm that their responsibilities are clearly understood.

Contractors shall be responsible for ensuring and demonstrating that all personnel employed by them are compliant with this EMP, and meet the responsibilities listed above.

The key personnel and environmental responsibilities of each role are presented in Table 1.

TABLE 1 - KEY ROLES AND RESPONSIBILITIES

ROLE	RESPONSIBILITY & DUTIES
Proponent	<ul> <li>Overall responsibility for the implementation and management of this EMP;</li> <li>Ensure the environmental policy is communicated to all personnel throughout the proposed project and ensure that employees, contractors and visitors understand and adhere to the EMP;</li> <li>Responsible for providing the required resources (including financial and technical) to complete the required tasks;</li> <li>Appoint a project manager and a site manager (or nominated supervisor);</li> <li>Ensure that all employees, contractors and visitors are inducted on environmental measures.</li> </ul>
Project Manager	<ul> <li>Responsible for ensuring compliance with this EMP including overseeing all day to day activities during the duration of the project, including routine and non-routine maintenance works, as well as decommissioning tasks;</li> <li>Ensure adequate resources are made available for implementation of this EMP;</li> <li>Responsible for the management, maintenance and revisions of this EMP;</li> <li>Ensure all personnel are aware of the commitments made in this EMP and any other relevant regulatory requirements applicable to the project;</li> <li>Ensure all employees and contractors participate in a site induction process prior to commencing work on the project;</li> <li>Maintain the community issues and concern register, and keep records of complaints;</li> <li>Ensure that best environmental practice is undertaken throughout the duration of the project; and</li> <li>Report any non-compliance or accidents to the regulatory authority.</li> </ul>
Site Manager (or	<ul> <li>Ensure that all employees, contractors and visitors to the site are conversant with</li> </ul>
nominated supervisor)	the requirements of this EMP, relevant to their roles on site and adhere to this EMP at all times;



ROLE	RESPONSIBILITY & DUTIES
	<ul> <li>Provide environmental awareness / management training and site inductions for all employees, contractors and visitors;</li> <li>Monitor daily operations and ensure adherence by personnel to the EMP;</li> <li>Receive, respond to and record complaints; and</li> <li>Report any non-compliance or accidents to the project manager.</li> </ul>
Employees (and	<ul> <li>Responsible for being compliant with this EMP throughout the project;</li> </ul>
contractors and	<ul> <li>Adhere to this EMP at all times;</li> </ul>
visitors where	<ul> <li>Ensure attendance of site inductions;</li> </ul>
applicable)	<ul> <li>Ensure appropriate briefings for certain activities have been provided and are fully understood; and</li> </ul>
	<ul> <li>Report any operations and conditions that deviate from the EMP or any non- compliant issues or accidents to the site manager and project manager.</li> </ul>

#### 2.2 Contractors

All contractors hired during the project (including contractors appointed for maintenance activities) shall be compliant with this EMP, and shall be responsible for the following:

- Undertaking activities in accordance with this EMP as well as relevant policies, procedures, management plans, statutory requirements, and contract requirements;
- Implement appropriate environmental and safety management measures;
- Report environmental issues, including actual or potential environmental incidents and hazards, to the project manager; and
- Ensure appropriate corrective or remedial action is taken to address all environmental hazards and incidents reported.

#### 2.3 EMPLOYMENT

The proponent should ensure that a locals first policy be adopted on the project pertaining to employment opportunities during the construction and operational phase of the project. The following shall be complied with:

- In liaison with the relevant authorities, the proponent shall ensure that local people have access to information about job opportunities and are considered first for contract employment positions;
- The number of job opportunities shall be made known together with the associated skills and qualifications;
- The maximum length of time the job is likely to last for shall be clearly indicated;
- Foreign workers with no proof of permanent legal residence shall not be hired; and
- Every effort shall be made to recruit from the pool of unemployed workers living in the local area.



#### 3 COMMUNICATIONS AND TRAINING

In order to ensure potential risks and impacts are minimised, it is vital that personnel are appropriately informed and trained on operational procedures that include the above mitigation measures. It is also important that regular communications are maintained with all the stakeholders and made aware of potential impacts and how to minimise or avoid them. This section sets out the framework for communication and training in relation to the EMP.

#### 3.1 COMMUNICATIONS

During the entire project, the project manager and / or site manager (or nominated site supervisor) shall communicate site-wide environmental issues to the project team through the following means (as and when required):

- Site induction;
- Audits and site inspections;
- Toolbox talks, including instruction on incident response procedures; and
- Briefings on key project-specific environmental issues.

This EMP shall be distributed to the project team, including contractors, to ensure that the environmental requirements are communicated effectively. Key activities and environmentally sensitive operations shall also be briefed to workers and contractors.

During the entire project regular communications between the management team shall include discussing any complaints received and actions to resolve them; any inspections, audits or non-conformance with this EMP and any objectives or target achievements.

#### 3.2 ENVIRONMENTAL EMERGENCY AND RESPONSE

Table 2 contains a list of numbers to be contacted in case of an emergency. All personnel will be made aware of these numbers.

TABLE 2 - EMERGENCY CONTACT DETAILS

TOWN	AMBULANCE	POLICE	FIRE BRIGADE
Swakopmund	+264 (64) 40-5731	+264 (64) 10111	+264 (64) 410-4111

#### 3.3 Complaints Handling and Recording

Any complaints received verbally or in writing by any personnel on the project site shall be recorded by the receiver, including the name and contact details of the complainant, date and time of the complaint, and the nature of the complaint. The information shall be given to the project manager who is overall responsible for the management of complaints and will provide a written response to the complainant. The project manager shall inform employees of issues, concerns or complaints.

The project manager shall maintain a complaint register that will detail the name and contact details of the complainant, date and time of the complaint, nature of the complaint, action is taken to resolve issues, and date of complaint handover. The project manager shall be responsible for nominating the correct personnel to coordinate and resolve the issue.



The workforce shall be informed about the complaints register, its location and the person responsible, in order to refer local residents or the general public who wish to lodge a complaint. The complainant shall be informed in writing of the results of the investigation and action to be taken to rectify or address the matter(s). Where no action is taken, the reasons are to be recorded in the register.

The complaints register shall be kept for the duration of the project and will be available for government or public review upon request.

#### 3.4 Training And Awareness

All personnel working on the project shall be competent to perform tasks that have the potential to cause an environmental impact. Competence is defined in terms of appropriate education, training and experience.

#### 3.5 SITE INDUCTION

All personnel involved in the project, contractors and visitors shall be inducted to the site with specific environmental and social awareness training, and health and safety issues. The environment and social awareness training shall ensure that everybody on site is familiar with the principles of this EMP, the environment and social aspects and impacts associated with their activities, the procedures in place to control these impacts and the consequences of departure from these procedures.

The project manager shall ensure a register of completed training is maintained.

The site induction should include, but not limited to the following:

- A general site-specific induction that outlines:
  - What is meant by "environment" and "social";
  - Why the environment needs to be protected and conserved;
  - o How construction activities can impact on the environment; and
  - What can be done to mitigate against such impacts;
- The inductee's role and responsibilities with respect to implementing the EMP;
- The site environmental rules;
- Details of how to deal with, and who to contact if environmental problems should occur;
- Focal themes such as compliance, reporting of accidents and incidents, good housekeeping and standard procedures for waste management;
- The potential consequences of non-compliance with this EMP and relevant statutory requirements; and
- The role of responsible people for the project.



## 4 REPORTING, COMPLIANCE, AND ENFORCEMENT

#### 4.1 Environmental Inspections and Compliance Monitoring

#### 4.1.1. DAILY COMPLIANCE MONITORING

A copy of this EMP shall be on-site throughout the duration of the project and shall be available upon request. It is the responsibility of the project manager and site manager (or nominated site supervisor) to ensure this EMP is complied with through their daily roles. Daily, weekly and monthly inspections will be undertaken. Any environmental problems or risks identified shall be notified to the project manager and actioned as soon as is reasonably practicable.

#### 4.1.2. Monthly Compliance Monitoring

Monthly inspections shall be undertaken by the site manager to check that the standards and procedures set out in this EMP are being complied with and pollution control measures are in place and working correctly. Any non-conformance shall be recorded, including the following details: a brief description of non-conformance; the reason for the non-conformance; the responsible party; the result (consequence); and the corrective action taken and any necessary follow up measures required.

#### 4.2 REPORTING

There shall be a requirement to ensure that any incident or non-compliance, including any environmental issue, failure of equipment or accident, is reported to the project manager immediately.

#### 4.3 ENVIRONMENTAL PERMITS

Whilst the Water Resources Management Act, No. 11 of 2013 is not enforced, it is best practice to adhere to its stipulations while ensuring compliance with the Water Act, No. 54 of 1956, which is maintained still. A licence to abstract water, also seawater, is required. As the abstraction of seawater will be obtained through beach boreholes, permit(s) to drill these boreholes need to be obtained as well. A permit to discharge brine is also required. The proponent will apply for the relevant permits and shall operate in accordance with any conditions stipulated.

#### 4.4 Non-compliance

Where it has been identified that activities are not compliant with this EMP, the project manager shall employ corrective actions so that the activities return to being compliant as soon as possible. In instances where the requirements of the EMP are not upheld, a non-conformance and corrective action notice shall be produced. The notice shall be generated during the inspections and the project manager shall be responsible for ensuring a corrective action plan is established and implemented to address the identified shortcoming.

A non-compliance event / situation, for example, is considered if:

- There is evidence of the contravention of this EMP and associated indicators or objectives;
- The project manager and / or site manager (or nominated supervisor) have failed to comply with corrective or other instructions issued by the project manager or qualified authority; or
- The project manager and /or site manager (or nominated supervisor) fail to respond to complaints from the public

Activities shall be stopped in the event of a non-compliance until corrective action(s) has been completed.



#### 4.5 INCIDENT REPORTING

The project manager must ensure that an accident and incident (including minor or near-miss) reporting system is maintained so that all applicable statutory requirements are covered. For any serious incident involving a fatality, or permanent disability, the incident scene must be left untouched until witnessed by a representative of the police. This requirement does not preclude immediate first aid being administered and the location being made safe.

The project manager must investigate the cause of all work accidents and significant incidents and must provide the results of the investigation and recommendations on how to prevent a recurrence of such incidents. A formal root-cause investigation process should be followed.

#### 4.6 DISCIPLINARY ACTION

This EMP is a legally binding document and non-compliance with it shall result in disciplinary action being taken against the perpetrator/s. Such action may take the form of (but is not limited to):

- Fines / penalties;
- Legal action;
- Monetary penalties imposed by the proponent on the contractor;
- Withdrawal of license/s; and
- Suspension of work.

The disciplinary action shall be determined according to the nature and extent of the transgression or non-compliance, and penalties are to be weighed against the severity of the incident.



## 5 ENVIRONMENTAL AND SOCIAL MANAGEMENT

#### 5.1 OBJECTIVES AND TARGETS

Environmental objectives for the project are as follows:

- Zero pollution incidents;
- Minimal disturbance to traffic;
- Minimise noise pollution;
- Minimise light pollution (the correct placement of lights);
- Minimise dust pollution; and
- Minimise the generation of waste.

#### 5.2 REGISTER OF ENVIRONMENTAL RISKS AND ISSUES

An environmental review of the proposed project has been completed to identify all the commitments and agreements made within the environmental assessment report. From this, a list of environmental commitments and risks were produced, which details deliverables including measures identified for the prevention of pollution or damage to the environment during the project.

Table 3 provides a register of environmental risks and issues, which identifies mitigation and monitoring measures, as well as the responsible person. This register will be subject to regular review by the project manager and updated when necessary. The project manager will use this register to undertake monthly inspections to ensure the project is compliant with this EMP.



TABLE 3 - ENVIRONMENTAL RISKS AND ISSUES, AND MITIGATION AND MONITORING MEASURES

ACTIVITY	POTENTIAL IMPACTS	MANAGEMENT / MITIGATION MEASURES	MONITORING REQUIREMENTS	RESPONSIBILITY
		CONSTRUCTION PHASE		
General construction activities (terrain preparation, minimal excavation, and general construction)	<ul> <li>Potential pollution to the environment</li> <li>Potential risk to the occupational health and safety of construction crew.</li> <li>Potential nuisance effect on community and surrounding communal areas</li> </ul>	<ul> <li>Develop and implement an operation manual or procedures to conduct work and implement monitoring programmes thereafter;</li> <li>Conduct site toolbox talks before shifts commence;</li> <li>Maintain continuous communication with I&amp;APs to identify concerns and mitigation measures;</li> <li>Compliance with all applicable laws and agreements;</li> <li>Training and raise awareness to sensitize employees about contentious issues like working in urban spaces and control of pollutants;</li> <li>Ensure appropriate supervision of all activities;</li> <li>Accidents and incidents need to be reported to the project manager and recorded in the incident register;</li> <li>Preventative measures will be in place when service and maintenance activities are done (drip trays, non-porous surfaces, funnels, non-damaged containers); and</li> <li>Refuelling will be done in areas with adequate preventative measures in place.</li> <li>Workers should be shifted as the project works require so as to avoid a large concentration of workers on site at any given moment. All 3000 workers should not be present on site at any given point in time;</li> <li>The proponent should ensure adequate and good quality break areas are provided for workers on site during their lunch breaks;</li> <li>Access to the beach should be restricted at all times during work hours;</li> <li>Security personnel to be stationed at access points to the site at all times during construction to manage pedestrian and vehicle entry to and exit from the site; and</li> <li>A visitor's register should be placed at the main entrance to the site and updated and maintained regularly to keep track of who comes to site.</li> </ul>	Weekly, monthly	Site manager and or Project manager or the nominated site supervisor



ACTIVITY	POTENTIAL IMPACTS	MANAGEMENT / MITIGATION MEASURES	MONITORING REQUIREMENTS	RESPONSIBILITY
	<ul> <li>Movement of heavy equipment and vehicles,</li> <li>Nuisance (noise) pollution</li> <li>Light disturbances</li> </ul>	the site only;	Daily throughout the construction period	
	- Dust and emissions	<ul> <li>All vehicles and machinery / equipment to be shut down or throttled back between periods of use;</li> <li>Use one identified access route only with appropriate turning circles and delivery zones;</li> <li>Apply dust suppression measures where possible as a proactive measure to avoid dust creation;</li> <li>Restrict speed of vehicles;</li> <li>Specific activities that may generate dust and impact on residents shall be avoided during high wind events; and</li> <li>Locate construction materials stockpiles in sheltered areas where it is not exposed to erosive effects of wind.</li> </ul>	Daily, weekly	



ACTIVITY	POTENTIAL IMPACTS	MANAGEMENT / MITIGATION MEASURES	MONITORING REQUIREMENTS	RESPONSIBILITY
	<ul> <li>Loss of soil quality due to mixing of earth matter, trampling, compaction and pollution,</li> <li>Enhanced wind erosion</li> </ul>	<ul> <li>Ensure prevention measures are in place when terrain activities take place. No concrete mixing to take place on open soil;</li> <li>Avoid activities during windy conditions;</li> <li>Where necessary, establish wind erosion barriers to curb possible erosion during high wind periods;</li> <li>Limit the possibility of compaction and creation of a hard subsurface in and outside the site. Areas utilized as construction equipment laydown areas should not be allowed to remain compacted after the construction period;</li> <li>Equipment and vehicles must be in a good condition to ensure that accidental oil spills do not occur and contaminate soil; and</li> <li>In the event of spills and leaks, polluted soils must be collected and disposed of at an approved hazardous waste site.</li> </ul>	Daily	
	Disruption to traffic flow in the immediate vicinity	<ul> <li>Set up appropriate vehicle movement signage on local roads/intersections surrounding the project site to direct traffic flow in a safe manner;</li> <li>Whenever feasible, construction vehicles should avoid leaving the site at peak traffic periods (07:00 to 08:30 AM, 12:00PM to 14:00PM and (17:30PM to 18:30 PM);</li> <li>Construction vehicles should not be allowed to park off site, except in dedicated parking spaces (off site) as may be agreed upon between the proponent and the local authority;</li> <li>All necessary reflective and lighting signs should be placed on project and construction vehicles to maximize visibility and reduce potential accidents that may have occurred otherwise.</li> </ul>	Daily	
	Loss / alteration of terrestrial habitat	<ul> <li>Compulsory toolbox talks and induction of employees;</li> <li>Always determine the line / route of activity beforehand and restrict all activities to a demarcated area whenever renovations to the building or landscaping is required; and</li> <li>Reinstate and rehabilitate where necessary.</li> </ul>	Depending on active activity on site	



ACTIVITY	POTENTIAL IMPACTS	MANAGEMENT / MITIGATION MEASURES	MONITORING REQUIREMENTS	RESPONSIBILITY
Fuel handling and storage, maintenance on equipment, machinery and vehicles	<ul> <li>Soil         contamination</li> <li>Groundwater         contamination</li> <li>Nuisance (visual         impacts, litter)</li> </ul>	<ul> <li>Good housekeeping;</li> <li>Training and awareness through toolbox talks and induction;</li> <li>Implement a Standard Operational Procedure on waste management, from cradle to grave for all kinds of waste possible on-site;</li> <li>Raise awareness about the importance of responsible waste management, including wastewater management;</li> <li>Implement a culture of correct waste collection, waste segregation and waste disposal;</li> <li>Avoid hazardous waste on site;</li> <li>Wastewater discharges will be contained – no disposal of wastewater directly into the environment; and</li> <li>All fuel and petrochemical products are to be stored on an impermeable, bunded and covered surface that is clearly marked and access controlled.</li> </ul>	Daily	<ul> <li>Employees, contractors</li> <li>Site manager (or nominated site supervisor</li> </ul>
Job creation, skills development and business opportunities	Beneficial socio- economic impacts on a local and regional scale.	<ul> <li>Maximise local employment and local business opportunities;</li> <li>Enhance the use of local labour and local skills as far as reasonably possible; and</li> <li>Ensure that goods and services are sourced from the local and regional economy as far as reasonably possible.</li> </ul>	Monthly	Project manager
General construction activities	Fire outbreaks	<ul> <li>All personnel and contractors on the site should comply with the fire management and emergency preparedness and occupational health and safety plans in its entirety, as developed by the proponent;</li> <li>Fire extinguishers must be kept on site at strategic locations, easily accessed and maintained in good working order;</li> <li>Regular fire drills to be conducted on site and attendance and performance recorded; and</li> <li>The proponent to develop a fire rescue and management procedure in collaboration with the local authority for the site and implement its provisions.</li> </ul>	Daily	ECO Officer
		OPERATIONAL PHASE		
Visitors to the building	Fire outbreaks	<ul> <li>The proponent to develop a fire rescue and management procedure in collaboration with the local authority for the building and implement its provisions including monitoring;</li> <li>Adequate safety signage should be displayed on all levels of the building as per the proponent's health and safety management plan principles and local municipal regulations in this regard;</li> </ul>	Weekly	ECO Officer



ACTIVITY	POTENTIAL IMPACTS	MANAGEMENT / MITIGATION MEASURES	MONITORING REQUIREMENTS	RESPONSIBILITY
		<ul> <li>All firefighting systems to be tested and maintained regularly as well as firefighting equipment; and</li> <li>All emergency escape routes to be kept uncluttered and unblocked to allow easy exit from the building.</li> </ul>		
	Safety of visitors and employees	<ul> <li>The proponent should implement its health and safety management plan stringently;</li> <li>Ensure all entrances and exits are structurally sound and safe to use at all times;</li> <li>Ensure security personnel are adequately trained and visible throughout the public spaces within and outside the building; and</li> <li>Ensure that effective complaints recording procedures are in place.</li> </ul>	Daily	ECO Officer
Job creation, skills development and business opportunities	Beneficial socio- economic impacts on a local and regional scale.	<ul> <li>Maximise local employment and local business opportunities;</li> <li>Enhance the use of local labour and local skills as far as reasonably possible;</li> <li>Ensure that goods and services are sourced from the local and regional economy as far as reasonably possible.</li> </ul>	Quarterly	Project manager
Generation of general waste	Unhygienic proliferation of domestic waste on site	<ul> <li>During operations, the solid waste for the proposed development will be managed and improved in line with the principles of the waste hierarchy of waste prevention, re-use, recycle or compost, energy recovery and disposal, where waste minimisation and recycling is preferred to waste treatment and disposal (National Solid Waste Management Strategy, MET 2019);</li> <li>A refuse container will be a SABS approved (SABS 1494), 240 litre, Polyethylene, two wheeled, mobile refuse containers (MGB 240), internationally known as the "Otto Bin"); and</li> <li>Every commercial unit should be supplied with an Otto Bin and all bins should be stored in a central storage area within the premises and emptied on a weekly basis.</li> </ul>	Weekly	Building maintenance team and Store owners
Outside lighting attached to the building or loose standing on the grounds	Light pollution	<ul> <li>Placement of outside wall lights on the first floor of the building should be directed to glow in a downward direction to avoid light pollution and glare onto strand street;</li> <li>No flood lights should be allowed to be installed on the property for the purposes of illuminating the sides of the building at night; and</li> <li>Perimeter lighting within the playpark area should also be placed in a downward facing manner.</li> </ul>	Monthly	Building maintenance team and Store owners



#### 6 IMPLEMENTATION OF THE EMP

All construction activities will be carried out in compliance with the relevant legal requirements and the drilling of beach boreholes to abstract seawater as well as the discharge of brine will be done in accordance with the Water Act, No 54 of 1956. Whilst the construction and operation of the proposed project does not fall under the Marine Resources Act, No. 27 of 2000, it is recognised that as an indirect consequence of the project, some activities may infer to the act – therefore the EMP considers the relevant guidelines and requirements of the act.

No significant impacts are anticipated for the activities that have been identified and management and mitigation measures are in place for potential risks.

#### This EMP:

- Has been prepared pursuant to a contract with the proponent
- Has been prepared on the basis of information provided to ECC up to September 2020
- Is for the sole use of the proponent, for the sole purpose of an EMP
- Must not be used (1) by any person other than the proponent or (2) for a purpose other than an EMP, and
- Must not be copied without the prior written permission of ECC.

ECC has prepared the EMP on the basis of information provided by the proponent and the environmental impact assessment report



## 12 APPENDIX B - NON-TECHNICAL SUMMARY

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ECC-111-307-NTS-02-D

# **NON-TECHNICAL SUMMARY**

DEVELOPMENT OF RESIDENTIAL & RETAIL (INCLUDING TOURISM) ACTIVITIES ON ERF 4747 IN SWAKOPMUND, ERONGO REGION

PREPARED FOR LIGHTHOUSE PROPERTY INVESTMENT TRUST



**JULY 2020** 



## NON-TECHNICAL SUMMARY

# DEVELOPMENT OF RESIDENTIAL & RETAIL (INCLUDING TOURISM) ACTIVITIES ON ERF 4747 IN SWAKOPMUND, ERONGO REGION, NAMIBIA

#### 1 PURPOSE OF THIS DOCUMENT

The purpose of this Non-Technical Summary (NTS) is to provide Interested and Affected Parties (I&APs) a background to the proposed project and to invite I&APs to register as part of the Environmental Impact Assessment (EIA) process. For the proposed development of residential & retail (including tourism) activities on Erf 4747, I&APs are hereby invited to register as part of the EIA process. Through registering, all I&APs will be kept informed throughout the EIA process, and a platform for participation will be provided to submit comments/recommendations pertaining to the project.

This NTS includes the following information on:

- The proposed project and location;
- The necessity of the project, benefits or adverse impacts anticipated;
- The alternatives to the project to be considered and assessed;
- How the EIA process works;
- The public participation process and how to become involved; and
- Next steps and the way forward.

# 2 DESCRIPTION OF PROPOSED PROJECT

#### 2.1 Brief Introduction

Environmental Compliance Consultancy (ECC) has been engaged by the proponent (Lighthouse Property Investment Trust), to undertake an EIA and Environmental Management Plan (EMP) in terms of the Environmental Management Act, 2007 and its regulations. An environmental clearance application will be submitted to the

relevant competent authority, the Ministry of Environment, Forestry and Tourism (MEFT).

#### 2.2 LOCATION

The proposed project is located on Erf 4747 at the Mole, Swakopmund main beach in the Erongo Region of Namibia (Figure 1).

#### 2.3 WHAT IS PROPOSED

The proponent is a developer of numerous prestigious projects in Namibia. Over the years, the proponent has built a national reputation in high quality property development, for the real estate market and for clients with low and high budgets.

The function of the proposed development of residential and commercial and associated supporting infrastructure will be to enhance local tourism for domestic and international visitors.

The proposed operational activities for this site are:

- The Provision of accommodation with ocean view, sunsets, and sunrise experiences at the Swakopmund main beach area:
- Provision of services such as retail outlets and restaurants, a wellness spa and fitness area; and a
- Green space and children's playground area inclusive of splash pads and swings.



#### 2.4 CONSTRUCTION AND OPERATION PHASE

The proposed construction activities envisaged during the proposed project:

- Construction of infrastructure, for possible accommodation facilities and / or office use, as well as associated facilities such as a fitness gym, spa, lounge area and restaurant/s;
- The proposed development will also include the construction of retail facilities;
- Possible construction, upgrade (if required)
  and connection of drainage infrastructure,
  sewerage pipelines and associated
  connections i.e. to the municipality for water
  supply and to the closest possible step-down
  transformer unit in the area for power
  supply; and
- Development and upgrade of the existing green space and children's playground area; as well as
- To upgrade municipal walkways/ boardwalk where applicable.

#### 2.5 WHY IS THE PROJECT NEEDED

The proposed development will deliver an upgrade to the Mole, Swakopmund main beach area by replacing the old demolished Swimming pool and Lighthouse Restaurant, which had sentimental value to the Swakopmund community, whilst offering tourists a highervalued service, which will cater for middle to upper market tourists and locals seeking reasonably priced accommodation, office space and leisure opportunities. The new development will expose tourists to the Swakopmund ocean view experience and local activities within the general central coastal areas of the Erongo Region, Namibia. This area has large tourism potential and will generate income for the municipality as well as establish an additional source of income for a portion of the local community.

# NON-TECHNICAL SUMMARY LIGHTHOUSE PROPERTY INVESTMENT TRUST

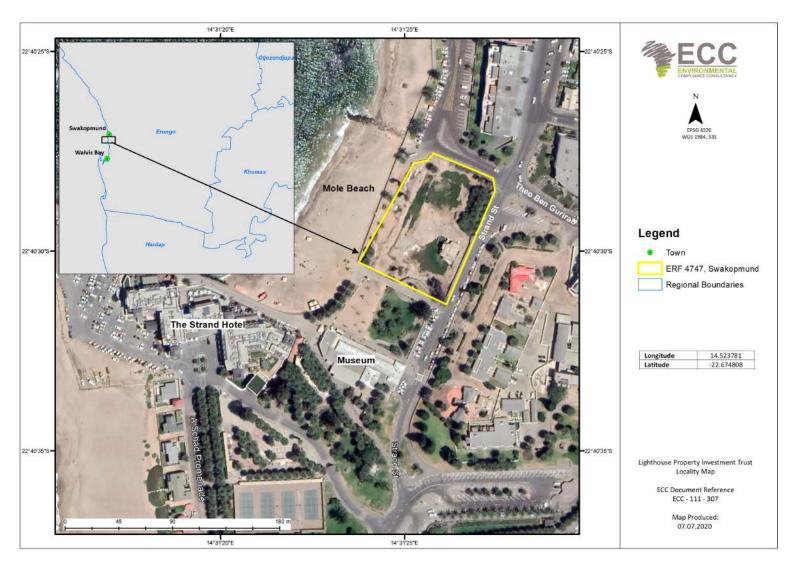


FIGURE 1 – LOCATION MAP OF THE PROPOSED PROJECT



#### 2.6 POTENTIAL IMPACTS OF THE PROJECT

#### 2.6.1 SOCIO-ECONOMIC

The potential social impacts are anticipated to be of minor significance, and those that may transpire shall be confined within the proposed project sites; these potential impacts may include, but not limited to the following:

- Temporary and Permanent jobs will be created as a result of the project; and
- Potential downstream economic benefits due to increased income flowing into the local tourism and goods supply sector.

ECC has engaged the professional services of a heritage assessment specialist to investigate the heritage value of Erf 4747.

The study concluded that no potential exists to unearth, damage or destroy heritage remains on the site due the current disturbed nature of the site and that its overall heritage value is low in (Vogt A., 2020).

#### 2.6.2 ENVIRONMENTAL

The potential environmental impacts are anticipated to be of low significance, and those that may occur shall be contained within the site, these potential impacts may include the following:

- The generation and management of waste;
- Construction of infrastructure including supporting connections; and
- Potential creation of noise and dust due to construction activities.

## 3 CONSIDERATION OF ALTERNATIVES

Best practice environmental assessment methodology calls for consideration and assessment of alternatives to a proposed project.

In a project such as this one, it is difficult to identify alternatives to satisfy the need of the proposed project; the activities shall be specific to the sites.

During the assessment, alternatives will take the form of a consideration of optimisation and efficiency to reduce potential effects.

## 4 THE ENVIRONMENTAL ASSESSMENT PROCESS

This EIA, conducted by ECC, is undertaken in terms of the Environmental Management Act, No. 7 of 2007 and its regulations. The process followed in this EIA is set out in the flowchart in Figure 2.

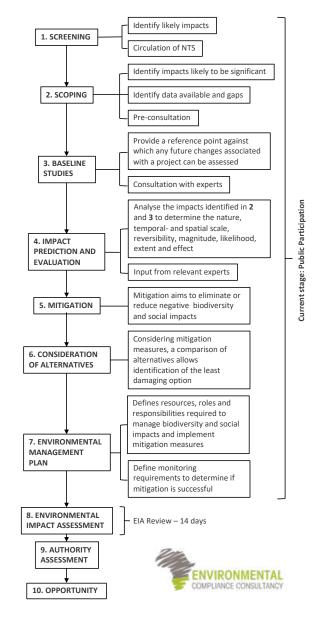


FIGURE 2 - FLOWCHART OF THE ENVIRONMENTAL ASSESSMENT PROCESS

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## 4.1 SCREENING

A review of the proposed project screening findings against the listed activities was conducted; the findings of which are summarised below:

## WASTE MANAGEMENT, TREATMENT, HANDLING, AND DIPOSAL ACTIVITES

- 2.1 The construction of waste sites, treatment of waste and disposal of waste.
- 2.3 The import, processing, use and recycling, temporary storage, transit or export of waste.

#### **TOURISM DEVELOPMENT ACTIVITIES**

6. The construction of resorts, lodges, hotels or other tourism and hospitality facilities

The potential environmental and social effects are anticipated to be of minor significance, and those that may occur shall be contained on the proposed development sites.

## 4.2 SCOPING

Due to the nature of the proposed project, and the implementation of industry best practice mitigation measures during the development phase of the project, the effects on the environment and society are expected to be minimal and localised.

#### 4.3 BASELINE STUDIES

For the proposed project, baseline information will be obtained through a desk-based study and site verification processes through focusing on the environmental receptors that could be affected by the proposed project. ECC will also engage with stakeholders, I&APs and the proponents to seek input into the assessment.

#### 4.4 IMPACT ASSESSMENT

Impacts will be assessed using the ECC EIA methodology. The EIA will be conducted in terms of the Environmental Management Act, No. 7 of 2007 and its regulations. ECC's methodology for impact assessments was developed using IFC

standards in particular Performance Standard 1 'Assessment and management of environmental and social risks and impacts' (IFC 2012, 2017) and Namibian Draft Procedures and Guidance for EIA and EMP (GRN, 2008), including international and national best practice with over 25 years of combined EIA experience.

#### 4.5 ENVIRONMENTAL MANAGEMENT PLAN

An EMP shall be developed for the proposed project setting out auditable management actions for the development of residential & retail (including tourism) activities on ERF 4747, to ensure careful and sustainable management measures are implemented for their activities in respect of the surrounding environment and community.

#### 4.6 PUBLIC PARTICIPATION AND

#### **ADVERTISING**

Public participation is an important part of the EIA process; it allows the public and other stakeholders to raise concerns or provide valuable local environmental knowledge that can benefit the assessment, in addition it can aid the design process. This project is currently at the scoping phase and public participation phase.

At this phase ECC will perform the following:

- Identify key stakeholders, authorities, municipalities, environmental groups and interested or affected members of the public, hereafter referred to as I&APs;
- Distribute the NTS for the proposed project (this document);
- Advertise the environmental application in two national newspapers;
- Place notices on-site at or near the boundary;
- If required host a public meeting to encourage stakeholder participation and engagement, and provide details of issues identified by the environmental practitioner, stakeholders and I&APs;

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- Record all comments of I&APs and present such comments, as well as responses provided by ECC, in the comments and responses report, which will be included in the scoping report that shall submitted with the application; and
- Circulate I&AP comments to the project team for consideration of project design.

Comments must be submitted in writing and can be emailed using the details in the contact us section below.

#### **CONTACT US**

We welcome any enquiries regarding this document and its content. Please contact:

Environmental Compliance Consultancy (ECC)

info@eccenvironmental.com

Tel: +264 816 697 608

#### www.eccenvironmental.com

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#### 13 APPENDIX C - EVIDENCE OF PUBLIC CONSULTATION

8 THURSDAY 6 AUGUST 2020 THE NAMIBIAN







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THE NAMIBIAN Thursday 13 August 2020 **21** 



NOTICE OF ENVIRONMENTAL ASSESSMENT & PUBLIC PARTICIPATION PROCESS DEVELOPMENT OF RESIDENTIAL & RETAIL (INCLUDING TOURISM) ACTIVITIES ON ERF 4747 IN SWAKOPMUND, ERONGO REGION, NAMIBIA

2007 will be made as per the following:

Applicant: Lighthouse Property Investment Trust
Environmental Assessment Practitioner (EAP): Environmental Compliance Consultancy
Location: Swakopmund, Erongo Region, Namibia

**Project:** Proposed development of residential & retail (including tourism) activities on Erf 4747 in Swakopmund, Erongo Region, Namibia

Proposed activity: The proposed project is for the development of residential & retail (including tourism) activities on Erf 4747 at the Mole, Swakopmund main beach, for possible accommodation facilities, as well as associated facilities such as a fitness gym, spa, a lounge area and restaurants. The proposed development will also include the construction of office space and onsite parking. Additional activities to be carried out on site include the upgrade of the existing green space and children's playground area and the municipal boardwalk where applicable.

Application for environmental dearance certificate: In terms of the Environmental Management Act, No. 7 of 2007 ECC, on behalf of Lighthouse Property Investment Trust, is required to apply for environmental clearance from the Ministry of Environment, Forestry and Tourism for the above-mentioned project.

Purpose of the review and registration period: The purpose of the review and registration period is introduce the proposed project and to afford registered interested and Affected Parties ([BAPS] opportunity to comment on the Background Information Document (BID) to ensure that all issues a concerns are brought forward, captured and considered further in the assessment.

Registration period: Effective from 06<sup>th</sup> – 27<sup>th</sup> August 2020

How you can participate: ECC is undertaking the required environmental assessment and public participation process in terms of the Act. I&APs and stakeholders are required to register for the project at: <a href="https://eccenvironmental.com/projects/">https://eccenvironmental.com/projects/</a>

vironmental Compliance Consultancy gistration Number: CC/2013/11404 embers: Mr 15 Bezuldenhout or Mrs J Mooney I Box 91193, Klein Windhoek I: +264 81 669 7608 mail: info@eccenvironmental.com

/ebsite: http://www.eccenvironmental.com roject ID: ECC-111-307-ADT-05-C





Department of **Hospitality and Tourism** 

## 2021 Hospitality and Tourism Qualifications

#### Basic Skills Chefs Certificate Course (1-year)

Applications will be accepted until Friday, 30 October 2020. Only 25 places are available. The course will begin in January 2021.

Students must be employed in the industry (commercial kitchen in a restaurant, hotel or lodge) and must have passed Grade 10.

#### Registration

Early in advance / special payment rules apply. See Application forms on NUST website.

#### Hospitality and Tourism Management Degree Programmes

Are you passionate about pursuing an exciting career in the travel and tourism industry? Then the Department of Hospitality and Tourism is the place to be. We offer the following degree programmes:

- Bachelor of Culinary Arts (3-years)
- Bachelor of Hospitality Management (NQF Level 7) (3-years)
- Bachelor of Tourism Innovation and Development (NQF Level 7) (3-years)
- Bachelor of Hospitality and Tourism Management Honours (NQF Level 8) (1-year)

See entry requirements and online applications on NUST website.

#### Enquiries:

Mr Ralf Herrgott

T: +264 61 207 2204 E: rherrgott@nust.na

T: +264 61 207 2093 E: idevoss@nust.na *NAMIBIA UNIVERSITY* OF SCIENCE AND TECHNOLOGY



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12 NAMIB TIMES 9 OCTOBER 2020

# n times

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Oswaldo Mendes and Carel de Jager in their Subaru Impreza at the first ever Erongo Sprint Photo contributed

Zachary Martin and Amanda Hugo in their VW Polo Vivo at the first ever Erongo Sprint rally Photo contributed





NOTICE OF AN ENVIRONMENTAL ASSESSMENT & PUBLIC PARTICIPATION PROCESS DEVELOPMENT OF RESIDENTIAL AND RETAIL (INCLUDING TOURISM) ACTIVITIES ON ERF 4747 IN SWAKOPMUND, ERONGO REGION, NAMIBIA

Environmental Compliance Consultancy CC (ECC) hereby gives notice to the public that an application for an environmental clearance certificate in terms of the Environmental Management Act, No. 7 of 2007 will be made as per the following:

Applicant: Lighthouse Property Investment Trust

Project: Proposed development of residential and retail (including tourism) activities on Eri

4747 in Swakopmund, Erongo Region, Namibia.

Purpose of this notice:

1. To provide new I&APs the opportunity to register for inclusion in the public participat

process.

2. To afford all new and existing registered interested and Affected Parties (I&APs) are

opportunity to comment on the preliminary assessment report. The period is effective from 12" – 27" October 2020.

ne perious seffective from 12 — 27 October 2020.

Proposed activity: The proposed project is for the development of residential and retail (including tourism) activities on Erf 4747 at the Mole, Swakopmund main beach, for possible accommodation facilities, as well as associated facilities such as a fitness gwn, spa, lounge area and restaurants, etc. The proposed development will also include the construction of office space and onsite parking. Additional activities to be carried out on sits include the upgrade of the existing green space and children's playground area and the municipal boardwalk where applicable.

I&APs and stakeholders are required to register for the project at:

https://eccenvironmental.com/projects/ Comments are also welcome via email by using the email address listed below.

Environmental Compliance Consultancy

Registration Number: CC/2013/11404 Members: Mr JS Bezuidenhout or Mrs J Mooney PO Box 91193, Klein Windhoek Tel: +264 81 669 7608



## **Erongo sprint rally 2020**

After the imposed Covid-19 lockdown, Walvis Bay Motor Club (WBMC) hosted the first ever Erongo Sprint rally last weekend outside Swakopmund.

The sprint rally was endorsed by the Namibia Motor Sport Federation (NMSF) and was held under the Covid-19 regulation with 15 rally cars, 3 quad bikes and 7 MX bikes.

A sprint rally is in a nutshell, a one day event in the form of a mini rally consisting of one stage with a distance of 6.37km. There are no time controls, no medals or trophies as it is a fun event under the NMSF's regulations.

The organizer of the event Allen Martin said that the event was held to show the NMSF and the sport commission that they can host a motor sport

sport commission that they can host a motor sport event under the Covid-19 regulations. Martin added, with all motor sport events cancelled due to covid pandemic, WBMC are in discussions with the NMSF to host one or two rallies before the end of the year as many club and national events had to be cancelled due to Covid. The fasted time of the day was 00.05.02 minutes and was set by Zachary Martin and Amanda Hugo who took honours by ending in the first place in his VW Polo Vivo with Oswaldo Mendes and Carel de Jager in their Subaru Impreza in a time of

The full result for the day was: 1. Zachary Martin and Amanda Hugo (00.05.02) 2. Oswaldo Mendes and Carel de Jager (00.05.39) 3. Rolf Pretorius Bartie Rautenbach (00.06.02) 4. Ettienne vd Heever and Cecil (00.06.10), 5. Quinton Liebenberg and Keren Till (00.06.25) 6. Gino Meyer and Riaan Hennop (00.06.25) 7 Berto Mostert and Paul van Niekerk (00.06.25) 8. Paul Oosthuizen and Johan du Plessis (00.06.30) 9. Jan Everson and Fanie Botes (00.06.32) 10. Tinus Malan and Paul van Niekerk (00.06.37)

11. Steven Marnewick and Jodine van Zyl (00.06.45)

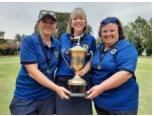
12. Wido Bartsch and Raymond Fourie (00.06.46) 13. Jacques Kruger and Roche Louw (00.06.51) 14. Joao Coimbra and Jackie Louw (00.06.51) 14. Joao Coimbra and Jackie Coimbra (00.07.07),15. Werner Bartsch and Kobus Mulder (00.07.12) Quads: 1. Marthinus Lombard (00.05.54), 2. Tom Scholtz (00.05.55) 3. Hugo Arangies (00.05.58). MX Bikes; 1. Robbie Schneider (00.06.04) 2. Gino Rossi (00.06.10) 3. Tarquin Liebenberg (00.06.21) 4. Ruan de Lange (00.06.23) 5. Andre Barnard (00.06.68) 6. Marthinus Schoeman (00.07 00) 8. (00.06.58) 6. Marthinus Schoeman (00.07.00) 8. Ole Steinstrater (00.08.40).

## **Father and sons National Trips** champions

The 2020 Namibian National Trips bowling championships were hosted by the Windhoek Bowling Club over the past weekend.

Poena Olivier and his two sons Cabous Olivier and Ronan Olivier were crowned as the Men's National Trips Bowling and Piet du Plooy as the runners up.

The Ladies champions are Anjuleen Viljoen, Miele van der Merwe and Elzaan de Vries with Henriette Partridge, Kobie champions with Johan Jacobs, Colin Peake Heesakkers and Annelize Opperman as runners up.



Ladies National Trips bowling champions Anjuleen Viljoen, Miele van der Merwe and Elzaan de Vries



Men's National Trips bowling champions Poena Olivier, Cabous Olivier and Ronan Olivier



## **Celebrating 4 years of** super cheap insurance

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## 14 APPENDIX D - ECC CVS

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## STEPHAN BEZUIDENHOUT

Name of Consultant: Stephan Bezuidenhout

**Position / Profession:** Managing Member & Senior Environmental

Practitioner

Date of Birth: 11 April 1989

Nationality: Namibian

**Professional Memberships:** EAPAN, FSC Environmental Chamber, NCE,

NCA, N-BiG

Email: stephan@eccenvironmental.com

Website: www.eccenvironmental.com

**Contact:** +264 81 262 7872



## **QUALIFICATIONS:**

**University of Pretoria:** 2011 – 2012 Postgraduate Degree in Environmental

Management and Analysis

**University of Stellenbosch:** 2007 – 2010 Bachelor of Applied Science

#### **PROFILE:**

ECC's proudly Namibian Principal leads the ECC team as the lead Environmental Practitioner with a strong and dedicated environmental background. Mr Bezuidenhout has leading practical experience in Identifying and applying legislative requirements to proposed projects. Identifying impacts and mitigations for projects within different sectors, including mining, energy, agriculture and construction.

## **KEY AREAS OF EXPERTISE:**

Agriculture and Ecology	- Aftercare, rehabilitation & restoration
	methodology & implementation
	Forest Stewardship Counsil (FSC)
	implementation and compliance
Environmental (and social) Impact	- Compiling EIA Reports and EMPs
Assessments (EIAs) (ESIAs)	Coordinate and review specialist studies
&	Review EIA reports
Environmental Management	Environmental Management Systems (EMS)
	Public Participation & Stakeholder
	Management
Project Management	- Management of teams through Southern
	Africa for various projects

**LANGUAGES:** 

	Reau	vvrite	эреак
English	Excellent	Excellent	Excellent
Afrikaans	Excellent	Excellent	Excellent



## **SUMMARY OF EXPERIENCE AND CAPABILITY:**

Since 2010, Stephan has been working as an environmental assessment practitioner. Stephan has a strong ecological background and has gained more than ten years' experience in the environmental industry. As a lead practitioner, Stephan has successfully driven environmental impact assessments and compliance assessments within Southern Africa. His hands on and practical experience and knowledge of international standards, such as FSC, IFC and World Bank standards allows Stephan to advise his clients and teams constructively and effectively.

## PROJECT EXPERIENCE

PROJECT	DATE	ROLE
Best Practice Guide: Environmental Principles for Mining in Namibia	2017 - 2019	Team member
The FSC National Forest Stewardship Standard of Namibia	(2018-2020)	Part of the working group who compiled the National Standard for Forest Stewardship Council (FSC) in Namibia allowing for a higher rate of certification and improved compliance.
Jumbo Charcoal FSC Group Scheme Management	2015 - 2020	Jumbo Charcoal FSC Group Scheme Management
Biophysical Rehabilitation Plan for ML 42, 43, 44 and 45 as well as an overarching 5-year Biophysical Rehabilitation Plan for Namdeb	2018 - 2019	Part of the ECC team who completed the reporting and aided in the implementation of the Biophysical Rehabilitation Plans for Namdeb.
ESIA amendment for B2Gold Namibia Mining Licence (ML 169) to developed underground working for the Otjikoto (gold mine)	2018 - 2019	Lead Environmental Assessment Practitioner managing the EIA process (including stakeholder engagement, PPP and report review).
Kunene Regional Counsel sustainable water supply Pipeline and Ancillary works	2017 - 2018	Lead Environmental Assessment Practitioner managing the EIA process (including stakeholder engagement, PPP and report review).
ESIA application for B2Gold Namibia 10.8 megawatt PV solar upgrade to the B2Gold Power Plant	2017 - 2018	Lead Environmental Assessment Practitioner managing the EIA process (including stakeholder engagement, PPP and report review).
ESIA application for Otjiwarongo Wastewater Treatment and Bulk Water Supply	2019	Lead Environmental Assessment Practitioner managing the EIA process (including stakeholder engagement, PPP and report review).
ESIA for the Wastewater Treatment facilities for Gondwanan Collection	2019	Lead Environmental Assessment Practitioner managing the EIA process (including stakeholder engagement, PPP and report review).
MAWF permit application for Water Abstraction and Discharge for Gondwanan Collection	2019	Lead Environmental Assessment Practitioner managing the EIA process (including stakeholder engagement, PPP and report review).
EIA application for various exploration activities for Votorantim Metals Namibia Pty Ltd	2018 - Present	Lead Environmental Assessment Practitioner managing the EIA process (including stakeholder engagement, PPP and report review).



Abengoa Solar SA, Kaxu Solar One 100MW Concentrating Solar Plants (CSP) Trough	2015 - 2017	Environmental Control Officer during commissioning and rehabilitation phases
Konkoonsies II PV Solar Energy Facility, On-site substation and a 132kV power line Northern Cape, South Africa	2015 - 2017	Environmental Assessment Practitioner during EIA process
Abengoa Solar SA Paulputs CSP (Pty) Ltd. 150 MW CSP Trough Northern Cape, South Africa	2015 - 2017	Environmental Assessment Practitioner during EIA Process
Abengoa Solar SA, Xina Solar One 200 MW CSP Trough Northern Cape, South Africa	2015 - 2017	Environmental Control Officer during construction phase
Soil Remediation and Commissioning report of NGALA Camp for Isondlo Project Support (IPS) (Pty) Ltd Gauteng, South Africa	2015	Lead consultant and project manager.
375 km 26-inch natural gas installation for SASOL & ROMPCO Mozambique representing Worley Parsons (Pty) LTD. South Africa	2013 - 2015	Environmental Coordinator and Manager
Department of Water Engineering (working on a catchment management project for the Municipality of Stellenbosch)	2011 - 2012	Intern at Aurecon South Africa
Other projects	2011-2020	Stephan has successfully completed various other projects in the sectors of Agriculture, Mining, Energy and Tourism where he acted as the Lead Environmental Assessment Practitioner managing the EIA process (including stakeholder engagement, PPP, and report review).

## **PUBLICATIONS**

N.S., et al., Some ecological side-effects of chemical and physical bush clearing in a southern African rangeland ecosystem, Southern African Journal of Botany (2015), http://dx.doi.org/10.1016/j.sajb.2015.07.012

The FSC National Forest Stewardship Standard of Namibia (Draft V 4). Co-authored by S Bezuidenhout, P Cunningham, A Ashby, F Detering, W Enslin & D Honsbein

## **CERTIFICATION:**

I, the undersigned, certify that to the best of my knowledge and belief, these data correctly describe me, my qualifications, and experience.

DATE: **21** / **10** / 20**20** 

**FULL NAME OF CONSULTANT** 

Jacobus Stephanus Bezuidenhout



# Jessica Mooney

# Director & Principal Environmental Practitioner



Hello! :)



Name

Jessica Mooney

**Born** 

24 October 1984

Phone

+264 81 653 1214

**Email** 

Jessica@eccenvironmental.co m

Website

www.eccenvironmental.com

Contact me!

How to reach me!

+264 81 653 1214



Jessica.mooney7



+264 81 653 1214



Jessica Mooney



## **Education & Qualifications**

Federation University Australia 2003-2006 Bachelor of Applied Science - Environmental Management

Additional Qualifications Management Systems Leadership ICAM - Incident Cause Analysis Method Certificate II in Metalliferous Mining core safety and risk management Certificate III in Mine Emergency Response

& Rescue

Level 3 – HLTFA402B Apply Advanced first Aid

Emergency Rope Rescue

Level 2 - 21593VIC First Aid level 2 Bonded Asbestos Removal >10m2 Leading and Managing People – Brisbane North Institute of TAFE



## **Experience & Work History**

#### Current

## **Environment Specialist**

**Environmental Compliance Consultancy** 

With 13 years international experience, Jessica provides professional consulting services to clients in Namibia with particular focus on approvals, ECCs, reporting and compliance.

- ECC Approvals
- Mine Closure Plans
- Rehabilitation
- Strategic Environmental Impact Assessments
- Social Impact Assessments
- ARD/AMD Assessments and Reporting
- IMS (ISO14001 and 18001)

Nov 2013-Feb 2016

## **Group HSE Manager**

Weatherly Mining Namibia

An exciting role covering the breadth of two operational underground mines (Otjihase and Matchless) and the construction of a new open pit mine (Tschudi) working for Weatherly Mining in Namibia, Africa.

- Managed company's SHEQ portfolio
- Full scale construction of new greenfield mine into operational copper mine
- Reduced LTIFR by 90% from 23.1 to 2.4 in 22 months!
- Implemented integrated management system
- Approvals, ECC renewals and EMPs
- Established the first mining environmental forums in Namibia
- Implemented SAFE COPPER cultural change programme



# Jessica Mooney

## **Environment Specialist**

## References

## Feel free to ask the boss

#### **MR CRAIG THOMAS**

Managing Director Weatherly Mining

## MR COLIN BULLEN

Managing Director Imerys (client)

Group Manager Lihir Gold

## **MR NICK CURREY**

Director at Sustainable Mining Strategies

## Or ask those who have worked

## for me?

Ms Asteria Salmon

Worked as Control Room Operator
WMN

Mr. Hermanus Lamprecht Paramedic Safety Officer

## Professional Associations

- Chamber of Mines Namibia
- Women on Boards
- The Chamber of Minerals and Energy of Western Australia Industry Member – Mining, Minerals and Resources

## **Fun Facts:**

- I can deadlift 135kg
- To keep fit I Olympic weight lift
- I run ultra Marathons & the longest run yet the fish river Canyon 65km
- I am one of 6 children do you think that means 4 of us suffer middle child syndrome?

## Words I live by:

'The journey will bring you happiest, not the destination'



## **Experience & Work History**

Feb 2013-Feb 2014

Jan 2010-

Feb 2013

Jan 2007-

Jan 2010

## **Environmental Consultant**

Ensolve Pty Ltd - Australia

In February 2013 an opportunity came about to launch my own business, Blue Wren Environmental Services.

During this time I have worked alongside Ensolve Pty Ltd to deliver several environmental projects including:

- A mine closure project taking an operating mine site into the rehabilitation and closure phase. This project involved the full development of a mine closure plan, facilitation of the government approvals, stakeholder engagement and technical environmental studies to inform the mine closure plan
- Sustainability reporting in accordance with the Global Reporting Initiative
- Rehabilitation of historic exploration sites and obtaining associated government approvals for relinquishment of bonds.

## **Site Environmental Manager**

Panoramic Resources - Australia

- Brought the site into full compliance with the Environmental Licence within 1 year.
- Managed projects relating to the expansions of the current mine tailings dams including obtaining approvals under the Mining Act 1978 and Environmental Protection Act 1986.
- Managed the environmental and community aspects of three operations; Savannah Nickel Mine, Copernicus Nickel Mine (currently in care and maintenance) and the operations at Wyndham Port
- Responsible for the environment, sustainability and social reporting portfolio
- Developed productive working relationships with local government environmental agencies and non-government agencies, which assisted with the approvals process.
- Developed strategies for the recruitment and retention of local Indigenous personnel

## **Environmental Systems Coordinator**

Lihir Gold Limited – Australia

Working on site to provide technical environmental and community advice to ensure all regulatory and licence obligations were met or exceeded

- Regulatory Approvals (State and Federal Government)
- Environment and social aspects of the international cyanide management code
- Operational budgeting and bond management for mine closure
- Compliance with the legislative framework
- Community engagement



## **CURRICULUM VITAE**

## LESTER HARKER

Name of Consultant: Lester Harker

Position / Profession: Environmental Assessment Practitioner

Date of Birth: 26 February 1988

Nationality: Namibian

**Email:** lester@eccenvironmental.com

Website: www.eccenvironmental.com

**Contact:** +264 81 602 2082



University of Stellenbosch: 2006 – 2010 Bachelor of Arts (Environment and

Development)

## **PROFILE:**

Lester works as an Environmental Assessment Practitioner with a diverse environmental background. Mr Harker has leading practice experience in fields of construction, exploration, monitoring and audit compliance and consultancy obtained from leading professionals.

## **KEY AREAS OF EXPERTISE:**

Environmental Management	-	Project Management
Environmental (and social) Impact Assessments (EIAs)	-	Conducting and managing various small to large scale EIAs Compiling EIA Reports and EMPs Coordinate and review specialist studies
Environmental & Social Compliance reporting	-	Environmental and Social compliance audits in the construction industry



ReadWriteSpeakEnglishExcellentExcellentExcellentAfrikaansExcellentExcellentExcellent

## **SUMMARY OF EXPERIENCE AND CAPABILITY:**

Has over 8 years of work experience. His first three years were as a junior environmental assessment practitioner, but already became involved with the holistic management of EIA projects. The following 5 years he has worked in the environmental management field with experience in Environmental Impact Assessments (EIAs), compliance monitoring and auditing in Namibia, the DRC and Equatorial Guinea. Has above average experience in successful client relations.

## **PROJECT EXPERIENCE**

PROJECT	DATE	ROLE
Collaborated with the British CRIDF donor organisation to conduct a high level environmental investigation to determine the feasibility of treating and reusing the Rehoboth Wastewater facility for agricultural purposes		Environmental Assessment Practitioner
Environmental scoping and impact assessment for exploration activities for Westrine Mining & Exploration Company (Pty) Ltd		Environmental Assessment Practitioner.
Conducted an Environmental Scoping and Impact Assessment for the construction of a cement mining and processing facility in Equatorial Guinea, North Africa, for N.B.L.E Sa.	2016	Environmental Assessment Practitioner.
Conducted an environmental impact assessment for the Dauremas Mineral Development Company for exploration and proposed mining activities, Kunene Region.		Environmental Assessment Practitioner.
Conducted an Environmental Impact Assessment for a terrestrial diamond exploration project south of Aus, Karas Region for Hallie Investment Number 14.		Environmental Assessment Practitioner.
Conducted an environmental performance audit in collaboration with a British firm for a copper and cobalt processing facility for the Somika Sarl Group of Companies operating in the DRC to fund the expansion of their processing facility.		Environmental Assessment Practitioner
Projects Completed while at ECC Environmental impact assessment for a pilot sustainable water supply project by means of desalination, powered by solar to supplement water supply for Walvis Bay Erongo Region, Namibia		Environmental Assessment Practitioner
Amendment application for the Palmwag Lodge, Gondwana Namibia.	2020	Environmental Assessment Practitioner
Environmental Assessment for the proposed development of residential, retail including tourism activities on Erf 4747, Swakopmund Namibia.	2020	Lead Environmental Assessment Practitioner managing the EIA process (including stakeholder engagement and PPP.
Environmental scoping and impact assessment for the proposed exploration activities on 19 EPLs	2020	Lead Environmental Assessment Practitioner managing the EIA process

in the Omaheke and Khomas regions for Kuiseb Copper Company (Pty)Ld		(including stakeholder engagement and PPP.
Environmental assessment for proposed exploration activities on EPL 7769 for Jin Peng Investments (Pty) Ltd	2020	Lead Environmental Assessment Practitioner managing the EIA process (including stakeholder engagement and PPP.
Environmental assessment for the proposed exploration activities on EPL 7688	2020	Lead Environmental Assessment Practitioner managing the EIA process (including stakeholder engagement and PPP.
Environmental and social compliance audit for 21 sites across Namibia under the Education, Training and Quality Improvement Project funded by the African Development Bank		Site audits and development of an audit report and corrective action plan



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## 15 APPENDIX E - PROPOSED PROJECT DESIGNS

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# ANNEXUREA

# 





## **LOCALITY**



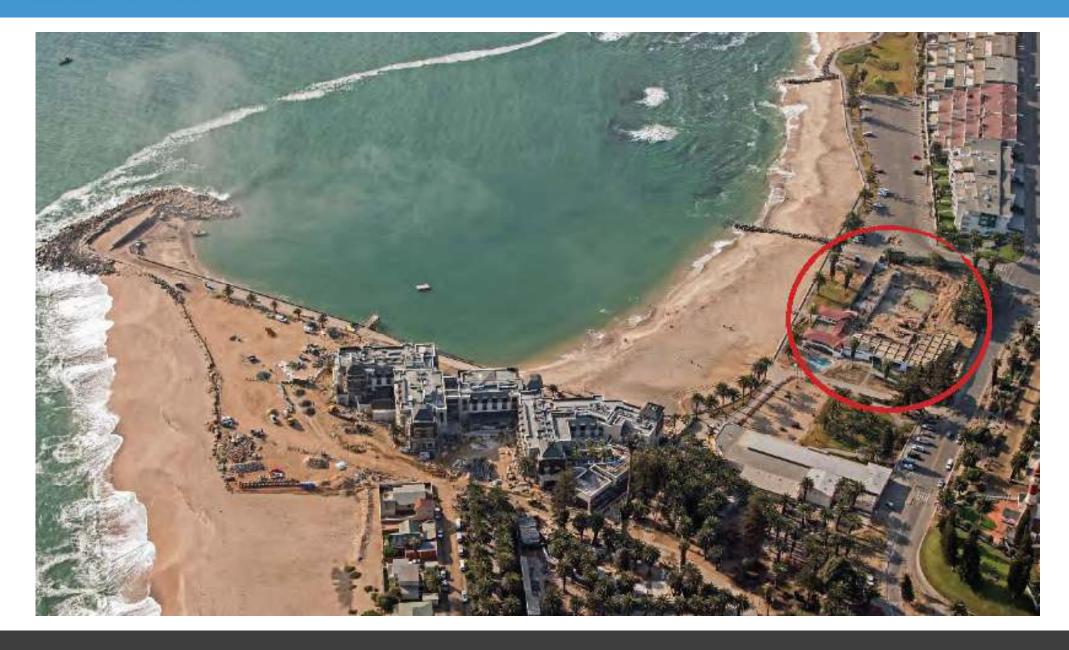
- THE SITE MOLE BEACH
- THE STRAND HOTEL
- MUSEUM
- PLAYPARK
- **G** THE LIGHTHOUSE
- **H** PARKING
- **ALTES AMPT**
- STATE GUESTHOUSE





ERF 4747

## **AERIAL IMAGE OF SITE**







## ERF 4747

## **DEMOLISHED BUILDING**

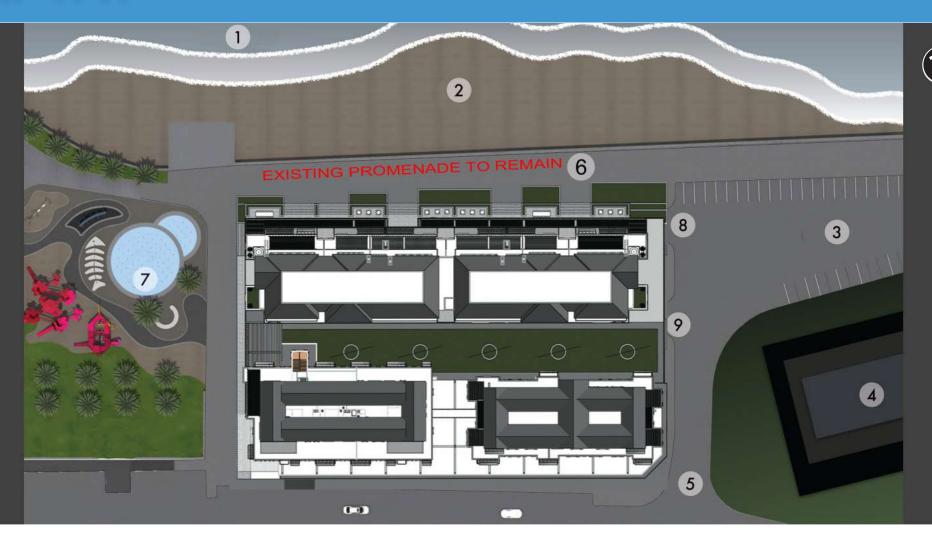








## **AREA PLAN 02**





- 2. Beach
- 3. Existing Parking
- 4. An der Welle
- 5. Theo Ben Gurirab Str
- 6. Existing Promenade
- 7. Play Park
- 8. Parking Entrance
- 9. Parking Entrance





## CRF 4747

## **BULK CALCULATIONS**

Achieved:

6086 sq.m 20'864.5 sq.m 2.9Achieved

#### **Bulk Calculation**

Basement:

Parking & Garages 2'633.5 sq.m Circulation 2'533.9 sq.m

**Ground Floor:** 

General Area 282.8 sq.m
Retail & Restaurants 1'811.5 sq.m
Parking 1'285.0 sq.m
Circulation 11'497.0sq.m

First Floor:

Residential 2'513.2 sq.m Circulation 695.8 sq.m

Second Floor:

Residential 2'500.8 sq.m Circulation 695.8 sq.m

Third Floor:

Residential 2'500.9sq.m Circulation 695.8 sq.m

Forth Floor:

Residential 2'566.6 sq.m Circulation 517.8 sq.m

Fifth Floor:

Residential 2'579.0 sq.m Circulation 517.8 sq.m

Sixth & Seventh Floor: Penthouse Level

Residential 3'739.4 sq.m Circulation 530.8aq.m Bulk Calculation:

 Retail
 140.1 sq.m

 Restaurants
 1′519.4 sq.m

 Residential
 16′399.9 sq.m

ERF Size: Total sq.m for Bulk: Bulk Factor:

**Parking Calculation:** 

Requirements:

Restaurants: (ratio 1/33.33 sq.m) 1′519.4 sq.m 46 Parkings Units: (ratio 1/ unit) 151 Units 151 Parkings Retail: (ratio 1/33.33 sq.m) 140.1 sq.m 4 Parkings Public Ablution: (ratio 1/33.33 sq.m) 152.0 sq.m No Parkings Required

Total: 233 Parkings Required

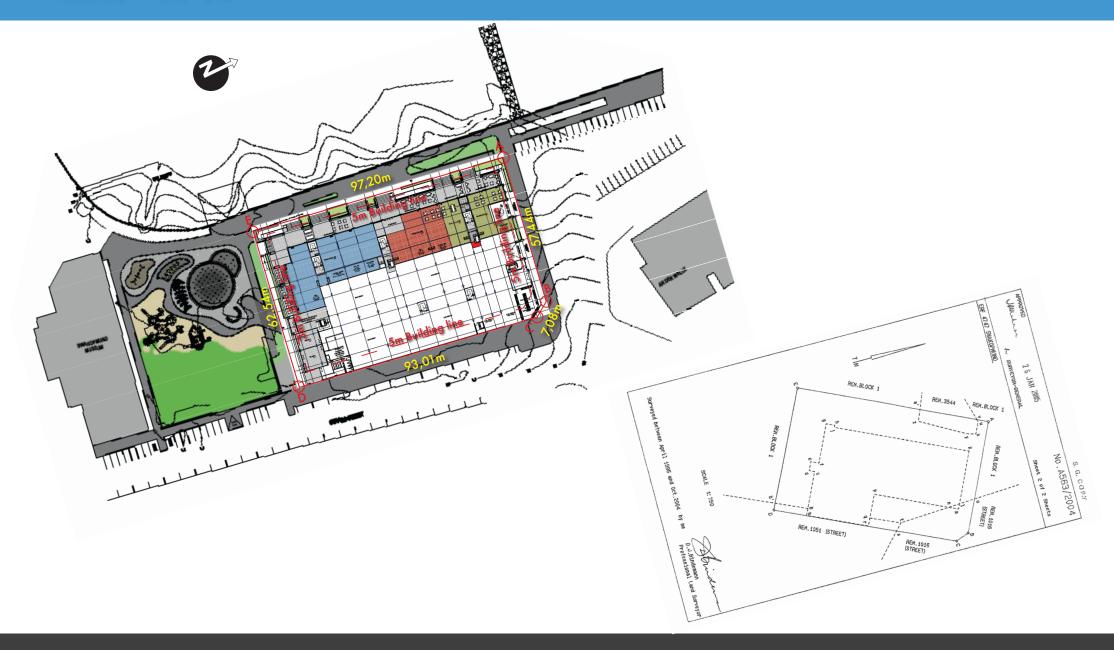
Total: 43 Parkings Extra

Total: 276 Parkings Provided





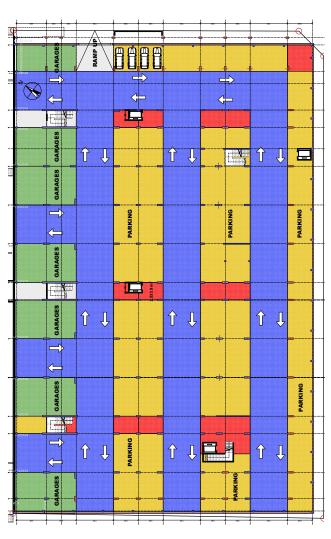
## **SITE PLAN & SITE DIAGRAM**





## **BASEMENT & GROUND FLOOR PLAN**





**BASEMENT** 



**GROUND FLOOR** 





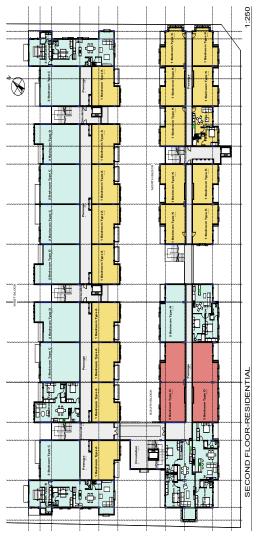
## **1ST & 2ND FLOOR PLAN**







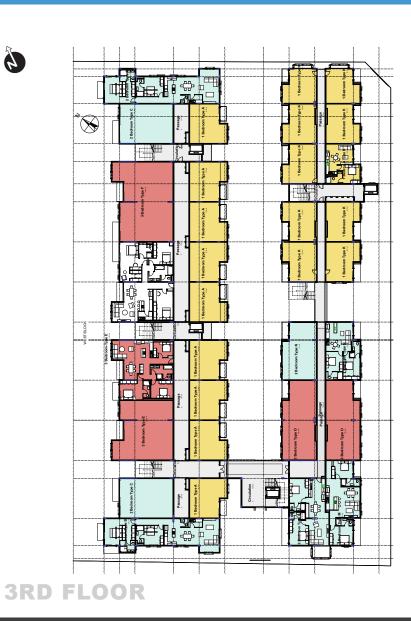


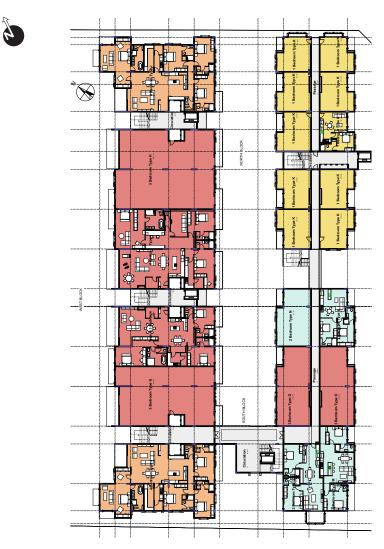


2ND FLOOR









**4TH FLOOR** 



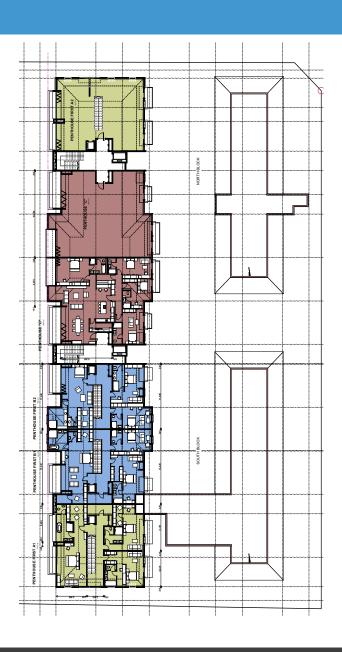






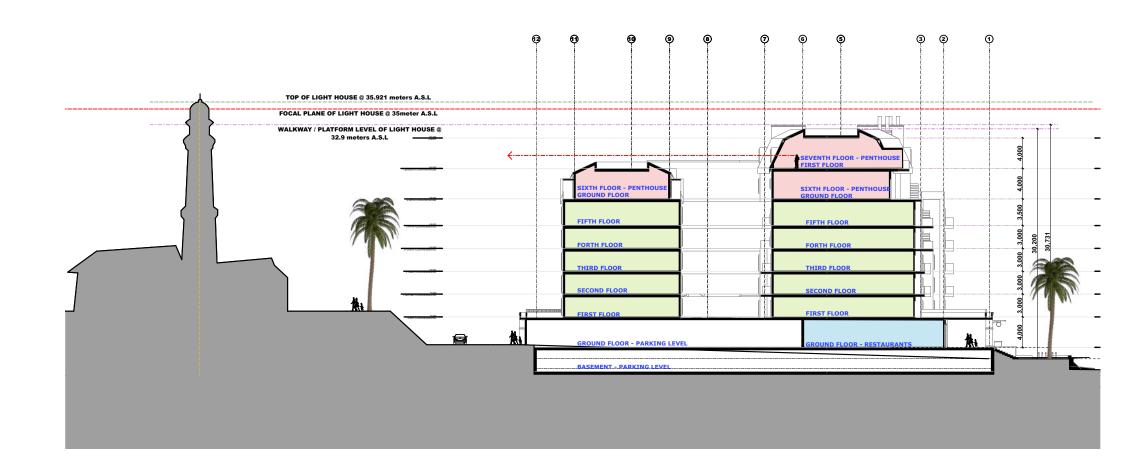
**5TH FLOOR** 





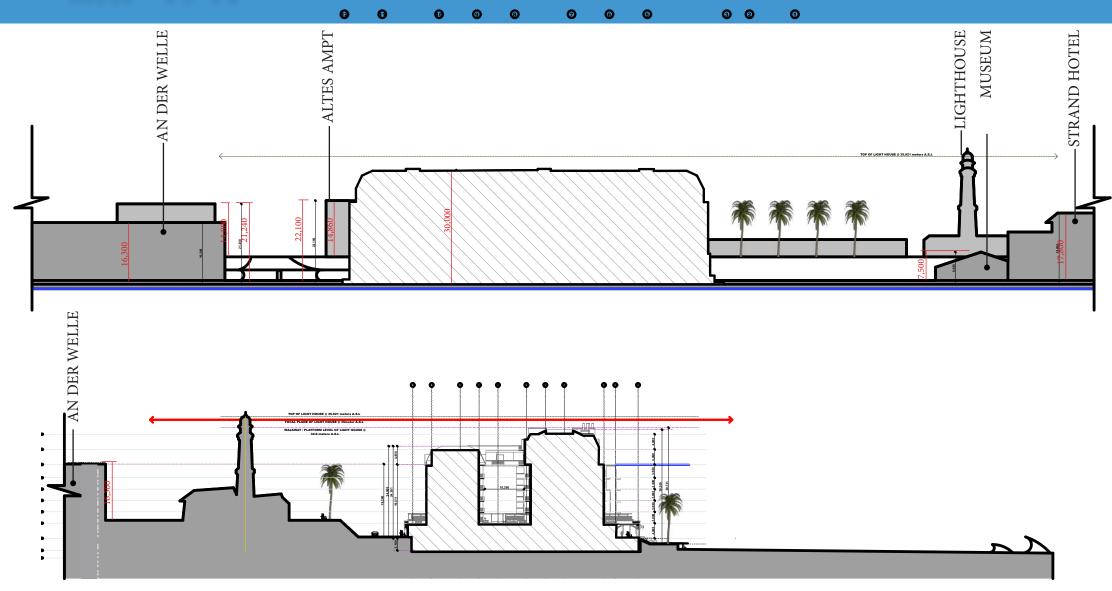
**7TH - PENTHOUSE** 







## **SKY LINE DIAGRAMS**





# **ELEVATIONS EASTERN**







# **ELEVATIONS**WESTERN













# ELEVATIONS NORTHERN







# 3D PERSPECTIVE SOUTH WESTERN







# 3D PERSPECTIVE SOUTH EASTERN







# 3D PERSPECTIVE WESTERN

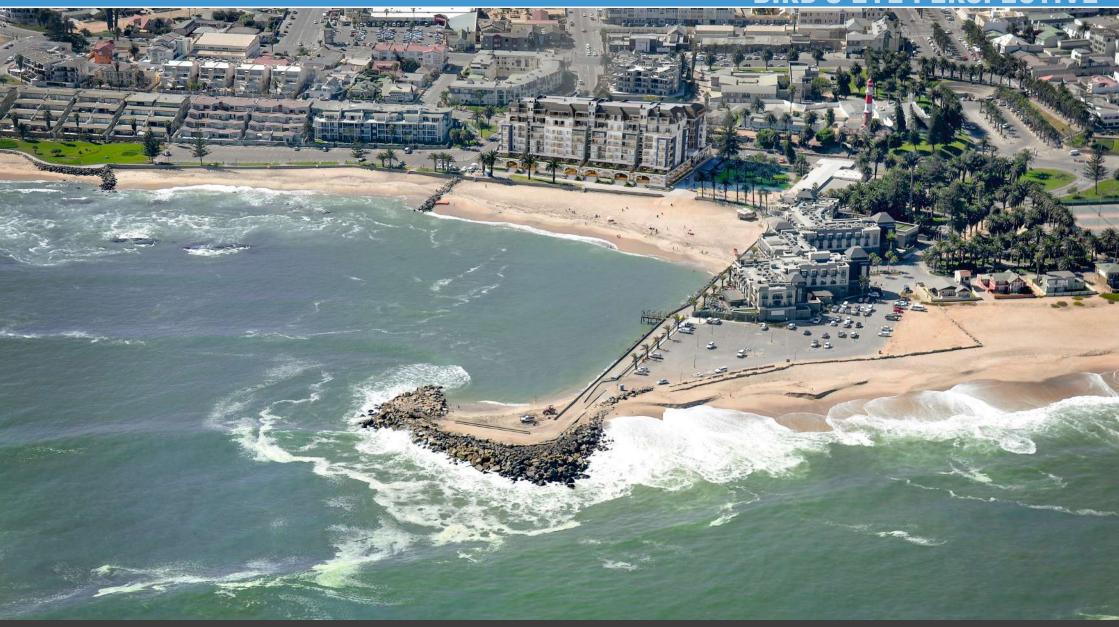






# **3D PERSPECTIVE**

#### BIRD'S EYE PERSPECTIVE







## **ROOF CONCEPT**

#### **SWAKOPMUND PRECEDENTS**











## **POPPED BOX FACADE CONCEPT**

#### **SWAKOPMUND PRECEDENTS**



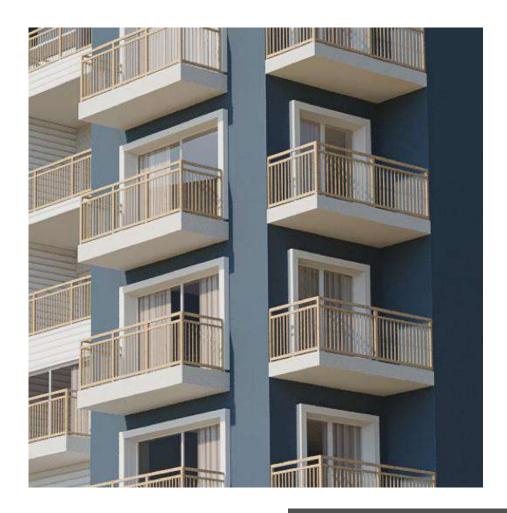






## **BALUSTRADE**

#### **SWAKOPMUND PRECEDENTS**







## **RHYTHM OF FACADE**

# SWAKOPMUND PRECEDENTS PROPOSED DESIGN ERF 4747 SWK SMALL MEDIUM LARGE LARGE LARGE

**RECESS** 

**FACADE** 





# SURROUNDING STRUCTURES WITHIN THE HERITAGE AREA

#### **SWAKOPMUND PRECEDENTS**





















# SURROUNDING STRUCTURES WITHIN THE HERITAGE AREA



















#### 16 APPENDIX F - ASSESSMENT FORM

The full application is available on their website

Assessment Form:	-							co Awards N
Email: admin@ecoawards-namibia.org								
Assessment Form:  Establishment details: Name: NTB Registration category And number: Physical address: Postal address: Postal address: Postal address:  Contact person: Name: Position: Cell-phone:  CRITERIA SUBSECTION POSSIBLE APPLICABLE SCORE  CRITERIA SUBSECTION POSSIBLE APPLICABLE SCORE  CRITERIA SUBSECTION POSSIBLE APPLICABLE SCORE  1. Management 23 23 23 2. Conservation 17 17 3. Energy 16 16 16 2. Waste, pollution, sewer 24 24 24 24 25. Waste, pollution, sewer 24 24 25. Waste, pollution, sewer 24 26. Building & landscaping 18 18 18 20. Social responsibility 13 36 36 36 36 36 36 37 38 39 30 30 30 30 30 30 30 30 30 30 30 30 30						mihia ora		
No of beds:   No of beds:	Namib							
No of beds:   No of beds:   No of beds:   No of beds:   Telephone:   Te	Ivallill					111221112		
Name:   No of beds:							Form:	ssessment F
NTB Registration category			6	No of heds			ils:	
Physical address:			S				tegory	
Postal address:				at several some contains				
Contact person:   Name:   Telephone:   Fax:   email:								
Name:				email:				tal address:
Name:							-	tact nereco
Position:   Cell-phone:   Fax: email:				Telephone			-	
CRITERIA   SUBSECTION   POSSIBLE   APPLICABLE   SCORE   SCORE								
SUBSECTION							50	-phone:
SUBSECTION			8					
2.         Conservation         17         17           3.         Energy         16         16           4.         Water         20         20           5.         Waste, pollution, sewer         24         24           6.         Building & landscaping         18         18           7.         Staff & Health         36         36           8.         Guiding         6         6           9.         Social responsibility         13         13           10.         Legal/NTB Compliance         16         16           SUBTOTAL         189         189           PERCENTAGE         100%         100%           To calculate the percentage; divide total own score by total APPLICABLE score (i.e. exclude ite applicable to your establishment specifically and exclude bonus points), multiply the answer by           11.         Bonus points         10%         10%           TOTAL FINAL SCORE         110%         110%           TOTAL FINAL SCORE           Number of Flowers applied for: (Circle applicable category):           40% or more = 55% or more = 70% or more = Flowers = Four Flowers = Five           Date: Name of Assessor: Signature: Date of MC approval:	AWARDE SCORE		10 A 2 T 1 A 2 T 1 T 1 T 1 T 1 T 1 T 1 T 1 T 1 T 1 T		APPLICABLE	POSSIBLE	i i	SUBSECTION
3.         Energy         16         16           4.         Water         20         20           5.         Waste, pollution, sewer         24         24           6.         Building & landscaping         18         18           7.         Staff & Health         36         36           8.         Guiding         6         6           9.         Social responsibility         13         13           10.         Legal/NTB Compliance         16         16           SUBTOTAL         189         189           PERCENTAGE         100%         100%           To calculate the percentage: divide total own score by total APPLICABLE score (i.e. exclude its applicable to your establishment specifically and exclude bonus points), multiply the answer by           11.         Bonus points         10%         10%           TOTAL FINAL SCORE         110%         110%           TOTAL FINAL SCORE           Number of Flowers applied for: (Circle applicable category):           40% or more								
4.         Water         20         20           5.         Waste, pollution, sewer         24         24           6.         Building & landscaping         18         18           7.         Staff & Health         36         36           8.         Guiding         6         6           9.         Social responsibility         13         13           10.         Legal/NTB Compliance         16         16           SUBTOTAL         189         189           PERCENTAGE         100%         100%           To calculate the percentage; divide total own score by total APPLICABLE score (i.e. exclude ite applicable to your establishment specifically and exclude bonus points), multiply the answer by           11.         Bonus points         10%         10%           TOTAL FINAL SCORE         110%         110%           TOTAL FINAL SCORE           Number of Flowers applied for: (Circle applicable category):           40% or more         55% or more         70% or more         80% or more         90%           = One Flower         = Two Flowers         = Three Flowers         = Four Flowers         = Five    Date:  Date of MC approval:				<del>:                                    </del>				
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Signature: Date of MC approval:							=	25000
Date of MC approval:					-		-	
							:	
Signature of MC Chair:								

JANUARY 2021 PAGE 93 OF 104



#### 17 APPENDIX G - SHADOW SIMULATION

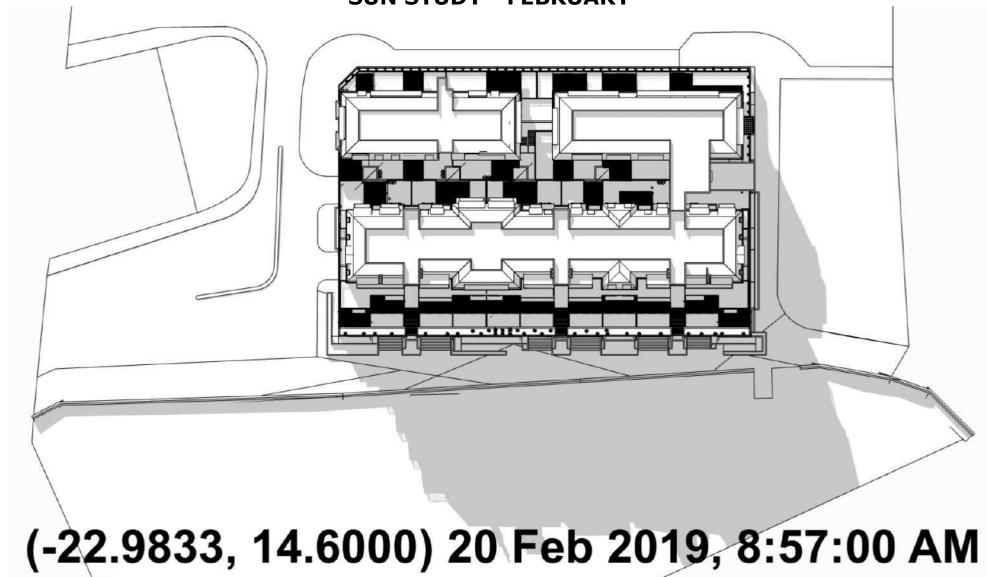
JANUARY 2021 PAGE 94 OF 104

# SUN STUDY FEBRUARY - DECEMBER





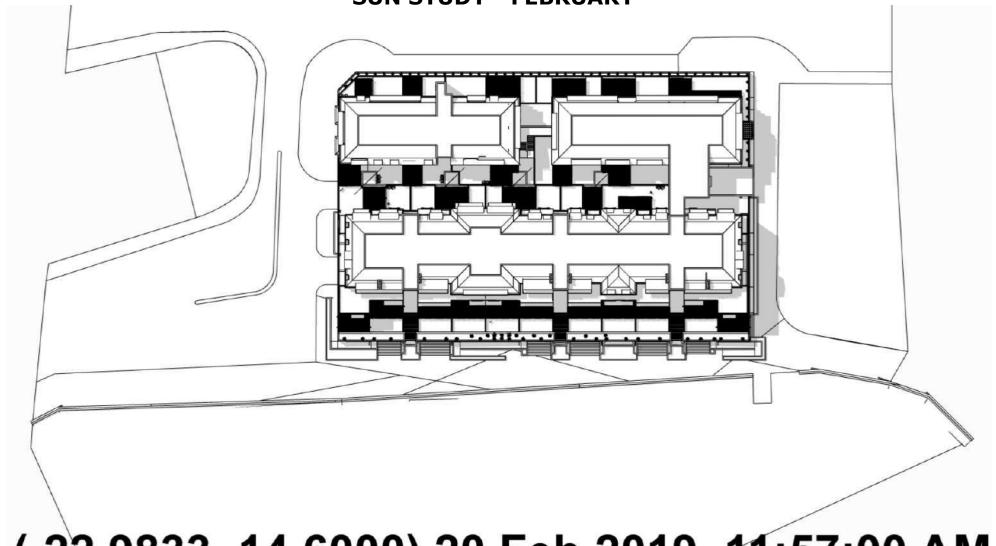
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**SUN STUDY - FEBRUARY** 

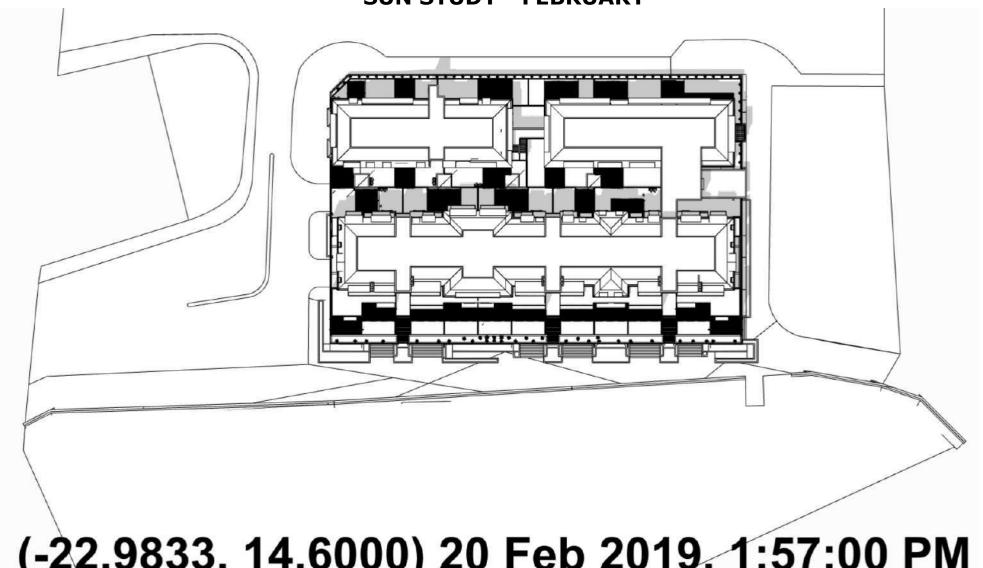


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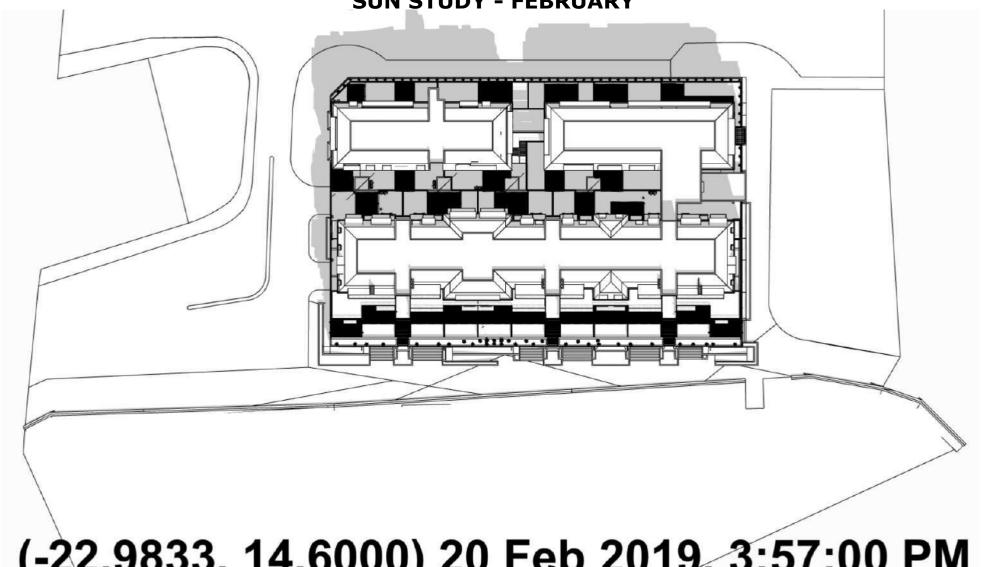
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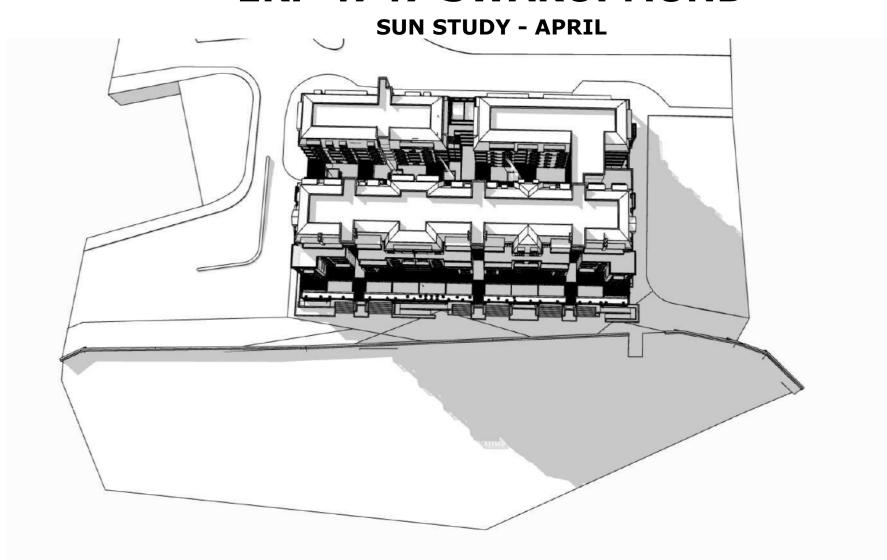
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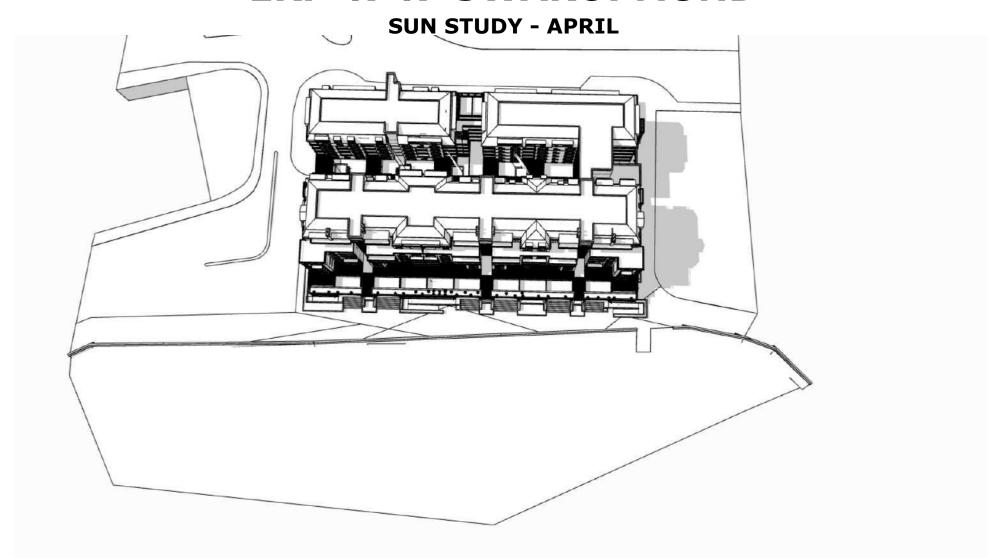




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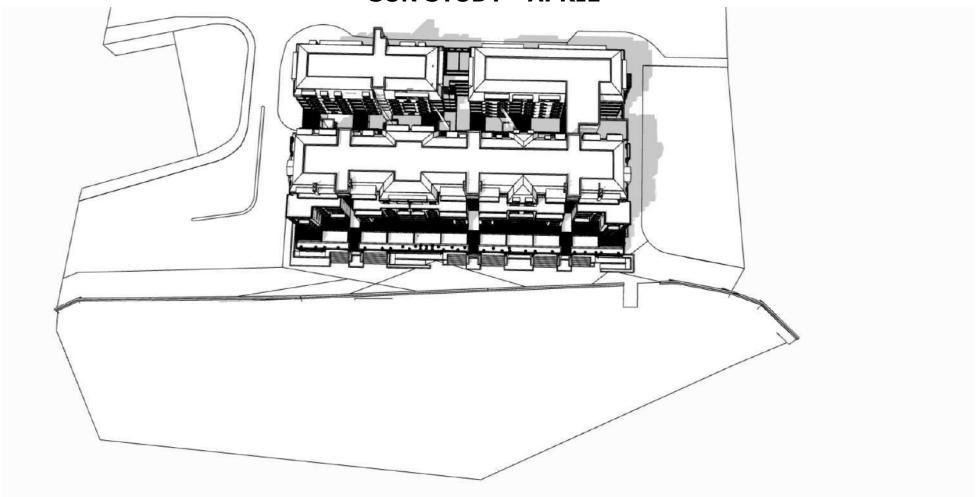


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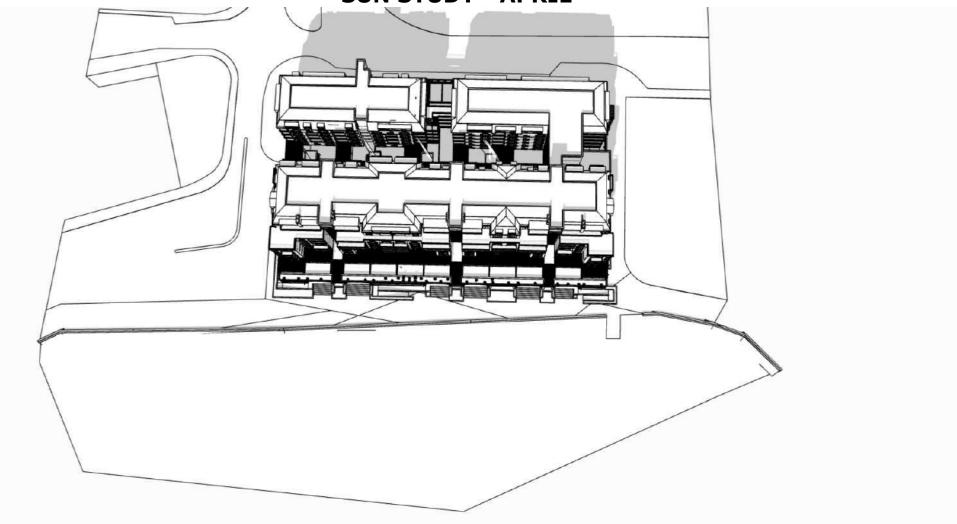


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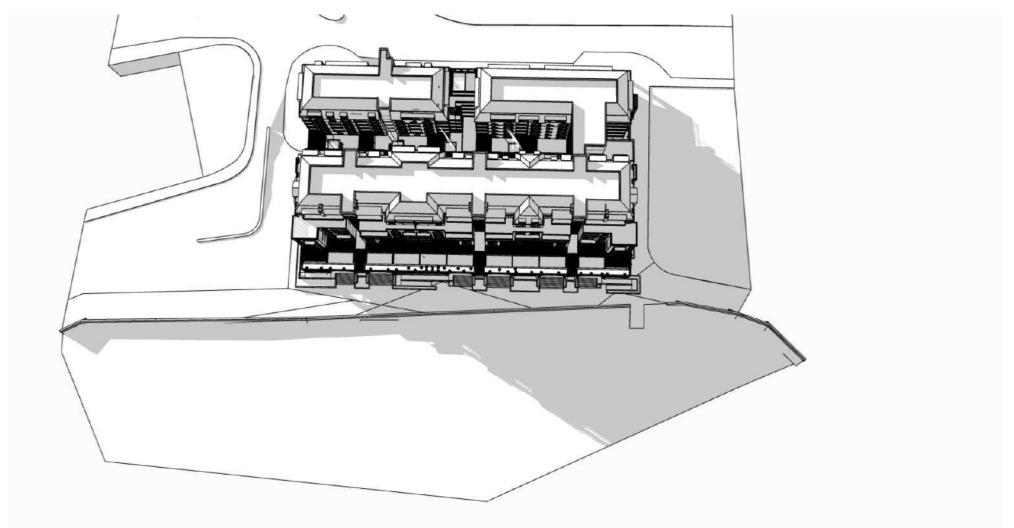


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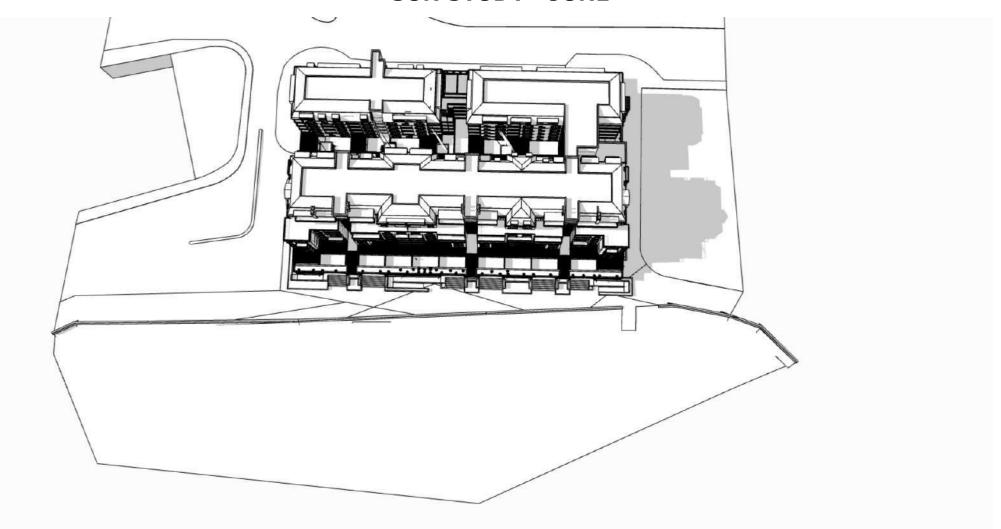


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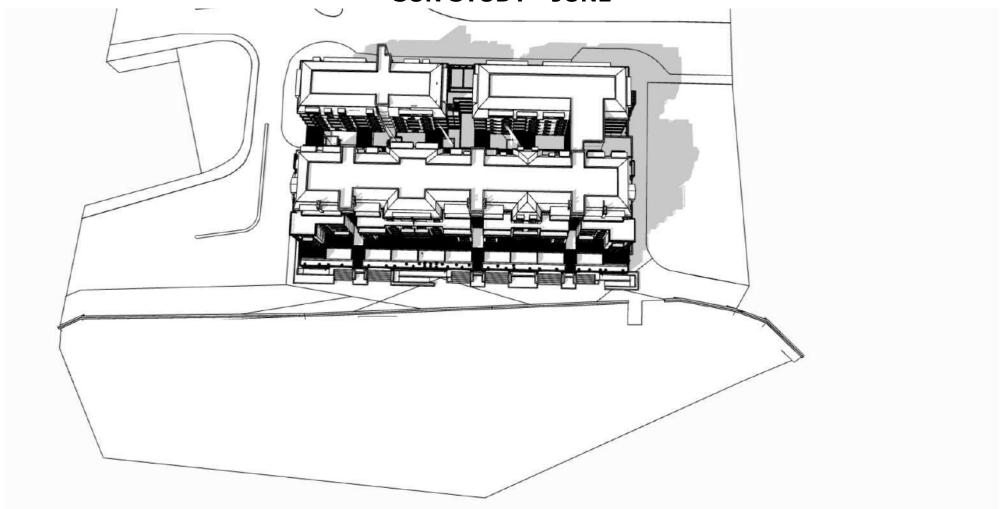


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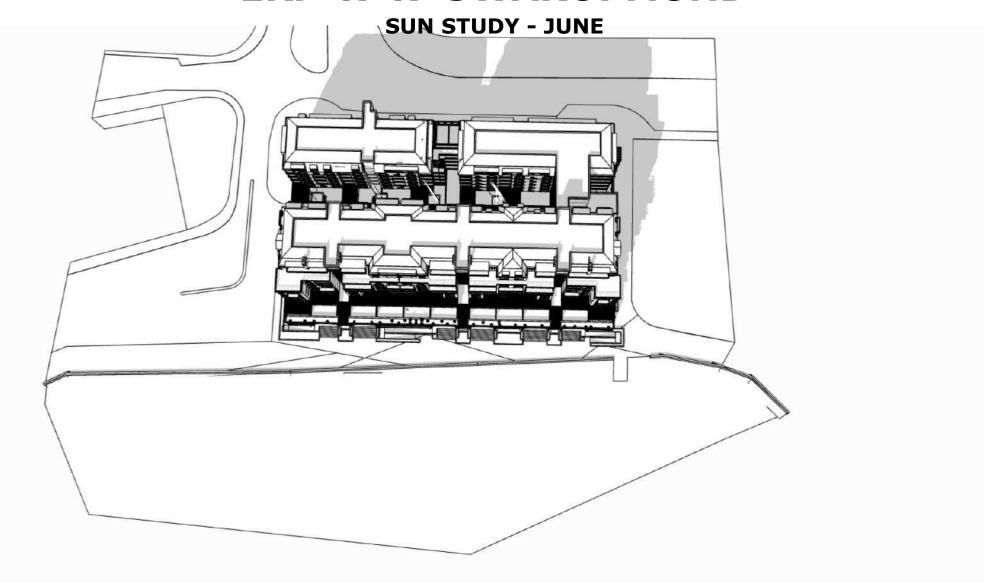
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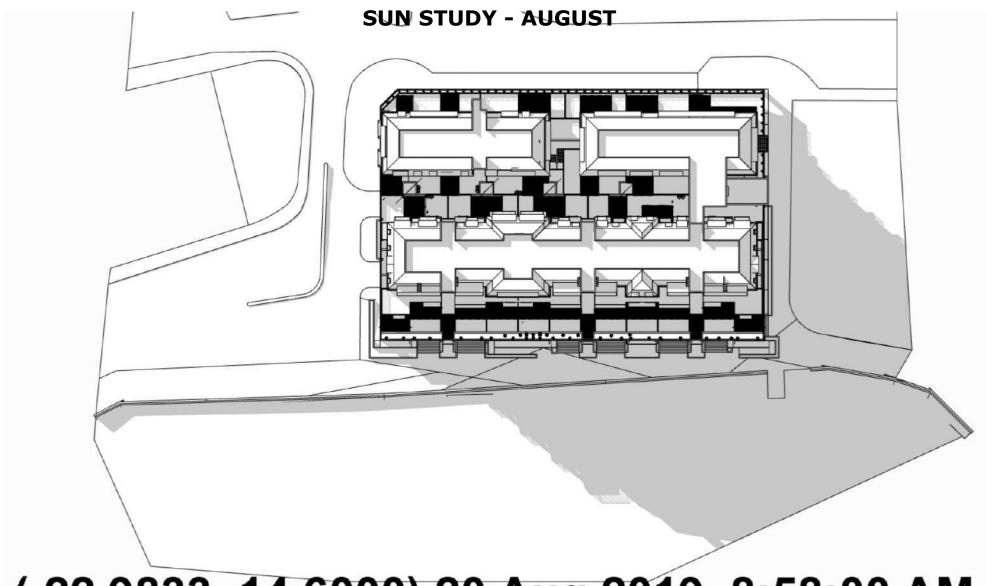






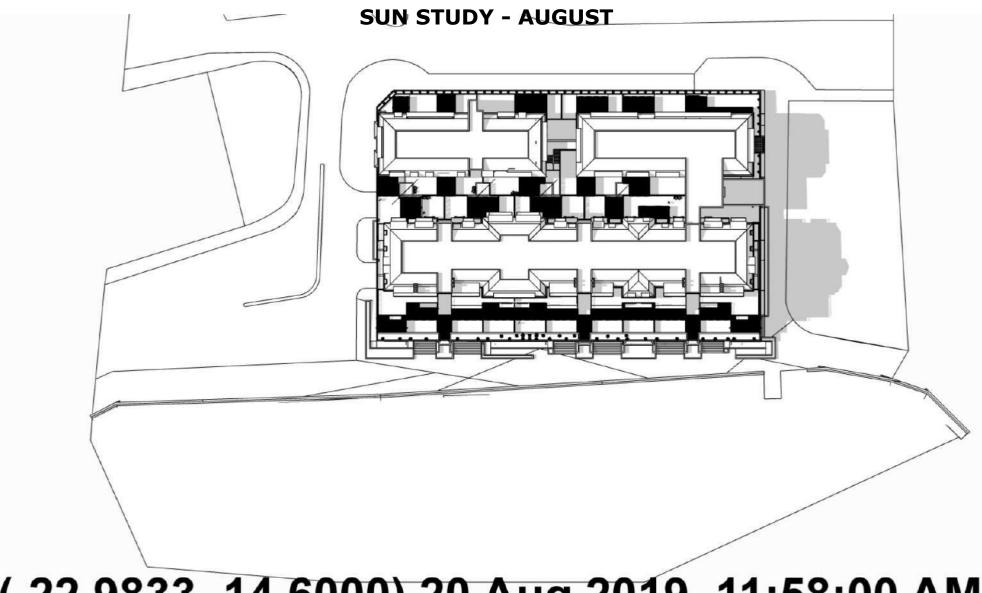
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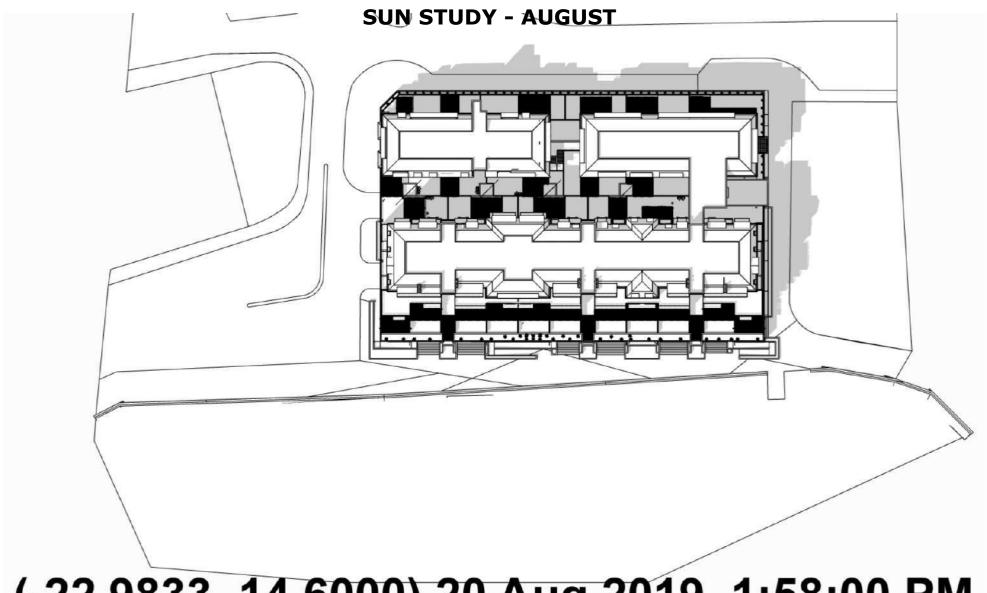
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LIGHTHOUSE PROPERTY
INVESTMENT TRUST

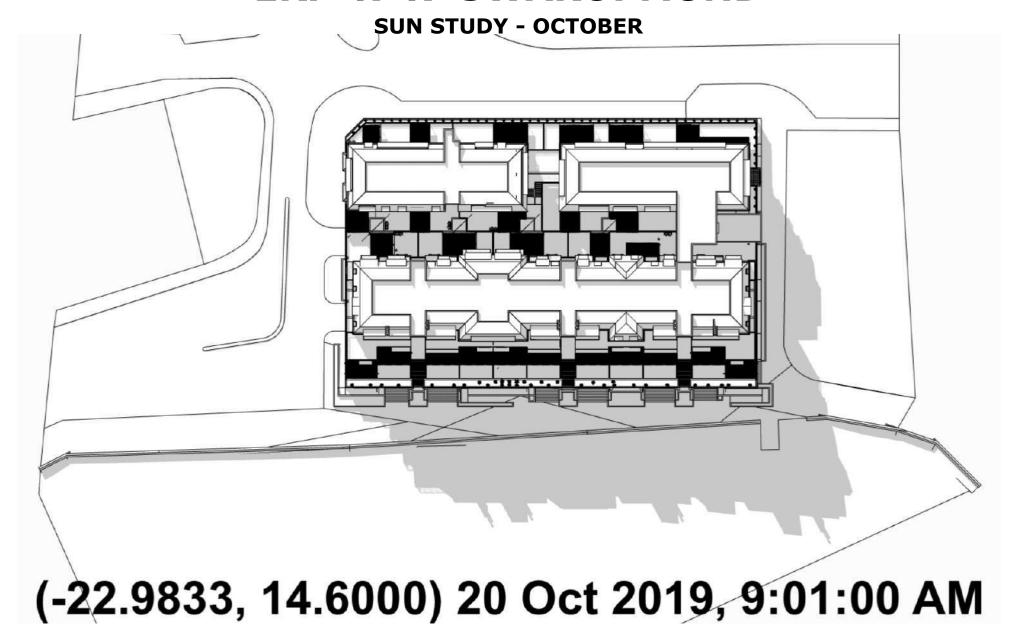


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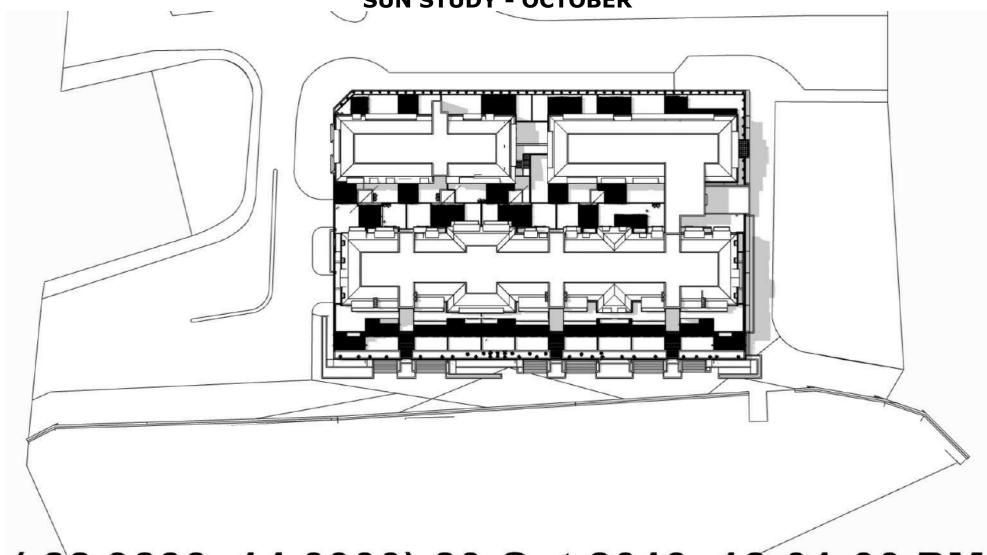








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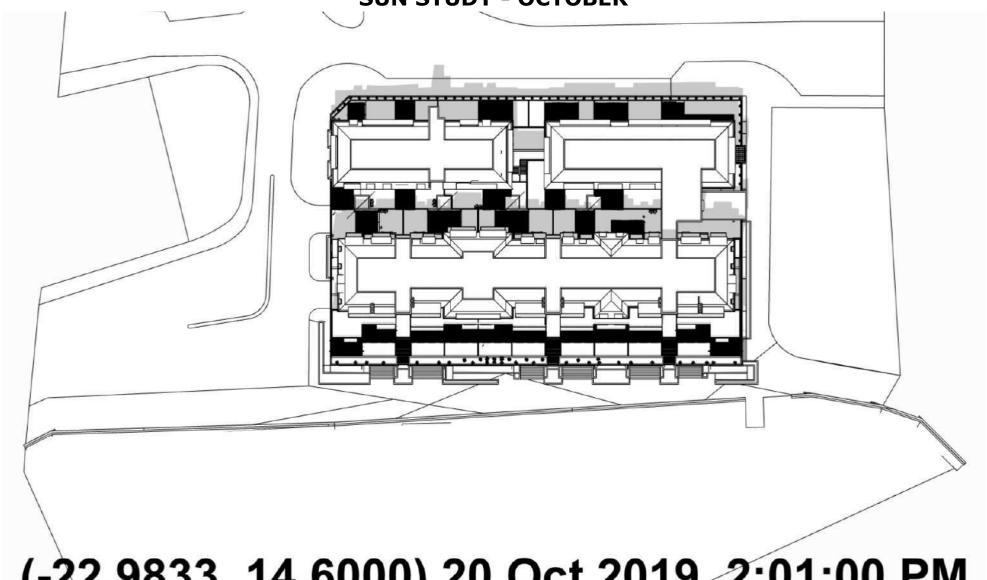


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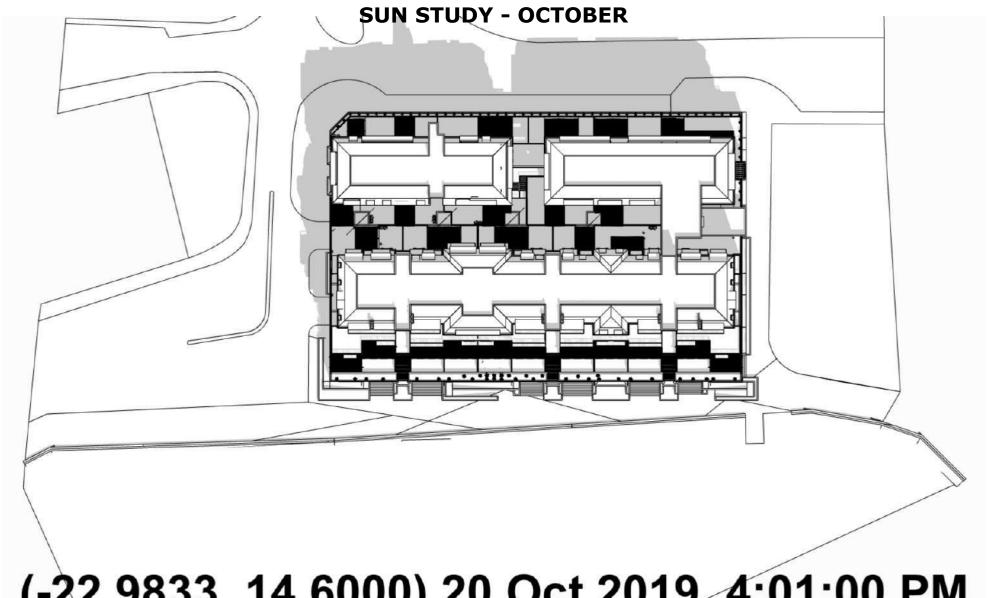


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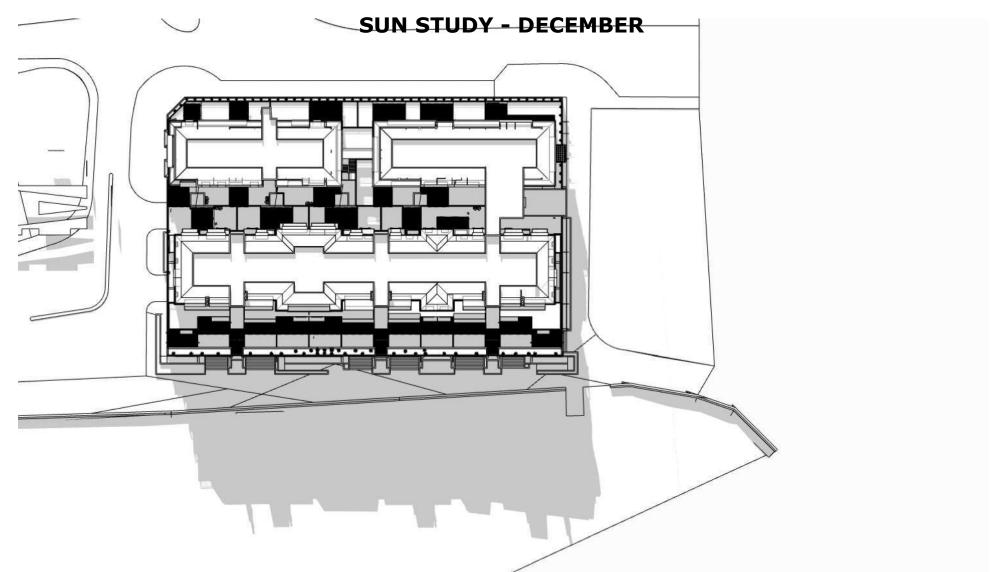
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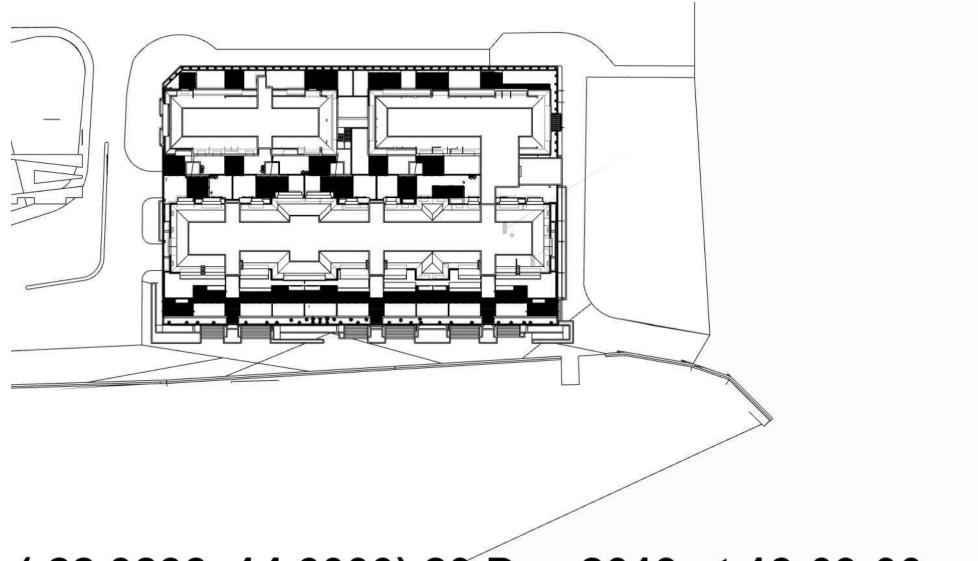


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LIGHTHOUSE PROPERTY
INVESTMENT TRUST



**SUN STUDY - DECEMBER** 

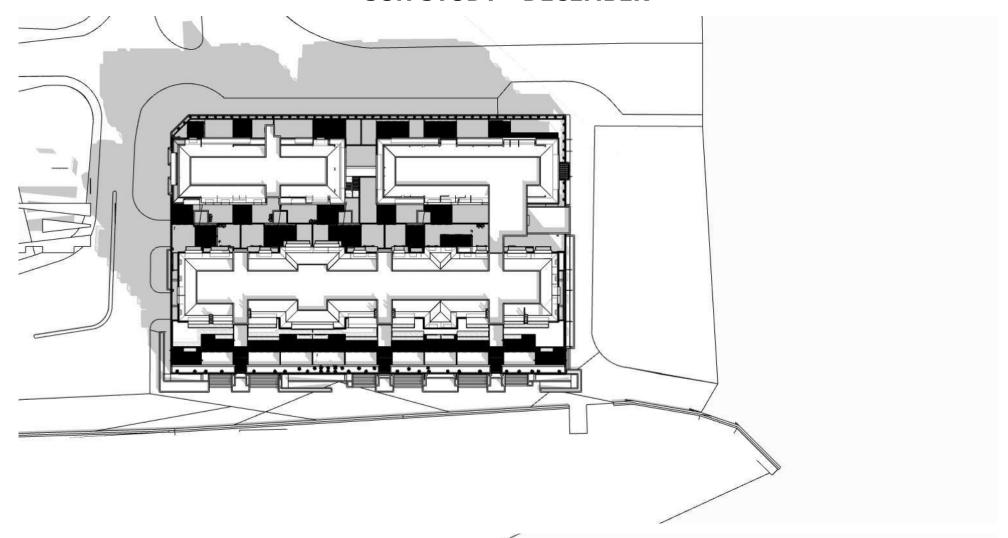


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### **ERF 4747 SWAKOPMUND**

**SUN STUDY - DECEMBER** 



(-22.9833, 14.6000) 20 Dec 2019 at 16:59:00





CHAMBERLAIN & ASSOCIATES
ARCHITECTS



#### 18 APPENDIX H - AESTHETIC APPROVAL GRANTED

JANUARY 2021 PAGE 96 OF 104



Ref No:

**Enquiries:** 

Erf 4747

A Swart

(064) 4104100

(064) 4104120

53 Swakopmund NAMIBIA

www.swkmun.com.na

swkmun@swkmun.com.na

2 June 2020

Chamberlain & Associates Architects P O Box 90622 WINDHOEK

Dear Mr André Mulder

**ERF 4747: AESTHETICAL SUBMISSION: PROSED NEW DEVELOPMENT** 

Your submission with regard to the above bears reference.

The purpose of this letter is to inform you that the aesthetical evaluation for the new proposed development in respect on erf 4747, Swakopmund, was submitted to Council for approval.

Council at its ordinary Council meeting held 26 March 2020, item 11.1.21, resolved:

- (a) That Council approves the aesthetical submission (attached) from Messrs Lighthouse Property Investment Trust for the new residential and retail development on Erf 4747.
- (b) That Messrs Lighthouse Property Investment trust submits the approved aesthetical plans to the National Heritage Council for consideration and their approval.
- (c) That once approval has been obtained from the National Heritage Council the plans be submitted to the Swakopmund Municipality's Engineering & Town Planning Department who will submit the application to the Management Committee of the Swakopmund Municipality for consideration and recommendation to the Municipal Council of Swakopmund where applicable.
- (d) That Council's takes note of the correspondence from Messrs Lighthouse Property Investment Trust's Legal representative, Messrs Dr Weder, Kauta & Hoveka Inc. dated 23 October 2019

Attached, please find the approved concept plans as submitted. However before your application can be submitted to Council for final approval we need confirmation and approval from the National Heritage Council of Namibia. Therefore kindly be informed that the approved plans needs to be submitted to the National Heritage Council of Namibia.

Approved aesthetical plans will lapse after 12 months from date of approval.

Kindly be informed that aesthetical submissions, which were approved, may not be altered or modified after the approval, whether it be by way of structural elements, in appearance or by colour scheme, or other decorational change. If alterations become necessary these must be submitted for aesthetical approval prior to any of these alterations being carried out on site.

Once this approval has been obtained a full submission of plans including the stamped Aesthetic approval plans needs to accompany the drawings submitted to Council for approval.

THE RESERVE THE PARTY OF THE PA

We await your final proposal for submission to Council.

Yours faithfully

CHIEF EXECUTIVE OFFICER

AS/as

Copy: Engineering Services

The Chief Executive Officer Municipality of Swakopmund P.O.Box: 53 Swakopmund Namibia

09 September 2019

#### Attention:

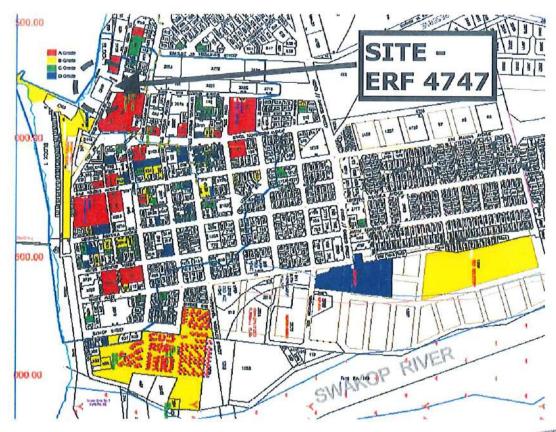
Mr. Alpheus Archie Benjamin CEO Municipality of Swakopmund

Dear Sir,

#### REG: ERF 4747 Swakopmund Submission of Proposed New Development

On behalf of our client, Lighthouse Property Investment Trust, we herewith submit a revised proposal for erf 4747 on the corner of Strand Street & Theo Ben Gurirab Avenue, situated within the conservation area.

We thus respectfully request your good office to consider the new submission for approval by the Town Council.





A - Referring to the AESTEHITC SUBMISSION GUIDELINES: Received from Swakopmund Municipality.

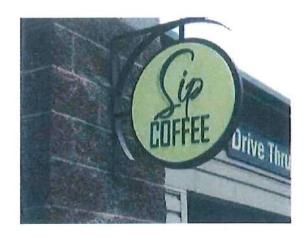
#### 6.1 (a)

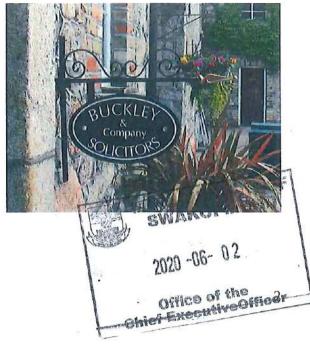
- Location of the building: please refer to page 1 of this document & page 1 & 2 of Annexure A
- Owner of the Property: Lighthouse Property Investment Trust, P.O.Box: 21904, Windhoek, Namibia.
- Conservation Area or Non-Conservation Area: Yes see diagram on page 1 of this document.
- Heritage Rating N/A
- Building Date N/A
- Colour Scheme Please see page 3 of this document.
- Signage Proposal Please see below, page 2 & 3
- Motivation for Demolishment Please see Page 4
- 6.2. (b) Copies of Heritage rating N/A
  - (c) Location Plan please refer to page 1 of this document & page 1 Annexure A
  - (d) Land Surveyors Diagram Please see page 6 Annexure A
  - (e) Site Plan with Dims Please see page 6 Annexure A
  - (f) All Floor Plans Please see page 7 11 Annexure A
  - (g) Coloured Elevations Please see page 14 17 Annexure A
  - (h) Satellite Dishes Indicated on elevation page 17 Annexure A
  - (i) Section of Building Please see page 12 Annexure A
  - (i) Artists Impression Please see page 18 22 Annexure A
  - (k) Digital Images of site Please see page 2 3 Annexure A
  - (I) Original Set will be delivered to the office.
  - (m) Electronic Copy will be e-mailed

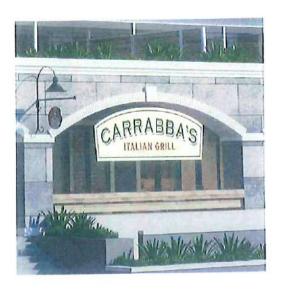
#### **B** - Detail description of the proposed development:

#### 1. SIGNAGE:

- i. Illuminated, Perspex signage (light box) for the Restaurants as per renders
- ii. Sandblasting & Vinyl stickers on Glass
- iii. 3D Illuminated building signage









#### 2. COLOUR SHEME:

creativity

## neutral-transitional paint colors



#### 3. DEMOLITION OF EXISTING:

The previous buildings were not listed as heritage. At that time the buildings were demolished it was a safety risk to the public and were falling apart.

#### In Terms of this Submission we would like to confirm the following:

#### 4. ZONING, PARKING & HEIGHT RESTRICTIONS:

**CURRENT ZONING: General Buisness** 

ERE SIZE:

6086 sa.m Unlimited

BULK ALLOWED: BULK ACHIEVED:

Bulk Factor 2.9

Residential

16'399,9 sq.m.

Restaurants

1'519.4 sq.m

Retail

140,1 sq.m

TOTAL

18'059.4 sq.m

#### PARKING CALCULATION:

Retail: (ratio 1/33,33 sq.m)

4 Parking's

Restaurants: (ratio 1/33.33 sq.m)

46 Parking's

Units: (ratio 1/ unit) 151 Units

151 Parking's

Total: Total: 200 Parking's Required 233 Parking's Provided

ALLOWABLE HEIGHT:

40 Meter from Natural Ground Level

PROPOSED HEIGHT:

30 Meter from Natural Ground Level

#### 5. PUBLIC AMENITIES - WITH IN THE BUILDING:

Beach showers are provided in the new play park area. i.

- In addition to this, 140sq.m public ablutions (male & female) incorporating ii. changing rooms with showers, Toilets and Lockers are provided, conveniently situated within the new development.
- iii. Various Restaurants including an ice-cream shop.

#### 6. PUBLIC AMENITIES - CHILDREN'S PLAYGROUND:

In tune with international trends & maintenance, a large spray ground and splash pad with waterspouts and arches is to be constructed. This design allows for less-supervised playtime for the children without the risk of drowning. This will reduce water usage, maintenance time & costs. It is also a much more hygienic solution. Please see attached examples.

Separate swings

The existing equipment that that can be in the

ii. Playground equipment will be provided on soft, clean beach sand with the provided on soft and th SWANOPMUNI) will remain. 2020 -06- 02

> Office of the Chief Executive Officer



#### 7. MATERIALS:

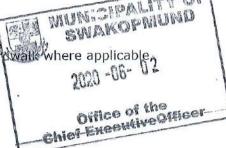
- Wall Type Everite Vermont Cladding, Brickwork (Different textured Plastered & Painted) & Off-shutter Concrete
- Roof Type Shingles in Charcoal (i.e. Strand Hotel), Reinforced Concrete ii. Slap - Waterproofed with torch-on product.
- Balustrades Type Timber. iii.
- Paving Cobble Stones, cement pavers in certain areas. iv.

#### 8. LANDSCAPING:

The surrounding area will be landscaped. The existing mature palm trees on the site currently will be relocated or replanted as part of the development

#### 9. THE DEVELOPMENT WILL CONSIST OF THE FOLLOWING:

- Tenant Parking (multi level). i.
- Commercial Area (restaurants). ii.
- Residential Area. III.
- Retail Space. iv.
- Upgrading of existing municipal walkways / boardwalk where applicable V.
- vi. Landscaping.
- New play park with spray ground. vii.



New public ablutions & change rooms with showers (male & female). VIII.

New ErongoRed substation. ix.

The site has no direct neighbours; the site is surrounded by a public park to the south, promenade on the west, public parking to the north & strand street to the east.

#### 10.REFUSE REMOVAL:

Standard green roll bins provided, space has been allocated within the building, under roof and secure, close to the security booth for controlled access by the refuse removal Trucks.

#### 1.1.PROPOSED UPGRADE:

The client proposes a joint venture in the upgrading of the promenade in front of the new development outside the erf. We look forward to working together with the municipality of Swakopmund to make the Swakopmund Mole a pristine public space.

#### 12. STATE HOUSE:

Proposal of the new building presented to and approved and supported by STATEHOUSE. See attached letter.

We trust you will find the above submission in order. Should you need more information please do not hesitate to contact the below.

Kind Regards,

Stephen Chamberlain

Sole Proprietor

Chamberlain & Associates Architects

André Mulder

Architect

Chamberlain & Associates Architects

Cc

A. Graham

- Jimmey Construction

J. Koen

- Jimmey Construction

J. Simpson

- Jimmey Construction

A. Malherbe - WKH

MUNICIPALITY OF SWAKOPWUND 2020 -08- 02 office of the Chief-Excensive

4 OR KWAME NKRUMAH AVE

350 FLOOR BRIDGEVIEW OFFICES & APARTMENTS KLEIN WINDHOEK NAMIBIA

TEL 1264 61 253 669 FAX 1264 88 655 9862

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LIGHTHOUSE PROPERTY INVESTMENT TRUST

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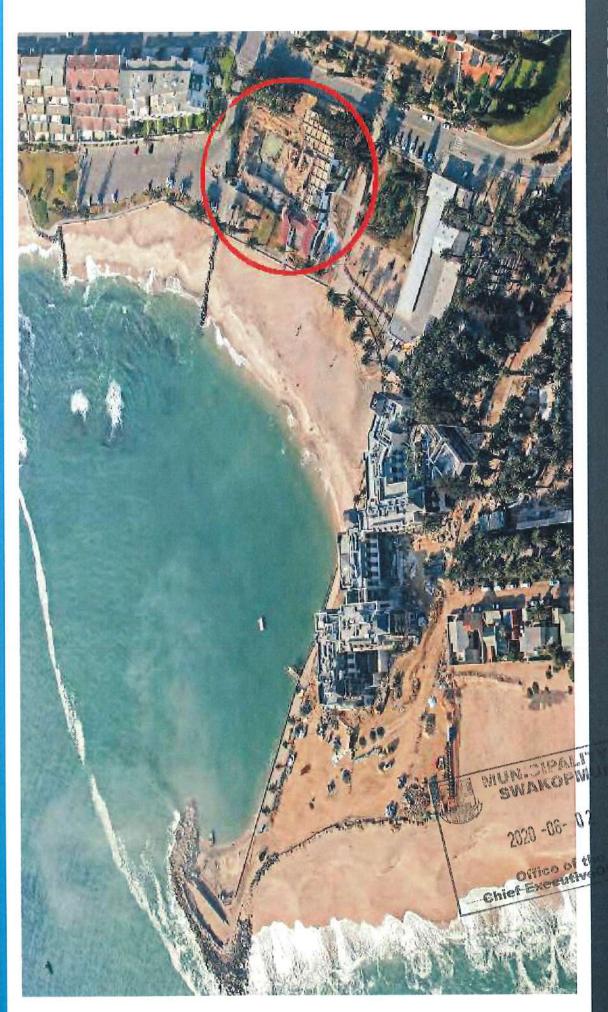
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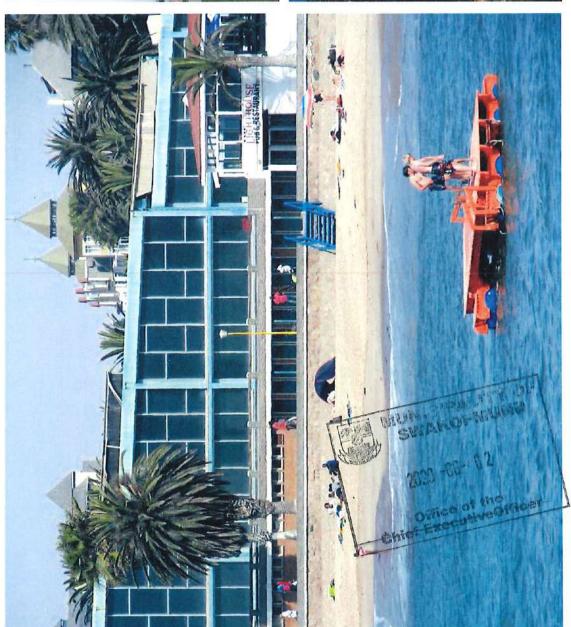
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7. Play Park

8. Parking Entrance 9. Parking Entrance

6. Existing Promenade

3. Existing Parking

5. Theo Ben Gurirab Str

4. An der Welle

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# **Bulk Calculation**

Basement:

Parking & Garages Circulation

2'633.5 sq.m 2'533.9 sq.m

Ground Floor:

General Area Retail & Restaurants

282.8 sq.m 1/811.5 sq.m 1/285.0 sq.m 11/497.0sq.m

Parking Circulation First Floor:

Circulation Residential

2'513.2 sq.m 695.8 sq.m

Second Floor:

Residential Circulation

2'500.8 sq.m 695.8 sq.m

Third Floor:

Residential Circulation

2'500.9sq.m 695.8 sq.m

Forth Floor:

Residential Circulation

2'566.6 sq.m 517.8 sq.m

Fifth Floor:

Residential Circulation

2'579.0 sq.m 517.8 sq.m

Sixth & Seventh Floor: Penthouse Level

Residential Circulation

3'739.4 sq.m 530.8aq.m

**3ulk Calculation:** 

Retail Restaurants Residential

1,519.4 sq.m 1,519.4 sq.m 16,399.9 sq.m

Achieved:

20'864.5 sq.m 2.9Achieved

ERF Size: Total sq.m for Bulk: Bulk Factor:

Parking Calculation:

Requirements:

Restaurants: (ratio 1/33.33 sq.m) Units: (ratio 1/ unit) Retail: (ratio 1/33.33 sq.m) Public Ablution: (ratio 1/33.33 sq.m)

Total:

Total:

Total:

1'519.4 sq.m 151 Units 140.1 sq.m 152.0 sq.m

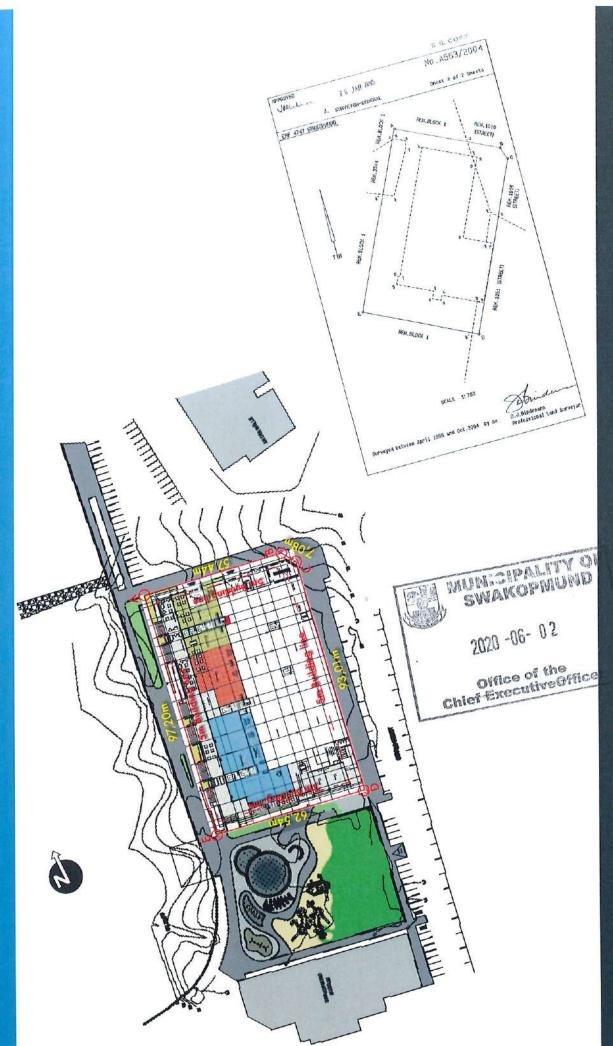
46 Parkings 151 Parkings 4 Parkings No Parkings Required

233 Parkings Required

43 Parkings Extra

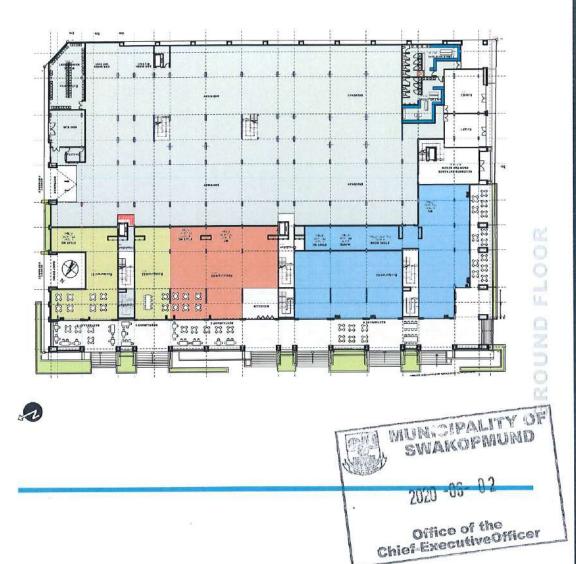
276 Parkings Provided

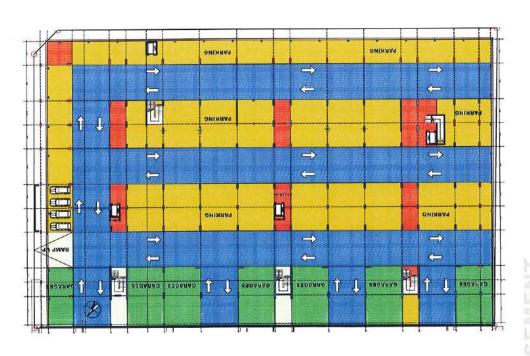
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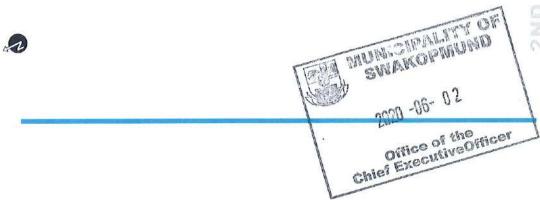


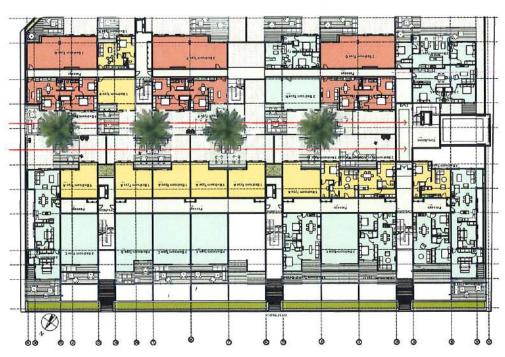
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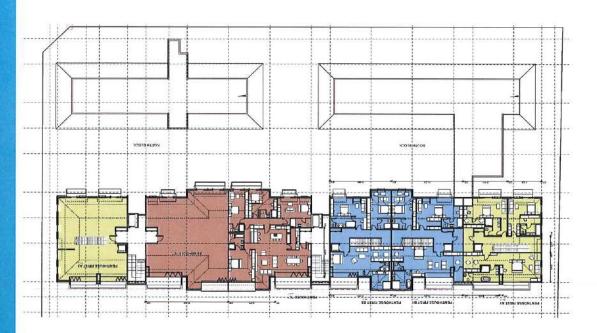
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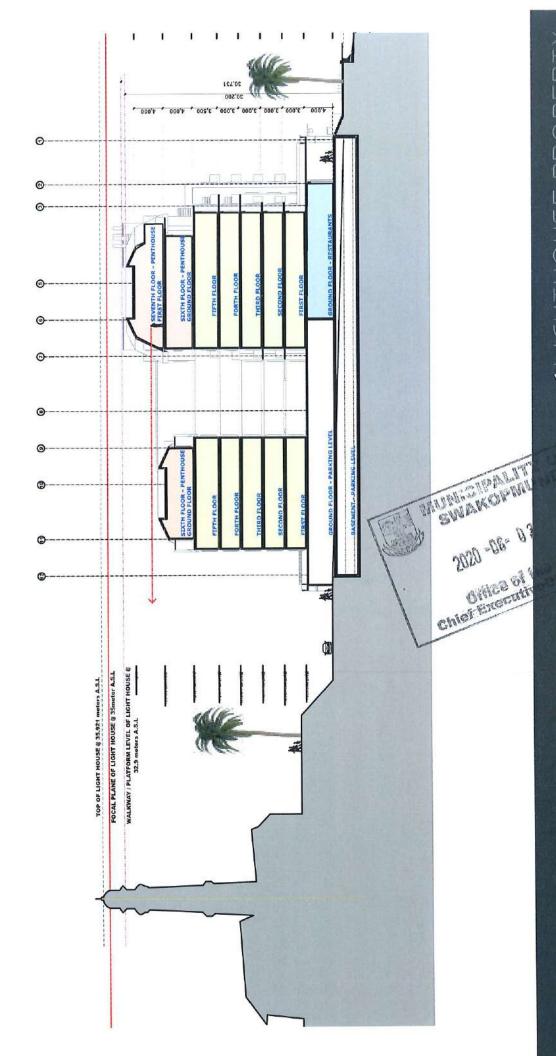


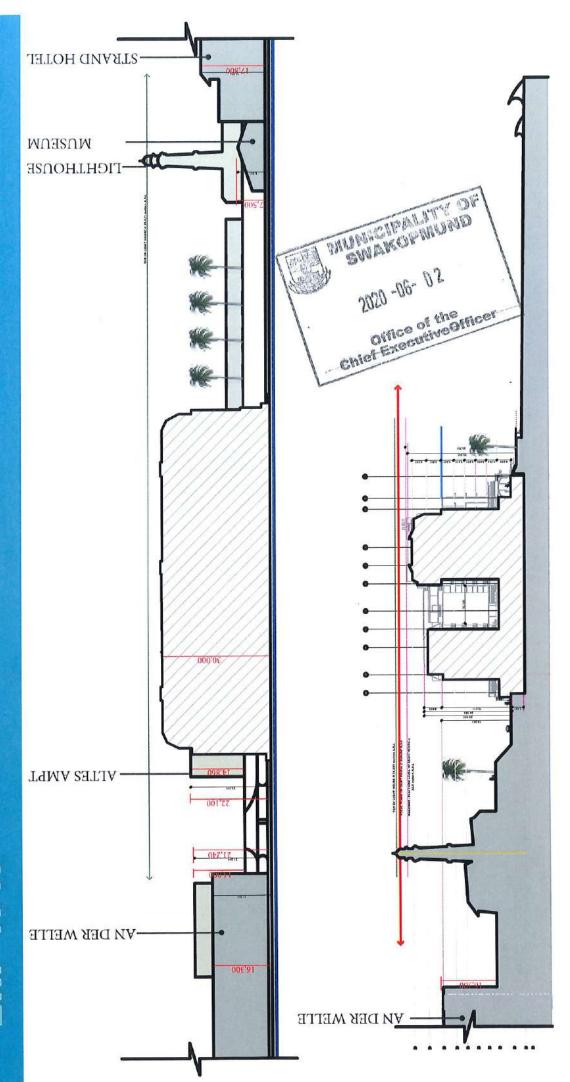
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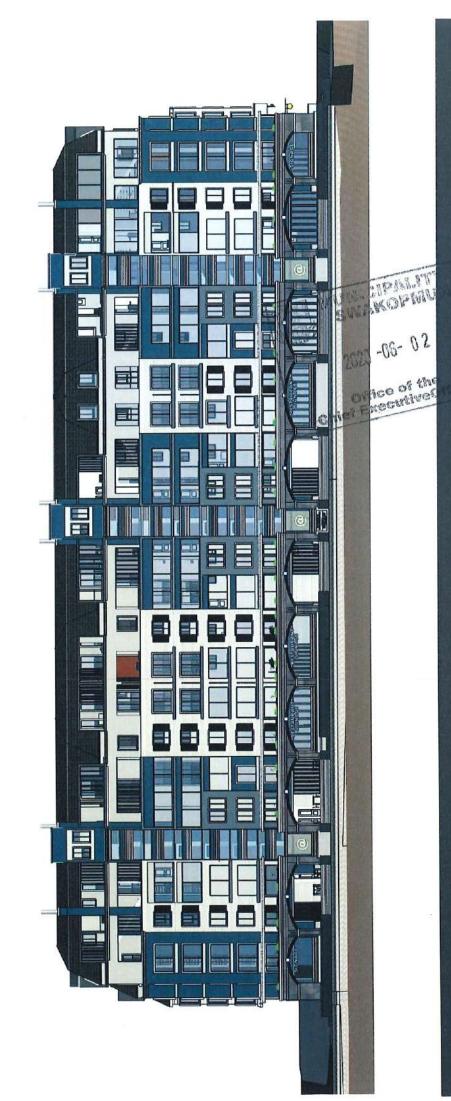
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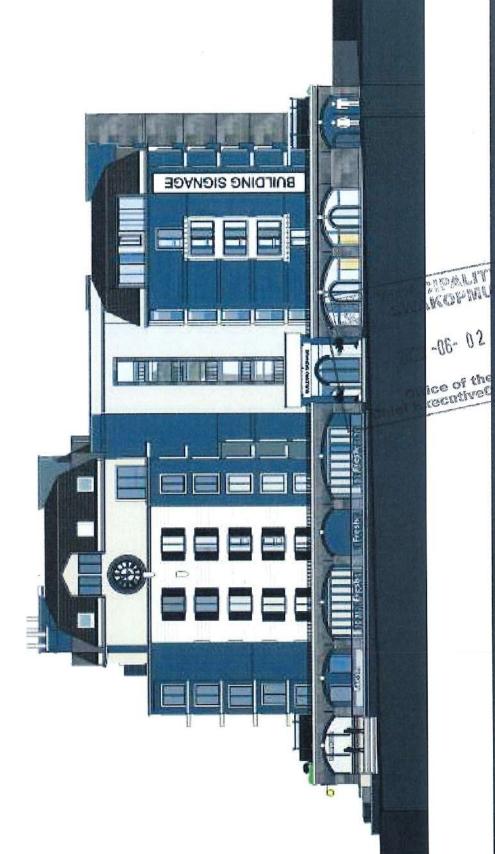
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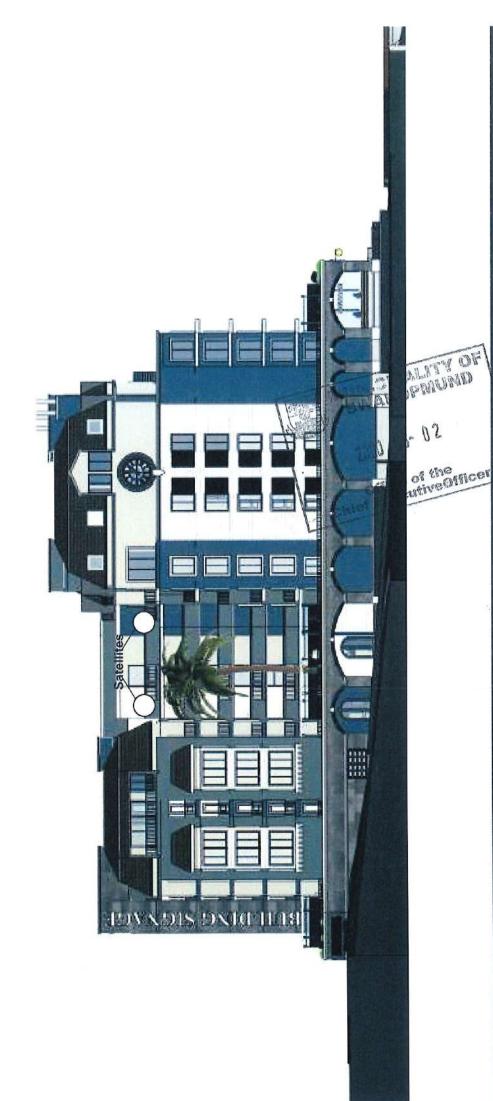
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# ERF 4747

# 3D PERSPECTIVE SOUTH WESTERN







## ERF 4747

# 3D PERSPECTIVE SOUTH EASTERN







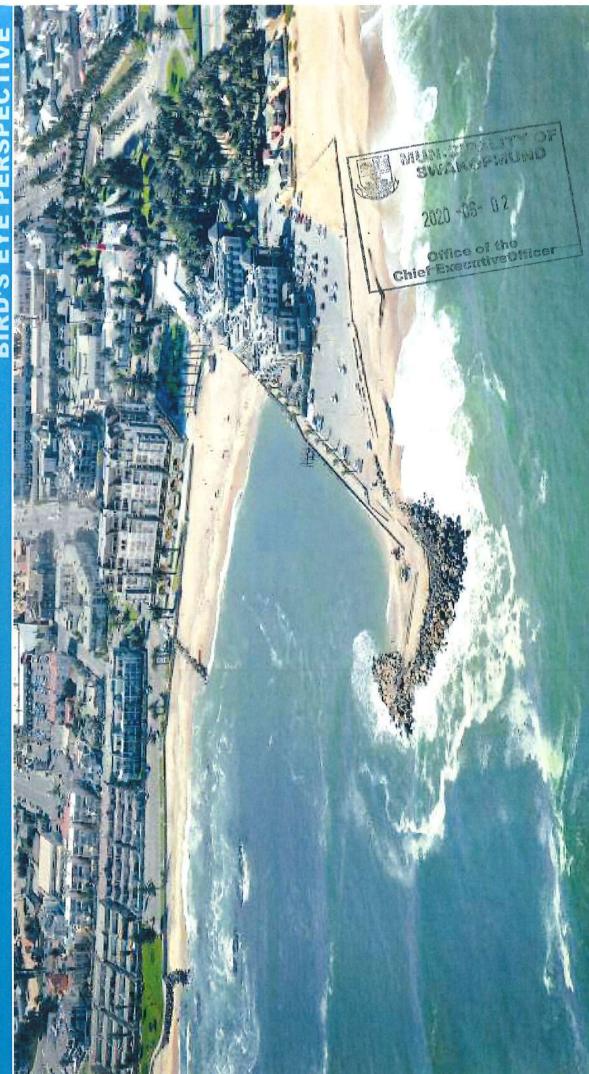
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# 3D PERSPECTIVE WESTERN

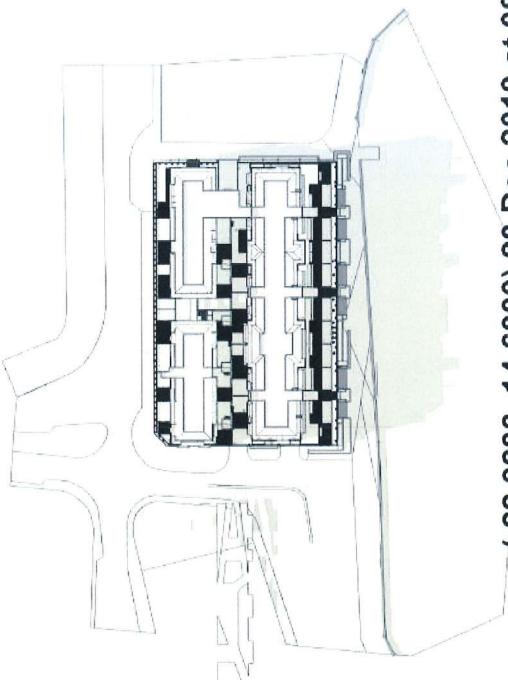












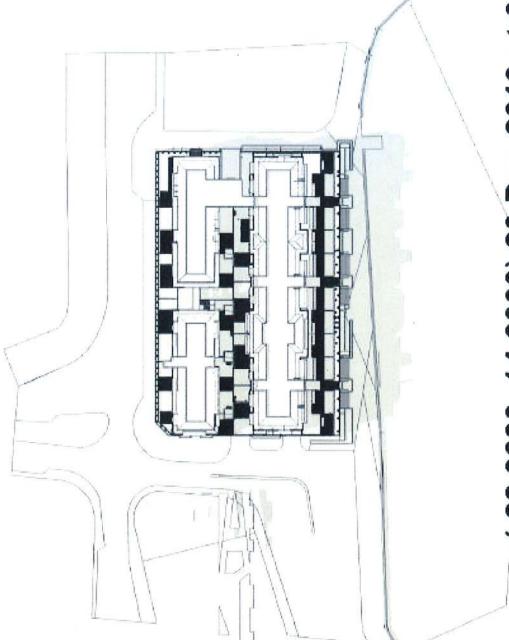
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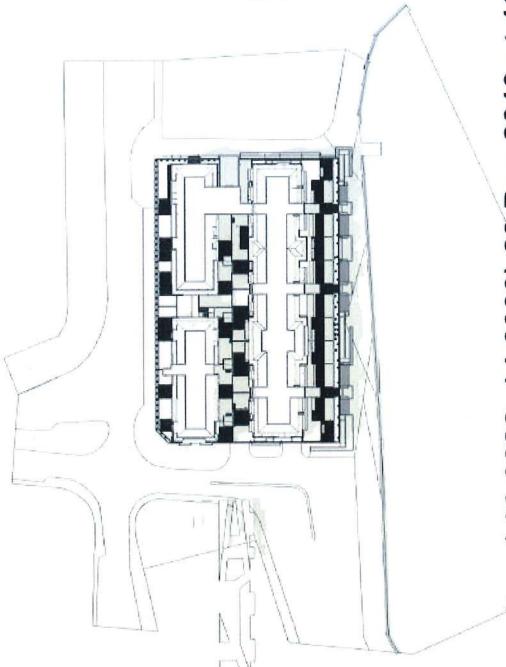
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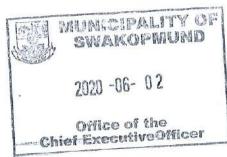


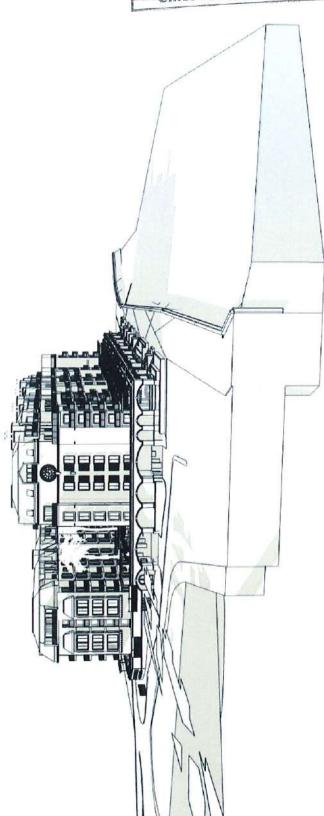


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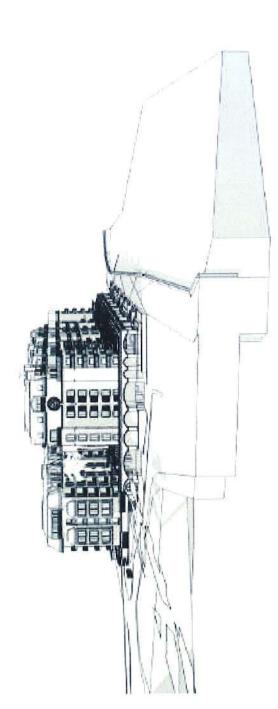
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PROPOSED DESIGN ERF 4747 SWK

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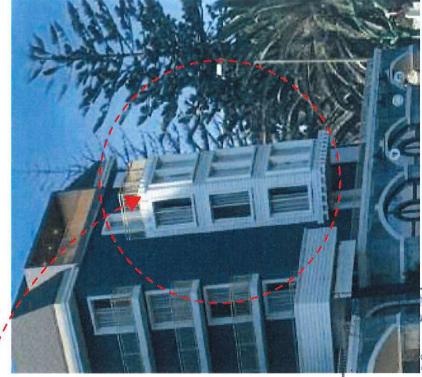
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### SWAKOPMUND PRECEDENTS

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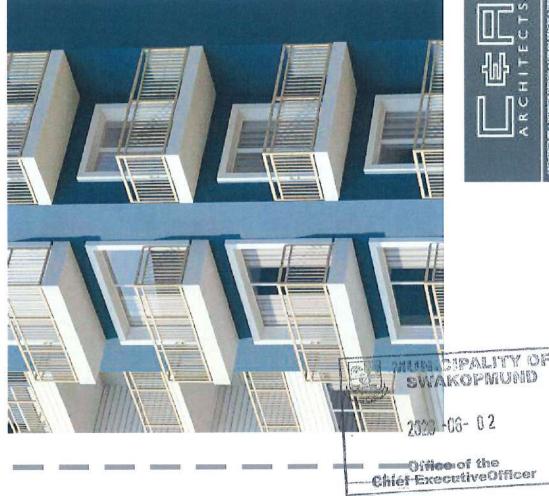
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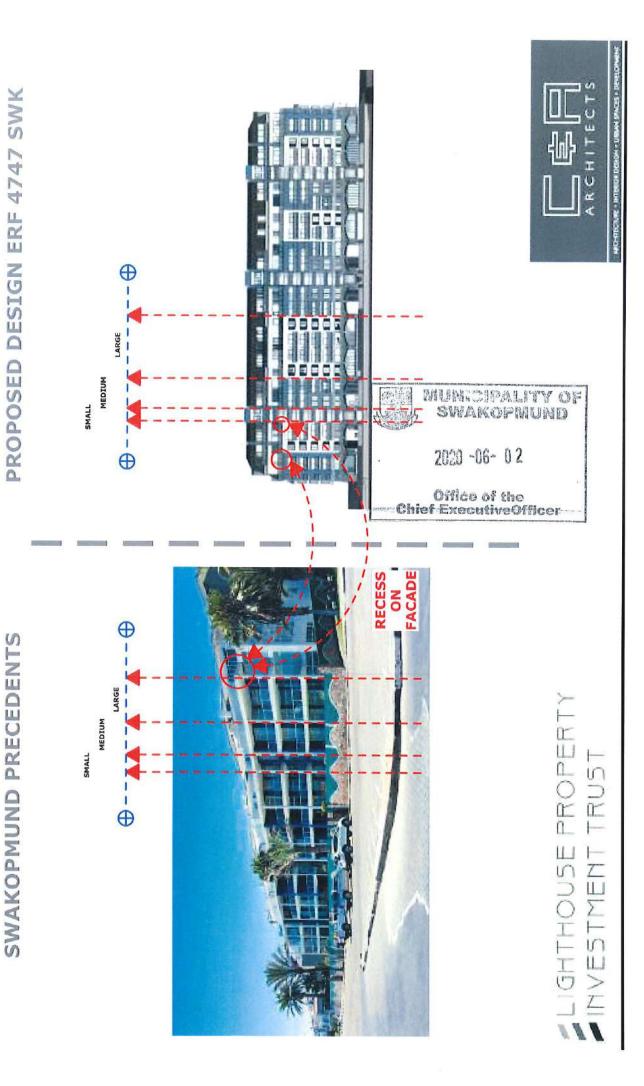
# PROPOSED DESIGN ERF 4747 SWK

SWAKOPMUND PRECEDENTS





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## THE HERITAGE AREA

### SWAKOPMUND PRECEDENTS











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ANNEXURE B. PLATGROUND

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5. Theo Ben Gurirab Str 6. Existing Promenade

3. Existing Parking

4. An der Welle

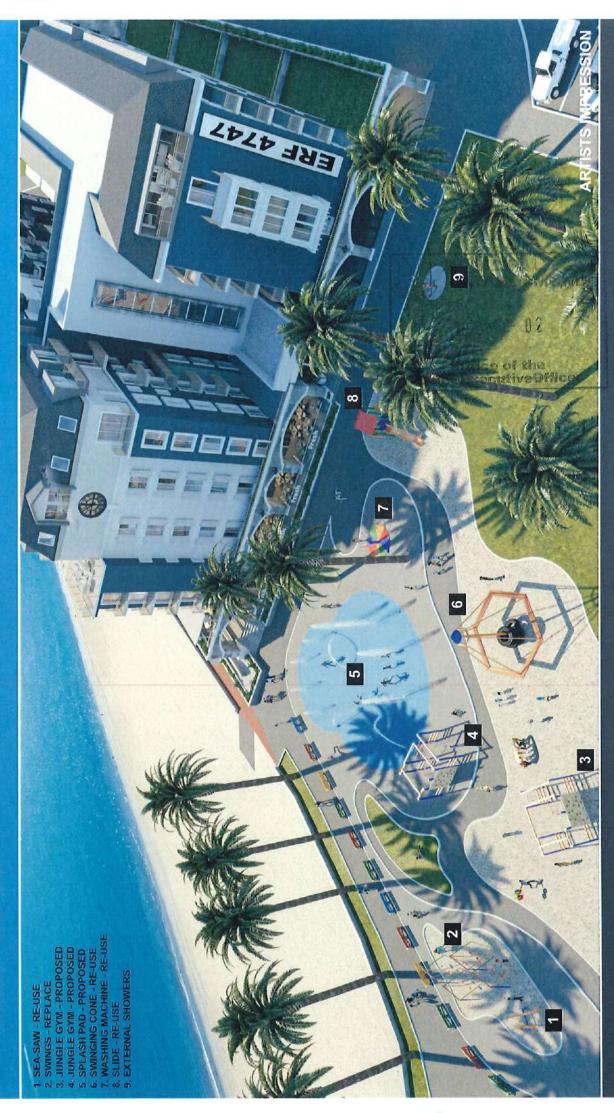
1. Atlantic Ocean

2. Beach

7. Play Park 8. Parking Entrance 9. Parking Entrance

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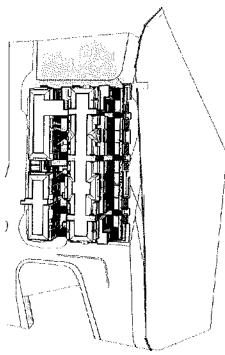
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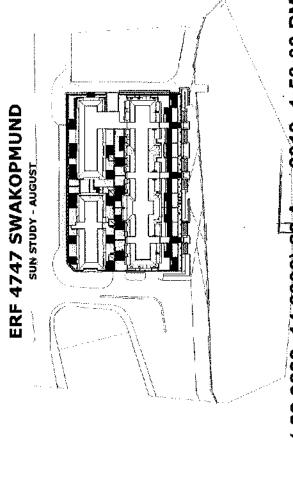
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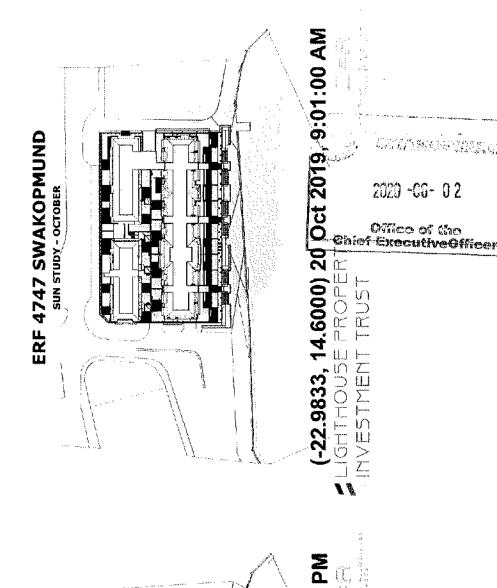
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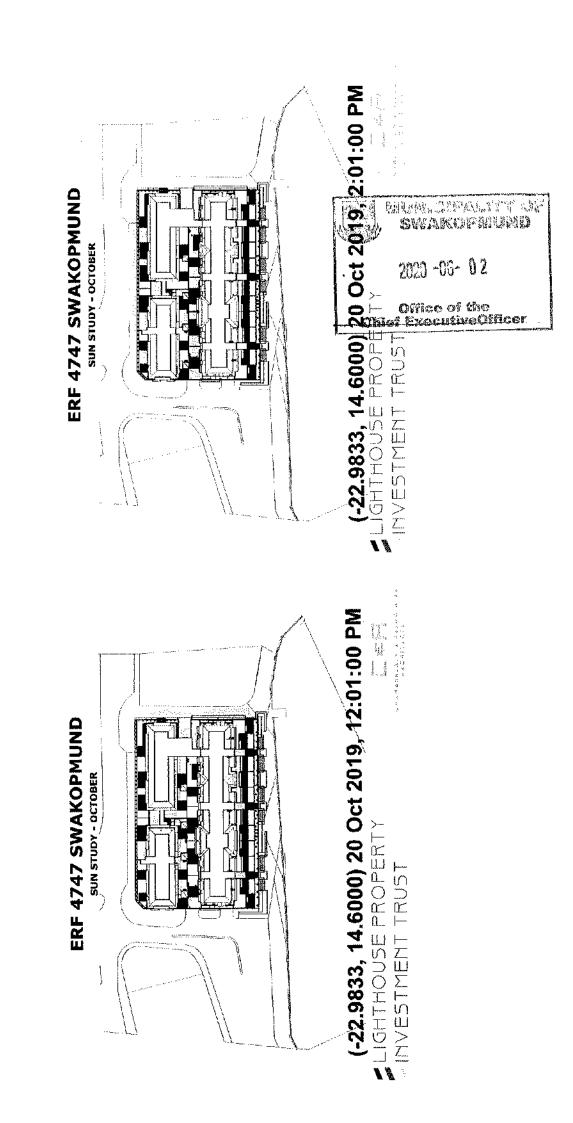
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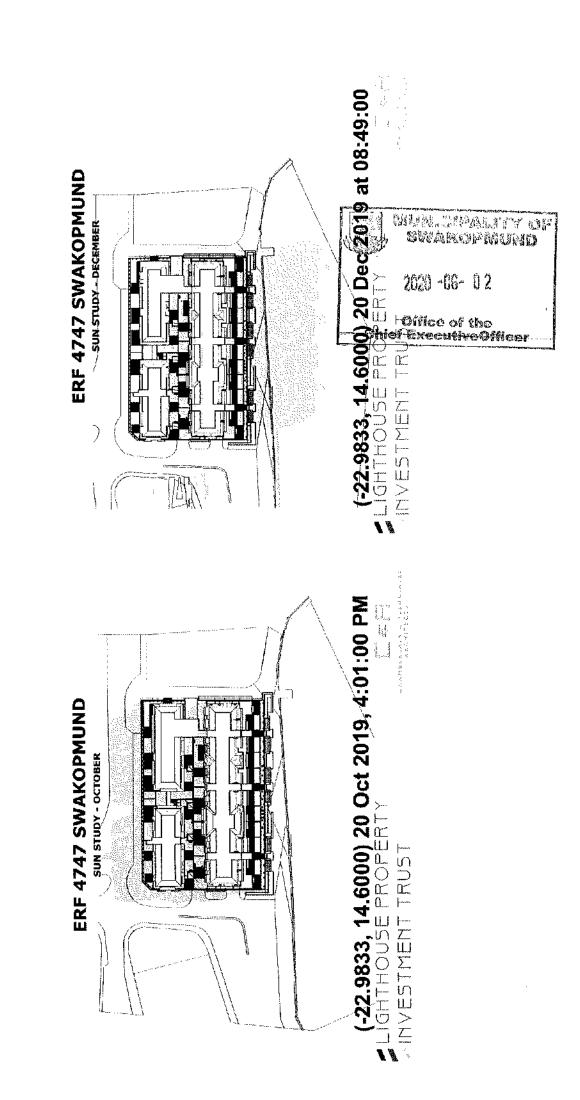
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### 19 APPENDIX I – HERITAGE OPINION ON ERF 4747

JANUARY 2021 PAGE 98 OF 104

### **Heritage Opinion**

### Erf 4747, Swakopmund: Tourism activities related to the proposed new Residential and Retail Development

### **Proponent:**

**Messrs Lighthouse Property Investment Trust** 



Compiled by: Dr Andreas Vogt (PhD)

For

**EAP** 

**Environmental Compliance Consultancy (ECC)** 



**July 2020** 

### **Swakopmund Heritage Opinion Erf 4747**

### **Background:**

The client has expressed the wish to have Erf 4747 Swakopmund developed into a residential and retail development along the popular beachfront in Swakopmund. Since this prominent site is located within the historical former harbour site of Swakopmund during the German colonial period (1984-1915), the wish has been expressed to subject this project to a heritage review of the site in question.

### Historical background:

### **German period (1892-1915)**

Swakopmund was developed as a harbour town as from 1892 onward, the reason being that (British) Cape colonial authorities were reluctant to have the German colonisers make use of the harbour facilities in Walvis Bay (annexed in 1878).<sup>1</sup>

Initially ships used to anchor at sea right in front of the fledgling harbour town, while cargo offloading and passenger landing was performed by smaller boats. These had to traverse the heavy sea swell and sea breakers at the beach, often resulting in heavy loss of human life and cargo. Crew boys who were experienced in traversing the tricky sea breakers were recruited from Liberia to steer the cargo boats through to the beach.

It was not for long that the wish was expressed that a wave breaker (harbour mole) should be built. This project was tackled in 1900, and completed in 1903. The wave breaker extended 310m seawards, with a rectangular transverse arm facing north at its tip, spanning another 35m or so.<sup>2</sup>

A customs shed was put up just east of the harbour where goods could be inspected by custom officials. This customs shed was completely destroyed in 1914 by British battle ships and stood in a ruinous shape until it was put into new use as museum in 1960, a function it has served ever since.

The lighthouse (11m high) was put even further land-inward on a small promontory in 1903. It was extended to its current height in 1910 (35.5m).<sup>3</sup>

The dwelling of the harbour master/port captain was situated just north of the harbour area. This building (also known as "Vierkantvilla") was translocated to mile 4 when this area was developed into up-market condominiums in more recent times.<sup>4</sup>

The three remaining structures (mole, customs shed and lighthouse) are the only visible and historical remainders of the former Swakopmund harbour at the mole basin.

Soon after the completion of the harbour mole the harbour basin silted up with drift sand from the Swakop River and to a large degree lost its functional value. In future the former mole

harbour basin it was mainly used for recreational purposes due to its protected and safe swimming area and sandy beach. The actual harbour area shifted to the beach between the jetty and the mole

About 1905 bathing facilities ("Wannen-Badeanstalt"/"Badehaus") with bathtubs and heated water were put up at exactly the location where Erf 4747 is today. They provided a public service for recreational, but also hygienic purposes. It should not be forgotten that at that stage the water supply for Swakopmund was rudimentary, and few houses would have had private baths and toilets, thus warranting a public bathing facility.

Since the waver-breaker/mole project had been a flop, a new initiative to extend the port facilities of Swakopmund was therefore undertaken from 1904 onward, resulting in the construction of a wooden pier, located a few metres to the north of the iron jetty. This wooden pier was ultimately 300m long, extending into the sea. It made the landing of goods and passengers much easier, as it carried three steam-driven cranes and rail tracks which eased the transport of the landed goods and even passengers who were hoisted on land by crane.

Unfortunately, a bore-worm gnawed away the structural support of the wooden jetty, so it was decided to construct an iron jetty, the building of which commenced in 1911. It was projected to be 640m long. Unfortunately, the outbreak of the First World War halted the construction works and it was only built to about 200 m or roughly one third of its originally planned size.

### **Mandate period (1920-1948)**

After the First World War Swakopmund lost its harbour function to Walvis Bay which is situated 30km south of Swakopmund. Walvis Bay's harbour facilities were extended, a cold storage facility for the export of beef to outside markets was added, and new high-rise cranes made offloading of goods much easier. Swakopmund was connected to Walvis Bay through a railway line which ran along the beach. The Swakop River was traversed by a railway bridge in 1927, which was washed away in 1931. Its pylons can still be seen in the Swakop River mouth just south of Swakopmund.<sup>6</sup> A new railway bridge was put up 6km up east of the Swakop River mouth in 1934.<sup>7</sup>

After 1920 the former harbour area in Swakopmund was solely used for recreational purposes. A Strand Café, public changing cabins and a beach supervisor's office were put up along the beach. Swakopmund was hailed as "the number one seaside resort of former SWA."

### South African period (1948-1990)

The loss of its harbour function after the First World War extended a heavy blow to the economic situation of Swakopmund. In future, its economic survival hinged on two functions: education (because of the more pleasant weather, which makes learning easier) and recreation (especially for guests from the inland who would visit the pleasant town during summer vacations in the hot December-January months).

In order to promote the inland tourism, Swakopmund engaged on a number of promotional activities such as, to name only a few:

- the erection of the old bungalows as from 1952,
- the establishment of the Swakopmund museum, housing the collections of Dr. Alfons Weber (opened in 1960),
- the annual equestrian championships (Reitturnier),
- the new A-frame bungalows from 1972,
- the music week (Musikwoche),
- a recreational hall (Haus der Jugend) in 1972,
- the new heated Olympic-sized indoor swimming pool in 1971, which was put up on the site of the former Badehaus. This swimming bath in turn was demolished a few years ago to make room for the new development that is under discussion in this heritage opinion.

Important infrastructural improvements at this time were:

- the completion of the tarred road from Windhoek to Swakopmund roundabout 1968, and
- the construction of the road traffic bridge over the Swakop River mouth, the building of which was started in 1967.8

Roundabout 1960 the old Strand Café made room for the older Strand Hotel, which was again replaced in recent times by the new Strand Hotel, run by O & L.

Swakopmund experienced another economic upswing when the Rössing Mine near Arandis was opened in 1976. It also gradually started to open to international tourism.

### Independence and beyond (1990 and thereafter)

The period after Independence saw a further upswing of Swakopmund as a tourist destination, which by now had been firmly established for both the inland and international tourism sectors alike.

The former mole harbour area saw new development in the form of upmarket condominiums (Am Meer etc.), new restaurants (Rafters), the brand new Strand Motel (after 2010), the demolition of the old heated swimming pool recently, etc.

Also, new uranium mines like Langer Heinrich, Valencia and Husab added to the economic upswing after Independence. Even outside the borders of Swakopmund, enormous developments have taken place since Independence (Mile 4, Langstrand, Hage Heights, DRC), to name only a few.

It seems that roughly since Independence the former mole harbour area moved increasingly into the parallel direction of both an upmarket dwelling and upmarket tourism function, with prestigious condominiums like Am Meer on the one hand, and upmarket hotels like the new Strand Hotel and the new residential and retail development on Erf 4747 on the other hand. This is not surprising given its historical focal point of Swakopmund's earliest harbour function, and

its long-standing usage for holiday makers and beach-visitors. It is for this reason that it will continue to be a major attractor of visitors to this coastal town in future.

### The heritage value of Erf 4747

The question now arises as to what the heritage value of Erf 4747 would be?

The answer is relatively simple: It has very little or no heritage value, because of the following facts:

- During the short-lived period when the mole basin was the focal point of the Swakopmund harbour (1892-1904), there were no recorded buildings on this site.
- Also, nothing noteworthy (e.g. stranding of a ship or discovery of a historic ship wreck) was ever recorded here.
- The only historical building on this site was the former Badehaus, which had little historical value. It was put up in 1905 after the mole basin had lost its harbour function as the basin had silted up (1903-4). It was a simple timber-frame building; had a mundane function (hot-water bathing facilities; in its tower there was most probably a water tank and a water heating geyser utility). Apart from appearing on a few historical photographs of this area, its existence has been almost forgotten. When it made room for the new heated Olympic-sized swimming pool before 1971, few mourned its demolition. It was also never included in a heritage register. (The Swakopmund heritage register of the NIA by Klaus Brandt and Edda Schoeddder was only compiled in 1986.)
- To the town of Swakopmund, the former Badehaus had a simple practical function like a garage or a changing restroom with ablutions typical for a seaside resort. There was no highly or even remote symbolic or significant historical association, nor did anything significant happen there which would make it a prominent heritage site.
- Even when the Badehaus made room for the new heated Olympic-sized swimming pool, it did not trigger an engaged heritage conservation controversy or anything similar (such as for instance in the case of the Woermannhaus which in 1971-2 was to be demolished to make room for a school hostel, but after public protest retained and turned into a public library and art gallery). The public and the authorities probably all agreed that the new swimming bath (also controversial in the beginning) ultimately added significantly more value to Swakopmund as a tourist destination.
- Even the successor of the Badehaus, the Olympic-sized swimming pool went without much fuss when it was demolished a couple of years ago. It also was a functional building (bathing facility) with no historical or symbolical relevance. In this it followed along the functional recreational lines of the former Badehaus, but also carried very little or no heritage significance.

Another question that could be posed is as to the wider heritage context of Erf 4747.

There are a few historical buildings defining the heritage context of the mole basin:<sup>9</sup>

The narrower context is supplied by the following:

- The lighthouse (1903/10)
- The mole (1900-3)
- Former customs shed (today Swakopmund Museum)
- Former Vierkantvilla (translocateded app. 2000)

As these were functional building structures with very little architectural finesse, they only influence their surroundings marginally. Their bearing on the design of a new residential and retail development would be near to zero.

The wider context comprises:

- The Bezirksamt (Presidential Palace) (1901)<sup>10</sup>
- Altes Amtsgericht (1905)<sup>11</sup>
- Kabelmesse (1899)<sup>12</sup>

Although all of them (listed above) constitute fine examples of German colonial architecture, their existence would also have near zero influence on the new residential and retail development, since there is no direct visual contact between these buildings and the new development.

Although, as has been shown above, the heritage value of Erf 4747 is relatively low, there is one aspect that should be considered, namely the height of the development to be established. <sup>13</sup>

To this, the following considerations are forwarded:

The former mole basin is probably Swakopmund's most popular and prominent recreational area, with sheltered open sea swimming opportunities, sandy beaches and numerous tourist attractions (restaurants, museum, craft markets etc.) nearby. It is basically this recreational function, and not its arstwhile and short-lived harbour function, which defines this part of the town historically, and to which most people – visitors and locals alike – have the strongest attachment.

Also, residents and authorities of Swakopmund have always ensured to maintain a low skyline of the town. A few prominent and rightly justifiable exceptions (Woermannhaus, Lighthouse) accentuated the low skyline in a delicate and conscientious manner. This added to the charm of a seaside resort that was meant to be recreational, and not sensational with high billboard, flashy lightshows, avant-garde high-rises, etc.

The design of the new residential and retail development should take this into consideration. It should add to the recreational value of the entire former mole basin, and latch onto it in this function rather than being a pompous and prestigious development at all costs. If therefore the height of the new development would critically infringe on the aesthetic or recreational appeal of the mole basin of such, it should be carefully revised. This, however, is an aesthetic and design issue in conjunction with the town development guidelines and height restrictions, and NOT, strictly speaking, a heritage issue. The guiding hand of a skilled architect is needed more in this than the retentive hand of the conservationist.

In short, the new development should add to the charm of the former mole basin rather than encourage both visitors and residents to the beach or as guests of the new development to stay away from there because it is so ugly.

This warning should not be taken lightly. Many fine beaches for instance in Spain and along the Mediterranean coast have been spoilt by high-rises on the beaches, leading to the neglect and decay of the houses right behind them because their sea view has been cut off. In addition, and this is specific to Swakopmund, the afternoon shadows on the building behind the new development (should it be too high) will be severely felt. As a rule the mist hovers from the morning and clears up in daytime. For those living on the eastside of the new development to be subjected to the shadows of the new development for the larger part of the afternoon, would constitute some serious detriment to their quality of living, ultimately resulting in a reduction of the property values there. This is to be understood as a thought only and not be read as a heritage issue. <sup>14</sup>

The picture complement on the following pages will point out the conservative skyline of Swakopmund very convincingly. 15

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About the author of this heritage opinion:

Andreas Vogt, born on 26.7.1962 in Windhoek/Namibia, unmarried, attended primary and high schools in Windhoek/Namibia. Conscription 1981-2, studied humanities thereafter (law, languages, political sciences, political philosophy and philosophy) at Stellenbosch University/South Africa during 1983-88, obtaining *B.A.* and *Hons.-B.A.*-degrees.

Employed between 1989-2001 at the then National Monuments Council of Namibia in Windhoek/Namibia (today National Heritage Council). Attended a post-graduate study course in heritage conservation at the Otto-Friedrich-University Bamberg/Germany with a bursary of the German Academic Exchange Service (*Deutscher Akademischer Austauschdienst* - DAAD) in 1993-4. Obtained *M.A-degree* in the subject of cultural history from Stellenbosch University/South-Africa in 1995. Doctorate (Dr.phil) 1997-2000 at the Otto-Friedrich-University Bamberg/Germany, again as bursary holder of the German Academic Exchange Service (*Deutscher Akademischer Austauschdienst* - DAAD).

Dr Vogt had been engaged in numerous heritage conservation projects in Namibia during his employment period at the National Monuments Council. He has authored several books, as well as numerous publications and articles in popular magazines and scientific journals pertaining to Namibian and African cultural history, heritage conservation, national monuments and topics related to tourism in Namibia. He currently lives in Windhoek as freelance journalist and writer.



This picture of Swakopmund in 1930 clearly shows the mole harbour basin with the Badehaus featuring prominently in the foreground, the Vierkantvilla to the left, the lighthouse, the customs shed, the old Strand Café and the old harbour mole in the immediate foreground.



This more recent picture of Swakopmund prior to the building of the new Strand Hotel shows the exact same mole harbour basin with the Olympic-sized swimming pool featuring on Erf 4747, the condominium development in the foreground left, with the lighthouse, the old customs shed Swakopmund Museum, and the old harbour mole in the immediate foreground.



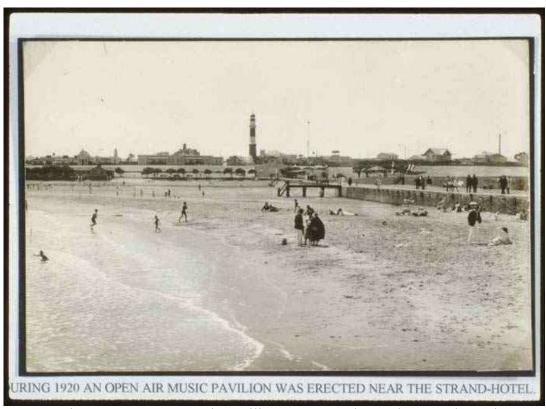
Construction of the harbour mole in 1903



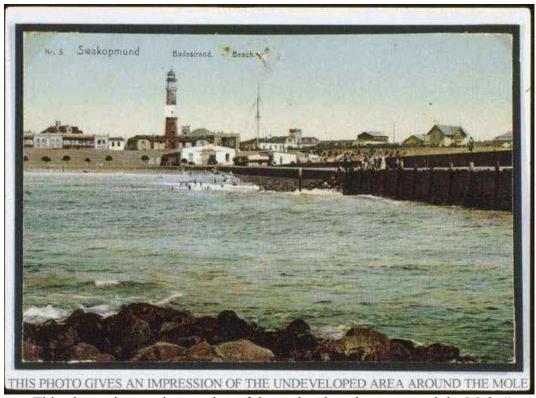
The old lighthouse before it was raised to its current height



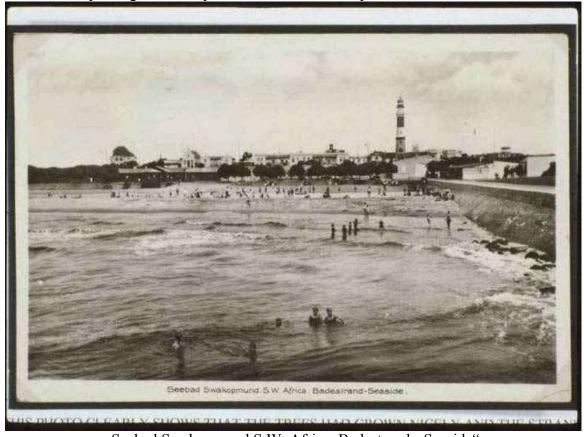
The old customs shed ("Kaiserliches Hauptzollamt") between the mole and the lighthouse after its destruction by British shell fire during World War I. It was developed into the Swakopmund Museum in 1960.



"During 1920 an open music pavilion was erected near the Strand Hotel."



"This photo gives an impression of the undeveloped area around the Mole."



"Seebad Swakopmund S.W. Africa. Badestrand - Seaside"



The Swakopmund and old Bezirksgericht (later used as summer residence of the administrators, now presidential palace).



The beach along the former harbour mole basin, with the Vierkantvilla, Badehaus and the Swakopmund railway station on the background right (app. 1930).



Holiday makers in the old harbour mole basin, with the Swakopmund railway station at the back (left), the Altes Amtsgericht, the changing cabins and the beach supervisor's office, the lighthouse and the old Strand Café (app. 1930).



The old Strand Café (app. 1930)



Inside the old Strand Café (app. 1930)



Inside the old Strand Café (app. 1930)



The old harbour mole (app. 1930)



The old harbour mole basin (app. 1930)



Swakopmund viewed from southeast, probably in the 1920's. The Badehaus is clearly visible; the custom goods shed is still in a ruinous shape. The Altes Amtsgericht, Bezirksamt and lighthouse are all clearly visible.



The mole harbour basin, probably in the 1930's; this time heavily silted up (perhaps after the floods in 1934). The Badehaus is again clearly visible.



Artist's impression of the old Badehaus, probably in the 1960's



The old Vierkantvilla (app. 1998) shortly before its translocation to Mile 4



The old wooden jetty with its three steam cranes



The old wooden jetty with its three steam cranes and railway tracks



The new steel jetty, built as from 1913, abandoned in 1915 after the war.



The rusted steel jetty (app. 1960), used by fishermen and people who took a walk there.



The head of steel the jetty app. 1998



The steel jetty after restoration in 1998



Swakopmund Lighthouse, Bezirksgericht, Intercontinental and Marines Monuments, app. 1970



The harbour mole basin and the old Strand Hotel (app. 1959)



The old Strand Hotel (app. 1959)



The new Magistrate's Offices (app. 1960)



The new police offices and post office (app. 1960)



View of the harbour mole area (app. 1958). The customs shed is still ruinous; the palm trees are still relatively small.



The entrance of the Swakopmud Museum, located in the old customs shed for the German colonial period, with the lighthouse in the background (1998)

#### Notes

1

<sup>&</sup>lt;sup>1</sup> Regarding the founding of the town of Swakopmund see François, C.v.: Deutsch-Südwestafrika. Geschichte der Kolonisation bis zum Ausbruch des Krieges mit Witbooi. Berlin 1899. Nachdruck Haller, Swakopmund 1993, and Rautenburg, H.: Das alte Swakopmund 1892–1919. Swakopmund, 1967.

<sup>&</sup>lt;sup>2</sup> Stengel, H.W.: Der Bau der Mole in Swakopmund. Die Muschel, 1967, p. 52-63. See also Marais, C.: Swakopmund Our heritage - Ons erfenis - Unser Erbe. Gamsberg Macmillan, 1996, p. 9.

<sup>&</sup>lt;sup>3</sup> Marais, C.: Swakopmund Our heritage, p. 9.

<sup>&</sup>lt;sup>4</sup> This bilding is identified as "Beamtenwohnung" in Marais, C.: Swakopmund Our heritage - Ons erfenis - Unser Erbe. Gamsberg Macmillan, 1996, p. 71.

<sup>&</sup>lt;sup>5</sup> Rautenburg, p. 177.

<sup>&</sup>lt;sup>6</sup> Stengel, H.W. Die Brücken Swakopmunds. In: Namib und Meer, Band 1, p. 69-81.

<sup>&</sup>lt;sup>7</sup> Stengel, H.W. Die Brücken Swakopmunds, p. 69-81.

<sup>&</sup>lt;sup>8</sup> Stengel, H.W. Die Brücken Swakopmunds, p. 69-81.

<sup>&</sup>lt;sup>9</sup> For these buildings see Marais, Chr.: Swakopmund Our heritage - Ons erfenis - Unser Erbe. Gamsberg Macmillan, 1996.

<sup>&</sup>lt;sup>10</sup> Marais, p. 7

<sup>&</sup>lt;sup>11</sup> Marais, p. 13

<sup>&</sup>lt;sup>12</sup> Marais, p. 67

<sup>&</sup>lt;sup>13</sup> The aesthetical approval from the new development was obtained from the municipality in June of this year, based on the acceptable height, design and color scheme of the new development approved by council. A sun study was also conducted from February last year to December last year which showed no residential building east of the development would be shadowed by the new development. This study was also approved by council in tandem with the aesthetical approval granted. (ECC)

<sup>&</sup>lt;sup>14</sup> A sun study was also conducted from February last year to December last year which showed no residential building east and southeast of the development would be shadowed by the new development based on the suns orbit from east to west over the town. This study was also approved by council in tandem with the aesthetical approval granted. (ECC)

granted. (ECC)

15 The contents and pictures of this heritage assessment are copyrighted and may not be used outside the scope of the agreement between the author and ECC without prior consent.

# Curriculum Vitae: Dr. Andreas Vogt

1. Born: Windhoek, Namibia, on 26 July 1962

2. **Primary Schools:** Orban Primary School, Windhoek

German Medium (DSW), Windhoek

3. Secondary School: Jan Möhr High School, Windhoek

Senior Certificate 1980

4. Compulsory Military Service/Conscription (1981-2)

Commissioned as 2<sup>nd</sup> Lieutenant in December 1981 Promoted to rank of 1<sup>st</sup> Lieutenant in December 1983

# 5. Tertiary Education:

- (a) Bachelor of Arts (BA) (University of Stellenbosch) 1983-7. Majors; Philosophy, Political Philosophy, Political Sciences, German.
- (b) *Honours- Bachelor of Arts* (Hons.BA) (University of Stellenbosch) 1988. Majors; Philosophy, Political Philosophy
- (c) Post-Degree Course in Heritage Conservation 1993-4 Otto. Friedrich University Bamberg, Germany Sponsored by **DAAD** (German Academic Exchange Service) Bursary
- (d) Master of Arts (MA) (University of Stellenbosch) 1995 Subject: Afrikaans Cultural Heritage Topic: "National Monuments in Namibia"
- (e) *PhD in Heritage Conservation* (Bamberg University) 1996-2002

Topic: "Military Fortifications of the German Schutztruppe in GSWA (Namibia) 1884-1915"

Sponsored by DAAD (German Academic Exchange

Service) Bursary. Duration of stay in FRG

October 1996-September 1997 January 1999-October 1999 March 2000-December 2000 Final Exam: 29 November 2000 Publication of Thesis: April 2002

- (f) Passed Estate Agents Examination on the *Legal Principles* of Estate Agency and Immovable Property on 19 November 1992
- (g) Passed Translation Examination and was sworn in as **Sworn Translator at the High Court of Namibia** on 23 April 2001.

# 6. Employment Career:

Brief interlude as journalist at *Allgemeine Zeitung* (German Daily), Windhoek, in 1982-3,

Departmental Assistant and part-time lecturer at the Department of Philosophy, University of Stellenbosch (1988);

Assistant Cultural Officer: Department of National Education, later Ministry of Basic Education and Culture, seconded to the National Monuments Council of Namibia as from 15 March 1989;

Promoted to the rank of Cultural Officer on 15 March 1990; Active as Secretary of the National Monuments Council since its inception in 1990;

- Responsible for finances of Council from 1990-1993: Audited reports 1991/92/93, as well as numerous other administrative tasks;
- Responsible for a number of successful building heritage restoration projects, including
  - Old Mission House, Omaruru
  - Old German School, Klein Windhoek
  - Twyfelfontein Information Shelter
  - Old Mission Church, Okahandja
  - Joseph Frederick's House, Bethanie
  - Hoba Kiosk, Hoba Meteorite, Grootfontein
  - Old German Fort (Museum), Grootfontein
  - Two-Tower Mission Church, Bethanie
- A number of proclamations as national monuments were effected in this time, e.g.
  - Herero Leader's Cemetery, Okahandja
  - Mission House, Mission Church and Cemetery, Olukonda
  - St. Barbara Church, Tsumeb
  - Old School Building (Museum), Tsumeb
  - 2<sup>nd</sup> Director's House, Tsumeb
  - OMEG Mining Office, Tsumeb
  - Old Location Cemetery, Windhoek, etc.
- Resigned from Ministry of Basic Education, Sport and Culture, and from the National Monuments Council of Namibia, on 30 August 2002;
- Took up employment at South African Tourism in Frankfurt (Germany) from 01 October 2001 –28 April 2002 as researcher and translator;
- Currently working as heritage consultant, freelancer writer, journalist in Windhoek, Namibia

#### 7. Other involvements:

Lecturer at the *Namibian Academy for Tourism and Hospitality* (NATH) on matters pertaining to Namibian cultural history and national heritage;

Former Member of *Museums Association of Namibia* (MAN); Founding member of *Namibian Collector's Society*; Member of the *Scientific Society of Namibia*  8. Publications: About five hundred publications/books/articles (see attached

list) in various publications like the *Journal of the Scientific Society of Namibia; Namibia Magazin; Flamingo, Namibia Travel Magazine, Travel News* as well as numerous newspaper articles, book reviews etc. on matters pertaining to Namibian

heritage, national monuments, culture, and people.

9. Status: Unmarried

10. Nationality: Namibian

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# List of Publications: Dr. Andreas Vogt

Consists of: Academic Theses, Academic Articles, Books, Magazine Articles, and Newspapers Articles and Columns

#### Academic Theses

# (I) Ein Inventarisierungskonzept für die Denkmalpflege in Namibia

Final thesis for the Post-Degree Course in Heritage Conservation at the Otto-Friedrichs University/Bamberg and the Technical High School Coburg, Germany, unpublished, 1994, 103 pages.

# (II) National Monuments in Namibia

**Master's Thesis** (Afrikaans Cultural History) at the University of Stellenbosch, 1995, 519 pages. (Published in December 2004 by Gamsberg Macmillan Publishers, Windhoek. 252 pages, 1 map, colour, gloss paper, ISBN 99916-0-593-2).

(III) Von Tsaobis bis Namutoni. Die Wehrbauten der Schutztruppe in DSWA (Namibia) 1884-1915. Phil. Diss, Universität Bamberg.
 (Doctoral Dissertation for the Dr. phil.-degree). Published by:
 Klaus Hess Verlag, Windhoek/Göttingen, 2002. 294 pages, illustrated (b&w, maps), ISBN 3-933117-25-9 (Germany); 99916-57-09-6 (Namibia).

#### Academic Articles

## (1) Bismarcks Gesinnungswandel in der Kolonialfrage

Journal der Namibia Wissenschaftlichen Gesellschaft No.46, Windhoek, 23.5.1998, S.1-26.

## (2) Bethanien in the south: A place well worth visiting

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## (3) Restoration of the Rhenish Mission Church in Bethanie

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#### (4) Bronzefigur findet neues Zuhause

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(5) Handelsfestungen an den Küsten Afrikas heute - die Sicht der Denkmalpflege

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(6) Die Bürgermeister von Windhoek ... und die nach ihnen benannten Straßen.

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(7) Denk mal, ein Denkmal

Von der Historischen Denkmalskommission zum National Monuments Council of Namibia

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(8) Rezension: Udo Kaulich: Die Geschichte der ehemaligen Kolonie Deutsch-Südwestafrika (1884-1914). Eine Gesamtdarstellung.

Jahrbuch für Europäische Überseegeschichte 3, 2003, S. 217-219

(9) Rezension: Hansjörg Michael Huber: Koloniale Selbstverwaltung in Deutsch-Südwestafrika. Entstehung, Kodifizierung und Umsetzung (=Rechtshistorische Reihe 213)

Jahrbuch für Europäische Überseegeschichte 3, 2003, S. 223-224.

(10) Die Kongokrise 1960-1965

Journal der Namibia Wissenschaftlichen Gesellschaft, Vol. 51-2003, S.35-62.

(11) Die Heldenstandbilder vor dem Parlamentsgebäude (Tintenpalast) in Windhoek

Mitteilungen Namibia Wissenschaftliche Gesellschaft Vol 45:4-6 April-Juni 2004, S. 5-16.

(12) "Ein Jahrhundert Südwest" - Zur Geschichte eines historischen Gebäudes in der Innenstadt Swakopmunds

Journal der Namibia Wissenschaftlichen Gesellschaft, Vol. 52-2004, S.93-115.

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(14) An officer, a scholar and a gentleman. Notes on the military career of Judge Clemens Gutsche (1876-1947)

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# (15) Rezension: Henning Melber (Hg.): Namibia. Grenzen nachkolonialer Emanzipation Frankfurt/M. 2003 Brandes & Apsel.

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# (18) Rezension: Ernst Rudolf Scherz: Südwestafrika Jahresberichte 1962-1979 Namibia. (2004); Ernst Rudolf Scherz: Südwester Geschichten am Lagerfeuer erzählt (2005); Ellen Ndeshi Namhila: Kaxumba kaNdola – Man and Myth – The Biography of a Barefoot Soldier (2005)

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## (20) Namibia. The forbidden Zone

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#### (22) Auf den Spuren eines legendären Pioniers – David Radford (1834-1913)

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## (23) Hundert Jahre Reiterdenkmal

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#### Books

- (I) Von Tsaobis bis Namutoni. *Die Wehrbauten der Schutztruppe in DSWA* (*Namibia*) 1884-1915. Phil. Diss, Universität Bamberg.

  Klaus Hess Verlag, Windhoek/Göttingen, 2002. 294 pages, illustrated (b&w, maps), ISBN 3-933117-25-9 (Germany); 99916-57-09-6 (Namibia).
  - (II) Namibia en Route ... im Zentrum, Osten und den Küstenregionen inklusive Windhoek und der Skeleton Coast (Translation A. Vogt)

Projects & Promotions (Herausgeber), Windhoek, Juni 2003, 64 Seiten.

(III) Namibia en Route ... in den zentralen Norden und die nordwestlichen Regionen, inklusive Etoscha, Waterberg und Kunene (Translation A. Vogt)

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Projects & Promotions (Publishers), Windhoek, June 2003, 64 pages.

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- (VI) Einführung in den südlichen Sternenhimmel (Translation A. Vogt) von Franz Conradie, ins Deutsche übersetzt von Andreas Vogt, Verlag Namibia Wissenschaftliche Gesellschaft, Windhoek 2004. 120 pages, (b & w) ISBN 99916-40-50-9 (Namibia); 3-933117-80-1.
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- (X) A closer look at Namibia. *A pictorial companion to a special country*Published by the author, Windhoek, 2007. 134 pages, illustrated, colour, 30x30cm. Soft cover, ISBN 978-99916-68-83-3.
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- (XIII) Reihe Südwester Texte I: Deimling, B.v.: Südwestafrika. Land und Leute Unsere Kämpfe Wert der Kolonie. Vortrag, gehalten in einer Anzahl deutscher Städte von Oberst von Deimling, Abteilungschef im Großen Generalstab, früher Kommandeur des 2. Feldregiments in der Schutztruppe für Südwestafrika. Herausgegeben von Andreas Vogt, Windhoek, Namibia, 2012. Soft cover, ISBN: 978-99945-73-49-3 (Namibia). 86 Seiten, schwarz-weiß, 32 Abbildungen, 1 Karte.
- (XIV) Reihe Südwester Texte II: Conradt, L.: Deutsch-Südwestafrikanische Seufzer. Humoristisch-satyrische Gedichte eines einsamen Farmers. 2. vermehrte Auflage. Verlag der Swakopmunder Buchhandlung G.m.bH., Swakopmund 1907. Herausgegeben von Andreas Vogt, Windhoek, Namibia, 2012. Soft cover, ISBN:978-99945-73-54-7 (Namibia). 76 Seiten, schwarzweiß, 1 Abbildung.
- (XV) Reihe Südwester Texte III: Seitz, Th.: Südafrika im Weltkriege. Der Zusammenbruch in Deutsch-Südwestafrika / Die Politik der Südafrikanischen Union / Weltfriede. Dietrich Reimer (Ernst Vohsen) A.-G. Berlin 1920. Herausgegeben von Andreas Vogt, Windhoek, Namibia, 2012. Soft cover, ISBN: 978-99945-73-75-2 (Namibia). 118 Seiten, schwarz-weiß, 32 Abbildungen.
- (XVI) Reihe Südwester Texte IV: Bredow, W., Dr. H. Lotz & A. Stauch: Die deutschen Diamanten und ihre Gewinnung. Eine Erinnerungsschrift zur Landesausstellung Windhuk 1914. Dietrich Reimer (Ernst Vohsen) Berlin 1914. Herausgegeben von Andreas Vogt, Windhoek, Namibia, 2013. Soft cover,

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- (XVII) Reihe Südwester Texte V: Erbe, H.: Stacheldrahtreime. Windhoek, o.D. Herausgegeben von Andreas Vogt, Windhoek, Namibia, 2013. Soft cover, ISBN: 978-999416-891-0-4 (Namibia). 63 Seiten, schwarz-weiß, 12 Skizzen von J. Voigts.
- (XVIII) Reihe Südwester Texte VI: Hoffmann, H.: Deutsch-Südwestafrika wird Mandatsland. Südwester Geschichte 1914-1925. Im Selbstverlag, Okahandja, 1991. Neu herausgegeben von Andreas Vogt, Windhoek, Namibia, 2014. ISBN: 978-99916-891-3-5 (Namibia). 128 Seiten, schwarz-weiß, 15 Bilder, 1 Karte.
- (XIX) Reihe Südwester Texte VII: Vogt, A.: Ausgewiesen! Die Liste repatriierter Deutscher aus dem ehemaligen Schutzgebiet Deutsch-Südwestafrika des Jahres 1919. Windhoek, Namibia, 2013. ISBN: 978-99916-891-4-2 (Namibia). 295 Seiten, schwarz-weiß.
- (XX) Reihe Südwester Texte XI: Eckardt, P.: Zwei Kriegsjahre beim südwestafrikanischen Train. Deutscher Kolonial-Verlag (G. Meinecke) Berlin o.J.. Neu herausgegeben von Andreas Vogt, Windhoek, Namibia, 2015. ISBN: 978-99916-891-8-0 (Namibia). 155 Seiten, schwarz-weiß, 27 Bilder.
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#### (Additional Contributions are either in print or in preparation)

Dr. Andreas Vogt 09/03/2020



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#### TERMS OF REFERENCE FOR A FULL TRAFFIC IMPACT ASSESSMENT

The below ToR as supplied by Burmeister and Partners on the 16<sup>th</sup> November 2020 below refers:

Lighthouse Properties Development Trust plans to do a tourism development project on Erf 4747, Strand Street, Swakopmund. For this proposed business development, a TIA is required with further details on the traffic circulation around the development.

This Development will further contribute to traffic volumes, which means some road and traffic systems upgrades might be required in the vicinity of the Development.

The focus would be to do a traffic impact assessment for Erf 4747, Strand Street based on the intended use of the new development, to determine what infrastructural and control measures would be required. The subject site is shown on the erf layout below:

### **Approach**

#### Site visit:

The site will be visited just to familiarise ourselves with the current road infrastructure and the current geometry of the adjacent roads and possible accesses as well as any other conditions that need to be taken into consideration. It should be noted that we area already well acquainted with the site having a coastal office in Swakopmund.

#### Data collection:

We will obtain the following data, but not limited to:

- Any planned upgrading or improvements of the adjacent roads;
- Previous traffic counts done at the intersections of Theo Ben Gurirab Avenue and Strand Street, as well as Theo Ben Gurirab Avenue and Tobias Hainyeko Street as well as Strand Street and Sam Nujoma Avenue as well as Strand Street and Ludwig Koch Street;

#### **Traffic counts:**

- Traffic counts will be conducted at the intersections of Theo Ben Gurirab Avenue and Strand Street, Theo Ben Gurirab Avenue and Tobias Hainyeko Street, Strand Street and Sam Nujoma Avenue as well as Strand Street and Ludwig Koch Street;
- The traffic counts will be conducted on a week day over twelve hour period, i.e. 6AM to 6PM. The morning peak, the midday peak and the afternoon peak will be included. All traffic movements will be counted with a distinction between light and heavy vehicles. Traffic volumes will be recorded in 15 minute intervals. The traffic count date should be done on a typical week day;
- The traffic counts should preferably be done during November 2020 or January 2021.

#### Traffic and parking demand



Trip generation for the new development will be made, based on TMH17 Trip Data Manual. Based on the different land uses, the required parking will be determined (confirmed). Important to note that the traffic impact should be based on the increase in traffic, based on the consent use and/or change in land uses. The property is entitled to traffic based on the current permissible uses, however the capacity requirement will be made on the total traffic demand.

#### **Traffic Analysis**

The additional traffic is estimated to impact Strand Street and Theo Ben Gurirab Avenue, Theo Ben Gurirab Avenue and Tobias Hainyeko Street and Strand Street and Sam Nujoma Avenue.

Traffic data will be analysed with Auto J, traffic engineering software used to analyse traffic flow and control options at intersections. The intersections will be analysed to determine the current Level of Service [LoS], as this will be used as basis to compare the impact of newly induced/generated traffic.

With the new trip generation data, the intersections will be analysed. If there is a significant drop in the LoS, geometric and control options will be tested in the Auto-J with the aim to maintain the current LoS.

As part of the analysis, background traffic growth will be included in the analysis. The expected growth rate to be used will be verified with Swakopmund Municipality.

#### **Concept Solutions:**

#### Intersection geometry:

The current intersections will be tested for whether it will meet the demand of the new traffic volumes. If necessary, concept geometric changes/improvements will be proposed.

#### **Traffic control measures:**

Traffic signals at the intersections might be considered as part of the mitigation solution. In our assessment, we will also determine if the traffic control at Theo Ben Gurirab Avenue and Tobias Hainyeko Streets have an optimal traffic light phasing and time setting.



## APPENDIX K – GEOTECHNICAL STUDY

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# **DPSH REPORT**

# New Development on Erf 4747, Swakopmund, Namibia

29 June 2016



**Photograph Courtesy of Lighthouse Property Investment Trust** 

#### **PREPARED BY:**

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#### Report review history:

Revision No	Date	Prepared by:	Reviewed by:			
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0	29.06.2016	ASSES STATE OF THE PARTY OF THE	Buin			

#### **Authors & Reviewers Qualifications and Affiliations:**

**Dennis McDonald** holds a national diploma in Civil Engineering and has been trained as a Civil Engineering technician covering project management, civil and structural design, contracts management, survey, laboratory management, investigations and testing, geotechnical investigations and report writing.

He has 42 years' combined experience, with 22 years managing his own civil SANAS Accredited engineering laboratories and geotechnical consultancy in the Southern Cape and Eastern Cape of South Africa. Dennis McDonald is registered with the Engineering Council of South Africa (ECSA) as a Registered Engineering technician # 2000 400 58, the South African Institute of Civil Engineers (SAICE), the Institute of Municipal Engineers of South Africa (IMESA), SABITA and SAT.

**Burger Fourie** holds an Honors Bachelor of Science (Geology) degree. He is currently undergoing in-service training as a Natural Scientist practicing Engineering Geology. He has 3 years' experience in Engineering Geology. Burger Fourie is registered with the South African Council for Natural Scientific Professions (SACNASP) as a Candidate Natural Scientist, Registration number: 115062.

#### <u>Declaration of Independence:</u>

The authors of this report are independent professional consultants with no vested interest in the project, other than remuneration for work associated with the compilation of this report.

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### **Appendices**

Appendix 1: DPSH Test Results

### 1. Introduction

Omamanya Geotechnical Consultants was appointed by Mr Nik Moroff on behalf of Jimmey Construction to conduct Dynamic Probe Super Heavy (DPSH) tests at Erf 4747, Swakopmund in the Erongo Region Namibia (**Figure 1**). The aim of the investigation was to attempt to establish the rock depth below Natural Ground Level (NGL).

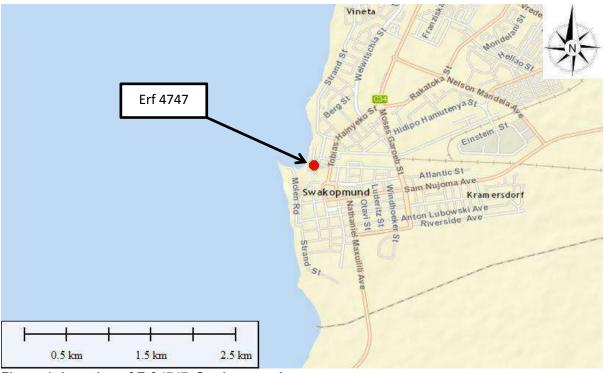


Figure 1: Location of Erf 4747, Swakopmund.

## 2. Site Description

The site is located where the old Municipal Swimming used to be in Swakopmund, on the beachfront known as the Mole. Buildings on site have mostly been demolished and there are currently shallow excavations.

## 3. Regional Geology

The majority of the central coastal region is covered by younger sediments forming either part of the visually impressive "Namib Sand Sea" (QGb), this only found south of Swakopmund, or surficial deposits (Qs) found blanketing the bedrock consisting of metamorphic rocks of the Swakop Group, Damara Sequence intruded by younger igneous intrusions (granites) as well as Karoo-aged dykes resulting in an intricate mixture of rock types as indicated in Figure 4.

The bedrock typically provides good bearing capacity, but excavations may prove to be difficult, requiring blasting in places, and the heterogeneity of the gneissic granite can cause uneven surfaces when excavated/blasted (Bulley, 1986).

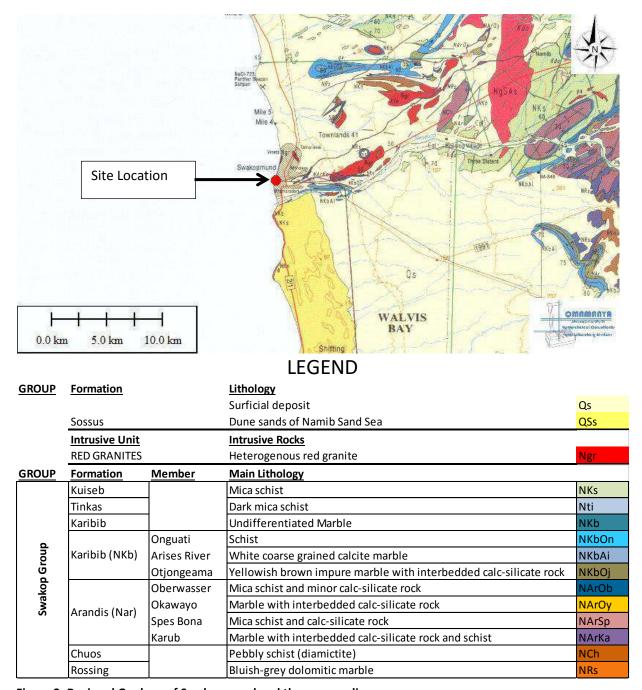


Figure 2: Regional Geology of Swakopmund and the surrounding area.

### 4. Results and Discussion

Four DPSH tests were conducted at the locations indicated on **Figure 3**. The tests were spaced to in order cover the site optimally. The DPSH Test Results are shown in **Table 1** below.

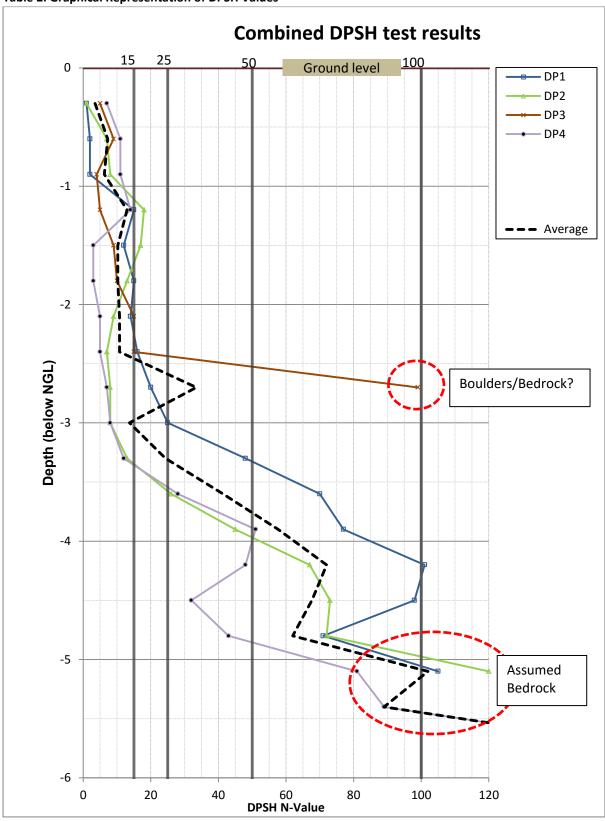


Figure 3: DPSH Test Locations on Site (Positions marked with handheld GPS)

Table 1: DPSH N-values with caclulated SPT N-Values, after (MacRobert et al.)

	Position no.									
Depth of Penetration (m)	DF	21	DI	P2	Di	P3	DI	P4	]	
	Number of blows							Minimum SPT	Empirical Soil	
	DPSH	*SPT N-	DPSH	*SPT N-	DPSH	*SPT N-	DPSH	*SPT N-	N-Value	Consistency
	$N_{30}$	Value	$N_{30}$	Value	$N_{30}$	Value	$N_{30}$	Value		
0.3	1	1	1	1	5	6	7	7	1	Very Loose
0.6	2	2	7	7	9	9	11	11	2	Very Loose
0.9	2	2	8	8	4	5	11	11	2	Very Loose
1.2	15	14	18	16	5	6	14	13	6	Loose
1.5	12	12	17	15	9	9	3	3	3	Very Loose
1.8	15	14	13	12	10	10	3	3	3	Very Loose
2.1	14	13	9	9	15	14	5	6	6	Loose
2.4	16	14	7	7	15	14	5	6	6	Loose
2.7	20	17	8	8	99	36	7	7	7	Loose
3.0	25	19	8	8	Refusal		8	8	8	Loose
3.3	48	27	13	12			12	12	12	Medium Dense
3.6	70	32	26	20			28	21	20	Medium Dense
3.9	77	33	45	26			51	28	26	Medium Dense
4.2	101	36	67	31			48	27	27	Medium Dense
4.5	98	36	73	32			32	22	22	Medium Dense
4.8	71	32	72	32			43	26	26	Medium Dense
5.1	105	36	120	38			81	33	33	Dense
5.4	Refusal		Refusal				89	34	34	Dense
5.7							158	40	40	Dense
6.0							Refusal		Refusal	

**Table 2: Graphical Representation of DPSH Values** 



The DPSH tests at DP1, DP2 and DP4 follow a similar trend with a consistency ranging from very loose to loose to a depth of 3m below NGL, from where the consistency increases to medium dense up to a depth of 4,8m, and dense to a maximum depth of 5,7m below NGL. The maximum depth of refusal was found at a depth of 5,7m at DP4. Considering the similarity in trends, it is assumed that refusal was encountered on bedrock.

At DP2, the consistency was similar to what was encountered at the other test positions to a depth of 2,4m below NGL, but from a depth of 2,4m to 2,7m the consistency drastically increased end refusal was encountered at 2.7m. Refusal is assumed to be on bedrock, as the NGL at DP2 is lower than at the other test locations which explain the shallow depth of refusal.

The water table depth could not be established during the DPSH tests.

#### 5. Recommendations

Based on the knowledge that multi-storey basement excavation will take place, it is recommended that the upper 4,0m below the NGL be excavated to stockpile for re-use in all backfill operations. It is likely that an uneven residual bedrock surface will be exposed using a large tracked excavator (>22ton and possibly with a rock bucket). Should further refusal be encountered during the excavation process then the desired founding depth will have been achieved and further excavation is not necessary.

A level founding platform can be created by employing either of the following methods:

- Use a pecker (Montebehr) to reduce any hard rock protrusions to ≥ 1.0m below any structural foundations invert level.
- Backfill using the excavated/stockpiled sand in 150-300mm layers, saturate and compact to 100% of Mod AASHTO density providing a safe bearing capacity of 200kPa – cap with a 150mm subbase layer (PI<6) compacted to 95% of Mod. AASHTO density as a working surface; or
- Backfill with an imported G5 material compacted to 95% of Mod AASHTO density (with a Plasticity Index (PI) of <6) in layers of 150mm to final thickness below any foundation invert level, in which case a safe bearing capacity of 450kPa can be assumed.

Due to the high assumed permanent water table, basements should be designed as a watertight retaining structure. Water stops are recommended for all construction joints up to the proposed final ground level.

It is recommended that a penetron admix (xypex) be included in all concrete works below water level.

### 6. Conclusion

In the present state of the site, it is recommended that the alluvial sand on the site should be excavated in accordance with the recommendations above in order to assure a suitable founding platform. This investigation, although test position specific, has sought to highlight potential founding, excavation difficulties, and possible rock depth and does not obviate the variable ground conditions and isolated zones of poor foundation / rock material not identified in this report.



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#### **DPSH - DYNAMIC PENETROMETER SUPER HEAVY TEST** PROJECT: THE LIGHTHOUSE - SWAKOPMUND **OPERATOR:** GEORGE BRITTNELL BH No: DATE: 25/06/2016 GEOLOGY: BEACH ALLUVIUM CLIENT: OMAMANYA GEOTECHNICAL CONSULTANTS COORDINATES: S 22 40 29.70 E 14 31 26.60 ELEVATION: 8 m AMSL EQUIPMENT: 63,5 KG HAMMER - 60 Deg 50 mm CONE PAGE: 1 OF 2 DEPTH: **BLOWS / PENETRATION** REMARKS ADJUSTED NO PENETRATION AT OF BLOWS ADJUSTED BLOWS AT 0.00m No. Of Blows 0 0 0 1 300mm 1 BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 0 0 2 300mm BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 0 1 0 2 300mm BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 5 3 4 15 300mm 15 BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 12 300mm 12 BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 4 15 300mm 15 BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 3 3 14 300mm 14 BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 16 300mm 16 BEACH ALLUVIUM Penetration (mm) 75 75 75 75 AT 2.40m No. Of Blows 4 5 6 20 300mm 20 BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 7 6 6 6 25 300mm 25 BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 9 11 14 14 48 300mm 48 BEACH ALLUVIUM Penetration (mm) 75 75 75 75



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#### **DPSH - DYNAMIC PENETROMETER SUPER HEAVY TEST** PROJECT: THE LIGHTHOUSE - SWAKOPMUND OPERATOR: GEORGE BRITTNELL BH No: DP 1 DATE: 25/06/2016 GEOLOGY: BEACH ALLUVIUM CLIENT: OMAMANYA GEOTECHNICAL CONSULTANTS COORDINATES: S 22 40 29.70 E 14 31 26.60 ELEVATION: 8 m AMSL EQUIPMENT: 63,5 KG HAMMER - 60 Deg 50 mm CONE 2 OF 2 PAGE: DEPTH: **BLOWS / PENETRATION** REMARKS ADJUSTED NO PENETRATION AT 15 No. Of Blows 18 18 19 70 300mm 70 BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 17 19 20 21 77 300mm BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 22 35 20 24 101 300mm 101 BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 23 25 24 26 98 300mm 98 BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 24 25 11 11 71 300mm 71 BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 12 19 31 43 105 300mm 105 REFUSAL Penetration (mm) 75 75 75 75 BOULDERS/GRAVEL/ROCK? No. Of Blows 0 300mm HOLE STOPPED AT 5.10m Penetration (mm) 75 75 75 75 No. Of Blows 0 300mm 0 Penetration (mm) 75 75 75 75 No. Of Blows 0 300mm 0 Penetration (mm) 75 75 75 75 No. Of Blows 0 300mm 0 75 Penetration (mm) 75 75 75 No. Of Blows 0 300mm 0 Penetration (mm) 75 75 75 75



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#### **DPSH - DYNAMIC PENETROMETER SUPER HEAVY TEST** PROJECT: THE LIGHTHOUSE - SWAKOPMUND OPERATOR: GEORGE BRITTNELL BH No: DP 2 DATE: 26/06/2016 GEOLOGY: BEACH ALLUVIUM CLIENT: OMAMANYA GEOTECHNICAL CONSULTANTS COORDINATES: S 22 40 28.10 E 14 31 26.50 ELEVATION: 8 m AMSL EQUIPMENT: 63,5 KG HAMMER - 60 Deg 50 mm CONE 1 OF 2 PAGE: DEPTH: **BLOWS / PENETRATION** REMARKS ADJUSTED NO PENETRATION AT No. Of Blows n 0 0 1 300mm BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 2 2 1 2 7 300mm BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 2 2 8 300mm BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 4 5 5 18 300mm 18 BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 4 5 4 4 17 300mm 17 BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 3 4 3 13 300mm 13 BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 2 2 9 300mm BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 2 2 2 7 300mm BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 8 300mm BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 2 2 8 300mm BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 2 3 4 4 13 300mm 13 BEACH ALLUVIUM Penetration (mm) 75 75 75 75



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### **DPSH - DYNAMIC PENETROMETER SUPER HEAVY TEST** PROJECT: THE LIGHTHOUSE - SWAKOPMUND OPERATOR: GEORGE BRITTNELL BH No: DP 3 DATE: 26/06/2016 GEOLOGY: BEACH ALLUVIUM CLIENT: OMAMANYA GEOTECHNICAL CONSULTANTS COORDINATES: S 22 40 28.90 E 14 31 25.00 ELEVATION: 7 m AMSL EQUIPMENT: 63,5 KG HAMMER - 60 Deg 50 mm CONE 1 OF 1 PAGE: DEPTH: **BLOWS / PENETRATION** REMARKS ADJUSTED NO PENETRATION AT 1 No. Of Blows 2 5 300mm BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 2 2 3 2 9 300mm BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 1 1 4 300mm BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 1 1 2 5 300mm BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 2 3 3 9 300mm BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 2 2 10 300mm 10 BEACH ALLUVIUM 75 Penetration (mm) 75 75 75 No. Of Blows 5 4 15 300mm 15 BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 4 3 4 4 15 300mm 15 BEACH ALLUVIUM Penetration (mm) 75 75 75 75 No. Of Blows 80 92 280mm 98.57 REFUSAL Penetration (mm) 75 75 75 55 BOULDERS/GRAVEL/ROCK? No. Of Blows 0 300mm HOLE STOPPED AT 2.68m 75 Penetration (mm) 75 75 75 NOTE: ROCK OUTCROP ON No. Of Blows 0 300mm 0 Penetration (mm) 75 75 75 75



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# **APPENDIX L: APPROVAL LETTER FROM STATE HOUSE**

JANUARY 2021 PAGE 104 OF 104



# Republic of Namibia State House

Tel: 2707111 Telex 3222 Telefax 221770 / 221780

Private Bag 13339 Windhoek

Our Ref: 2/2/6

Your Ref:

Enquiries Mr. Erastus M. Haitengela 061-2707784/5 26 February 2019

Dr. Jacko Koen Chief Executive Officer Jimmey Construction (Pty) Ltd P.O. Box 1575 WINDHOEK

Dear Dr. Koen

# PROPOSED DEVELOPMENT ON ERF NO. 4747, SWAKOPMUND

Reference is made to previous correspondences on this matter and the recent meeting held on the 25th February 2019 at State House office.

The Honourable Minister and the senior management of the State House would like to thank you and your colleagues for the informative presentation you made on 25 February 2019 to clear up any outstanding matters we had on this project.

Kindly be informed that the Office of the President is satisfied with the corrective measures you have put in place to address our concern. Therefore, I hereby confirm that you can proceed with the development on Erf. No. 4747 as per the revised plan you recently presented to our Office.

Thanking you in advance.

Yours sincerely

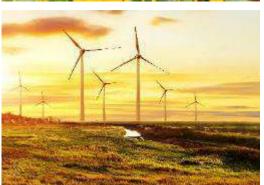
Amb. Claudia Grace Unchona Executive Dilector















ECC DOCUMENT CONTROL: ECC-111-307-REP-08-A

# **ENVIRONMENTAL ASSESSMENT ADDENDUM REPORT**

ERF 4747, SWAKOPMUND, ERONGO REGION

PREPARED FOR



DECEMBER 2020



# TITLE AND APPROVAL PAGE

Project Name: ERF 4747 SWAKOPMUND, ERONGO REGION – ESIA Addendum Report

Client Name: Lighthouse Property Investment Trust

Ministry Reference: N/A

**Status of Report:** Submitted for government review

Date of issue: December 2020

Review Period N/A

### **Environmental Compliance Consultancy Contact Details:**

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### Confidentiality

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# **DEFINITIONS AND ABBREVIATIONS**

DEA	Directorate of Environmental Affairs
EAP	Environmental Assessment Practitioner
EIA	Environmental Impact Assessment
EMA	Environmental Management Act
EMP	Environmental Management Plan
GCN	Gondwana Collection Namibia
IFC	International Finance Cooperation
I&AP	Interested and affected parties
IUCN	International Union for Conservation of Nature
JMC	Joint Management Committee
MAWF	Ministry of Agriculture Water and Forestry
MET	Ministry of Environment and Tourism



# 1. INTRODUCTION

## 1.1. PURPOSE OF THE ADDENDUM

This addendum report has been compiled following the public review periods of the Environment and Social Impact Assessment (ESIA) for the proposed development of the proposed commercial and retail (including tourism) activities on erf 4747 in Swakopmund, Erongo Region. Two sets of public consultation periods were conducted.

- The Initial public consultation period with adverts published and comments accepted on the NTS between 6 and 27 August 2020. See appendix E for newspaper adverts.
- The second round of public participation took place between 12<sup>th</sup> October and 27<sup>th</sup> October 2020 See appendix F for newspaper adverts.

The ESIA was completed for the project and undertaken in accordance with the requirements of the Environmental Management Act, 2007 (Act No. 7 of 2007) and the Environmental Impact Assessment Regulation, 2007 (No. 30 of 2011) gazetted under the Environmental Management Act, (EMA), 2007 (Act No. 7 of 2007).

Environmental Compliance Consultancy (ECC) prepared a preliminary assessment report, which was made available for public review for the period between 13-28<sup>th</sup> October 2020. The preliminary assessment report and the final ESIA report was compiled by ECC and incorporated all comments made by registered I&APs to the project. The report underwent amendments as a result of input and comments provided by I&APs, and evolved into the final ESIA report.

This addendum report comprises all comments received during the entire public consultation period; presents the responses from ECC and the proponent; and signposts where further information has been provided in the ESIA report.

The addendum report has been set out to provide a concise summary as set out below in table 1.

TABLE 1 - ESIA ADDENDUM REPORT STRUCTURE

CHAPTER	TITLE	CONTENT
-	Acronyms	A list of acronyms used throughout the report.
1	Introduction	This chapter introduces the addendum report provides background information on the ESIA process.
2	Summary of Comments	This chapter provides a summary of comments received from I&APs and Stakeholders.
3	Acknowledgements	Provides acknowledgements for the ESIA and Addendum.
4	Detailed Comment and Response Table	The detailed list of comments received during the public review with comments.



# 2. SUMMARY OF COMMENTS FROM I&APS

## 2.1. Introduction

The ESIA report was formally submitted to the relevant competent authorities, Ministry of Environment, Forestry and Tourism (MEFT) and Interested and Affected Parties (I&APs) on Thursday 17<sup>th</sup> December 2020 for public and stakeholder comment. Comments received were collated in a register that is presented in Table 2. Each comment has been responded to, and where it could be material to the decision making or enhanced the ESIA, amendments were made to the ESIA report. This has been cross referenced in the collated register as presented in Table 2. Where substantial changes were made due to feedback, amended or new sections have been signposted in the addendum report table for easy review and reference.

The final ESIA report has been issued to the MEFT and relevant competent stakeholders and I&APs to accompany the application for an environmental clearance certificate.

The final ESIA report is available to download at: <a href="www.eccenvironmental.com">www.eccenvironmental.com</a>

### 2.2. KEY FEEDBACK

The preliminary assessment documentation was provided to all I&APs, identified stakeholders and made publicly available on ECC's website to solicit comments, feedback and allow genuine participation in the ESIA process. Two sets of comments were received during the review process, from different stakeholder groups or types including private residents who neighbour the proposed project site; Ministry of Fisheries and Marine Resources; a local town planning expert; the Swakopmund municipality and businesses including Woermann, Brock & Co.

This varied group of I&APs and stakeholders for the project presented useful, meaningful and valuable input into the ESIA. The balanced feedback consisted of some corrections; identification of errors; requests for further information; and in some cases, an I&AP gave feedback to ECC confirming that their original concerns had been adequately addressed in the ESIA and that no further comments relating to that topic were required.

The key areas raised from the review can be summarised in the following categories:

- Infrastructure services concerns: Most I&APs raised concern about the capability of services provision to the development.
  - ✓ ECC conducted further work on the amended ESIA report on this aspect to address this concern.
- **Cumulative impact assessment (CIA)**: Further work to strengthen the CIA and to understand the potential impacts this project may have in combination with other potential projects was requested.
  - ✓ ECC conducted further work on the CIA to address this key concern, the addition of a more detailed CIA has been provided in the final ESIA report.
- **The height of the building:** Most residents highlighted this to be a concern and impact negatively on the current seascape skyline of the historical CBD of Swakopmund.
  - ✓ ECC conducted further research and included information in the ESIA report to address this concern.
- The traffic concern: Key concerns relate to impacts to road users and accessibility to the Mole area during construction and operation.
  - ✓ Several additions and or comments pertaining to these concerns have been addressed throughout the report and each concern is signposted with a response or where further information has been included to address this.

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- **Sense of place:** a key concern raised was the expected misalignment of the building with the current architectural status quo of the Mole
  - ✓ ECC conducted further research and the findings are contained in section 7.5.2 of the assessment report



# 3. ACKNOWLEDGEMENTS

ECC would like to thank the I&APs and stakeholders for providing feedback during the ESIA process. ECC has endeavoured to include all inputs received by I&APs. The feedback received has resulted in a robust and detailed ESIA that has been developed to international standards and complies with the IFC guidelines.

ECC acknowledges that constructive feedback results in a more robust and improved ESIA. This process results in a project that is understood by the community and I&APs. The I&APS feedback has contributed to potential issues or concerns being addressed and considered throughout the remainder of the development approval process.

ECC would like to thank the heritage specialist for his input during the ESIA and for your care in passing on your knowledge of the local environment.

Although the official public review period is over, the proponent and ECC is open to continued consultation with I&APs and stakeholders. As outlined in the ESMPs, consultation will be ongoing through the construction and operations of the proposed project. We look forward to the implementation phase of the project and continued work with all stakeholders.

Lastly ECC would like to thank the proponent for being so considerate and accommodating to the input and feedback from the ESIA team. Thank you for taking on and including feedback from the I&APs, local experts and our team.



# 4. DETAILED COMMENT AND RESPONSE FROM PUBLIC REVIEW

### TABLE 2 - I&AP AND STAKEHOLDER FEEDBACK

NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
	FEEDBACK RECEIVED FROM I&APS FROM THE FIRST ROUND	OF PUBLIC CONSULTATION	(ADVERTS, SITE NOTICES AND THE NTS MADE AVAILABLE)
1	Environmental Compliance Consultancy (ECC) Environmental Assessment Practitioner ERF 4747, Swakopmund Lighthouse Property Investment Trust ECC-111-307-NTS-02-C  1. The idea of a green space, a children's playground, a splash pool and swings is good — although essentially replacing what was previously demolished. However, what is missing from the proposal (and essential to preserve the delicate environmental infrastructure at the coast) is the provision of public toilets, showers and changing facilities for beach users, all of which existed in the previous (municipal) structure. The existing temporary toilet facilities can then, as a gesture of community outreach, be donated by the developers to communities in areas such as DRC.  2. No mention is made of the existing ecology of the area, and in particular the extensive plantations of palm trees. There	Mr. Robin Tyson Received via email (07.08.2020)	Good day,  The BID is available on the website (link below); however, I attach it hereto for ease of reference.  https://eccenvironmental.com/project/development-of-residential-retail-including-tourism-activities-on-erf-4747-in-swakopmund-erongo-region/  All information regarding design height, heritage etc. will be sent to all I&AP within the next week.  "Good morning Robin  Your email is well received, and the correction noted."



NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
	FEEDBACK RECEIVED FROM I&APS FROM THE FIRST ROUND (	OF PUBLIC CONSULTATION	(ADVERTS, SITE NOTICES AND THE NTS MADE AVAILABLE)
	needs to be a guarantee from the developers that ALL existing palm trees will be retained in the proposed development.		
	3. No mention is made of the height of the proposed structure. Anything more than four stories high will not only fail to blend in with the existing buildings to the north and south of the proposed development, and also potentially block the essential emergency light for shipping from the historic lighthouse, but also block out sunlight, especially on winter afternoons, in areas to the east of the development.  4. No mention is made of traffic and parking issues. Free offstreet parking for customers of the restaurants and spa to the east of the development must be provided.  - Robin Tyson		
2	Cc: Romeo Muyunda, Ministry of Environment and Tourism  The height of the building – 1. visual impacts for locals and 2.	Ms. Carlene Binneman	Standard ECC I&AP acknowledgement reply with the stakeholder
2	blocking of the lighthouse. 3. Restrictions of locals to enjoy the beach and walkway - many people exercise and walk their dogs on the walkway. There should be no restrictions with the upgrade in the ERF. The upgrade of tourism facilities must consider the local needs. Restaurants with a sea view are a great addition for locals and tourists. 4. The Strand Hotel has	Received via email (10.08.2020)	letter and link to the NTS was provided to the I&AP.

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NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
	FEEDBACK RECEIVED FROM I&APS FROM THE FIRST ROUND	OF PUBLIC CONSULTATION	I (ADVERTS, SITE NOTICES AND THE NTS MADE AVAILABLE)
	a spa, so there is no real need for an additional one in the same vicinity.		
3	Will you have a public meeting?	Dr. Gaby Schneider (Comment received via telephone) 10.08.2020	This is dependent upon the need for a public meeting once the public reviews the draft reports and project information. There were few requests for a public meeting, and most matters were addressed through the reporting and review process, therefore a public meeting was deemed unnecessary.
	Thanks for talking to me earlier. I managed to get myself registered, the mistake that I had made when I could not find the right project was that I was in the wrong project category.  Since you are required to make comments immediately when registering, I read through the document provided. This document does not say a word about how this development will look like, and how high it will be. How does ECC expect IAPs to comment, when this information is withheld?  In terms of the EMA Regulations, Section 23  (2) Before the applicant submits a report compiled in terms of these regulations to the Environmental Commissioner, the applicant must give registered interested and affected parties access to, and an opportunity to comment in writing on the report.  (3) Reports referred to in subregulation include (a)	Comment received via email (10.08.2020)	Standard ECC I&AP acknowledgement reply with the stakeholder letter and link to BID direct response as below.  Thank you for your email below, and as discussed on the phone this morning I would like to clarify a few points as set out below.  1. The manner in which ECC call for public participation is to advertise and request those who have an interest in a project to register for it – this way we compile a list of I&APs and it's those I&APs whom we seek engagement and input throughout the process.  2. The EIA is a 'process' and therefore we like to engage the public in this process. The adverts and site notices are the first steps in seeking the I&APs initial concerns, comments, questions or queries.  3. We then commence a process of continued engagement with the I&APs as we work through the EIA  4. The input from the I&APs (which comes in many forms from phone calls, meetings, emails, registration etc) we use to ensure the EIA adequately assesses these potential impacts.

ESIA ADDENDUM REV 01 PAGE 10 OF 86



NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER	RESPONSE / CLARIFICATION
		DETAILS	
	FEEDBACK RECEIVED FROM I&APS FROM THE FIRST ROUND	OF PUBLIC CONSULTATIO	N (ADVERTS, SITE NOTICES AND THE NTS MADE AVAILABLE)
	scoping reports; (b) scoping reports amended and resubmitted; (c) assessment reports; and (d) assessment reports amended and resubmitted.  However, none of this information is provided. I am not sure whether you are aware that this is a sensitive issue in Swakopmund, and in case you have not seen it, I attach a photo of the proposed development (the latest version that is available to the public). The fact that the above information is withheld will certainly many people jump to the conclusion that it is done on purpose, exactly like the choice of time period (06-27/08/2020), when all people have other COVID-19 related problems dominating their minds. It is my understanding that ECC stands for best practice and feel that this is definitely not best practice.		5. Once we finish the draft assessment reports, we then send the reports out to the registered I&APs (those that registered in step 1) for their review, comment and input – the dates for this depends on when we complete our work and the assessment, but this period hasn't started yet.  6. With regards to the advert in the paper – the purpose of the advert is to allow people to register their interest and to seek out people who could be interested and or affected, the review period mentioned in the advert is the review period of the background information document and the registration period. You are correct we can make this clearer in our wording of the adverts and we will do so going forward. Thank you for suggesting this improvement.  We have registered you as an I&AP for the project and our team will be in contact with you as an I&AP throughout the process.  Finally we certainly do strive for best practice which is why we run the I&AP process as set out above, and as discussed over the phone. We do it in this manner in order to have meaningful public participation rather than completing our assessment and simply providing it to the I&APs to comment.  Many thanks and kind regards,
	Dear Lovisa, Many thanks for your mail. In order to make informed comments, may I please get a copy of the design and Dr Vogt's specialist report?		Dear Dr. Schneider  Thank you for showing commitment to the EIA process as an I&AP. Your constructive inputs will be appreciated.



I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER	RESPONSE / CLARIFICATION
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FEEDBACK RECEIVED FROM I&APS FROM THE FIRST ROUND	OF PUBLIC CONSULTATION	(ADVERTS, SITE NOTICES AND THE NTS MADE AVAILABLE)
		As we are compiling the draft documentation including the assessment of comments received throughout this initial call for public participation, we will release all relevant documentation to all registered I&APs once we are at that stage in the EIA process. It is premature to do so at this stage.  I trust you will find this in order.  Dear Gabi,  We note your concern.  The draft documentation, once available, will incur an additional 7-day review period by all I&APs after the close of the initial registration period on the 27th of August 2020.  The NTS and adverts are the official documentation available for the initial call for public participation, to introduce the project and create a database of registered I&APs, with whom further communication throughout the EIA process will be established.
		All details you wish to review about the project will be contained in the draft documentation.
Dear Lester,  Many thanks indeed. However, I still do not understand why I		Dear Dr Schneider,

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	have to wait patiently until 27/08, and then I have to rush the		We thank you for your email and voicing your concerns. We have
	review of a number of documents in a one-week period and		recorded your comments and they will be reflected in the
	make my comments in a hurried fashion.		documentation.
	The way ECC handles this process creates the perception that		Kindly take note that we, ECC, maintain the highest possible
	the wool is pulled over stakeholders' eyes (with basically no		standard when conducting any work, especially crucial
	information on the design given before 27/08), and then they		components such as public participation.
	have a very short period to review documents and give		
	comments, which will lead to a situation where few		We work in accordance to processes which allow I&AP to register
	comments will be received. Please note that I am not saying		within a timeframe. We then provide all relevant information and
	that this is your intention, but this is how it is viewed by many.		provide review timeframes in accordance to the relevant
	I simply cannot understand why you could not even include a visual impression of the building in the NTS. Since ECC		legislation, and in most cases we exceed the required timeframes as prescribed in the legislation to allow more than reasonable time
	withholds the information on the design, stakeholders can		for I&AP to review the documentation. The same will apply with
	only assume that it is still the same design that was		this specific project. To be clear we are not withholding any
	introduced the last time (I attach a picture so that you can see		information, however following process to avoid preferential
	what I am talking about, and we are on the same slate).		treatment.
	Please understand that this project is a very sensitive one in		The current process (initial registration of I&AP), is targeted at any
	Swakopmund. There were previous occasions where		and all potential I&AP to review the BID provided and decide
	stakeholders could come to the municipality to enter their		whether or not to register and provide any comments if felt
	comments in a ring-bound file, and at the end of the day the		required based on the BID. Thereafter, all information (in this case,
	developer's representative was seen tearing sheets out of the		designs, specialist studies, scoping study and management plan)
	file. As a consequence, many stakeholders approach this		will be provided for a more in depth review. As stated above, this
	project with a high amount of distrust. Pushing the EIA through in a period where we are all restricted due to the		process with be allocated a more than reasonable time for I&AP to review the documentation and provide comments, especially
	COVID-19 regulations adds to this distrust. After demolishing		considering the current situation whereby Covid-19 restrictions
	the old building without any apparent reason (as no new		make face to face communication a challenge.
	building has been erected ever since), the developer has		
	subjected Swakopmund and its inhabitants and visitors alike		



NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
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	to years of having an unsightly demolished site, with demolition not even completed, right on its iconic Mole beach. Please appreciate that this is a rather emotional issue. ECC would therefore be well advised to handle the process with utmost transparency and accountability, and according to best practise. As I have pointed out to Jessica on a number of occasions, I do not think that what is happening right now is best practise.  Please see my comments in the spirit of constructive criticism. I am all for a development at this site, as we need to get rid of this "Ground Zero", as I call it, but it should be a development that all can embrace, which, I am afraid, is not the case with the proposal in the attached picture.  Looking forward to your answer I send my very best regards		I trust the above assures you that we are following due procedure and maintain the highest level of transparency.
4	Thank you for accepting my application to register as an I&AP.  I have a number of questions and concerns regarding this process that you are conducting and also the development itself:  Process:  - How can this process be validly conducted with the public during lockdown in Erongo? Many residents and property owners are locked out of the area so will not see the signs that are meant to be posted on the boundaries and will also not be getting the local newspaper.  - How can public meetings be called during the lockdown period which extends past the timing for I&AP inputs period?	Mike Leech Comment received on the 11/08/2020	Process:  The Regulations of the Environmental Management Act does not require a public meeting. However, in due consideration for the restrictions, ECC has opted to embark upon an extended public participation process, by allowing more than the required 21-day public participation period on the review and feedback on the preliminary assessment report and the draft assessment report. Public participation occurred between 06 August and 05 October 2020, and then again between 12 and 19 October 2020.

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NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
	FEEDBACK RECEIVED FROM I&APS FROM THE FIRST ROUND (	OF PUBLIC CONSULTATION	(ADVERTS, SITE NOTICES AND THE NTS MADE AVAILABLE)
	- I walk past the site three times every week and have not yet seen any signs?		Site notices were put up on the site during the week of the 10 <sup>th</sup> of August 2020.
	Development - How does this EIA fit in with previous EIA's and designs that have been submitted for this site? - What has changed in the current proposal that requires a re-		Dear Mr Leech,
	submission? - Where can one see the design layout and skyline profile?		Apologies for the delayed response from my team.
	- Does the project propose how to deal with the additional capital and operating costs it will bring to the sewage and firefighting systems of the town?		I respond to your questions/concerns below in blue:  Process:
	- Has an updated viability study been completed that takes account of the impacts on tourism and travel of covid-19?		How can this process be validly conducted with the public during
	Dear Stephan		lockdown in Erongo? Many residents and property owners are locked out of the area so will not see the signs that are meant to be posted on the boundaries and will also not be getting the local newspaper. The public participation process requires two adverts
	I have not received any response to my mail below to info@eccenvironmental.com following acceptance of my		to be placed in two different newspapers for two separate weeks as well as a site notice to be placed on site as a minimum
	registration as an I&AP in respect of the Mole Development		requirement. Additionally, a minimum timeframe is provided for
	Maybe you can assist?		the public participation period. We will exceed these minimum requirements by means of extended public participation timeframes, as well as additional adverts in newspapers. Any
	Regards		additional recommendations are welcome.
	Mike		How can public meetings be called during the lockdown period which extends past the timing for I&AP inputs period? Public meetings are not required by the act. In special cases such as this
			year where any gathering is restricted additional steps can be taken to allow relevant Interested and Affected Parties (I&AP)



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	FEEDBACK RECEIVED FROM I&APS FROM THE FIRST ROUND	OF PUBLIC CONSULTAT	TION (ADVERTS, SITE NOTICES AND THE NTS MADE AVAILABLE)
	Dear Stephan, Thank you for your comprehensive reply. I look forward to receiving the draft scoping document for review. Regards Mike		reasonable time to review the required information.  I walk past the site three times every week and have not yet seen any signs? I refer to your email (attached for ease of reference) highlighting the site notice has been placed on site. We additionally plan to place a site notice at the Municipality Notice board. The Municipality was closed last week, however we shall endeavor to place it the moment we have a chance.  Development  How does this EIA fit in with previous EIA's and designs that have been submitted for this site? The environmental clearance certificate application we have been commissioned for is specifically for tourism activities (the proposed hotel) that may form part of the proposed project.  What has changed in the current proposal that requires a resubmission? This is not a re-submission; this is an application for tourism activities as explained above.  Where can one see the design layout and skyline profile? I have registered you as an I&AP. Thus far a non-technical summary (attached) (also sometimes referred to as a Background Information Document - BID) has been made available to the public as the initial process of the public participation process. We are currently drafting a scoping assessment that will include all the relevant information including height, design and heritage assessments. You (the Interested and Affected Parties (I&AP)) will then be invited to review the information and provide comments. We will then record all comments and address the scoping study as such. Thereafter we will again send the information to the Interested and Affected Parties (I&AP) for final review and ensure



NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER	RESPONSE / CLARIFICATION
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			all comments are reflected in the document. Once this is done we will submit to the relevant Ministry for a Record of Decision.
			Hereto a link to our website where you can record comments and download the NTS.
			https://eccenvironmental.com/project/development-of- residential-retail-including-tourism-activities-on-erf-4747-in- swakopmund-erongo-region/
			Does the project propose how to deal with the additional capital and operating costs it will bring to the sewage and fire-fighting systems of the town? The scoping assessment does include information regarding this aspect.
			Has an updated viability study been completed that takes account of the impacts on tourism and travel of covid-19? You raise a valid point. This will be included in the scoping assessment.
			<b>Response:</b> The economic impacts of COVID are being felt globally and the full effects of this are yet to be understood, the developer is taking into consideration unplanned situations (for example COVID) and how this affects the economics of such a project
			Lastly, I would like to mention:
			We thank you for your email and voicing your concerns. We have recorded your comments and they will be reflected in the documentation.
			Kindly take note that we, ECC, maintain the highest possible standard when conducting any work, especially crucial components such as public participation.
			I trust the above assures you that we are following due procedure and maintain the highest level of transparency



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5	Please register the undersigned as I&AP for subject project.  Please urgently send BID.  Why is an EIA now required? i.e., what aspects of the proposal have triggered the need for an EIA?  Good Day Lovisa, please advise, when will the draft Scoping Report be available? Will you send this out to all registered I&APs? Thanks, kind regards,	Frank Löhnert (received via email on the 11/08/20200  Comment received via email (02.09.2020)	Standard ECC I&AP acknowledgement reply with the stakeholder letter and link to the BID.  Dear Mr. Löhnert Thank you for your inquiry. The preliminary assessment report will be released to the public for review in due course, once all details are finalized.  As a registered I&AP you will be notified when the documents will be made available for this review. Thank you.
6	Hope to see a development that respects the interests of all residents and not only those of a selected few.	Mr Patrick Kohlstaedt 17.08.2020	Standard ECC I&AP acknowledgement reply with the stakeholder letter and link to BID
7	Just confirming that you received our online registration for the application by Lighthouse Property Investment Trust (see below)?  Will you be sending out a BID? What is the proposed height of the development?  Thanks & regards Ann & Mike	Mr & Mrs. Mike and Ann Scott Comment received via email (17.08.2020)	Standard ECC I&AP acknowledgement reply confirming the I&APs registration with the stakeholder letter and link to BID  Dear Mike and Ann  All project-related details including building designs, height, and colours will be included in the scoping study report, that will be circulated to all registered I&AP in due course.
	Dear Lovisa Thank you for the feedback. Unless we are missing it, the height of the proposed structure is not yet included. Is it		Thank you.

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NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER	RESPONSE / CLARIFICATION
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8	correct that you will still be sending out these details in due course? Regards Ann & Mike Scott Hi Jessica, on the website to register as interested party for the Mole erf, I requested a current draft of the building plan. I would like to see that first to be able to comment. Could you please send that? And I think it would make sense to include that on the website. Thanks! Regards, Monika	Ms Monika Ruppel Comment received via email (20.08.2020)	Dear Monika  Thank you for registering as an I&AP on this project. Your comments have been received and will be reflected in the final I&AP commentary trail.  We are in the process of finalising the release of the preliminary scoping study and impact assessment which contains the full project details including the design of the building, as well as the envisioned impacts we have deemed likely to occur from this project.  This preliminary scoping study and impact assessment will be made available to all registered I&APs soon, to review and relay back to us any constructive inputs to further flesh out the assessment.  This we believe will encourage a comprehensive collaboration effort on the project, especially considering the restrictions on face-to-face interaction due to the Covid-19 situation.  The preliminary assessment documentation will be made available for a 14-day period for review and commentary, which is more than what the EMA Regulations of 2012 dictates. Thereafter, all inputs received from the community will be addressed and incorporated into the Draft Report. The Draft Report will be circulated for an additional 7 day period to I&APs for review, after

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NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER	RESPONSE / CLARIFICATION
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9	Good Day Please register me as an IAP for the development of Erf 4747 in Swakopmund. Regards  Anja  Good day, Thank you for the BID on the proposed development of Erf 4747 in Swakopmund.  Reading through the document I am a bit concerned that ECC already anticipate potential environmental impacts of low significance. To my understanding, an EIA is to be done to assess potential impacts — to give a judgement already in the BID suggests that the environmental consultants are not approaching the EIA study unbiased but have an idea of the outcome already.  It is mentioned that the proponent is a developer of numerous prestigious projects in Namibia. Please list some of these developments to allow for verification of this statement.  The EIA should definitely include a section looking at sense of place for the proposed development, as well as the visual	Anja Kreiner Registration request received via email (21.08.2020)  Comment received via email (25.08.2020)	which public comments received will again be incorporated into the draft report and submitted to the government as the final version for a Record of Decision on the application.  I trust this explanation of due process will assure you of our efforts to manage this process transparently and comprehensively.  Standard ECC I&AP acknowledgement reply with the stakeholder letter and link to the BID.  Dear Dr, Kreiner,  Thank you for providing us with your inputs. We have registered your concerns and hereby provide some explanatory notes to the issues raised.  The NTS provides a summary of the EIA process followed by the EAP, and may contain a list of potential envisioned impacts predicted to occur from the proposed project. Although predictions are made, their ratings may change as the process unfolds. All impacts and their significance ratings will be contained in the assessment report.  All relevant details pertaining to the proponent will be contained in the assessment report. The Am Weinberg estate in Windhoek is



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	impact of the development. Regards Anja		one such product of the developers.  All potential impacts related to the development will be contained in the assessment report.  Please note the preliminary assessment report will be made available to the registered I&APs for a 14-day period for review and feedback. The preliminary assessment report contains a list of predicted impacts drawn from the baseline conditions of the site and general area and information received from the proponent. The purpose of this public review is to allow the public to add to these impacts those that they feel should be included as part of the assessment.  Thereafter, the public feedback received will be incorporated into the draft assessment report and released again for review by the I&APs for commentary.  The final assessment report will then incorporate the draft assessment review feedback and submitted to the government for a record of decision.
10	A good development needs to be in a proper proportion to the whole / rest of the area.	Hans-Jürgen Sauer  Comment received via email (26.08.2020)	Standard ECC I&AP acknowledgement reply with the stakeholder letter and link to BID included.

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11	Dear Ms, Bezuidenhout Please forward the I&A registration form to me. Thank you Kind Regards	Paulina Engelbrecht Registration. request received via email (27.08.2020)	Standard ECC I&AP acknowledgement reply with the stakeholder letter and link to the registration form and BID included.
	The proposed project falls within the Swakopmund Municipality's jurisdiction and therefore the Municipal Council is an Interested and Affected party in this regard. Please forward all relevant information to us regarding the proposed project.	Comment received via email (31.08.2020)	
12	To whom it may concern:	Karen Miller - Architect	Dear Ms, Miller
	Serious concerns about the proposed development of Erf 4747, Swakopmund  In response to advert currently displayed by ECC on Erf 4747 Swakopmund calling for public participation.	Comment received via email (25.08.2020)	Thank you for showing interest in the project. You have been registered as an Interested and Affected Party and your comments will be reflected in the relevant assessment documentation.
	The following are serious concerns about the proposed development of Erf 4747 as publicly displayed by the developer in the past. This is a response specifically concerning the required EIA currently being carried out. There are a number of factors which must be not only considered, but also be corrected in order to reach a responsible, legally		We acknowledge receipt of your comments and concerns raised, and we will respond to them in due course.  In the meantime, kindly find the attached standard letter to stakeholders.
	correct and beneficial development of Erf 4747. The property is of such a sensitive nature for various reasons, which will be enumerated below, and historical decisions concerning this property have not been taken according to legally required		Response to the guidelines contained in the structure plan:  The structure plan is a guiding document and not in force, therefore it cannot be used as an authoritative voice for



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	processes. The EIA that is currently being undertaken must		development activities yet. The same structure plan advocates for
	acknowledge and take into consideration each of these		the municipality to take the lead on development matters in the
	unresolved processes and decisions. The outcome of this EIA		CBD, which relates to height restrictions, etc. as an example.
	will be very critically scrutinised by the citizens of this coastal		
	town, and has the potential of uncovering serious shortfalls in		Response to Public Petitions against the large building proposed
	local and national authority proclamations that have been		for Erf 4747:
	passed.		B 11: 11: 1 2047
			Public petitions in 2017 are not relevant to the current ESIA as the
	In a nutshell: if the processes to get to a point of carrying out		project has changed significantly to that which was petitioned
	an EIA have not been properly executed, the entire exercise is rendered untenable.		against in 2017.
	rendered unterlable.		Other matters raised are discussed in the updated ESIA report in
	a) The Property, Erf 4747:		the following sections:
	a) The Property, Ell 4747.		the following sections.
	The property is an island in a large piece of land listed as an A-		Chapter 2: Section 2.7.5
	rated piece of public open property. This is listed in the 'Blue		Chapter 3: Section 3.1, table 2
	Files' referred to in the National Heritage Act and in the Town		Chapter 5: Section 5.12
	Planning Scheme of Swakopmund. Thus, it was always		
	intended that this area must be a public precinct, of benefit to		
	the public. This was also indicated in the 2000 Structure Plan		
	of Swakopmund and has now been reinforced in the newly		
	proposed 20-year Structure Plan of Swakopmund.		
	The property falls within the proclaimed Conservation Area of		
	Swakopmund, proclaimed after independence. Refer to:		
	Government Gazette 1 September 2006. No.3688,		
	Conservation Area (No.260, 2006). DECLARATION OF AREA TO		
	BE A CONSERVATION AREA: NATIONAL HERITAGE ACT, 2004,		
	"Under section 54(1) of the National Heritage Act, 2004 (Act		
	No.27 of 2004).		
	Erf 4747 was never a commercial property. It was a Municipal		



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	property. Multi-million-dollar projects that have been undertaken historically, in the vicinity of this property, were undertaken by private and public entities with the knowledge of this being a Municipal property. These historical developments were all undertaken under a Town Planning Scheme which restricted building heights to 13m (with special relaxation to a maximum of 16m) and Bulk factors of a maximum of 2 on business properties.  This property is placed against the only safe swimming beach, patrolled by sea rescue, in Swakopmund. This reinforces the character of this public open area, and thus emphasizes the absolute need for a responsible decision regarding this highly sensitive property.  Lifting of Building Height restrictions and Bulk factors in the Swakopmund Town Planning Scheme: The process of altering the Town Planning Scheme to allow for building height relaxations to 30 and 40m within the Conservation Area and along the beach front, especially on "Business Zoned" properties was not carried out above board. Firstly this process requires advertising and public participation. This was not done, and therefore these		
	relaxations cannot be considered legal. This Scheme cannot be enforced and must first be taken through all the correct processes.		
	The National Heritage Council has the mandate to protect the Conservation Area of Swakopmund. It is proclaimed under the National Heritage Act. The Municipality of Swakopmund, the		
	Minister and NAMPAB did not approach the National Heritage Council concerning relaxation of height restrictions and Bulk		



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	factors within the proclaimed Conservation Area prior to changing this in the Town Planning Scheme no 61. NHC are the main stakeholders and they have not approved this change.  Apparently the Town Planning Scheme was incorrectly registered/proclaimed under number 62 (which does not exist). Therefore, Town Planning Scheme no 61 has never been proclaimed. This you must also research.  The National Heritage Act requires the EIA to be carried out on a development of the height intended for this property, but this should not even be at this stage if the above items and following items are not in order.  Public Petitions against the large building proposed for Erf		
	4747: The public petition undertaken in 2017 must give an idea of the public participation and response to the proposed design on Erf 4747. This petition lists more than 2000 objections against the proposed development on Erf 4747. This must be acknowledged not only by the Municipality, the Minister and Ombudsman to whom it was sent, but also by the team doing the EIA study, particularly as public participation is specifically called for in the EIA process. The public has repeatedly voiced their objections: all the signed lists at public 'scopings' of the building design proposals for Erf 4747 must be scrutinized here.		
	Aesthetics Committee Evaluations: The Swakopmund Municipality has an Aesthetics Committee that assists in the evaluation of any designs within the		



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	Conservation Area and large buildings outside the		
	Conservation Area (and not within the Industrial Area). This is		
	officially recorded in the Town Planning Scheme and the		
	entire process of assessment is described there. This committee approved a design on Erf 4747 a few years ago,		
	which had a reasonable design in terms of height and bulk.		
	It must be noted that at no stage did the Aesthetics		
	Committee of the Swakopmund Municipality approve		
	subsequent designs which do not fall in line with		
	Swakopmund Town Planning Scheme no 12. Therefore, all the		
	designs with excessive heights were not approved by this		
	committee.		
	National Heritage Council: The National Heritage Council sent a letter of objection		
	against height relaxations to the Swakopmund Municipality,		
	Ministry of Urban and Rural Development and NAMPAB on 25		
	January 2018.		
	On 29 August 2019 a meeting was held between the National		
	Heritage Council and the Aesthetics Committee of the		
	Swakopmund Municipality, chaired by the CEO of the		
	Municipality. In this meeting, at which the legal advisor of the		
	National Heritage Council, Mr Damaseb was also present, the		
	CEO noted that he would hold by the decision of the		
	Aesthetics Committee on Erf 4747 design evaluations. This		
	was not upheld however. The sequence is that all submissions		
	must first be approved by the Aesthetics Committee before		
	they are sent to the National Heritage Council for approval.		
	The Municipal Council over-wrote the decision of the		
	Aesthetics committee and sent the submission to the National		



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		DETAILS	
	FEEDBACK RECEIVED FROM I&APS FROM THE FIRST ROUND (	OF PUBLIC CONSULTATION	(ADVERTS, SITE NOTICES AND THE NTS MADE AVAILABLE)
	Havitaga Council without Aacthotics Committee approval		
	Heritage Council without Aesthetics Committee approval.  The National Heritage Council cannot approve the proposals		
	for Erf 4747, knowing that there are so many objections		
	against this development, and changes to local authority		
	schemes that were not correctly processed. There is a very		
	serious liability attached to such a decision.		
	Swakopmund Town Planning Scheme changes:		
	The entire process of changes to the Swakopmund Town		
	Planning scheme changes must be investigated. Even the		
	Municipal Councilors questioned the process. There was a		
	letter to a private individual acknowledging the application for this relaxation officially included in the publicly available		
	minutes of Municipal Council meetings, dated 29 September		
	2016. This cannot be deemed an acceptable process and must		
	be investigated.		
	Newspaper Articles:		
	There were newspaper articles on 17 November and 5		
	December 2017 objecting and calling for the assistance of the		
	National Heritage Council concerning height relaxations in		
	Swakopmund. The public has not sat back and let this process,		
	especially on Erf 4747 takes its course. The public has made every effort to be heard and this has not been adequately		
	acknowledged. The EIA now, once again, calls for public		
	participation, as was the case at public scoping exercises of		
	the proposed design on Erf 4747. Strangely the public was not		
	invited to participate when the attempt was made to change		
	height restrictions in the Swakopmund Town Planning		
	Scheme, although this is a requirement.		



NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
	FEEDBACK RECEIVED FROM I&APS FROM THE FIRST ROUND	OF PUBLIC CONSULTATION	(ADVERTS, SITE NOTICES AND THE NTS MADE AVAILABLE)
	New Proposed 20 Year Structure Plan for Swakopmund: The Municipality, and by implication the Swakopmund rate payer, has spent a lot of time and money in appointing a team of professionals to compile a 20-year Swakopmund Structure Plan. This team has presented its final proposal to the public and the Erf 4747 is specifically pointed out in this Structure Plan. In fact, the Plan proposes that no buildings of a height exceeding 15m can be placed anywhere a certain distance along the shoreline or within the Conservation Area of Swakopmund.  Specific to Erf 4747 this Structure Plan indicates that the building should not be higher than 15m, with a relaxation to an absolute maximum of 18m because of the steep fall of the land alongside. Thus, any alternative to this would in fact place the entire 20-year Structure Plan in jeopardy. This would set a precedent that would cause countless legal cases concerning other properties in Swakopmund.  It is my humble opinion that the approval process on Erf 4747 should not be at Environmental Impact Assessment stage, as there are so many questionable issues that must be resolved, as noted above. In order for the Heritage Council to take a responsible, informed and beneficial decision regarding Erf 4747, the above matters must be resolved. The extent of liability associated with a decision at this stage cannot be placed on the shoulders of the National Heritage Council. A more acceptable design with a maximum height of 18m and sight lines through the complex toward the sea from behind the building must be considered.		



NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER	RESPONSE / CLARIFICATION
		DETAILS	
	FEEDBACK RECEIVED FROM I&APS FROM THE FIRST ROUND	OF PUBLIC CONSULTATION	(ADVERTS, SITE NOTICES AND THE NTS MADE AVAILABLE)
13	Kind regards  Karen Miller  Where can I view a blueprint of the project? Especially regarding the planed future width of the promenade. How far will the stairs of the building complex reach to the actual sidewalk at the beach? The actual fence reaches at its end to a only 2 meter gap of the main most attractive promenade at the tourist destination Swakopmund!	Alexander Honisch 28.08.2020	"Dear Mr. Honisch You have been registered as a stakeholder of the proposed "Development of residential & retail (including tourism) activities on ERF 4747 in Swakopmund, Erongo Region" EIA project.  Attached please find the letter to stakeholders. All project-related details inclusive of building designs, height, color scheme, etc., is included in section 1.3 of the updated ESIA report. In the meantime, kindly follow the link below to access the Non- Technical Summary (NTS) for the project Link: https://eccenvironmental.com/wp-content/uploads/2020/08/ECC- 111-307-NTS-02-D.pdf "
	Thank you. Unfortunately, the attached map is not very in detail. Does the Erf on which the complex will be erected include the beach promenade and will the complex be built including the existing promenade? Does that mean that the building will block the public from using the beach promenade? Are there no more detailed plans of the complex available for the public?	Comment received via email (01.09.2020)	Dear Mr Honisch,  Thank you for your reply. A detailed site map will be contained within the assessment report which will be released to the public for review in due course, once all details are finalised.  The promenade will not be adversely affected by the development, nor will it be consumed by the development. As mentioned above all relevant documents will be included in the assessment report which will be released for public review and comment. As a registered I&AP you will be notified when the documents will be

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NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER	RESPONSE / CLARIFICATION
		DETAILS	
	FEEDBACK RECEIVED FROM I&APS FROM THE FIRST ROUND	OF PUBLIC CONSULTATION	(ADVERTS, SITE NOTICES AND THE NTS MADE AVAILABLE)
			made available for this review.  Kind regards
			Response to how far will the stairs of the building complex reach
			to the actual sidewalk at the beach:
			The promenade as it is, is the property of the Municipality, therefore it is not expected that the proponent will infringe on property that is not under their ownership. The proponent may upgrade the promenade walkway where applicable with the permission of the of the Municipality.
14	Dear Ladies and Gentlemen, I Gabi Woermann herewith want to be registered as an "I&AP" wrt/ above. My reason: I am a resident of Swakopmund and a shareholder of various companies since 1900	Mr. Ingo Woermann  Comment received via email (28.08.2020)	Standard ECC I&AP acknowledgement reply with the stakeholder letter and link to the registration form and BID was provided to the I&AP.
	my email address: wok45678@gmail.com pls. also register Mr. Ingo Woermann: iwoermann@wbswakop.com		
	I thank you. Pls confirm that you have received my application for both e-mail addresses.		
15	Dear Ladies and Gentlemen, I Gabi Woermann herewith want to be registered as an "I&AP" wrt/ above. My reason: I am a resident of Swakopmund and a shareholder	Gabi Woermann	Standard ECC I&AP acknowledgement reply with the stakeholder letter and link to the registration form and BID was provided to the I&AP.

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NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
	FEEDBACK RECEIVED FROM I&APS FROM THE FIRST ROUND	OF PUBLIC CONSULTATION	(ADVERTS, SITE NOTICES AND THE NTS MADE AVAILABLE)
	of various companies since 1900  my email address: wok45678@gmail.com pls. also register Mr. Ingo Woermann: iwoermann@wbswakop.com  I thank you. Pls confirm that you have received my application for both e-mail addresses.  Hi there, thanks, for info. I previously questioned the following: 1- enough public parking ON SITE (on erf 4747) due to planned commercial usage/high traffic volume whereas the street nowadays is already congested.  2- fire - security measurements (see point 1) what is the height of the proposed building? Will the Fire Brigade of Swakopmund be able and have the right equipment to operate?  3- wrt: point 2 above (height) what are the plans for the LightHouse?  I will appreciate to get infos on my request, Thank you and best regards.  Gabi Woermann.	Comment received via email (28.08.2020)  Comment received via email (01.09.2020)	Further information on issues raised are contained in the following sections within the updated ESIA report:  Chapter 3: Section 3.1 Chapter 4: Sections 4.3; 4.4.4 Chapter 5: Section 5.5  The operation of the existing lighthouse falls under the domain of Namport in collaboration with the Swakopmund Municipality and not the proponent.



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	FEEDBACK RECEIVED FROM I&APS FROM THE FIRST ROUND	OF PUBLIC CONSULTATION	(ADVERTS, SITE NOTICES AND THE NTS MADE AVAILABLE)
16	No comments at the stage and would recommend synergy between ECC's individual EIA projects to be commensurate to ECC's draft structure pan for Swakopmund, Swakopmund Municipality.	Ignatius Kauvee  Comment received via email (07.09.2020)	Standard ECC I&AP acknowledgement reply with the stakeholder letter and link to the NTS was provide to the I&AP. No further comments were received.
17	I would like to register as an I≈ please keep me posted on this development.	Oliver Krappmann  Comment received via email (07.09.2020)	Standard ECC I&AP acknowledgement reply with the stakeholder letter and link to the NTS was provide to the I&AP. No further comments were received.



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	COMMENTS RELATED TO THE REVIEW OF THE PRELIMINARY ASSESSMENT REPORT AND ITS APPENDICES				
18	This is to confirm that I have looked through all documents supplied by ECC regarding the above and am now satisfied that my concerns (public conveyances, showers, playpark, water features) have been addressed, along with concerns regarding the aesthetic design of the building, as well as height concerns.  Message from: Robin Tyson Media Consultant, Swakopmund, Namibia	Robin Tyson  Comment received via email (13.10.2020)	Thank you no further action is required.		
19	We are interested to gain insight into the actual construction plans of the development on Erf 4747 located within the heritage area of Swakopmund, specifically how they affect the width of the walkway, promenade, and the overall beach area in front of the complex to be built. We have at the moment a tin fence which leaves at its north end a very small, about 2-meter broad walkway at the main promenade of the tourist destination Swakopmund! What is the exact perimeter of Erf 4747?	Alexander Honisch  Comment received via email (13.10.2020)	Thank you for your mail.  Section 23 of the EMA regulations contains a provision which allows for written comments to be directed to the environmental commissioner by I&APs, after submission of final reports to the environmental commissioner, for a period of seven days.  We are not in possession of construction plans for the building, as these still need to be developed by the proponent's engineers. In terms of the walkway, the proponent will not encroach onto the existing walkway, however this walkway could be upgraded by the proponent as per the development agreement between the proponent and the Swakopmund municipality as and where needed.  The exact size of the Erf is 6086m2. Please see figure 1 under Section 1 within the preliminary assessment report for the site		

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NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION		
	COMMENTS RELATED TO THE REVIEW OF THE PRELIMINARY ASSESSMENT REPORT AND ITS APPENDICES				
			boundaries.		
			The report can be accessed via:		
			https://eccenvironmental.com/project/development-of-		
			residential-retail-with-tourism-activities-on-erf-4747-in-swakopmund-erongo-region/		
20	Good day,	Anja Kreiner	Dear Dr. Kreiner		
	My major concern with this new development is the possible obstruction of the lighthouse. It should be clearly shown in		Thank you for your email received on the 21st October 2020.		
	the documents, from where the lighthouse will be obstructed and it must be ensured that safety for vessels at sea is not compromised and international guidelines followed. Approval	Comment received via email (21.10.2020)	We take note of your concern raised and acknowledge that it is valid.		
	must be obtained from the Directorate of Maritime Affairs		We can confirm that consultations have taken place between the		
	and the port captain of Namport. The municipality will start building public ablution blocks on		proponent and Namport as mentioned in section 4.4.5 in the preliminary assessment report. However, we will include a more		
	the parking area next to the proposed development – have any consultations taken place between the developer and the		detailed write-up on this maritime aspect in the final assessment documentation.		
	municipality or do we have a duplication of efforts now?				
	Regards		Further details are contained in sections 5.5 and 7.6.2 in the updated ESIA report.		
	Anja		apadica Esix report.		
21	Good Day to All,	Gabi Woermann	Dear Mrs Woerman		
	Do you think there is a possibility to give/grant us more time				
	for comments? May be until mid-Nov.2020?	Comment received via	Thank you for your mail received on the 16th of October 2020.		
	Pls. remember, due to covit-19, I myself, my son Ingo	email (16.10.2020)	In response to your request for additional time to review the		
	Woermann and others, simply		reports, please note the following points which serves to provide		
	are working under extreme stress, to keep our companies		context to the public participation process of the EIA that we are		

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NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
	COMMENTS RELATED TO THE REVIEW O	F THE PRELIMINARY ASSES	SMENT REPORT AND ITS APPENDICES
	going y mas also is due		following
	going, x-mas also is due, so it would be very much appreciated to extend the due date for comments.  The project sits on your desks. We do understand. On the other hand, the sale of the erf 4747, acc. to my knowledge, was agreed in 2006, paid approx 8 to 10 years later, and now it's on the rush. Not that much from your site, pls. get me right.  I thank you very much Gaby Woermann, also for Ingo Woermann and other concerned Swakopmunders.		following.  Section 7, sub regulation (1) (e) states: "give all registered interested and affected parties an opportunity to comment on the scoping report in accordance with regulation 23".  Regulation 23, sub regulation (1) (a) then states: "comments are submitted within 7 days of notification of an application or receiving access to a scoping report or an assessment report".  ECC's interpretation and subsequent adherence to these provisions are as follows:  On the 12th of October 2020, all registered interested and affected
	Hi, there, the ECC team, especially Lester, I am very grateful for your understanding, assistance etc. at all times. We will try to meet the dead-line. Thanks once again		parties on the project were provided access to preliminary assessment report, the environmental management plan and supporting documents through our website for review. ECC provided a comments period of 15 calendar days ending on the 28th of October 2020 to all interested and affected parties, to review and comment on the documentation provided. Note that ECC doubled the number of days from that which is provided for by law.  Although the 28th of October serves as a deadline for comments to reach us, registered interested and affected parties that could not submit their comments on time, could still do so after the lapse of the review period granted. Such comments will still be considered and incorporated into the reports where applicable. After the 28th of October ECC will commence with incorporating comments received from the I&APs. Thereafter an additional 7 days are then provided for review and comments on the final reports, which includes the incorporation of comments received during the initial review period, before submission to government



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	COMMENTS RELATED TO THE REVIEW OF THE PRELIMINARY ASSESSMENT REPORT AND ITS APPENDICES				
			is made. Therefore, we believe your comments will be included even if provided to us after 28 October. If at all possible, we kindly request the comments to be submitted by no later than 4 November.  In Summary, all registered interested and affected parties are able to submit their comments to ECC throughout the EIA process up until the end of the final review period on the final documentation. Therefore, cumulatively more than 15 days are essentially available to interested and affected parties to engage with ECC with written commentary.  The timeframes provided are there to streamline, manage and document the EIA process within the framework of the regulations of the Environmental Management Act and not to disadvantage any person.  We trust that the explanation above provides you with a more contextual understanding of the process ECC is following and the accommodative nature of our approach.		
22	User of the beach and amenities in the area	Sandie Fitchat	Dear Ms Sandie Fitchat,		
		Comment received via email (22.10.2020)	Thank you for your mail received (22 October 2020), you have now been registered as an Interested and Affected Party (I&AP) for the project. The final assessment documents will be made available to all I&APs		
			once it is complete.  Please feel free to submit your comments on the preliminary		



NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
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	COMMENTS RELATED TO THE REVIEW C	F THE PRELIMINARY ASSES	SMENT REPORT AND ITS APPENDICES
			assessment report should you have any.
23	I must object in the strongest terms to the height of the proposed development on ERF 4747.  This is not in keeping with the surrounding area and I would not like the surrounding area and beachfront to be allowed to be changed with high rise buildings.  This will spoil Swakopmund's appeal to visitors. It will spoil the enjoyment by Swakopmunders of the freedom and openness that the beachfront currently affords everyone.  I also cannot see how the height does not obstruct the full beam of the lighthouse, yes the development is just below the centre of the light of the lighthouse but that is surely not sufficient. This is a major safety issue in times of electronic navigation breakdown. Also the light from the lighthouse and the fog horn will surely disturb residents in this new development as they are so close to the lighthouse? I would also not be happy if as a result of complaints of the "new residents" the lighthouse is forced to curtail its activities.  This proposed development will also set a precedent for other buildings along the beach front to be redeveloped to maximum height for maximum gain which in my opinion will	Jacky Mansfield  Comment received via email (26.10.2020)	The maritime safety issue based on the positions of the lighthouse and the development has received renewed attention and a more detailed write-up was included in the final assessment documentation. See chapter 5, section 5.5.  Other matters raised are addressed in the following sections  Chapter 4: Section 4.4.4  Chapter 6: Section 6.3, table 6  Chapter 7: Section 7.5.2



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	ruin Swakopmund's beachfront and the ambience of the houses behind and turn it into yet another commercial mess as experienced in many other parts of the world that had once upon a time beautiful open beachfronts.  The Strand Hotel has been sympathetic to the surroundings, I see no reason for others to be allowed to spoil this.  I would think 3 storeys and possibly a penthouse above would still fit in with the surroundings.  Trusting you will note this comment and record it as required.  Regards		
24	thank you for the opportunity to comment on the Erf 4747 design.  Of course, all are eager to get rid of the current state of the erf, which has been an eye sore for many years already. Nevertheless, any new development should be carefully planned, taking all effects into consideration. While I am leaving that to the experts, with certainly more knowledge on this, I would like to send the following comments to the design of the building:  We have the large building facing the sea and then a less tall building in the back. Was it considered that the building in the	Ms Monika Ruppel  Comment received via email (26.10.2020)	These matters have been addressed in the updated ESIA report. Please refer to the following sections:  Chapter 4: Section 4.4.4 Chapter 5: Section 5.4 Chapter 6: Section 6.3, table 6 Chapter 7: Section 7.5.5  The economic impacts of COVID are being felt globally and the full effects of this are yet to be understood, the developer is taking into consideration unplanned situations (for example COVID) and how this affects the economics of such a project.

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	COMMENTS RELATED TO THE REVIEW C	F THE PRELIMINARY ASSES	SMENT REPORT AND ITS APPENDICES
	back, especially the bottom storeys, will most of the time fall into the shadow of the higher building next to it? This factor, directly at the Atlantic coast, will contribute to low temperature in the building, very little direct sunlight, and thus making it less attractive and contributing to high energy costs to heat the place up.		
	I am staying close to the Platz am Meer development in Swakopmund. I just want to make sure that the developers of erf 4747 are aware of the fact, that the concepts are similar. Just at Platz am Meer we now already see that most of the flats/accommodation units are not utilized/empty/not sold even after many years now. Also different restaurants have opened and closed again, not prospering as the developers had imagined. I do not need to mention how badly the formerly fast growing tourism sector has been affected by the SARS-Cov2 pandemic. In this light, I do not see the need for such a tall building, which will take away much of the charm our laid back town of Swakopmund has.		
	Do not get me wrong - I am not opposing development and new ideas, I just cannot imagine that Swakopmund, in future, will have the need for two massive building, of 6 and 7 storeys high.		
	And can you perhaps inform me, why the Strand Hotel development was refused their initial design, which was also planned higher initially?		
	Have the buildings less tall, increase effectiveness in the remaining space, to avoid empty places, which are not		



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	COMMENTS RELATED TO THE REVIEW O	F THE PRELIMINARY ASSES	SSMENT REPORT AND ITS APPENDICES
	contributing to a good image. Personally, I cannot relate to the duplication of planned services offered, such as the spa, which is already offered at the Strand Hotel and other places in Swakopmund, partly also in close proximity of the beach/ocean. Therefore - reduce its size and use it more effectively, thereby creating something unique, instead of changing our skyline tremendously by duplicating available offers and accepting empty and unused establishments.  Kind regards,		
2.5	Monika		
25	Good day,	Patrick Kohlstaedt	These matters have been addressed in the updated ESIA report.  Please refer to the following sections:
	Herewith receive my vehement and strongest objection against the proposed development on ERF 4747, Old Municipal Pool and adjacent areas.	Comment received via email (26.10.2020)	Chapter 5: Section 5.5 Chapter 6: Section 6.3, table 6
			Chapter 7: Section 7.5.4
	The proposed development with its height will:1. Obstruct views of Properties and areas behind the development		
	<ul><li>2.Change climate and wind at the Mole</li><li>3.Disturb Lighthouse Navigational beacons</li></ul>		
	4.Disregard previous developments that blended in with the		
	area @ lower heights		
	<ul><li>5. Spoil the attractiveness of the area to visitors</li><li>6. Set precedence for Highrise developments on the</li></ul>		
	beachfront, which only serve the interest of the developer.		
	Below an exemplary picture of such developments as present		
	along the Mediterranean coast. Studies in those areas prove,		
	that this has a detrimental impact on the socioeconomic development of such communities and surrounding		



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	neighbourhoods, which by far outweigh the immediate short term benefits that are anticipated.  It should not become the problem of the community, that an overambitious developer (with no regard for surroundings) needs to bargain on a maximum return on such a development, to ensure that the dysfunctional replacement pool that was constructed can be accommodated in this investments return.  Please record this comment and relay as required.  Regards, Patrick Kohlstaedt 0811226694		
26	Thank you for registering me.  I am now attaching the petition as mentioned in my registration.  Kind regards	Wilfried Groenewald  Comment received via email (26.10.2020)	Response to petition received: The petition is not dated and contains signatures from 2017, which renders it not applicable to the current status of the project (which underwent significant changes) and the ESIA.



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	COMMENTS RELATED TO THE REVIEW OF THE PRELIMINARY ASSESSMENT REPORT AND ITS APPENDICES					
27	herewith my objection against the proposed development on ERF 4747, Old Municipal Pool and adjacent areas.  The development with its proposed height will  Have a negative impact on its surrounding environment, by changing the climate on the playground.  Be unsightly and an unfair development within the surrounding lower developments.  May result in more high-rise buildings near the seafront. This can regress the socioeconomic environment. Comparable to Durban main beach areas, which has become unsafe for locals and tourists.  The developer is seeking major profit at the loss of the surrounding harmonious developments, behind and next to the development.  Swakopmund has open dwellings for sale at the moment. Please reconsider the height of your development, to blend in with the current developments.	Carmen Johannes  Comment received via email (26.10.2020)	These matters have been addressed in the updated ESIA report.  Please refer to the following sections in the report:  Chapter 4: Section 4.4.4 Chapter 5: Section 5.5 Chapter 7: Sections 7.5.2; 7.5.4 EMP: Safety mitigation measures			
28	Good Morning  Herewith receive my strongest objection against the proposed development on Erf 4747, Old Municipal Pool and adjacent areas.  The proposed development with its height will:	Karin Lohmann  Comment received via email (27.10.2020)	These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:  Chapter 5: Sections 5.7; 5.5 Chapter 6: Section 6.3, table 6 Chapter 7: Sections 7.5.4			

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NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
	COMMENTS RELATED TO THE REVIEW O	F THE PRELIMINARY ASSES	SMENT REPORT AND ITS APPENDICES
	Change climate and wind at the Mole Spoil attractiveness of the area to visitors Disregard previous development that blended in with the area at lower heights Obstruct views of properties and area behind the development Disturb Lighthouse Navigational beacons – very important! Set precedence for high rise development on the beachfront which only benefits the developer. This will have a detrimental impact on the socio-economic development of such communities and surrounding neighbourhoods.		
29	Dear Municipality of Swakopmund and the Team at the Environmental Compliance Consultancy,  It is with very great concern that we follow the plans to go forward with a high-rise building on erf 4747, including tourism activities and ablution blocks.  An Olympia-sized swimming pool had to go in order to make room for ablution blocks and an ugly high-rise building, which is going to be another white elephant on the shores of Swakopmund. We are also greatly concerned about the shadows this huge building will cast onto the area around it, especially towards the south and onto the playground. This playground has a deep history and some of us have already played on the same equipment on the same playground many decades ago. The planned tourism activities and retail spaces will take away the charm of this deeply historical area.	Gudrun Berens  Comment received via email (26.10.2020)	These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:  Chapter 4: Section 4.4.4 Chapter 5: Section 5.4 Chapter 7: Sections 7.5.2; 7.5.5

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NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
	COMMENTS RELATED TO THE REVIEW O	F THE PRELIMINARY ASSES	SSMENT REPORT AND ITS APPENDICES
	To underline the disadvantages of a high-rise building in this particular area of erf 4747:  We are living in a south-facing double-storey building and the street in front of our house only dries rarely and only when we have the warm East wind weather. During the rest of the year there is a huge wet patch on the street in front of our house. Now imagine what this huge building will do to the Mole and the area around the main beach. This building will cast a monster shadow. The entrance of the building is facing into the south wind, creating a cold and wet wind tunnel effect. More parking spots, more shops — who is going to frequent those places? The stretch along the Strand Hotel is also half-empty most of the time. Why do we need another huge building with more retail space when there is no buying force? We have hundreds of coffee shops, do we really need another one? Do we really need more retailers, where a number of shops in the centre of town are empty? We can understand the good use of ablution facilities and changing rooms. But we cannot understand this huge overkill on retail space, a monster building next to the lighthouse, 5 metre short of the length of the lighthouse. The whole skyline of Swakopmund is going to change with this huge monster, plus the flair of this quaint tourist town is going to disappear with the erection of a skyscraper casting its shadows onto the beach area/playground area and making this stretch look like anther San Francisco or "Gold Coast" on the East Coast of Australia. Why can Swakopmund not stay special and quaint, and why can we not preserve its uniqueness?		



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	COMMENTS RELATED TO THE REVIEW O	F THE PRELIMINARY ASSES	SMENT REPORT AND ITS APPENDICES
	We are very concerned that the Swakopmund public is not properly consulted or asked for their opinion.  Shame on all the greedy hands who are selling the soul of Swakopmund!  We are really not amused.  Kind regards, G. Berens		
30	COMMENTS ON PROPOSED DEVELOPMENT ON ERF 4747  1. I am duly authorized to act on behalf of SINCO INVESTMENTS 103 (Pty) Ltd. being an owner of an apartment in AM ALTEN AMTSGERICHT (AAA) in Theo-Ben Gurirab Ave.  2. This development will be directly in front of the AAA and will block a significant part of views to the sea for most of the apartments in AAA.  3. This development is in the historic part of town. Has clearance already been granted by the Esthetics Committee and the Heritage Council for this development. If not, why not?  4. When the Strand Hotel was developed some years ago a vigorous public debate ensued with Interested and Affected Parties before finality was reached on how to proceed with what was subsequently approved. When will similar public	Riaan Eksteen  Comment received via email (26.10.2020)	These matters have been addressed in the updated ESIA report.  Please refer to the following sections in the report:  Chapter 2: Section 2.7.5  Appendix C  Chapter 3: Section 3.1  Chapter 5: Section 5.4  Chapter 7: Sections 7.5.4; 7.6.2  The updated ESIA report and EMP was submitted to the MEFT for a record of decision.

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NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION		
	COMMENTS RELATED TO THE REVIEW OF THE PRELIMINARY ASSESSMENT REPORT AND ITS APPENDICES				
	meetings be held regarding this proposed development? If not, why not?				
	5. Have public notices on the proposed development been duly posted in newspapers for the attention of the general public? If not, why not?				
	6. Have all the other specified requirements in terms of the relevant Environment Act and Regulations been met in full? If not, why not?				
	7. Has government clearance already been obtained to erect a building close to or near the Presidential Complex? If not, why not?				
	8. In the immediate vicinity of the proposed development there is already an inordinate number of apartments, hotel rooms, bed & breakfast facilities, restaurants and coffee shops that make the addition of new ones superfluous, especially in these trying times when the existing ones can barely cope or have already close down.				
	9. In addition to this last point, the proposed kiosk and toilet facility the Municipality intends constructing will be within a 100 meters of the proposed develop. Has this been taken into account? If not, why not?				
	10. These points and other relevant aspects about this proposed development will be further dealt with during the public meetings that are to be held if the developer wants to comply with all the stipulations of the said Act and				

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NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
	COMMENTS RELATED TO THE REVIEW O	F THE PRELIMINARY ASSES	SMENT REPORT AND ITS APPENDICES
	Regulations. Residents of Swakopmund are entitled to full disclosure of all aspects of this development and to have the assurance that they will be adequately heard at public meetings to which they are legally entitled.  Please acknowledge receipt of this email and that I will be kept informed about this proposed development.  Thank you,		
31	We, residents and ratepayers of Swakopmund, strongly object to the proposed development on erf 4747 for the following reasons:  1.) This is the prime recreational area in centre of town that must be kept open and available for recreation for all inhabitants and visitors. Especially because the rough beachfronts near Swakopmund do not anywhere allow such safe swimming as at the Mole.  2.) Worldwide experience has taught the universal lesson that seafronts should be kept free of high-rise residential developments. Degradation and/or exclusivity being the main reasons.  3.) The aesthetic impact on the historical centre of Swakopmund is catastrophic and totally unacceptable to any person, be it resident or visitor. The proposed design will not only kill the attractive uniqueness of Swakopmund but will create high density living space with little regard to quality of life for its residents.	Ilme Schneider  Comment received via email (26.10.2020)	These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report: Chapter 7: Sections 7.5.2; 7.5.4



NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
NO	INAF / STARLITOLDER COMMINICIAL RECEIVED	STARLITOLDER DETAILS	RESPONSE / CLARIFICATION
	COMMENTS RELATED TO THE REVIEW O	F THE PRELIMINARY ASSES	SMENT REPORT AND ITS APPENDICES
	4.) The Town Council of Swakopmund is under legal obligation		
	to protect the wellbeing and prosperity of all its ratepayers and residents and not just protect and support the prosperity of one developer, as seems obvious in this case.  Faithfully,  Dr. Herbert Schneider		
	Von meinem iPhone gesendet		
32	(Below english translation received in German) Betr.: Molen-Entwicklung Swakopmund (Erf4747) (AZ, 12. März 2019 & 03.September 2019)  Re: Molen development Swakopmund (Erf4747) (AZ, March 12, 2019 & September 03, 2019) The topic of what Swakopmund looks like or should look like in the future is one that we should deal with much more intensively here. I would like to immediately address a point that really shocked me: The decision to amend the town planning (amendment Scheme No.61), i.e., that in future highrise buildings with a height of 40 meters may be built in Swakopmund. What folly! I hope that the city council, who are responsible for this and who saw to it that this law was passed, will reconsider their decision. Why else would we need a monument council and an aesthetics committee? "Defacing" a city with indifference and maintaining cultural	Hans Joachim & Birgit Pack  Comment received via email (27.10.2020)	Thank you, the issue of height restriction is addressed in chapter 4, section 4.4.4.  The economic impacts of COVID are being felt globally and the full effects of this are yet to be understood, the developer is taking into consideration unplanned situations (for example COVID) and how this affects the economics of such a project.

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NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
	COMMENTS RELATED TO THE REVIEW C	DF THE PRELIMINARY ASSES	SMENT REPORT AND ITS APPENDICES
	It is urgent that we pay attention to the question of how we should deal with the urban aesthetics, with possibly planned high-rise buildings and especially with the historical core, our pier. Otherwise, there is a risk that the unique character and charm that defines Swakopmund to its residents and tourists compared to other cities - will be lost.  Whatever you think of it - I myself am absolutely not enthusiastic about high-rise buildings in inner-city areas. Why must this planned "apartment block" (151 apartments) be so much higher than the surrounding buildings? People should see this new building on the computer visualization compared to the neighboring buildings. Maybe it just doesn't fit into the overall picture because of it's eight floors? The building complex is far too big; has too little structure and too much concrete everywhere!  I can't help but get the impression that this is not about maintaining the cityscape - (not to mention the interests of preserving a cultural heritage), but rather simply about the pursuit of profit by certain financial groups. To this I can only ask: Swakop locals, defend yourselves. Prevent this beautiful coastal city from being sacrificed to such groups!  This is about the height of the building and I very much hope that the developers give in and say goodbye to their "cloud project".  I know it's a matter of taste, but do we really want to spoil our Swakopmund pier with such a massive new building? Many other cities in the world have already made this mistake, so		



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	COMMENTS RELATED TO THE REVIEW O	F THE PRELIMINARY ASSES	SMENT REPORT AND ITS APPENDICES
33	Summary comments and overall perception of the project. The review has taken a box ticking approach to the legal	Mike Leech	These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:
	requirements and does not deal with many of the key points that are of concern to the town and its residents.  • The issue of how the Swakopmund height restrictions came to be changed just before this project's first submission still needs to be visited.  • As your documents states "New tourism developments, in particular, are to be designed in such a way that they are unobtrusive, environmentally sympathetic and, as far as possible, enhance rather that detract from the visual impression of the environment". This building in no way complies with this requirement, it is simply designed to maximise NPV.  • The impacts on the town's fire brigade and fire system are said to be covered within the Health and Safety management Plan to be developed by the proponent. This a plainly a missing point in this review as the knock-on effects on capital budgets for new higher reach fire engines and pumping equipment should fall to the costs of the developer and not be borne by the ratepayers. At least there should be a plainly stated acceptance by the developer that fire main upgrading	Comment received via email (27.10.2020)	Chapter 3: Section 3.1 Chapter 4: Sections 4.5.4; 4.5.5 Chapter 7: Section 7.5.2; 7.6.2  The economic impacts of COVID are being felt globally and the full effects of this are yet to be understood, the developer is taking into consideration unplanned situations (for example COVID) and how this affects the economics of such a project.
	and equipment improvements, inclusive of capital will be borne by them.  • The composition of the various elements of the		



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	COMMENTS RELATED TO THE REVIEW OF THE PRELIMINARY ASSESSMENT REPORT AND ITS APPENDICES				
	development are not at any point clearly laid out for understanding. There is regular reference to the retail footprint of 140m2 but nowhere are the number of units detailed out so that the relative sizes of the different uses, residential, retail and restaurants can be compared. It would appear that this is actually a hotel with three restaurants and a few lobby shops. The value of which given the current oversupply of hotel rooms is debateable.  • The sketch map reflecting the parking bays, existing and new show that new ones will be provided down the eastern side of the road next to the current temporary hoarding. The area reflected already exists and there is no meaningful increase in public parking.  • The whole topic of the impact on the residents and visitors to the area is brushed over. Presumably the 233 new inbuilding parking spaces will be "paid" parking and form part of the project's income stream. If these are not open public parking places then how is the additional custom to be dealt with, as is part of the town planning requirements?  • Sewage management is said to have been assessed and agreed with the municipality. Given that the coastal section of the Swakopmund sewer system is already under strain with regular overflows during the busy season, this agreement should be made public. It should cater for the significant capital upgrading that will be needed in the immediate Mole area and also the booster stations along the beach. If not spelled out in detail then there should be an acceptance by the developer that the on-costs, capital and upgrading are for their account.  • Need for the proposed project. There is scant coverage of the new tourism and economic environment and it seems				



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	COMMENTS RELATED TO THE REVIEW O	F THE PRELIMINARY ASSES	SSMENT REPORT AND ITS APPENDICES
	highly improbable that a sound financial case can be made for this project in a post-covid world, where airlines are predicting up to 5 years to get back to 2019 levels of business. It is not possible to show how this project will add value to Swakopmund at this time.  MD Leech Swakopmund resident.		
34	Good day,  I would like to send you my objection regarding the project of erf 4747.  The height of 8 storeys does not fit into the surrounding area and makes this area look like a massive block in the midst of lower built complexes of max 3-4 storeys.  The layout of single bedroom apartments is not going to sell in this area as there are not many high income people in this town to buy here and as a holiday apartment this would be too small.  The reduction in size of the only main play ground in town is not ok.  I do not believe that regarding the current economic situation in Swakopmund and Namibia in general regarding the statistics of sales of properties currently this will be a white elephant with many empty units still for sale. We have so many guest houses here and people are reluctant to buy at	Birgit Linow  Comment received via email (26.10.2020)	These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:  Chapter 4: Section 4.4.4  It is not expected that the proposed development will reduce the size of the playground. The only agreement in place with the Municipality is that it may be upgraded.

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	COMMENTS RELATED TO THE REVIEW O	F THE PRELIMINARY ASSES	SSMENT REPORT AND ITS APPENDICES
35	this moment!!! I say no to a white elephant and yes to a much smaller complex in this area with the ideas as given!  Kind regards  Birgit Linow  Good day	Alma Wallis	These matters have been addressed in the updated ESIA report.
	It is well-known, that the height relaxation higher than 13m is not applicable to the historical zone of Swakopmund.  Any relaxation in this regard needs special permission from Council.  We feel that this opportunity should have been granted to the newly erected buildings in the vicinity eg. Strand Hotel and other new buildings in the historical zone of Swakopmund which were developed recently.  Granting permission to the proposed development for a height of more than 13m could be seen as favoritism. It has come to our attention that a height relaxation will be applied for a 30m tower in the CBD of Swakopmund if the relaxation for the new development on ERF 4747 is approved. We will most certainly also object to this application because we feel that the historical area of Swakopmund should not be subjected to alterations of this nature.  Kindly record this objection and relay as required.  Kind regards Detlev Doll, Barbara Doll, Sinclair Investment 101, R Eksteen, C	Comment received via email (27.10.2020)	Please refer to the following sections in the report:  Chapter 3: Section 3.1, table 2 Chapter 4: Section 4.4.4



NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
	COMMENTS RELATED TO THE REVIEW O	F THE PRELIMINARY ASSES	SMENT REPORT AND ITS APPENDICES
	Reiff, G Bellwinkel, R Burger, J Du Toit, Springbuck Trust, Diekman, Adler, Sinclair Investment 75 Body Corporate Am Alten Amtsgericht,		
36	Hi, I don't like your idea AT ALL at the Mole! Go and build it at Langstrand or Mile 4, there it might fit in with the rest. We don't need Bling Bling at the Mole, not of that size. I DO object! Raini Becker Born and bred in Swakopmund.	Raini Becker  Comment received via email (27.10.2020)	Thank you, no further work is required.
37	Please acknowledge my urgent and vehement objection against the proposed development on Erf 4747.  It blocks views of properties and areas behind the development.  It shall destroy the atmosphere of our cozy, friendly Swakopmund.  There are already plenty shops and apartments standing empty.  Locals could not afford to rent those apartments, so most of the year they will be abandoned It disturb Lighthouse Navigation beacons	Kirsten Günzel  Comment received via email (27.10.2020)	These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:  Chapter 5: Section 5.5 Chapter 6: Section 6.3, table 6 Chapter 7: Section 7.5.2; 7.5.4

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	COMMENTS RELATED TO THE REVIEW O	F THE PRELIMINARY ASSES	SSMENT REPORT AND ITS APPENDICES
	It does not suit into the area, and is not attractive for visitors ,nor swimmers. Please record this comment and relay as required  Regards Kirsten Gunzel 081 322 8928		
38	Dear Mr Bezuidenhout Comment on EIA for Proposed Building on Erf 4747 Please register us as Interested and Affected Parties. We are opposed to the construction of the proposed building on Erf 4747, as detailed in your EIA Report: Preliminary Assessment Report and Impact Assessment - Erf 4747 Swakopmund, 2020. We believe that the EIA does not adequately address the issues arising from the development and therefore the assessment is flawed and incomplete. Please see below our comments to substantiate this conclusion. Socio Economic Assessment— the EIA does not include a socioeconomic study by an external specialist. The EIA argues the benefit of the project but then only includes generic statistics about population and tourism benefits but nothing specific to this project. No interviews or investigations were done to determine the view of the local population, tourism and hospitality sectors to determine whether there is an actual need for such a facility or additional accommodation in Swakopmund. Socio Economic Impacts - Large tourism/retail/residential developments in Swakopmund i.e. the Waterfront La Mer are currently underutilized. There is an excess of both	Svenja and David Garrard  Comment received via email (28.10.2020)	These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:  Chapter 5: Section 5.6 Chapter 7: Sections 7.5: 7.5.1; 7.5.2; 7.5.3; 7.5.4



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	COMMENTS RELATED TO THE REVIEW C	OF THE PRELIMINARY ASSES	SMENT REPORT AND ITS APPENDICES
	residential and retail units, including restaurants and shops which cannot either be rented or sold. It is commonly known that accommodation facilities within Swakopmund struggle to meet optimum occupancy, even during peak season. Construction work provides only temporary employment. The long-term employment opportunities stated in the EIA document are unsubstantiated (i.e. not linked to any specific commercial activity). Given the sensitivity of this building in the heart of Swakopmund, the EIA should have included an independent socio-economic study which could hold up to scrutiny.  Visual Assessment – Reference is made to visual aspects of the project. The assessment however does not include an independent visual specialist study or at the very least photo montages of the existing landscape from different viewpoints with the new building inserted. Given the sensitivity of this project and the size of the building, this study should have commissioned it as part of the EIA.  Visual Impact - Despite the reduction of 10 metres, the building still remains a large multi-story complex completely out of character with the surrounding environment and indeed of Swakopmund as a whole. The building will alter the sense of place of the beach location by dominating the skyline and its bulk will overshadow the smaller dwellings that lie adjacent. Those dwellings include the Strand Hotel, which manages to fit in within the surrounding landscape.  Traffic Assessment and Impacts – the EIA does not include a traffic assessment. Although parking will be provided, the EIA does not look at how traffic will move into the area and out		



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	and whether the roads and intersections have the capacity to deal with this large additional flow. As the access to the Mole is restricted on the Museum side this could result in significant congestion around the area, known to be an issue during the holiday periods. The movement of trucks carrying goods and construction vehicles will also need to be examined. For this size of building, a traffic study should have been done.  Noise, Dust and Odour Assessment and Impacts – these aspects are briefly mentioned and the EIA concludes that they are non-significant. However, the long-term impacts from the operation of restaurants/tourism outlets are not discussed in any detail. Odour arising from cooking smells, reversing sirens from delivery vehicles, waste odour, hours of operation etc. are not mentioned. The EIA refers to the EMP; however, these issues should have been discussed and assessed within the EIA document as these impacts could result in significant nuisance on surrounding residential occupants.  In conclusion the EIA report does not adequately investigate and assess the key issues arising from this development and therefore does not present to the public a thorough assessment. Given this, appropriate and detailed mitigation measures have not been developed in the EMP. It is recommended that the MEFT does not approve the EIA until further work is done to address these issues.  We look forward to these comments being included in your public consultation process in accordance with the requirements of the Environmental Management Act No 7 of 2007 and addressed as part of the EIA process. Kind regards		



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	COMMENTS RELATED TO THE REVIEW O	F THE PRELIMINARY ASSES	SMENT REPORT AND ITS APPENDICES
	Svenja and Dave Garrard Concerned residents of Swakopmund		
39	Dear Lester,	Dr. Gabi Schneide	Dear Dr Schneider
	kindly receive my comments as follows:  (i) I am delighted that the process has started to remove the	Comment received via email (27.10.2020)	Thank you for your email of comments received on the 27th October 2020.
	ugly demolition site and replace it with something better.  (ii) I am, however, concerned about the massive building that		My apologies for only getting back to you now as I have been outside proper network reach for the week.
	is proposed, although I notice that it has been scaled down compared to previous proposals. All other buildings in the area are a lot less high, and there have been building height		Your comments are noted and will be considered and incorporated into the final assessment documentation.
	restrictions in the area in the past for a good reason. As a matter of fact, the proposed structural development plan for Swakopmund includes a height restriction of 18 m in the area.		On point (v) in your list of comments I want to state that the upgrade of the existing "greens" and promenade walkway will be undertaken by the proponent where applicable as agreed to and
	(iii) A building of that height will completely destroy the flair and atmosphere of the Mole, and obstruct the view of historical buildings like the light house for example. It will also		signed off with the Swakopmund Municipality.  The walkway is municipal property, and the proponent is willing to assist with the necessary upgrades to it. In addition, any other
	leave parts of the Mole beach in the shadow for half a day.		services the proponent requires for this development is also at the proponent's expense and included in the signed development
	(iv) I completely disagree with the heritage expert's view that there are no buildings with heritage value and/or historical		agreement between the parties.
	significance in the area, and thereby reducing the iconic light house and the building to the east off it, as well as other historical buildings in the area as worthless and not deserving		The rest of the issues raised have been addressed in the updated ESIA report in the following sections:

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NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
NO	TWAP / STAKEHOLDER COMMINIENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
	COMMENTS RELATED TO THE REVIEW O	F THE PRELIMINARY ASSES	SSMENT REPORT AND ITS APPENDICES
	conservation. The light house is a landmark of Swakopmund,		Chapter 3: Section 3.1, table 2
	and considered so important, that it features in the coat of arms of the town - so how can Dr Vogt call it insignificant?		Chapter 4: Section 4.4.4 Chapter 7: Section 7.5.2
	arms of the town - so now can be vogt can it insignificant!		Chapter 7. Section 7.5.2
	(v) The proposal also talks about developing the greens and		
	the walkway; however, they are not part of era 4747. On		
	which basis is this possible?		
	(vi) At present there are some 2 000 properties on the market		
	in Swakopmund. Do we really need more flats for sale? Or will		
	this become another white elephant?		
	Dest as as ad-		
	Best regards		
	Gabi		
40	To whom it may concern	Jade McClune	Thank you, no further work is required.
	I am writing to express my concern with and objection to the	Comment received via	
	proposed development at Erf 4747.	email (28.10.2020)	
		,	
	Firstly, I object to this architectural monstrosity on the		
	grounds that it significantly marrs the beachfront as it would ruin the pristine landscape and aesthetic of the area. It also		
	imposes on public spaces.		
	Secondly, from my recollection there were conditions		
	attached to the original contract, which stipulate that the		
	developers were supposed to provide an alternative public swimming pool, among other terms. Which to the best of my		
	knowledge have not all been met.		

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NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
	COMMENTS RELATED TO THE REVIEW O	F THE PRELIMINARY ASSES	SMENT REPORT AND ITS APPENDICES
41	Both the current condition in which the area has been left by the developers for over 10 years, as well as the proposed development do not seem to offer any benefit to ordinary residents. It would satisfy the needs of private developers and wealthy investors while depriving local residents of the benefits offered by public spaces, such as the public swimming pool we used to enjoy, and easily accessible public beach areas that are important to our local culture.  I consider this proposed development to be an eyesore and an obstacle to the full enjoyment by residents of Swakopmund of the beaches and public areas they are accustomed to. I regard this as just a further step in the privatisation of beaches, and I wholly reject the proposal.  Jade McClune  Swakopmund resident  To: Lester Harker and Jessica Bezuidenhout, Environmental Compliance Consultancy Office of the Environmental Commissioner, DEA, Ministry of Environment, Forestry and Tourism  Opposition to APP – 00169 – Development on Erf 4747 Swakopmund, Erongo Region, Namibia by Lighthouse Property Investment Trust  Dear Sir/Madam,	Nadine Moroff Comment received via email (29.10.2020)	These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report: Chapter 5: Sections 5.5; 5.6 Chapter 7: Sections 7.5.3; 7.5.5; 7.6.1

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NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
	COMMENTS RELATED TO THE REVIEW O	F THE PRELIMINARY ASSES	SSMENT REPORT AND ITS APPENDICES
	It would seem as if anything is better than the current sorry state of erf 4747 and I recognise the thought and deliberations that went into the ideas for erf 4747. I understand the objective of the developers to maximise gain after the losses of the last years, with the miscalculations of the new swimming pool. I see the interest of the local authority, which needs job creation in Swakopmund more than ever. Others might have a short-term gain of this development, and even others will want to follow suit, also building high-rise buildings on our precious coastline.  But we need to think strategically and not only of ourselves and only of today.		
	So called "development" tends to blind people of the long-term and society-wide goals. The current plans for erf 4747 of the Lighthouse Property Investment Trust is not "development" that will be sustainable, it is not development that will benefit many. Only a few will gain at the cost of many. This high-rise building will be a shame for future generations.		
	The Municipality of Swakopmund Structure Plan 2020-2040 should give a longer-term vision for the Mole area for the best interest of society. It is said in that document that building height recommendations of this structure plan and heritage laws are to be respected: the maximum building height for a new building on erf 4747 should not exceed 18 m and the building should be set back at the southern side by a minimum of 5 m per upper two floors.		



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	Furthermore the lighthouse is given more respect than in the report from ECC: "Lighthouse tower: Most prominent feature and icon of Swakopmund. Vistas to it need to be kept open." It is ironic that a development by the "Lighthouse Property Investment Trust" plans to dwarf the Swakopmund Lighthouse and obstruct it from view for a large part of one of Swakopmund's most preferred beaches. It is ironic that a report issued by them says the lighthouse and other historical buildings in the Mole lack finesse or historical significance (ECC-111-307-REP-07-D, page 42)! I strongly disagree that the impact on the "Historical feel of the town tied to its sense of place" is "minor".		
	There are more deceptions in the report: The shadow simulation does not even cover the whole area of the simulated shadow, thus not showing how far south it will reach over the play park or even towards the Museum! The Museum is disregarded as a "receptor" of noise impacts from construction activities (page 55) and so it goes on. As already mentioned by me and I hopefully recorded at last consultations 3		
	3rd September 2019: The Conservation/Heritage Area was declared for a reason. The Swakopmund city centre with its colonial style buildings with an African touch, are what makes Swakopmund unique: a quaint little		



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	COMMENTS RELATED TO THE REVIEW C	OF THE PRELIMINARY ASSES	SMENT REPORT AND ITS APPENDICES
	town, with a historically unique set of buildings and no highrise buildings as elsewhere in the world.  I strongly suggest we keep it that way: no high rise buildings on the seafront and in the city centre.  The Swakopmund Structural Plan has found more suitable areas for high rise buildings. Why destroy the uniqueness of Swakopmund, its basis of tourism attraction, when we have other options of development that would benefit more people?!  Other sea-side town and cities worldwide have messed it up: look at Spain for example and other  European countries: for short-term money only benefitting a few, the whole town was destroyed by disrupting the beach view for the rest of the town/city. We should learn from their mistakes!  I reiterate a high-rise building along Swakopmund's favourite beach would disturbing the sense of place in the area, as well as disturbing the atmosphere for which the Mole area is renowned. It would block the view of the lighthouse in many areas of the beach. It would cast a shadow over the play park. This public area with the palm trees, grass in the sun and the playpark is a favourite amongst Swakopmunders. It is one of the few places where all people mingle, no matter what colour or age. This is probably our most important cross-cultural meeting place. We don't want that overshadowed!  Regarding Report ECC-111-307-REP-07-D, PRELIMINARY ASSESSMENT REPORT PLUS IMPACT  ASSESSEMENT, Erf 4747 SWAKOPMUND, I want to raise following concerns:  What will be the parking situation for Museum, play-park and		



NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
	COMMENTS RELATED TO THE REVIEW O	F THE PRELIMINARY ASSES	SSMENT REPORT AND ITS APPENDICES
	beach visitors during construction? For sure the traffic will be slowed down and obstruction on this narrow road. Dust etc. will be a problem, especially to the sensitive objects in the Museum. Noise of construction will disrupt Museum visitors and staff. Construction might sway people not to visit the area, thus negatively impacting the Museum. Museum visitors might not be able to reach the parking easily due to construction vehicles. The report only mentions residents that will be disturbed but forgot (potential) Museum visitors and staff. A medium-term reduction of visors to museum is expected (reversible once Sur la Plage opened). This will be hard to bear for the Museum after COVID-19 and economic recession. Table 18 should have included the Museum as receptor. Table 19: I strongly disagree with the judgement that the impact on historic feel of the town tied to its sense of place is only minor! Formerly the lighthouse was always visible from all areas of the beach (even when the old swimming pool was still there). The lighthouse is part of the sense of space, which is not visible from many areas once the new building should be erected. The nature of  this impact is definitely not reversible nor negligible nor any of the other mild words used. Thus the significance of this impact is not minor! (p 56) Shadow during most parts of the		



NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
	COMMENTS RELATED TO THE REVIEW O	F THE PRELIMINARY ASSES	SMENT REPORT AND ITS APPENDICES
	extent of the shadow was shown? That the shadow extends beyond the simulation range?!  Table 20: thus strongly disagree with rating as minor significance of impact.  Please supply a proper shadow simulation, showing the full extend of the shadow!  I trust the discrepancies in the report and the short-term vision only benefitting very few Namibians will cause the project not to go ahead in the form proposed in the abovementioned report!  Yours sincerely,  Nadine Kohlstädt		
42	To: info@eccenvironmental.com att: Mrs. Hester Mrs. Jessica and the whole Team re: erf: 4747 Swakopmund Project - Lighthouse Property Investment Trust Dear All, in the very first place I want to thank you for a very detailed job done and for the extension until the 4th  November 2020 you, Mrs. Hester, granted me, to deliver my comments/concerns/ objections  (as follows): Could the Municipality of Swakopmund provide a proof that the TOWN PLANNING SCHEME is/was amended legal recently of building up to a height of 30	Gabi Woermann  Comment received via email (03.11.2020)	These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:  Chapter 3: Section 3.1, table 2 Chapter 7: Section 7.5.2

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NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
	COMMENTS RELATED TO THE REVIEW O	  F THE PRELIMINARY ASSES	SMENT REPORT AND ITS APPENDICES
	meters? At its present stage the proposed disproportionate building does not comply nor compare to the present surrounding and the rest of the MOLE Beach Front Image neither to the rest of the town. Therefor it would not attract Tourism from abroad or South Africa. Nor would such an elite building/accommodation complex contribute to the social-economical peace and stability of Swakopmund and its inhabitants. I thank you very much to consider and incl. my comments. May I please expect an answer. Kind regards Gabriele Woermann Swakopmund, 1st		
43	I would herby like to voice my strongest objection against the proposed development on ERF 4747, Old Municipal Pool and adjacent areas.  The height restriction relaxation was already not done by protocol and the development of such a building is only going to serve a few but harm many.  The building will block light to all buildings and developments behind and next to it. And this in Swakopmund's main attraction area!  Even the units within the proposed development will not receive much light because of the layout of the building.  All properties behind the building will instantly loose value.	Maike Becker  Comment received via email (02.11.2020)	These matters have been addressed in the updated ESIA report.  Please refer to the following sections in the report:  Chapter 3: Section 3.1, table2 Chapter 4: Section 4.4.4 Chapter 7: Sections 7.5.2; 7.5.5

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NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
	COMMENTS RELATED TO THE REVIEW O	F THE PRELIMINARY ASSES	SMENT REPORT AND ITS APPENDICES
	The character of Swakopmund will be changed for ever irreversibly. Keeping in mind, that this specific character is what draws thousands of tourists every year.  The building will set a precedence for more high rise buildings on the beach front. In many examples around the world it has been learnt that this kind of development is the worst possible thing to do to a beach front town. It is only logical that a cities skyline should start from small to tall the further you move away from the shoreline. This allows for higher value developments even in 2nd 3rd or 4th row.  The building will most probably not even be occupied fully due to the current and ongoing economic depression. Which is estimated to still last for another 10 years. This will give Swakopmund yet another white elephant, like the Platz am Meer Development in Vineta.		
	Kind regards  Maike Becker		
44	Good day,  My strong objection against the proposed development on ERF 4747:  It obstructs the lighthouse navigational beacons The Mole is a historic feature and should have buildings around that fits with the style and have aesthetic value in that	Ulrike Rodenwoldt  Comment received via email (26.10.2020)	These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:  Chapter 5: Sections 5.5 Chapter 6: Section 6.3, table6 Chapter 7: Section 7.4; 7.5.2

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NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
	COMMENTS RELATED TO THE REVIEW O	F THE PRELIMINARY ASSES	SMENT REPORT AND ITS APPENDICES
	environment The change of climate and wind is of concern for the life in our precious ocean, has a detrimental impact on socioeconomic development.  Please record this opinion.  Regards from a concerned citizen  Ulrike		
45	On 26/10/2020, 5:35 PM, "wolfram.becker@gmx.de" <wolfram.becker@gmx.de> wrote:  Herewith receive my vehement and strongest objection against the proposed development on ERF 4747, Old Municipal Pool and adjacent areas.  The proposed development with its height will  1. Obstruct views of Properties and areas behind the development  2. Change climate and wind at the Mole  3. Disturb Lighthouse Navigational beacons  4. Disregard previous developments that blended in with the area @ lower heights  5. Spoil the attractiveness of the area to visitors  6. Set precedence for Highrise developments on the beachfront, which only serve the interest of the developer.  Below an exemplary picture of such developments as present along the Mediterranean coast. Studies in those areas prove, that this has a detrimental impact on the socioeconomic development of such communities and</wolfram.becker@gmx.de>	Wolfram Becker  Comment received via email (02.11.2020)	These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:  Chapter 5: Section 5.5 Chapter 6: Section 6.3, table 6 Chapter 7: Section 7.5.4

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NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION			
	COMMENTS RELATED TO THE REVIEW OF THE PRELIMINARY ASSESSMENT REPORT AND ITS APPENDICES					
	surrounding neighbourhoods, which by far outweigh the immediate short-term benefits that are anticipated.  It should not become the problem of the community, that an overambitious developer (with no regard for surroundings) needs to bargain on a maximum return on such a development, to ensure that the dysfunctional replacement pool that was constructed can be accommodated in this investments return.  Gesendet mit der mobilen Mail App					
46	Please acknowledge my urgent and vehement objection against the proposed development on Erf 4747.  It blocks views of properties and areas behind the development  It shall destroy the atmosphere of our cozy, friendly Swakopmund	Birke Hower  Comment received via email (26.10.2020)	These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:  Chapter 5: Sections 5.4; 5.5 Chapter 6: Sections 6.3, table 6			
	There are already plenty shops and apartments standing					

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NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION			
110	INAL / STAREHOLDER COMMENT RECEIVED	STAREHOLDER DETAILS	RESI SHOE, CEARINGATION			
	COMMENTS RELATED TO THE REVIEW OF THE PRELIMINARY ASSESSMENT REPORT AND ITS APPENDICES					
	empty					
	Locals could not afford to rent those apartments, so most of the year they will be abandoned					
	It disturb Lighthouse Navigation beacons					
	It does not suit into the area, and is not attractive for visitors ,nor swimmers					
	Please record this comment and relay as required					
	Regards					
	Birke Hower					
47	I would hereby like to voice my strongest objection against	Freya Lund	These matters have been addressed in the updated ESIA report.			
	the proposed development on Erf 4747, Old Municipal Pool and adjacent areas.	Comment received via	Please refer to the following sections in the report:			
	and dajacent dreas.	email (26.10.2020)	Chapter 3: Section 3.1, table 2			
	Reasons for Objection:	, ,	Chapter 6: Section 6.3, table 6			
	That it is a known fact worldwide that high-rise buildings		Chapter 7: Section 7.5.2; 7.5.5			
	along a beach front are to the detriment of tourism and social		The proposed development is not expected to infringe upon the			
	environment,		boardwalk/promenade on its western side or southern side, as this			
	2. That such developments e.g., Spain Do NOT contribute		is municipal property.			
	substantially to the economy in general  3. That such developments are benefitting only a few					
	That such developments are benefitting only a few     That such developments do not create job opportunities					
	as the owners will in most cases not be permanent occupants					
	5. That such a high-rise building will block the light and view					

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NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
	COMMENTS RELATED TO THE REVIEW O	F THE PRELIMINARY ASSES	SMENT REPORT AND ITS APPENDICES
	of all the existing buildings 6. That it is the responsibility of the municipal council to ensure that existing properties retain their values 7. That it is the municipal council's responsibility to ensure that ALL residents and property owners have easy access to the beach. 8. That the character of Swakopmund, and thus it's tourist attraction, will be changed forever and irreversibly. 9. That a city's skyline should start from small to tall the further you move away from the shorelines. 10. That height restrictions as per town planning scheme have not been adhered to 11. That the economic circumstances are not conducive to such a development 12. That Swakopmund cannot afford another white elephant like Platz am Meer As a property owner in Swakopmund I expect that my objections are to be seriously considered Freya Lund		
48	081 261 8801  Dear Madam/Sir,	Jens Prothmann	Thank you. No further work is required.
40	The above proposed pompous/disproportionate development does not befit our beautiful and exquisite Swakopmund.  Hence, I vehemently object to it.	Comment received via email (26.10.2020)	Thank you. No further work is required.
	Sincerely,		

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NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION			
	COMMENTS RELATED TO THE REVIEW OF THE PRELIMINARY ASSESSMENT REPORT AND ITS APPENDICES					
	Jens Prothmann					
	Dear Madam/Sir,  The above proposed pompous/disproportionate development does not befit our beautiful and exquisite Swakopmund.  Hence, I vehemently object to it.  Sincerely,  Hanli Prothmann	Hanli Prothmann  Comment received via email (26.10.2020)	Thank you. No further work is required.			
49	If one takes developments of untouched areas around the world into account, then one must realise that the opinions of the people staying in the areas to be developed are normally not taken into account.  This is the kind of phenomena we are experiencing here in Swakopmund on Erf 4747 while we as the onlookers can only watch in awe how the rich mould the world around us and take the monetary spills thereon, defying the wishes of all Swakopmunders and of the tourists visiting the original beaches of Swakopmund fleeing the concrete jungle of the world's biggest cities.	Markus von Jeney  Comment received via email (26.10.2020)	Thank you, no further work is required.			

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NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION			
	COMMENTS RELATED TO THE REVIEW OF THE PRELIMINARY ASSESSMENT REPORT AND ITS APPENDICES					
50	We can only pray and hope that you have the wisdom to take the right decision that will keep the beach front in Swakopmund intact for many years to come!  Markus von Jeney  Good day,	Anna Schwietering	These matters have been addressed in the updated ESIA report.			
50	Kindly receive herewith my strongest objection against the proposed development on ERF 4747, Old Municipal Pool and adjacent areas, Swakopmund. In addition to the following obvious concerns, that the proposed development with its height will:  1. Obstruct views of Properties and areas behind the development 2. Change climate and wind at the Mole 3. Disturb Lighthouse Navigational beacons 4. Disregard previous developments that blended in with the area at lower heights 5. Spoil the attractiveness of the area to visitors 6. Set precedence for High-rise developments on the beachfront, which only serve the interest of the developer. This kind of development will destroy the very nature of Swakopmund as a quaint coastal town on the Namib coast of the African country NAMIBIA with its distinct architecture, that brings us the tourists seeking authenticity (and not masstourism) in the first place! Regards, Anna Schwietering	Comment received via email (26.10.2020)	Please refer to the following sections in the report:  Chapter 5: Section 5.5 Chapter 6: Section 6.3, table 6 Chapter 7: Section 7.5.4			
	Concerned Citizen.					



NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
	COMMENTS RELATED TO THE REVIEW O	F THE PRELIMINARY ASSES	SSMENT REPORT AND ITS APPENDICES
51	Re: Letter from Patrick Koehlstaedt. Objection to the proposed development of ERf 4747.  I hereby 100% support the objections written to you by Mr Patrick Koehlstaedt re: the proposed development on Erf 4747 Swakopmund, Old Municipal pool and adjacent areas.  I agree with him on all points that he has raised against the proposed development  I would also like to ask why a development such as this is even being considered during these times of economic hardship, and the limitations in all areas that COVID 19 is presenting us with?  I would actually also ask, why have these plans come so far and why were they not rejected on day one?  How is this development in any way going towards helping and uplifting the local community?  Do we seriously need more expensive accommodation? This is Swakopmund with a tiny population, not Miami Beach.  I urge you to really re-consider what you are doing here, and what the benefits are to the community, if any.  Will the developers feel proud to build a place like this? Will he sleep well at night when the money runs out halfway through and the building is left half standing as an even greater eyesore for people to flinch at? Then it will be too late to dig up the foundations.	Caroline Behrens  Comment received via email (27.10.2020)	Response: The economic impacts of COVID are being felt globally and the full effects of this are yet to be understood, the developer is taking into consideration unplanned situations (for example COVID) and how this affects the economics of such a project.



NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION				
	COMMENTS RELATED TO THE REVIEW OF THE PRELIMINARY ASSESSMENT REPORT AND ITS APPENDICES						
	I am sure that sensible, balanced comments have been given in in objection to this development, I urge you now to listen to them.  With kind regards Caroline Behrens						
52	Scanned letter attached from a group of people submitting their concerns  Issues raised included: Height of the building Water and Sewage Electricity consulption Waste management and fire rescue facilities Traffic increase	H.& E. Tölken  Comment received via email (03.11.2020)	These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:  Chapter 4: Sections 4.4.4; 4.5.1; 4.5.2; 4.5.3; 4.5.4. Chapter 5: Section 5.6, and Chapter 7: Section 7.5.3				
53	Dear Sir/Madam,  Thank you for the opportunity to comment on the documents you have prepared "to support" the development of erf 4747 Swakopmund. I note that ECC claims it is independent of the proponent, has no vested interest or financial interest in the proposed development.  1. Please send me proof that the recent Town Planning	Buffy Tebbit  Comment received via email (04.11.2020)	Response: Please note that the title deed of the property is attached as appendix D to this addendum report.  All technical details relating to parking space calculations can be found in the Aesthetic approval documentation attached as an appendix to the ESIA report.				
	ESIA ADDENDUM	DEV/ 01	DACE 75 OF 96				

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NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
	COMMENTS RELATED TO THE REVIEW C	F THE PRELIMINARY ASSES	SSMENT REPORT AND ITS APPENDICES
	Scheme amendment (upon which this development proposal relies) has been approved and followed all the legal requirements as per the Town Planning Act etc.		Please note that the developer may upgrade the existing playground as part of its signed development agreement with the Municipality.
	2. Please send evidence that Swakopmund Municipality had the authority to sell erf 4747 to Lighthouse Property Investment Trust.		Please note the geotechnical study completed for the project is presented as an appendix to the assessment report.
	Please present proof of identity of the proponents, the members of Lighthouse Property Investment Trust.		Please note that approval from the National Heritage council was not provided.
	4. Please present verification that the number of parking spaces you have allowed for this development are as per Town Planning requirements.		Please refer to the following sections in the updated ESIA wherein these matters are addressed:  Chapter 3: Section 3.1
	I note the proposal includes residential AND office space, as well as retail restaurants, wellness spa, gym etc. all of which have to be catered for when calculating parking space		Appendix D Chapter 5: Section 5.6 Chapter 7: Section 7.5.1; 7.6.1
	requirements.  5.Please send me the road traffic study that is obligatory part of EIA and EMP - please include evidence of claims made regarding impacts of air pollution, noise, vibrations to surrounding existing structures both during the proposed construction phase and then after once development has been completed.		
	6. Please send me the noise pollution study that is obligatory part of EIA and EMP - please include evidence of claims made regarding impacts during both the proposed construction phase and then after once development has been completed.		



NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
	COMMENTS RELATED TO THE REVIEW C	OF THE PRELIMINARY ASSES	SMENT REPORT AND ITS APPENDICES
	Please indicate decibel rating of proposed air condition ventilation systems for both the residential and commercial (restaurant) components of the proposed development.		
	7. Clearly there will need to be mitigating measures with regards to the negative environmental impact the proposed development will have vis noise, traffic, air pollution etc. Please advise which Municipal by laws will be followed with regards to operating hours, HGV weight restrictions etc.		
	8. Please present a study that reviews the municipal infrastructure is able to support such a high-density development in an already established residential area, directly adjacent to the beach. Please include reference to Municipal responsibilities of water supply, sewerage, refuse collection, street cleaning/maintenance, fire rescue service in the event of an emergency etc.		
	9. Please present proof that the proposed development has been given approval from the Heritage Council. Please advise if erf 4747 is within the CBD of Swakopmund.		
	10. Please advise date for the public scoping exercise.		
	11. Please send me the engineering study that supports the notion that a below ground level car park is feasible within this development. Please include copy of the most recent land survey diagrams.		



NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
	COMMENTS RELATED TO THE REVIEW O	F THE PRELIMINARY ASSES	SMENT REPORT AND ITS APPENDICES
	12. I note the proposed development includes the redevelopment of existing playground area. Please present by which authority the owner of erf 4747 would also have rights to the playground area? In addition, please present diagram to show that the proposed residential/retail development will have a footprint that wholly lies within the boundaries of erf 4747.  It is not a stretch to realise that this is an elitist development. It does not benefit the majority of Swakopmund rate payers. Further it is not unreasonable to estimate that the selling price for such residential units will be well beyond the finances of the majority of Namibians. Please send your response justifying the need for even more luxury residential apartments in Swakopmund. Please include reference to how many high-end residential apartments and houses currently stand vacant for sale vs. the estimated number of Namibians who continue to seek affordable housing in Swakopmund. Please present rational to develop even more office space, indicating how much existing office space has been vacant for a number of years already.  Please confirm receipt of this email by reply and advise when you will be able to reply to the above questions.		
	Regards, E J Tebbit		



NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
	COMMENTS RELATED TO THE REVIEW C	OF THE PRELIMINARY ASSES	SSMENT REPORT AND ITS APPENDICES
54	Scanned letter received from Mrs. G Woermann on behalf of Mr. Mercker attached as Appendices B	Mr. Eberhard Mercker  Comment received via email (04.11.2020)	Response: The proponent is unaware of the playground falling under the jurisdiction of the Ministry of Environment, forestry and Tourism and will therefore have to liaise with the responsible parties and the municipality with regards to access on said property and its possible effects on the development agreement signed with the municipality.
55	Scanned letter attached of concerns signed by a group of I&APS and attached as Appendix C:  Issues raised included: Height of the building Water and Sewage Electricity consumption Waste management and fire rescue facilities Traffic increase	Nickys world  Comment received via email (04.11.2020)	These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:  Chapter 4: Sections 4.4.4; 4.5.1; 4.5.2; 4.5.3; 4.5.4. Chapter 5: Section 5.6, and Chapter 7: Section 7.5.3



# APPENDIX A – SCANNED LETTER FROM H&E TOLKEN

info@eccenvironmental.com				
nfo@eccenvironmental.com				
re: erf 4747 Swakopmund Pr	e: erf 4747 Swakopmund Project – Lighthouse Investment Trust			
and raise our concerns wrt: the planned 30 mrt. height no We are aware that we are late	kopmund citizens, want to make use ew building on above erf. e: however to work through a very v ever that we never to late. Pls. conci	well done paper of 227 pages took		
Are there any professional tr	raceable proofs to rectify this high ir	ncrease in the following:		
WATER and SEWERAGE? ELECTRICITY CONSUME WASTE ASSESSMENT? F MAINLY TRAFFIC INCRE +	PTION ? FIRE rescue facilities ?			
NAME	SIGNATURE	DATE		
GABY TIRRONOW	9 tong.	3-11. 2020		
Willi Mosse-We	isolude Wolnington	3.11.2020		
High Toller	HITS )	ir 1/		
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Lawika Behre	78711EN 71230	11 51 3.11, 202		
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### APPENDIX B – SCANNED LETTER FROM EBERHARD MERCKER

### TO WHOM IT MAY CONCERN

Re: Erf 4747, Lighthouse Property Investment Trust

### Background:

While being chairperson of the Scientific Society Swakopmund the question was raised whether the building of the Swakopmund Museum was encroaching into the adjourning erf commonly called Childrens' Playground or not.

### Investigation showed:

- The building of the Museum does not encroach onto the adjourning erf (established for survey).
- This erf, called on old plans of that area as "Unsurveyed Sea Erf", does not belong to the Municipality of Swakopmund but is owned by the Government of Namibia. Subsequent negotiations between the various ministries resulted in the decision that Ministry of Tourism and Nature Conservation would be responsible for this erf in future.
- 3 As this erf was never surveyed it is not part of the Municipal Area.
- In case some institution should want it to be incorporated into the Municipal Area a lengthy process via the Townships Board will have to be started necessitating advertisements in all local newspapers. This did not happen up to date.

### Consequently:

This "Unsurveyed Sea Erf" or any part of it cannot be included in any way into the proposed development of Erf 4747 Swakopmund.

Dated at Swakopmund, this 4th day of November 2020

E Mercla

Eberhard Mercker



# APPENDIX C – SCANNED LETTER FROM NICKYS WORLD

2011			
	info@eccenvironmental.com		
m/	re: erf 4747 Swakopmund Project	– Lighthouse Investment Tru	st
	the planned 30 mrt, height new bui	ilding on above erf.	se of our right of Public Participation well done paper of 227 pages took cider the following:
	Are there any professional traceabl		
9	WATER and SEWERAGE ? ELECTRICITY CONSUMPTION WASTE ASSESSMENT ? FIRE re MAINLY TRAFFIC INCREASE ? +	? scue facilities ?	
	NAME	SIGNATURE	DATE
	Pombili	Allati	04.11.20
	Melisa	Madjikuru	4.11.20
	<u>26</u>		4:11:20
	NOILIMERCE	N).H	04.11.20
	Magda Roaths	No.	04-11-2020
	Bernice Kisting	R.	Q 11-2020
	Maitha Mutaleni	Mhutalen.	C4-(1-0000
	A Cart	O Tribungien	04-11-900
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info@eccenvironmental.com			
re: erf 4747 Swakopmund Proje	ct – Lighthouse Investment Trust		
We, a group of various Swakopmund citizens, want to make use of our right of Public Participation and raise our concerns wrt: the planned 30 mrt. height new building on above erf.  We are aware that we are late: however to work through a very well done paper of 227 pages took some time. We do hope however that we never to late. Pls. concider the following:			
Are there any professional trace	able proofs to rectify this high in	crease in the following:	
WATER and SEWERAGE ? ELECTRICITY CONSUMPTIC WASTE ASSESSMENT ? FIRE MAINLY TRAFFIC INCREASI +	rescue facilities ?		
NAME	SIGNATURE.	DATE	
Annie Coessess		2/11/20	
Wolfgang Neubre	4 Mln	3/11/2020	
Aute Won See	1 481	3 11-2020	
Jochen Kleubn	ech Whi	03/11/2020	
Ji Ha Wei dwar	in Maga	03/11/2020	
Rosemarie Ma	ten for the	03/11/2020	
HI von Jewi-12	Mondeust	2.112020	
K von Jewitz	Val	2.11. 2020	
Gisela Leugeryan	in P.L.	3.11, 2020	
H Strinbrück	NO.	B.11-80 An	
Al Stainhail	P.C. Shadapi de	S.11,2010	
ROST LOCHCEMAN	1 (K-hle	3/1/2020	
Werner Hötzel	While	3 N. 220	
Sabina Hotzel	3. Hotel	3. U. 262	
Narine Troast	Nrock	3/11/2020	
STOURS HESS	The	3/11/2020	
	10	311/200	
Henry Dudde	Dullde	3111 600	



### APPENDIX D – TITLE DEED FOR ERF 4747

2

AND THE SAID APPEARER DECLARED THAT his said principal on the 21 May 2010 had truly and legally sold, and that he/she, in his/her capacity aforesaid, did, by these presents, cede and transfer, in full and free property, to and on behalf of

# THE TRUSTEES FOR THE TIME BEING OF THE LIGHTHOUSE PROPERTY INVESTMENT TRUST

(hereinafter styled the TRANSFEREE)

Its Successors-in-title or Assigns,

CERTAIN Erf No. 4747 Swakopmund

SITUATE In the Municipality of SWAKOPMUND

Registration Division "G" ERONGO REGION

EXTENT 6086 (Six Nil Eight Six) Square metres, as will appear from

Diagram No. A 563/2004

HELD BY Certificated of Consolidated Title No. T 469 /2014

**SUBJECT** to the following conditions imposed in terms of the Town Planning Ordinance, Ordinance 18 of 1954, as amended, and as created in Certificate of Consolidated Title No.

T 459 2014, namely: -

## IN FAVOUR OF THE LOCAL AUTHORITY

- A. The erf shall only be used or occupied for purposes which are in accordance with, and the use or occupation of the erf shall at all times be subject to, the provisions of the Swakopmund Town Planning Scheme prepared and approved in terms of the Town Planning Ordinance, 1954 (Ordinance 18 of 1954) as amended.
- B. The building value of the main building, excluding the outbuilding to be erected on the erf shall be at least four times the municipal valuation of the erf.

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### APPENDIX D - ADVERT

THE NAMIBIAN 8 THURSDAY 6 AUGUST 2020





NOTICE OF ENVIRONMENTAL ASSESSMENT & PUBLIC PARTICIPATION PROCESS DEVELOPMENT OF RESIDENTIAL & RETAIL (INCLUDING TOURISM) ACTIVITIES ON ERF 4747 IN SWAKOPMUND, ERONGO REGION, NAMIBIA

Applicant: Lighthouse Property Investment Trust
Environmental Assessment Practitioner (EAP): Environmental Compliance Consultancy
Location: Swakopmund, Erongo Region, Namibia

Project: Proposed development of residential & retail (including tourism) activities on Erf 4747 in Swakopmund, Erongo Region, Namibia

Proposed activity: The proposed project is for the development of residential & retail (including tourism) activities on Erf 4747 at the Mole, Swakopmund main beach, for possible accommodation facilities, as well as associated facilities such as a firese gym, spa, a longer area and restaurants be proposed development will also include the construction of office space and onsite parking. Additional activities to be carried out on site include the upgrade of the existing green space and children's playground area and the municipal boardwalk where applicable.

Purpose of the review and comment period: The purpose of the review and comment period is to present the proposed project and to afford interested and affected parties (IBAPs) an opportunity to comment on the project to ensure that all issues and concerns are captured and considered in the assessment.

teview period: The review and comment period is effective from 06th - 27th August 2020.







### APPENDIX D - ADVERT

12 NAMIB TIMES 9 OCTOBER 2020

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Oswaldo Mendes and Carel de Jager in their Subaru Impreza at the first ever Erongo Sprint Photo contributed

Zachary Martin and Amanda Hugo in their VW Polo Vivo at the first ever Erongo Sprint rally Photo contributed





NOTICE OF AN ENVIRONMENTAL ASSESSMENT & PUBLIC PARTICIPATION PROCESS DEVELOPMENT OF RESIDENTIAL AND RETAIL (INCLUDING TOURISM) ACTIVITIES ON ERF 4747 IN SWAKOPMUND, ERONGO REGION, NAMIBIA

ntal Compliance Consultancy CC (ECC) hereby gives notice to the public that at for an environmental clearance certificate in terms of the Environmenta ant Act, No. 7 of 2007 will be made as per the following:

urpose of this notice: . To provide new (&APs the opportunity to register for inclusion in the put

rocess.

To afford all new and existing registered interested and Affected Parties (I&APs) as spoortunity to comment on the preliminary assessment report. the period is effective from 12\*-27\* October 2020.

ne penois effective from LY – ZY October 2020.

Topopoed activity. The proposed project is for the development of residential and retail including tourism) activities on Erf 4747 at the Mole, Swekopmund main beach, for costible accommodation facilities, as well as associated facilities such as a fitness gym, spa, lounge area and restaurants, etc. The proposed development will also include the onstruction of office space and onsite parking. Additional activities to be carried out on its include the upgrade off the existing green space and children's playground area and the nunicipal boardwalk where applicable.

I&APs and stakeholders are required to register for the project at:

itps://eccenvironmental.com/projects/ comments are also welcome via email by using the email address listed below.

Environmental Compliance Consultancy

tegistration Number: CC/2013/11404 Members: Mr JS Bezuidenhout or Mrs J



# **Erongo sprint rally 2020**

After the imposed Covid-19 lockdown, Walvis Bay Motor Club (WBMC) hosted the first ever Erongo Sprint rally last weekend outside Swakopmund.

The organizer of the event Allen Martin said that

Incognizer of the event Anen warms and materials the event was held to show the NMSF and the sport commission that they can host a motor sport event under the Covid-19 regulations.

Martin added, with all motor sport events cancelled due to covid pandemic, WBMC are in discussions with the NMSF to host one or two rallies before the end of the year as many club and pational events had to be cancelled due to Covid and the contract of the contrac national events had to be cancelled due to Covid. national events had to be cancelled due to Covid.
The fasted time of the day was 00.05.02 minutes
and was set by Zachary Martin and Amanda Hugo
who took honours by ending in the first place in
is VW Polo Vivo with Oswaldo Mendes and
Carel de Jager in their Subaru Impreza in a time of
00.05.39 in second place.

The sprint rally was endorsed by the Namibia Motor Sport Federation (NMSF) and was held under the Covid-19 regulation with 15 rally cars, 3 quad bikes and 7 MX bikes.

A sprint rally is in a nutshell, a one day event in the form of a mini rally consisting of one stage with a distance of 6.37km. There are no time controls, no medals or trophics as it is a fun event under the NMSF's regulations.

The full result for the day was: 1. Zachary Martin and Amanda Hugo (00.05.02) 2. Oswaldo Mendes and Carel de Jager (00.05.39) 3. Rolf Pretorius Bartie Rautenbach (00.06.02) 4. Ettienne distance of 6.37km. There are no time controls, no medals or trophics as it is a fun event under the NMSF's regulations.

NMSF's regulations.

The full result for the day was: 1. Zachary Martin and Amanda Hugo (00.05.02) 2. Oswaldo Mendes and Carel de Jager (00.05.30) 3. Rolf Pretorius Bartie Rautenbach (00.06.02) 4. Ettienne des and Carel de Jager (00.06.21) 6. Gino Mendes and Carel de Jager (00.05.01), 5. Quinton form of a mini rally consisting of one stage with a distance of 6.37km. There are no time controls, no medials or trophics as it is a fun event under the NMSF's regulations.

Experimentally is in a nutshell, a one day event in the form of a mini rally consisting of one stage with a distance of 6.37km. There are no time controls of the vent of the des and Carel de Jager (00,05,39) 3. Rolf Pre-torius Bartie Rautenbach (00.06.02) 4. Ettienne vd Heever and Cecil (00.06.10), 5. Quinton Liebenberg and Keren Till (00.06.25) 6. Gino Meyer and Riaan Hennoy (00.06.25) 7 Berto Mostert and Paul van Niekerk (00.06.25) 8. Paul Oosthuizen and Johan du Plessis (00.06.30) 9. Jan Everson and Fanie Botes (00.06.32) 10. Tinus Malan and Paul van Niekerk (00.06.37) 11. Steven Marpowick and Iodine van Zul Tinus Malan and Paul van Niekerk (00.06.37)
11. Steven Marmewick and Jodine van Zyl
(00.06.45) 12. Wido Bartsch and Raymond
Fourie (00.06.46) 13. Jacques Kruger and Roche
Louw (00.06.51) 14. Joao Coimbra and Jackie
Coimbra (00.07.07),15. Werner Bartsch and
Kobus Mulder (00.07.12) Quads: 1. Marthinus
Lombard (00.05.34), 2. Tom Scholtz (00.05.55)
3. Hugo Arangies (00.05.58), MX Bikes; 1.
Robbie Schneider (00.06.04) 2. Gino Rossi
(00.06.10) 3. Tarquin Liebenberg (00.06.21) 4.
Ruan de Lange (00.06.23) 5. Andre Barnard
(00.06.58) 6. Marthinus Schoeman (00.07.00) 8.
Ole Steinstrater (00.08.40).

# **Father and sons National Trips** champions

The 2020 Namibian National Trips bowling championships were hosted by the Windhoek Bowling Club over the past weekend.

Poena Olivier and his two sons Cabous The Ladies champions are Anjuleen and Piet du Plooy as the runners up.

Olivier and Ronan Olivier were crowned state Laure Viljoen, Miele van der Merwe and Elzaan as the Men's National Trips Bowling de Vries with Henriette Partridge, Kobie champions with Johan Jacobs, Colin Peake Heesakkers and Annelize Opperman as runners up.



Ladies National Trips bowling champions Anjuleen Viljoen, Miele van der Merwe and Olivier, Cabous Olivier and Ronan Olivier



Men's National Trips bowling champions Poena



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