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ENVIRONMENTAL ASSESSMENT ADDENDUM REPORT

ERF 4747, SWAKOPMUND, ERONGO REGION

PREPARED FOR

 LIGHTHOUSE PROPERTY
INVESTMENT TRUST

DECEMBER 2020

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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 12th October and 27th 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 13-28th 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 17th 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: www.eccenvironmental.com

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.

- **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	<p>Environmental Compliance Consultancy (ECC) Environmental Assessment Practitioner ERF 4747, Swakopmund Lighthouse Property Investment Trust ECC-111-307-NTS-02-C</p> <p>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.</p> <p>2. No mention is made of the existing ecology of the area, and in particular the extensive plantations of palm trees. There</p>	<p>Mr. Robin Tyson Received via email (07.08.2020)</p>	<p>Good day,</p> <p>The BID is available on the website (link below); however, I attach it hereto for ease of reference.</p> <p>https://eccenvironmental.com/project/development-of-residential-retail-including-tourism-activities-on-erf-4747-in-swakopmund-erongo-region/</p> <p>All information regarding design height, heritage etc. will be sent to all I&AP within the next week.</p> <p>"Good morning Robin</p> <p>Your email is well received, and the correction noted."</p>

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	<p>needs to be a guarantee from the developers that ALL existing palm trees will be retained in the proposed development.</p> <p>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.</p> <p>4. No mention is made of traffic and parking issues. Free off-street parking for customers of the restaurants and spa to the east of the development must be provided.</p> <p>- Robin Tyson</p> <p>Cc: Romeo Muyunda, Ministry of Environment and Tourism</p>		
2	<p>The height of the building – 1. visual impacts for locals and 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</p>	<p>Ms. Carlene Binneman Received via email (10.08.2020)</p>	<p>Standard ECC I&AP acknowledgement reply with the stakeholder letter and link to the NTS was provided to the I&AP.</p>

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	<p>a spa, so there is no real need for an additional one in the same vicinity.</p>		
3	<p>Will you have a public meeting?</p> <hr/> <p>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.</p> <p>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?</p> <p>In terms of the EMA Regulations, Section 23</p> <p>(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.</p> <p>(3) Reports referred to in subregulation include (a)</p>	<p>Dr. Gaby Schneider (Comment received via telephone)</p> <p>10.08.2020</p> <p>Comment received via email (10.08.2020)</p>	<p>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.</p> <hr/> <p>Standard ECC I&AP acknowledgement reply with the stakeholder letter and link to BID direct response as below.</p> <p>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.</p> <ol style="list-style-type: none"> 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.

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	<p>scoping reports; (b) scoping reports amended and resubmitted; (c) assessment reports; and (d) assessment reports amended and resubmitted.</p> <p>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.</p> <hr/> <p>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?</p>		<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Many thanks and kind regards,</p> <hr/> <p>Dear Dr. Schneider</p> <p>Thank you for showing commitment to the EIA process as an I&AP. Your constructive inputs will be appreciated.</p>

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	<p>Dear Lester,</p> <p>Many thanks indeed. However, I still do not understand why I</p>		<p>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.</p> <p>I trust you will find this in order.</p> <p>Dear Gabi,</p> <p>We note your concern.</p> <p>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.</p> <p>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.</p> <p>All details you wish to review about the project will be contained in the draft documentation.</p> <p>Dear Dr Schneider,</p>

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

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	<p>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.</p> <p>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.</p> <p>Looking forward to your answer I send my very best regards</p>		<p>I trust the above assures you that we are following due procedure and maintain the highest level of transparency.</p>
4	<p>Thank you for accepting my application to register as an I&AP.</p> <p>I have a number of questions and concerns regarding this process that you are conducting and also the development itself:</p> <p>Process:</p> <ul style="list-style-type: none"> - 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? 	<p>Mike Leech Comment received on the 11/08/2020</p>	<p>Process:</p> <p>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.</p>

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	<p>- I walk past the site three times every week and have not yet seen any signs?</p> <p>Development</p> <p>- How does this EIA fit in with previous EIA's and designs that have been submitted for this site?</p> <p>- What has changed in the current proposal that requires a re-submission?</p> <p>- Where can one see the design layout and skyline profile?</p> <p>- 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?</p> <p>- Has an updated viability study been completed that takes account of the impacts on tourism and travel of covid-19?</p> <hr/> <p>Dear Stephan</p> <p>I have not received any response to my mail below to info@eccenvironmental.com following acceptance of my registration as an I&AP in respect of the Mole Development</p> <p>Maybe you can assist?</p> <p>Regards</p> <p>Mike</p> <hr/>		<p>Site notices were put up on the site during the week of the 10th of August 2020.</p> <hr/> <p>Dear Mr Leech,</p> <p>Apologies for the delayed response from my team.</p> <p>I respond to your questions/concerns below in blue:</p> <p>Process:</p> <p>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. The public participation process requires two adverts 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 requirement. Additionally, a minimum timeframe is provided for 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 additional recommendations are welcome.</p> <p>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)</p>

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	<p>Dear Stephan, Thank you for your comprehensive reply. I look forward to receiving the draft scoping document for review. Regards Mike</p>		<p>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.</p> <p>Development</p> <p>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.</p> <p>What has changed in the current proposal that requires a re-submission? This is not a re-submission; this is an application for tourism activities as explained above.</p> <p>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</p>

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			<p>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. 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 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</p>

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5	<p>Please register the undersigned as I&AP for subject project.</p> <p>Please urgently send BID.</p> <p>Why is an EIA now required? i.e., what aspects of the proposal have triggered the need for an EIA?</p> <hr/> <p>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,</p>	<p>Frank Löhnert (received via email on the 11/08/2020)</p> <p>Comment received via email (02.09.2020)</p>	<p>Standard ECC I&AP acknowledgement reply with the stakeholder letter and link to the BID.</p> <p>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.</p>
6	<p>Hope to see a development that respects the interests of all residents and not only those of a selected few.</p>	<p>Mr Patrick Kohlstaedt</p> <p>17.08.2020</p>	<p>Standard ECC I&AP acknowledgement reply with the stakeholder letter and link to BID</p>
7	<p>Just confirming that you received our online registration for the application by Lighthouse Property Investment Trust (see below)?</p> <hr/> <p>Will you be sending out a BID? What is the proposed height of the development?</p> <p>Thanks & regards Ann & Mike</p> <p>Dear Lovisa Thank you for the feedback. Unless we are missing it, the height of the proposed structure is not yet included. Is it</p>	<p>Mr & Mrs. Mike and Ann Scott</p> <p>Comment received via email (17.08.2020)</p>	<p>Standard ECC I&AP acknowledgement reply confirming the I&APs registration with the stakeholder letter and link to BID</p> <hr/> <p>Dear Mike and Ann</p> <p>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.</p> <p>Thank you.</p>

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	<p>correct that you will still be sending out these details in due course? Regards Ann & Mike Scott</p>		
8	<p>Hi Jessica,</p> <p>on the website to register as interested party for the Mole erf, I requested a current draft of the building plan.</p> <p>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.</p> <p>Thanks!</p> <p>Regards, Monika</p>	<p>Ms Monika Ruppel</p> <p>Comment received via email (20.08.2020)</p>	<p>Dear Monika</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>

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			<p>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.</p> <p>I trust this explanation of due process will assure you of our efforts to manage this process transparently and comprehensively.</p>
9	<p>Good Day Please register me as an IAP for the development of Erf 4747 in Swakopmund. Regards</p> <p>Anja</p> <hr/> <p>Good day, Thank you for the BID on the proposed development of Erf 4747 in Swakopmund.</p> <p>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.</p> <p>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.</p> <p>The EIA should definitely include a section looking at sense of place for the proposed development, as well as the visual</p>	<p>Anja Kreiner Registration request received via email (21.08.2020)</p> <p>Comment received via email (25.08.2020)</p>	<p>Standard ECC I&AP acknowledgement reply with the stakeholder letter and link to the BID.</p> <hr/> <p>Dear Dr, Kreiner,</p> <p>Thank you for providing us with your inputs. We have registered your concerns and hereby provide some explanatory notes to the issues raised.</p> <p>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.</p> <p>All relevant details pertaining to the proponent will be contained in the assessment report. The Am Weinberg estate in Windhoek is</p>

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	<p>impact of the development. Regards Anja</p>		<p>one such product of the developers. All potential impacts related to the development will be contained in the assessment report.</p> <p>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.</p> <p>Thereafter, the public feedback received will be incorporated into the draft assessment report and released again for review by the I&APs for commentary.</p> <p>The final assessment report will then incorporate the draft assessment review feedback and submitted to the government for a record of decision.</p>
10	A good development needs to be in a proper proportion to the whole / rest of the area.	<p>Hans-Jürgen Sauer Comment received via email (26.08.2020)</p>	Standard ECC I&AP acknowledgement reply with the stakeholder letter and link to BID included.

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11	<p>Dear Ms, Bezuidenhout Please forward the I&A registration form to me. Thank you Kind Regards</p> <hr/> <p>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.</p>	<p>Paulina Engelbrecht Registration. request received via email (27.08.2020)</p> <p>Comment received via email (31.08.2020)</p>	<p>Standard ECC I&AP acknowledgement reply with the stakeholder letter and link to the registration form and BID included.</p>
12	<p>To whom it may concern:</p> <p>Serious concerns about the proposed development of Erf 4747, Swakopmund</p> <p>In response to advert currently displayed by ECC on Erf 4747 Swakopmund calling for public participation.</p> <p>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 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</p>	<p>Karen Miller - Architect</p> <p>Comment received via email (25.08.2020)</p>	<p>Dear Ms, Miller</p> <p>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.</p> <p>We acknowledge receipt of your comments and concerns raised, and we will respond to them in due course.</p> <p>In the meantime, kindly find the attached standard letter to stakeholders.</p> <p>Response to the guidelines contained in the structure plan:</p> <p>The structure plan is a guiding document and not in force, therefore it cannot be used as an authoritative voice for</p>

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	<p>processes. The EIA that is currently being undertaken must acknowledge and take into consideration each of these unresolved processes and decisions. The outcome of this EIA will be very critically scrutinised by the citizens of this coastal town, and has the potential of uncovering serious shortfalls in local and national authority proclamations that have been passed.</p> <p>In a nutshell: if the processes to get to a point of carrying out an EIA have not been properly executed, the entire exercise is rendered untenable.</p> <p>a) The Property, Erf 4747:</p> <p>The property is an island in a large piece of land listed as an A-rated piece of public open property. This is listed in the 'Blue Files' referred to in the National Heritage Act and in the Town 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</p>		<p>development activities yet. The same structure plan advocates for the municipality to take the lead on development matters in the CBD, which relates to height restrictions, etc. as an example.</p> <p>Response to Public Petitions against the large building proposed for Erf 4747:</p> <p>Public petitions in 2017 are not relevant to the current ESIA as the project has changed significantly to that which was petitioned against in 2017.</p> <p>Other matters raised are discussed in the updated ESIA report in the following sections:</p> <p>Chapter 2: Section 2.7.5 Chapter 3: Section 3.1, table 2 Chapter 5: Section 5.12</p>

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	<p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>		

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	<p>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.</p> <p>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.</p> <p>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.</p> <p>Public Petitions against the large building proposed for Erf 4747:</p> <p>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.</p> <p>Aesthetics Committee Evaluations:</p> <p>The Swakopmund Municipality has an Aesthetics Committee that assists in the evaluation of any designs within the</p>		

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	<p>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.</p> <p>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.</p> <p>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</p>		

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	<p>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.</p> <p>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.</p> <p>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.</p>		

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	<p>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.</p> <p>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.</p> <p>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.</p>		

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	<p>Kind regards</p> <p>Karen Miller</p>		
13	<p>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!</p> <p>_____</p> <p>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?</p>	<p>Alexander Honisch</p> <p>28.08.2020</p> <p>Comment received via email (01.09.2020)</p>	<p>"Dear Mr. Honisch</p> <p>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.</p> <p>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.</p> <p>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</p> <p>"</p> <p>_____</p> <p>Dear Mr Honisch,</p> <p>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.</p> <p>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</p>

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			<p>made available for this review.</p> <p>Kind regards</p> <p>Response to how far will the stairs of the building complex reach to the actual sidewalk at the beach:</p> <p>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.</p>
14	<p>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</p> <p>my email address: wok45678@gmail.com pls. also register Mr. Ingo Woermann: iwoermann@wbswakop.com</p> <p>I thank you. Pls confirm that you have received my application for both e-mail addresses.</p>	<p>Mr. Ingo Woermann</p> <p>Comment received via email (28.08.2020)</p>	<p>Standard ECC I&AP acknowledgement reply with the stakeholder letter and link to the registration form and BID was provided to the I&AP.</p>
15	<p>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</p>	<p>Gabi Woermann</p>	<p>Standard ECC I&AP acknowledgement reply with the stakeholder letter and link to the registration form and BID was provided to the I&AP.</p>

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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&AP; 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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18	<p>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.</p> <p>Message from: Robin Tyson Media Consultant, Swakopmund, Namibia</p>	<p>Robin Tyson</p> <p>Comment received via email (13.10.2020)</p>	<p>Thank you no further action is required.</p>
19	<p>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?</p>	<p>Alexander Honisch</p> <p>Comment received via email (13.10.2020)</p>	<p>Dear Mr Honisch</p> <p>Thank you for your mail.</p> <p>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.</p> <p>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.</p> <p>The exact size of the Erf is 6086m². Please see figure 1 under Section 1 within the preliminary assessment report for the site</p>

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			<p>boundaries.</p> <p>The report can be accessed via:</p> <p>https://eccenvironmental.com/project/development-of-residential-retail-with-tourism-activities-on-erf-4747-in-swakopmund-erongo-region/</p>
20	<p>Good day,</p> <p>My major concern with this new development is the possible obstruction of the lighthouse. It should be clearly shown in 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 must be obtained from the Directorate of Maritime Affairs and the port captain of Namport.</p> <p>The municipality will start building public ablution blocks on the parking area next to the proposed development – have any consultations taken place between the developer and the municipality or do we have a duplication of efforts now?</p> <p>Regards Anja</p>	<p>Anja Kreiner</p> <p>Comment received via email (21.10.2020)</p>	<p>Dear Dr. Kreiner</p> <p>Thank you for your email received on the 21st October 2020.</p> <p>We take note of your concern raised and acknowledge that it is valid.</p> <p>We can confirm that consultations have taken place between the proponent and Namport as mentioned in section 4.4.5 in the preliminary assessment report. However, we will include a more detailed write-up on this maritime aspect in the final assessment documentation.</p> <p>Further details are contained in sections 5.5 and 7.6.2 in the updated ESIA report.</p>
21	<p>Good Day to All,</p> <p>Do you think there is a possibility to give/grant us more time for comments? May be until mid-Nov.2020?</p> <p>Pls. remember, due to covit-19, I myself, my son Ingo Woermann and others, simply are working under extreme stress, to keep our companies</p>	<p>Gabi Woermann</p> <p>Comment received via email (16.10.2020)</p>	<p>Dear Mrs Woerman</p> <p>Thank you for your mail received on the 16th of October 2020.</p> <p>In response to your request for additional time to review the reports, please note the following points which serves to provide context to the public participation process of the EIA that we are</p>

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	<p>going, x-mas also is due, so it would be very much appreciated to extend the due date for comments.</p> <p>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.</p> <p>I thank you very much Gaby Woermann, also for Ingo Woermann and other concerned Swakopmunders.</p> <hr/> <p>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</p>		<p>following.</p> <p>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".</p> <p>ECC's interpretation and subsequent adherence to these provisions are as follows:</p> <p>On the 12th of October 2020, all registered interested and affected 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.</p> <p>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</p>


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			<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
22	User of the beach and amenities in the area	<p>Sandie Fitchat</p> <p>Comment received via email (22.10.2020)</p>	<p>Dear Ms Sandie Fitchat,</p> <p>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.</p> <p>The final assessment documents will be made available to all I&APs once it is complete.</p> <p>Please feel free to submit your comments on the preliminary</p>

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			assessment report should you have any.
23	<p>Hi</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>Jacky Mansfield</p> <p>Comment received via email (26.10.2020)</p>	<p>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.</p> <p>Other matters raised are addressed in the following sections</p> <p>Chapter 4: Section 4.4.4 Chapter 6: Section 6.3, table 6 Chapter 7: Section 7.5.2</p>

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	<p>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.</p> <p>The Strand Hotel has been sympathetic to the surroundings, I see no reason for others to be allowed to spoil this.</p> <p>I would think 3 storeys and possibly a penthouse above would still fit in with the surroundings.</p> <p>Trusting you will note this comment and record it as required.</p> <p>Regards</p>		
24	<p>Dear ECC team,</p> <p>thank you for the opportunity to comment on the Erf 4747 design.</p> <p>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:</p> <p>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</p>	<p>Ms Monika Ruppel</p> <p>Comment received via email (26.10.2020)</p>	<p>These matters have been addressed in the updated ESIA report. Please refer to the following sections:</p> <p>Chapter 4: Section 4.4.4 Chapter 5: Section 5.4 Chapter 6: Section 6.3, table 6 Chapter 7: Section 7.5.5</p> <p>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.</p>

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	<p>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.</p> <p>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.</p> <p>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.</p> <p>And can you perhaps inform me, why the Strand Hotel development was refused their initial design, which was also planned higher initially?</p> <p>Have the buildings less tall, increase effectiveness in the remaining space, to avoid empty places, which are not</p>		

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	<p>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.</p> <p>Kind regards, Monika</p>		
25	<p>Good day,</p> <p>Herewith receive my vehement and strongest objection against the proposed development on ERF 4747, Old Municipal Pool and adjacent areas.</p> <p>The proposed development with its height will:</p> <ol style="list-style-type: none"> 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. <p>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</p>	<p>Patrick Kohlstaedt</p> <p>Comment received via email (26.10.2020)</p>	<p>These matters have been addressed in the updated ESIA report. Please refer to the following sections:</p> <p>Chapter 5: Section 5.5 Chapter 6: Section 6.3, table 6 Chapter 7: Section 7.5.4</p>

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	<p>neighbourhoods, which by far outweigh the immediate short term benefits that are anticipated.</p>  <p>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.</p> <p>Please record this comment and relay as required.</p> <p>Regards, Patrick Kohlstaedt 0811226694</p>		
26	<p>Thank you for registering me.</p> <p>I am now attaching the petition as mentioned in my registration. Kind regards</p>	<p>Wilfried Groenewald</p> <p>Comment received via email (26.10.2020)</p>	<p>Response to petition received:</p> <p>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.</p>

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27	<p>Good day,</p> <p>herewith my objection against the proposed development on ERF 4747, Old Municipal Pool and adjacent areas.</p> <p>The development with its proposed height will</p> <p>Have a negative impact on its surrounding environment, by changing the climate on the playground.</p> <p>Be unsightly and an unfair development within the surrounding lower developments.</p> <p>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.</p> <p>The developer is seeking major profit at the loss of the surrounding harmonious developments, behind and next to the development.</p> <p>Swakopmund has open dwellings for sale at the moment. Please reconsider the height of your development, to blend in with the current developments.</p> <p>Carmen Johannes</p>	<p>Carmen Johannes</p> <p>Comment received via email (26.10.2020)</p>	<p>These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:</p> <p>Chapter 4: Section 4.4.4</p> <p>Chapter 5: Section 5.5</p> <p>Chapter 7: Sections 7.5.2; 7.5.4</p> <p>EMP: Safety mitigation measures</p>
28	<p>Good Morning</p> <p>Herewith receive my strongest objection against the proposed development on Erf 4747, Old Municipal Pool and adjacent areas.</p> <p>The proposed development with its height will:</p>	<p>Karin Lohmann</p> <p>Comment received via email (27.10.2020)</p>	<p>These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:</p> <p>Chapter 5: Sections 5.7; 5.5</p> <p>Chapter 6: Section 6.3, table 6</p> <p>Chapter 7: Sections 7.5.4</p>

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	<p>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.</p>		
29	<p>Dear Municipality of Swakopmund and the Team at the Environmental Compliance Consultancy,</p> <p>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.</p> <p>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.</p>	<p>Gudrun Berens</p> <p>Comment received via email (26.10.2020)</p>	<p>These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:</p> <p>Chapter 4: Section 4.4.4 Chapter 5: Section 5.4 Chapter 7: Sections 7.5.2; 7.5.5</p>

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	<p>To underline the disadvantages of a high-rise building in this particular area of erf 4747:</p> <p>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 another 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?</p>		

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	<p>We are very concerned that the Swakopmund public is not properly consulted or asked for their opinion.</p> <p>Shame on all the greedy hands who are selling the soul of Swakopmund!</p> <p>We are really not amused. Kind regards, G. Berens</p>		
30	<p>To whom it my concern</p> <p>COMMENTS ON PROPOSED DEVELOPMENT ON ERF 4747</p> <ol style="list-style-type: none"> 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 	<p>Riaan Eksteen</p> <p>Comment received via email (26.10.2020)</p>	<p>These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:</p> <p>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</p> <p>The updated ESIA report and EMP was submitted to the MEFT for a record of decision.</p>

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	<p>meetings be held regarding this proposed development? If not, why not?</p> <p>5. Have public notices on the proposed development been duly posted in newspapers for the attention of the general public? If not, why not?</p> <p>6. Have all the other specified requirements in terms of the relevant Environment Act and Regulations been met in full? If not, why not?</p> <p>7. Has government clearance already been obtained to erect a building close to or near the Presidential Complex? If not, why not?</p> <p>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.</p> <p>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?</p> <p>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</p>		

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	<p>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.</p> <p>Please acknowledge receipt of this email and that I will be kept informed about this proposed development.</p> <p>Thank you,</p>		
31	<p>We, residents and ratepayers of Swakopmund, strongly object to the proposed development on erf 4747 for the following reasons:</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Ilme Schneider</p> <p>Comment received via email (26.10.2020)</p>	<p>These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:</p> <p>Chapter 7: Sections 7.5.2; 7.5.4</p>

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	<p>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.</p> <p>Faithfully,</p> <p>Dr. Herbert Schneider</p> <p>Ilme Schneider</p> <p>Von meinem iPhone gesendet</p>		
32	<p>(Below english translation received in German) Betr.: Molen-Entwicklung Swakopmund (Erf4747) (AZ, 12. März 2019 & 03. September 2019)</p> <p>Re: Molen development Swakopmund (Erf4747) (AZ, March 12, 2019 & September 03, 2019)</p> <p>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 high-rise 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 heritage do not go hand in hand.</p>	<p>Hans Joachim & Birgit Pack</p> <p>Comment received via email (27.10.2020)</p>	<p>Thank you, the issue of height restriction is addressed in chapter 4, section 4.4.4.</p> <p>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.</p>

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	<p>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.</p> <p>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 its eight floors? The building complex is far too big; has too little structure and too much concrete ... everywhere!</p> <p>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!</p> <p>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".</p> <p>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 let's not make the same mistake, because our children and grandchildren will not forgive us for it.</p> <p>Hans Joachim Pack Swakopmund</p>		

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33	<p>Summary comments and overall perception of the project. The review has taken a box ticking approach to the legal requirements and does not deal with many of the key points that are of concern to the town and its residents.</p> <ul style="list-style-type: none"> • 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 than 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 and equipment improvements, inclusive of capital will be borne by them. • The composition of the various elements of the 	<p>Mike Leech</p> <p>Comment received via email (27.10.2020)</p>	<p>These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:</p> <p>Chapter 3: Section 3.1 Chapter 4: Sections 4.5.4; 4.5.5 Chapter 7: Section 7.5.2; 7.6.2</p> <p>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.</p>

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	<p>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 over-supply of hotel rooms is debateable.</p> <ul style="list-style-type: none"> • 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 in-building 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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	<p>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.</p> <p>MD Leech Swakopmund resident.</p>		
34	<p>Good day,</p> <p>I would like to send you my objection regarding the project of erf 4747.</p> <p>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.</p> <p>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.</p> <p>The reduction in size of the only main play ground in town is not ok.</p> <p>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</p>	<p>Birgit Linow</p> <p>Comment received via email (26.10.2020)</p>	<p>These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:</p> <p>Chapter 4: Section 4.4.4</p> <p>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.</p>

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	<p>this moment!!! I say no to a white elephant and yes to a much smaller complex in this area with the ideas as given!</p> <p>Kind regards</p> <p>Birgit Linow</p>		
35	<p>Good day</p> <p>It is well-known, that the height relaxation higher than 13m is not applicable to the historical zone of Swakopmund.</p> <p>Any relaxation in this regard needs special permission from Council.</p> <p>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.</p> <p>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.</p> <p>Kindly record this objection and relay as required.</p> <p>Kind regards</p> <p>Detlev Doll, Barbara Doll, Sinclair Investment 101, R Eksteen, C</p>	<p>Alma Wallis</p> <p>Comment received via email (27.10.2020)</p>	<p>These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:</p> <p>Chapter 3: Section 3.1, table 2</p> <p>Chapter 4: Section 4.4.4</p>

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	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	Good day 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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	<p>It does not suit into the area, and is not attractive for visitors ,nor swimmers. Please record this comment and relay as required</p> <p>Regards Kirsten Gunzel 081 322 8928</p>		
38	<p>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 socio-economic 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</p>	<p>Svenja and David Garrard</p> <p>Comment received via email (28.10.2020)</p>	<p>These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:</p> <p>Chapter 5: Section 5.6 Chapter 7: Sections 7.5: 7.5.1; 7.5.2; 7.5.3; 7.5.4</p>

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	<p>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.</p> <p>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.</p> <p>· 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.</p> <p>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</p>		

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	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Kind regards</p>		

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	Svenja and Dave Garrard Concerned residents of Swakopmund		
39	<p>Dear Lester,</p> <p>kindly receive my comments as follows:</p> <p>(i) I am delighted that the process has started to remove the ugly demolition site and replace it with something better.</p> <p>(ii) I am, however, concerned about the massive building that 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 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.</p> <p>(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 leave parts of the Mole beach in the shadow for half a day.</p> <p>(iv) I completely disagree with the heritage expert's view that there are no buildings with heritage value and/or historical 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</p>	<p>Dr. Gabi Schneide</p> <p>Comment received via email (27.10.2020)</p>	<p>Dear Dr Schneider</p> <p>Thank you for your email of comments received on the 27th October 2020.</p> <p>My apologies for only getting back to you now as I have been outside proper network reach for the week.</p> <p>Your comments are noted and will be considered and incorporated into the final assessment documentation.</p> <p>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 signed off with the Swakopmund Municipality.</p> <p>The walkway is municipal property, and the proponent is willing to assist with the necessary upgrades to it. In addition, any other services the proponent requires for this development is also at the proponent’s expense and included in the signed development agreement between the parties.</p> <p>The rest of the issues raised have been addressed in the updated ESIA report in the following sections:</p>

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	<p>conservation. The light house is a landmark of Swakopmund, and considered so important, that it features in the coat of arms of the town - so how can Dr Vogt call it insignificant?</p> <p>(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?</p> <p>(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?</p> <p>Best regards</p> <p>Gabi</p>		<p>Chapter 3: Section 3.1, table 2 Chapter 4: Section 4.4.4 Chapter 7: Section 7.5.2</p>
40	<p>To whom it may concern</p> <p>I am writing to express my concern with and objection to the proposed development at Erf 4747.</p> <p>Firstly, I object to this architectural monstrosity on the grounds that it significantly mars the beachfront as it would ruin the pristine landscape and aesthetic of the area. It also imposes on public spaces.</p> <p>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.</p>	<p>Jade McClune</p> <p>Comment received via email (28.10.2020)</p>	<p>Thank you, no further work is required.</p>

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	<p>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.</p> <p>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.</p> <p>Jade McClune Swakopmund resident</p>		
41	<p>To: Lester Harker and Jessica Bezuidenhout, Environmental Compliance Consultancy Office of the Environmental Commissioner, DEA, Ministry of Environment, Forestry and Tourism</p> <p>Opposition to APP – 00169 – Development on Erf 4747 Swakopmund, Erongo Region, Namibia by Lighthouse Property Investment Trust</p> <p>Dear Sir/Madam,</p>	<p>Nadine Moroff</p> <p>Comment received via email (29.10.2020)</p>	<p>These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:</p> <p>Chapter 5: Sections 5.5; 5.6 Chapter 7: Sections 7.5.3; 7.5.5; 7.6.1</p>

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	<p>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.</p> <p>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.</p> <p>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.</p>		

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	<p>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”.</p> <p>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</p> <p>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</p>		

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	<p>town, with a historically unique set of buildings and no high-rise 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?!</p> <p>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!</p> <p>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!</p> <p>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</p>		

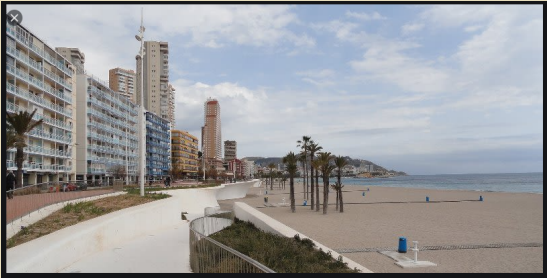
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	<p>beach visitors during construction? For sure the traffic will be slowed down and obstruction on this narrow road. Dust etc. will be a problem, especially to the sensitive objects in the Museum. Noise of construction will disrupt Museum visitors 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 visitors 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</p> <p>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 year is on the playground. Was it deliberate that not the full</p>		

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	<p>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 above-mentioned report! Yours sincerely, Nadine Kohlstädt</p>		
42	<p>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</p>	<p>Gabi Woermann Comment received via email (03.11.2020)</p>	<p>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</p>

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	<p>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</p>		
43	<p>Good day, 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.</p>	<p>Maike Becker Comment received via email (02.11.2020)</p>	<p>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</p>

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	<p>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.</p> <p>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.</p> <p>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.</p> <p>Please consider this objection and relay as required</p> <p>Kind regards</p> <p>Maike Becker</p>		
44	<p>Good day,</p> <p>My strong objection against the proposed development on ERF 4747:</p> <p>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</p>	<p>Ulrike Rodenwoldt</p> <p>Comment received via email (26.10.2020)</p>	<p>These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:</p> <p>Chapter 5: Sections 5.5 Chapter 6: Section 6.3, table6 Chapter 7: Section 7.4; 7.5.2</p>

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	<p>environment The change of climate and wind is of concern for the life in our precious ocean, has a detrimental impact on socioeconomic development.</p> <p>Please record this opinion.</p> <p>Regards from a concerned citizen</p> <p>Ulrike</p>		
45	<p>On 26/10/2020, 5:35 PM, "wolfram.becker@gmx.de" <wolfram.becker@gmx.de> wrote:</p> <p>Herewith receive my vehement and strongest objection against the proposed development on ERF 4747, Old Municipal Pool and adjacent areas.</p> <p>The proposed development with its height will</p> <ol style="list-style-type: none"> 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. <p>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</p>	<p>Wolfram Becker</p> <p>Comment received via email (02.11.2020)</p>	<p>These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:</p> <p>Chapter 5: Section 5.5 Chapter 6: Section 6.3, table 6 Chapter 7: Section 7.5.4</p>

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	<p>surrounding neighbourhoods, which by far outweigh the immediate short-term benefits that are anticipated.</p>  <p>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.</p> <p>Gesendet mit der mobilen Mail App</p>		
46	<p>Good day</p> <p>Please acknowledge my urgent and vehement objection against the proposed development on Erf 4747.</p> <p>It blocks views of properties and areas behind the development</p> <p>It shall destroy the atmosphere of our cozy, friendly Swakopmund</p> <p>There are already plenty shops and apartments standing</p>	<p>Birke Hower</p> <p>Comment received via email (26.10.2020)</p>	<p>These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:</p> <p>Chapter 5: Sections 5.4; 5.5 Chapter 6: Sections 6.3, table 6</p>

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	<p>empty</p> <p>Locals could not afford to rent those apartments, so most of the year they will be abandoned</p> <p>It disturb Lighthouse Navigation beacons</p> <p>It does not suit into the area, and is not attractive for visitors ,nor swimmers</p> <p>Please record this comment and relay as required</p> <p>Regards</p> <p>Birke Hower</p>		
47	<p>I would hereby like to voice my strongest objection against the proposed development on Erf 4747, Old Municipal Pool and adjacent areas.</p> <p>Reasons for Objection:</p> <ol style="list-style-type: none"> 1. That it is a known fact worldwide that high-rise buildings along a beach front are to the detriment of tourism and social environment, 2. That such developments e.g., Spain Do NOT contribute substantially to the economy in general 3. That such developments are benefitting only a few 4. 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 	<p>Freya Lund</p> <p>Comment received via email (26.10.2020)</p>	<p>These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:</p> <p>Chapter 3: Section 3.1, table 2 Chapter 6: Section 6.3, table 6 Chapter 7: Section 7.5.2; 7.5.5</p> <p>The proposed development is not expected to infringe upon the boardwalk/promenade on its western side or southern side, as this is municipal property.</p>

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	<p>of all the existing buildings</p> <p>6. That it is the responsibility of the municipal council to ensure that existing properties retain their values</p> <p>7. That it is the municipal council's responsibility to ensure that ALL residents and property owners have easy access to the beach.</p> <p>8. That the character of Swakopmund, and thus it's tourist attraction, will be changed forever and irreversibly.</p> <p>9. That a city's skyline should start from small to tall the further you move away from the shorelines.</p> <p>10. That height restrictions as per town planning scheme have not been adhered to</p> <p>11. That the economic circumstances are not conducive to such a development</p> <p>12. That Swakopmund cannot afford another white elephant like Platz am Meer</p> <p>As a property owner in Swakopmund I expect that my objections are to be seriously considered</p> <p>Freya Lund</p> <p>081 261 8801</p>		
48	<p>Dear Madam/Sir,</p> <p>The above proposed pompous/disproportionate development does not befit our beautiful and exquisite Swakopmund.</p> <p>Hence, I vehemently object to it.</p> <p>Sincerely,</p>	<p>Jens Prothmann</p> <p>Comment received via email (26.10.2020)</p>	<p>Thank you. No further work is required.</p>

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		
	<p>Dear Madam/Sir,</p> <p>The above proposed pompous/disproportionate development does not befit our beautiful and exquisite Swakopmund.</p> <p>Hence, I vehemently object to it.</p> <p>Sincerely,</p> <p>Hanli Prothmann</p>	<p>Hanli Prothmann</p> <p>Comment received via email (26.10.2020)</p>	<p>Thank you. No further work is required.</p>
49	<p>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.</p> <p>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.</p>	<p>Markus von Jeney</p> <p>Comment received via email (26.10.2020)</p>	<p>Thank you, no further work is required.</p>

NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
COMMENTS RELATED TO THE REVIEW OF THE PRELIMINARY ASSESSMENT REPORT AND ITS APPENDICES			
	<p>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!</p> <p>Markus von Jeney</p>		
50	<p>Good day, 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:</p> <ol style="list-style-type: none"> 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. <p>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 mass-tourism) in the first place!</p> <p>Regards, Anna Schwietering</p> <p>Concerned Citizen.</p>	<p>Anna Schwietering</p> <p>Comment received via email (26.10.2020)</p>	<p>These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:</p> <p>Chapter 5: Section 5.5 Chapter 6: Section 6.3, table 6 Chapter 7: Section 7.5.4</p>

NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
COMMENTS RELATED TO THE REVIEW OF THE PRELIMINARY ASSESSMENT REPORT AND ITS APPENDICES			
51	<p>To whom it may concern. Re: Letter from Patrick Koehlstaedt. Objection to the proposed development of Erf 4747.</p> <p>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.</p> <p>I agree with him on all points that he has raised against the proposed development..</p> <p>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?</p> <p>I would actually also ask, why have these plans come so far and why were they not rejected on day one?</p> <p>How is this development in any way going towards helping and uplifting the local community?</p> <p>Do we seriously need more expensive accommodation? This is Swakopmund with a tiny population, not Miami Beach.</p> <p>I urge you to really re-consider what you are doing here, and what the benefits are to the community, if any.</p> <p>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.</p>	<p>Caroline Behrens</p> <p>Comment received via email (27.10.2020)</p>	<p>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.</p>

NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
COMMENTS RELATED TO THE REVIEW OF THE PRELIMINARY ASSESSMENT REPORT AND ITS APPENDICES			
	<p>I am sure that sensible, balanced comments have been given in in objection to this development, I urge you now to listen to them.</p> <p>With kind regards Caroline Behrens</p>		
52	<p>Scanned letter attached from a group of people submitting their concerns</p> <p>Issues raised included: Height of the building Water and Sewage Electricity consulpction Waste management and fire rescue facilities Traffic increase</p>	<p>H. & E. Tölken</p> <p>Comment received via email (03.11.2020)</p>	<p>These matters have been addressed in the updated ESIA report. Please refer to the following sections in the report:</p> <p>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</p>
53	<p>Dear Sir/Madam,</p> <p>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.</p> <p>1. Please send me proof that the recent Town Planning</p>	<p>Buffy Tebbit</p> <p>Comment received via email (04.11.2020)</p>	<p>Response: Please note that the title deed of the property is attached as appendix D to this addendum report.</p> <p>All technical details relating to parking space calculations can be found in the Aesthetic approval documentation attached as an appendix to the ESIA report.</p>

NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
COMMENTS RELATED TO THE REVIEW OF THE PRELIMINARY ASSESSMENT REPORT AND ITS APPENDICES			
	<p>Scheme amendment (upon which this development proposal relies) has been approved and followed all the legal requirements as per the Town Planning Act etc.</p> <p>2. Please send evidence that Swakopmund Municipality had the authority to sell erf 4747 to Lighthouse Property Investment Trust.</p> <p>3. Please present proof of identity of the proponents, the members of Lighthouse Property Investment Trust.</p> <p>4. Please present verification that the number of parking spaces you have allowed for this development are as per Town Planning requirements.</p> <p>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 requirements.</p> <p>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.</p> <p>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.</p>		<p>Please note that the developer may upgrade the existing playground as part of its signed development agreement with the Municipality.</p> <p>Please note the geotechnical study completed for the project is presented as an appendix to the assessment report.</p> <p>Please note that approval from the National Heritage council was not provided.</p> <p>Please refer to the following sections in the updated ESIA wherein these matters are addressed:</p> <p>Chapter 3: Section 3.1 Appendix D Chapter 5: Section 5.6 Chapter 7: Section 7.5.1; 7.6.1</p>

NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
COMMENTS RELATED TO THE REVIEW OF THE PRELIMINARY ASSESSMENT REPORT AND ITS APPENDICES			
	<p>Please indicate decibel rating of proposed air condition ventilation systems for both the residential and commercial (restaurant) components of the proposed development.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>10. Please advise date for the public scoping exercise.</p> <p>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.</p>		

NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
COMMENTS RELATED TO THE REVIEW OF THE PRELIMINARY ASSESSMENT REPORT AND ITS APPENDICES			
	<p>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.</p> <p>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.</p> <p>Please confirm receipt of this email by reply and advise when you will be able to reply to the above questions.</p> <p>Thank you. Regards, E J Tebbit</p>		

NO	I&AP / STAKEHOLDER COMMENT RECEIVED	STAKEHOLDER DETAILS	RESPONSE / CLARIFICATION
COMMENTS RELATED TO THE REVIEW OF THE PRELIMINARY ASSESSMENT 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

re: erf 4747 Swakopmund Project – 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. consider the following:

Are there any professional traceable proofs to rectify this high increase in the following:

- WATER and SEWERAGE ?
- ELECTRICITY CONSUMPTION ?
- WASTE ASSESSMENT ? FIRE rescue facilities ?
- MAINLY TRAFFIC INCREASE ?
- +

NAME	SIGNATURE	DATE
GABY TIRROMA	<i>G. Tirrom</i>	3-11-2020
Ulli Grosse-Weisbude	<i>U. Grosse-Weisbude</i>	3.11.2020
Habli Töllen	<i>H. Tö</i>	" "
Aldo Rehse	<i>A. Rehse</i>	" "
Laurika Behmer	<i>L. Behmer</i>	" "
1. Eberhard TÖLKEN BISMARCKSTR. (3.11.2020)		
2. It will obscure The real Landmarkes Built in former Times! We are proud of our heritage (Government Building to Lighthouse		
K. M. Fötsch	<i>K. M. Fötsch</i>	3.11.2020

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 adjoining erf commonly called Childrens' Playground or not.

Investigation showed:

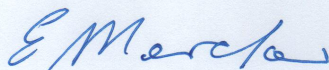
- 1 The building of the Museum does not encroach onto the adjoining erf (established for survey).
- 2 This erf, called on old plans of that area as "Unsurveyed Sea Erf", does not belong to the Municipality of Swakopmund but is owned by the Government of Namibia. Subsequent negotiations between the various 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.
- 4 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:

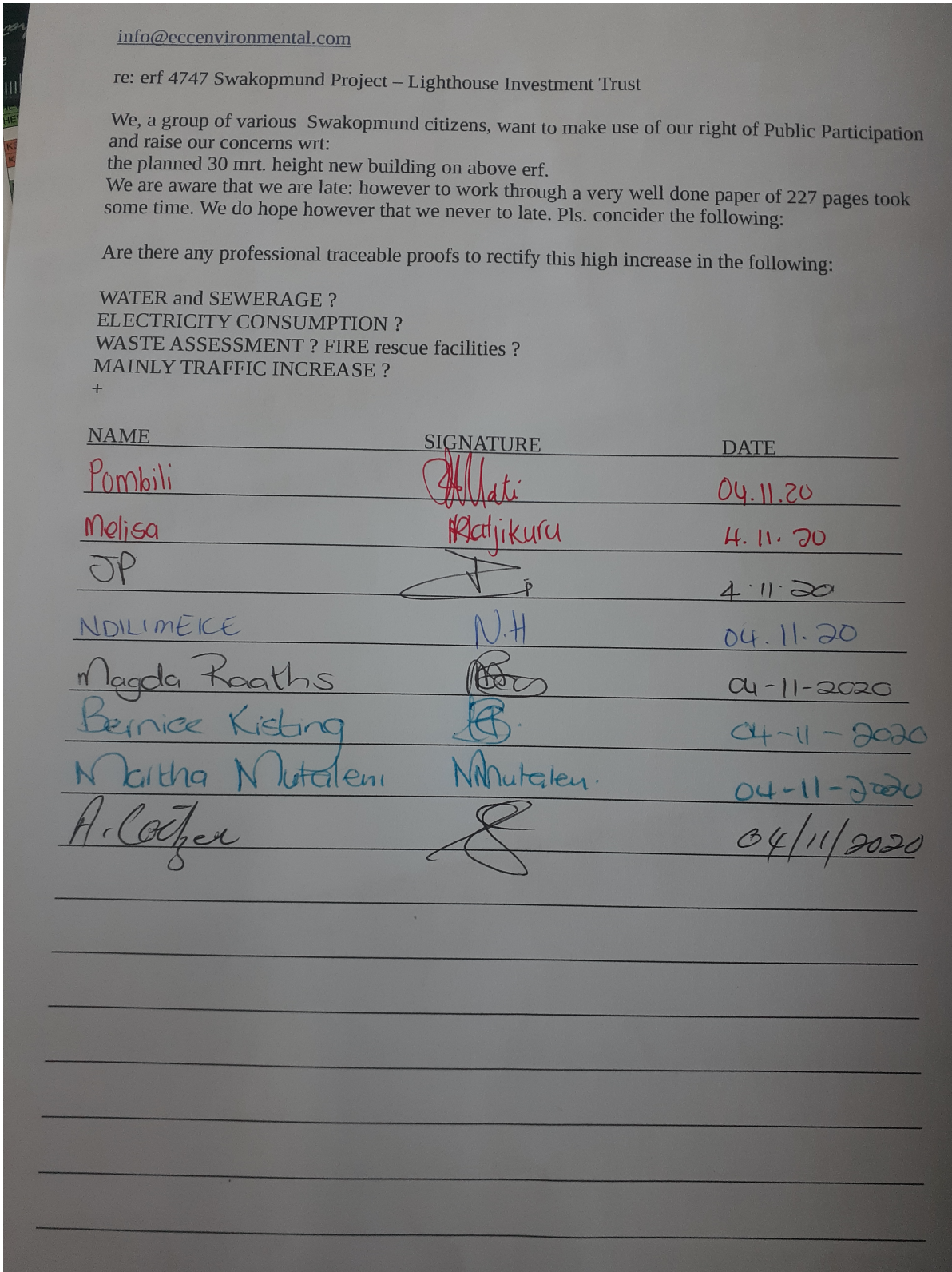
This "Unsurveyed Sea Erf" or any part of it cannot be included in any way into the proposed development of Erf 4747 Swakopmund.

Dated at Swakopmund, this 4th day of November 2020

Eberhard Mercker



APPENDIX C – SCANNED LETTER FROM NICKYS WORLD



info@eccenvironmental.com

re: erf 4747 Swakopmund Project – 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. consider the following:

Are there any professional traceable proofs to rectify this high increase in the following:

- WATER and SEWERAGE ?
- ELECTRICITY CONSUMPTION ?
- WASTE ASSESSMENT ? FIRE rescue facilities ?
- MAINLY TRAFFIC INCREASE ?
- +

NAME	SIGNATURE	DATE
Arnold Sassen	[Signature]	2/4/2020
Wolfgang Neubrech	[Signature]	3/11/2020
Heike Neustadt	[Signature]	3.11.2020
Jochen Neubrech	[Signature]	03/11/2020
Ji Ha Weidmann	[Signature]	03/11/2020
Rosmarie Matenke	[Signature]	03/11/2020
M. von Jewitz	[Signature]	2.11.2020
K. von Jewitz	[Signature]	2.11.2020
Gisela Leugemann	[Signature]	3.11.2020
H. Steinbrück	[Signature]	3.11.2020
H. Steinbrück	[Signature]	3.11.2020
Ros LINGEMANN	[Signature]	3/11/2020
Werner Hötzel	[Signature]	3.11.2020
Sabina Hötzel	[Signature]	3.11.2020
Narine Troost	[Signature]	3/11/2020
STAURO HESS	[Signature]	3/11/2020
Hanni Dulle	[Signature]	3/11/2020

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 **TRANSFEEE**)

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 469 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.



APPENDIX D – ADVERT

8 THURSDAY 6 AUGUST 2020

THE NAMIBIAN



HANG WITH ALL THE GHELSON

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IRON ROSE

THE QUEEN

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SUIDOOSTER

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NOTICE OF ENVIRONMENTAL ASSESSMENT & PUBLIC PARTICIPATION PROCESS
DEVELOPMENT OF RESIDENTIAL & 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
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 clearance 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 an environmental clearance to the Ministry of Environment, Forestry and Tourism for the above-mentioned project.

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 (I&APs) an opportunity to comment on the project to ensure that all issues and concerns are captured and considered in the assessment.

Review period: The review and comment period is effective from 06th – 27th 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: <https://eccenvironmental.com/projects/>

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 7008
E-mail: info@eccenvironmental.com
Website: <http://www.eccenvironmental.com>
Project ID: ECC-111-307-08-A






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when you trade in your **iPhone 7**.

*Trade-in T's & C's apply

Available at:

APPENDIX D – ADVERT

12 NAMIB TIMES

9 OCTOBER 2020

namib times

Sport

Send your sports news to
journalist5@namibtimes.net



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

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



Erongo sprint rally 2020

Rudi Bowe

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 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 fastest 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 00.05.39 in second place.

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. Etienne 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 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 (00.06.58) 6. Marthinus Schoeman (00.07.00) 8. Ole Steinstrater (00.08.40).



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 (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
Environmental Assessment Practitioner (EAP): Environmental Compliance Consultancy
Location: Swakopmund, Erongo Region, Namibia
Project: Proposed development of residential and retail (including tourism) activities on Erf 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 participation process.
2. To afford all new and existing registered Interested and Affected Parties (I&APs) an opportunity to comment on the preliminary assessment report.
The period is effective from 12th – 27th 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 gym, spa, a 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 site 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
E-mail: info@eccenvironmental.com
Website: <http://www.eccenvironmental.com>
Project ID: ECC-111-307-ADT-05-c



Father and sons National Trips champions

Rudi Bowe

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 champions with Johan Jacobs, Colin Peake 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 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



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