

## Appendix L

### DRAFT COMMENTS AND RESPONSES REPORT

#### Basic Assessment Process for the Application for a Waste Management License to Decommission the Everite Asbestos Site, Brackenfell

DFFE App reference: 14/12/16/3/3/1/2473  
Heritage Western Cape Case Number: 120523ZS27M  
DWS reference: 16/1/1/6/6/7

January 2022

Compiled by  
Chand Environmental Consulting  
P O Box 238, Plumstead, Cape Town, 7801



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**ANNEXURE 1: Database of Potential Interested and Affected Parties**

*Further Annexures will be added to the final version of this report, following the public review period for the draft Basic Assessment Report*

## 1. INTRODUCTION

This document is the draft Comments and Response Report, appended to the post-application draft Basic Assessment Report (BAR), for the proposed capping and re-development of the Everite Asbestos Site, Erf 18354, Brackenfell. The post-application draft BAR is currently being subjected to a 30-day public review period and, by virtue of being appended to the BAR, this report is also under the 30-day review period. The Interested & Affected Parties (I&AP) database exclusive of the contact information is included in **Annexure 1**. Note that the database will include I&AP contact information once the final BAR is submitted to the Department of Forestry, Fisheries and Environment (DFFE).

All comments raised in relation to the draft BAR will be considered, and where appropriate, changes will be incorporated into the final BAR for submission to the competent authority (the DFFE) for final decision-making.

This report describes the process used to identify and notify potential Interested and Affected Parties (I&APs) of the proposal, BAR and associated public review and comment period.

This report will be updated following the public review period of the post-application draft BAR and would incorporate the following:

- Evidence of distribution of notification letters/ emails of the post-application Draft BAR to potential I&APs;
- Evidence of notification notice placement including a map of the location of notices for the post-application draft BAR;
- Evidence of uploading the post-application draft BAR and Executive Summary to Chand's website for the duration of the public review period;
- Updated I&AP Database (following registration of I&APs);
- Comments received from I&APs on the post-application draft BAR;
- Responses to the comments received from I&APs on the post-application draft BAR; and
- Minutes of any meeting/s held, if applicable.

### 1.1 Potential I&AP Database Compilation

Chand has conducted research in the area and has also used the I&AP database for the previous Basic Assessment process that was undertaken for the same site and closure of the asbestos dump site thereon in 2013, with an update on representative details. Additional research was also undertaken through a site visit which the EAP also noted surrounding business names, as well as some research thereon online for updated contact information of local businesses as well as ward councillors and other state departments and relevant contact officials/representatives. As a result, the following parties as required in Regulation 41 (2) (b) of the EIA Regulations, 2014 (as amended) are included in the preliminary I&AP database:

- Owners and Occupiers of the site where the activity is to be undertaken (noting that the Applicant is the landowner and that there are no occupiers of the site as it must be secured and access-controlled given the presence of asbestos);
- Owners and Occupiers of the land adjacent to the site where the activity is to be undertaken;
- The Municipal Ward Councillor and Sub-Council Manager (the latest contact information has been obtained from the City of Cape Town's website, the Ward Councillor would also serve as the point of contact with the local community, particularly those who may not have access to internet/documents for download);

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- Organs of the State having jurisdiction in respect of any aspect of the activity (these include City of Cape Town Municipality, Department of Environmental Affairs and Development Planning (DEA&DP)- Waste Management and Contaminated Land branches, Department of Water and Sanitation-DWS, HWC, CapeNature, and CapeNature);
- Local Ratepayers' Association;
- Local groups which could facilitate community engagement (i.e. Brackenfell Community Policing Forum, Protea Heights South Neighbourhood Watch, Protea Heights North Neighbourhood Watch, Bellville South Community Police Forum, Brackenfell Forum) (in order to reach I&APs who may not have access to email, but to also adhere to social distancing requirements to slow the spread of the COVID-19 virus).

Note that no specific environmental or civic associations other than those mentioned above have come to light yet, but these may emerge through the process.

The I&AP database would be updated as comments are received from I&APs during the Basic Assessment process.

The potential I&AP database is included in **Annexure 1**. Note that, to protect privacy, the contact information of these parties has not been made publically available. However, the full database, which would contain contact details, will be included in the final submission to the DFFE.

## **2. Previous Basic Assessment Process**

It should be noted that there was a previous Basic Assessment process for the same site and closure thereof in 2013, but the application lapsed, hence the need to re-initiate it through a new process (i.e. this Basic Assessment process). This report also addresses comments from Interested and Affected Parties (which include local residents, state departments, civic interest groups, etc.) received as part of the aforementioned process undertaken in 2013.

The following local authorities were informed of the proposal and Basic Assessment process in 2013:

- National Department of Environmental Affairs (now DFFE)
- DEA&DP
- National Department of Labour
- National Department of Water Affairs (now the Department of Water and Sanitation-DWS)
- Western Cape Department of Economic Development and Tourism
- Western Cape Department of Community Safety
- City of Cape Town: Environmental and Heritage management
- City of Cape Town: Waste Disposal
- City of Cape Town: Planning and Built Development Management

The following local authorities responded with comments in the Basic Assessment process in 2013:

- National Department of Water Affairs
- Department of Economic Development and Tourism
- City of Cape Town (various departments)
- D:EA&DP: Waste Management Directorate
- Cape Nature

The following aspects and issues were raised by I&APs during the Basic Assessment process in 2013:

- Queries around the possibility of purchasing portions of the rehabilitated land.
- Support for the development.
- Concerns relating to risk and safety with regards to the removal of asbestos waste.
- Recommendations for the handling and disposal of asbestos waste and asbestos-contaminated land during the construction/decommissioning phase.
- Traffic and the need for a traffic impact assessment.
- Recommendations/options for conservation of natural vegetation remnants.
- Recommendations in terms of alien clearing and rehabilitation.
- Stormwater management.
- Recommendations with regard to waste, pollution and dust management.
- Process-related issues (regarding the Basic Assessment process being followed).
- Confirmation from the DWA indicating that the stormwater retention pond is not considered a "watercourse" in terms of the National Water Act (No. 36 of 1998).
- Comments received by I&APs mistaking the proposal for another proposed development in the area by the same developer (The Brackenfell Development Framework).

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The way that the above issues have been addressed in the post-application draft BAR are indicated in Table 1.

**Table 1 Issues raised in 2013 Basic Assessment Process and how they have been dealt with now**

| No. | Issue   | How the issue has been dealt with  |
|-----|---|--|
| 1   | Queries around the possibility of purchasing portions of the rehabilitated land.  | Given the history of the site as a hazardous waste disposal facility, there are restrictions in place which prevents the sale of individual plots. The developer (Durobrick "(Pty) Ltd) is required to continue to manage the property as a whole. Individual erven would likely be rented to prospective tenants.   |
| 2   | Support for the development.  | This is merely noted and does not require further response.  |
| 3   | Concerns relating to risk and safety with regards to the removal of asbestos waste.   | It should be noted that the full body of asbestos would not be removed, and a site capping exercise would secure the site into the future. The proposed capping layerworks and re-development has been devised in such a way as to limit the amount of excavation required. Note, however, that in certain cases the removal of asbestos would be required and under those circumstances, a method statement will be drawn up for the handling and disposal of asbestos related waste would need to be compiled by the Contractor. This is specified in the EMP. Furthermore, the EMP has included mitigation measures from an Accredited Asbestos Inspection Authority.               |
| 4   | Recommendations for the handling and disposal of asbestos waste and asbestos-contaminated land during the construction/decommissioning phase. | Recommendations have been included in the EMP and provided by an Accredited Asbestos Inspection Authority.   |
| 5   | Traffic and the need for a traffic impact assessment.   | An updated Traffic Impact Assessment was done for this Basic Assessment process. It is included in the draft BAR.  |
| 6   | Recommendations/options for conservation of natural vegetation remnants.  | Retention of the vegetation on the site is not possible, given the need to secure the site from existing mole activity bringing asbestos to the surface. The capping technique proposed is not compatible with the retaining of this portion of vegetation. Should development be approved, <i>Lampranthus explanatus</i> plants would be relocated to the nearby Bracken Nature Reserve and also be provided to specialists to create an ex-situ population, to provide the best option in terms of the likelihood of long term survival of these species and the population strain found on the site. This is explained as a requirement in the BAR and is also included in the EMP. |
| 7   | Recommendations in terms of alien clearing and rehabilitation.  | The EMP includes measures for alien clearing and rehabilitation, particularly in terms of the landscape plan.  |

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|           |  |  |
|-----------|--|--|
| <b>8</b>  | Stormwater management.   | The proposed stormwater management is described in the project description and a draft stormwater management plan is appended to the Draft BAR.  |
| <b>9</b>  | Recommendations with regard to waste, pollution and dust management.   | The EMPr includes measures to control waste, pollution and dust.   |
| <b>10</b> | Process-related issues (regarding the Basic Assessment process being followed when there is hazardous waste).  | The waste licence application is for the decommissioning of an existing waste site. The listed activities triggered and the need for a Basic Assessment process is explained in the draft BAR. |
| <b>11</b> | Confirmation from the DHSWS indicating that the stormwater retention pond is not considered a "watercourse" in terms of the National Water Act (No. 36 of 1998). | This has been noted in the Draft BAR. No further response is required.   |
| <b>12</b> | Heritage: HWC confirmed that the NHRA does not apply as there is no reason to believe that the proposed development would impact on heritage resources.          | This has been noted in the Draft BAR. No further response is required.   |
| <b>13</b> | Comments received by I&APs mistaking the proposal for another proposed development in the area by the same developer (The Brackenfell Development Framework).    | This is merely noted as a previous issue but does not pertain to this process, so no further response is necessary.  |

There are also text boxes throughout the draft Basic Assessment Report which refer to how these previous issues have been addressed. The text boxes look like this:

**I&AP Comment Addressed from Previous Process: [note on comment/issue]**

### 3. NOTIFICATION METHODOLOGY

#### 3.1 Post-Application Draft BAR

The following public participation activities have been undertaken in support of the 30-day public review period of the post-application draft BAR:

- Maintenance of the I&AP database which is included as **Annexure 1**;
- Circulation of notification letters to notify I&APs of project and post-application draft BAR via email and regular post (to those I&APs who do not have email addresses) to the preliminary I&AP database;
- Notification of the availability of the post-application Draft BAR was provided to the following state departments:

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- Department: Forest, Fisheries and Environment: Chemicals & Waste Management: Chief Directorate;
- Department of Labour;
- City of Cape Town Municipality: Environment and Heritage Management;
- City of Cape Town: Northern Suburbs Environmental Health;
- Department of Community Safety;
- DFFE: Rectification;
- CapeNature;
- Department of Human Settlements, Water & Sanitation;
- Heritage Western Cape;
- Western Cape Department of Economic Development and Tourism;
- Department of Environmental Affairs and Development Planning: Planning;
- Department of Environmental Affairs and Development Planning: Pollution and Chemicals Management;
- Department of Environmental Affairs and Development Planning: Waste Management;
- Department of Environmental Affairs and Development Planning: Biodiversity;
- Department of Environmental Affairs and Development Planning: Air Quality;
- National Department of Forestry, Fisheries and Environment (DFFE): Biodiversity and Conservation;
- CapeNature;
- National Department of Transport and Public Works; and
- Department of Agriculture, Land Reform and Rural Development.
- A knock-and-drop exercise was undertaken to deliver notification letters to adjacent businesses;
- Uploading of the post-application draft BAR and executive summary to the Chand website for the duration of the public comment period;
- Placement of a Site Notice in English and Afrikaans at the entrance to the site;
- Placement of adverts in two newspapers, notably Die Burger (a regional newspaper) and Die Tygerburger (a local newspaper), one of which was in English and the other in Afrikaans.

Evidence of the above will be included in the next iteration of this report.

### **3.2 Decision**

Following the public review of the post-application draft BAR, comments received by I&APs during the 30-day public comment period will be considered and the BAR will be revised appropriately.

Comments received by I&APs will be captured in this Comments and Response Report, which will be appended to the final BAR submitted to the DFFE for decision-making.

Notification of the authorities' decision on the application for environmental authorisation, as well as information on the manner in which the decision may be appealed, will be distributed to all registered I&APs.

### **3.3 Engagement with State Departments**

To-date, no comment has been received from any state departments during this Basic Assessment process. Relevant state departments have been invited to comment on the draft BAR as described in section 3.1.



## **4. COMMENTS AND RESPONSES**

All relevant documentation related to the consultation process will be included in this section following the 30-day public review period of the post-application draft BAR.

The issues and concerns raised during the consultation process will also be included in the final BAR as well as the final version of this report which will be appended thereto.

## **5. CONCLUSION**

A Basic Assessment process for the capping and redevelopment of the site was undertaken in 2013 and the comments raised therein have been responded to in the post-application draft BAR.

The public participation process for this Basic Assessment process will follow the approved PPP Plan and be carried out in accordance with the requirements of Regulation 41 of the EIA Regulations, 2014 (as amended) and there is currently a 30day public review period of the post-application draft BAR underway.

Engagement with State Departments and other I&APs will continue through their review and comment on the post-application draft BAR, noting that in the previous process, HWC confirmed that no heritage sensitivities exist on site and that no further assessment in that regard is necessary and DWS confirmed that the stormwater pond on site is a stormwater pond and not a “wetland”.

Evidence for the current public review period, comments made by I&APs during that time, as well as the responses to those comments will be included in the updated version of this report that will accompany the final BAR, which would be submitted to the relevant competent authority for decision-making.

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# **ANNEXURES**

**ANNEXURE 1: Database of Potential Interested and Affected Parties**

*Further Annexures will be added to the final version of this report, following the public review period for the draft Basic Assessment Report*

| NAME  | SURNAME          | ORGANISATION  |
|---|------------------|---|
| <b>STATE DEPARTMENTS/AUTHORITIES _ DEPARTMENT OF ENVIRONMENTAL AFFAIRS &amp; DEVELOPMENT PLANNING</b> |                  |   |
| Eddie   | Hanekom          | Department of Environmental affairs & Development Planning: Waste Management  |
| Lance   | McBain - Charles | Department of Environmental affairs & Development Planning: Waste Management  |
| Wilna   | Kloppers         | Department of Environmental affairs & Development Planning: Contact for NEMWA Part 8 General actions  |
| Simon   | Botha            | Department of Environmental affairs & Development Planning: Waste Management  |
| Ongeziwe  | Ndletyana        | Department of Environmental affairs & Development Planning: Waste Management  |
| Zayed   | Brown            | Department of Environmental affairs & Development Planning: Pollution Monitoring and Information Management                                   |
| Anthony   | van Wyk          | Department of Environmental affairs & Development Planning: Pollution Monitoring and Information Management                                   |
| Catherine   | Bill             | Department of Environmental affairs & Development Planning: Pollution Pollution Management  |
| Joy   | Leaner           | Department of Environmental affairs & Development Planning: Air Quality   |
| Peter   | Harmse           | Department of Environmental affairs & Development Planning: Air Quality   |
| Etienne   | Roux             | Department of Environmental affairs & Development Planning: Waste Management  |
| Pieter  | Van Zyl          | Department of Environmental Affairs and Development Planning: Development Planning  |
| Andrea  | Thomas           | Department of Environmental Affairs and Development Planning: Development Planning  |
| Annelize  | De Villiers      | Department of Environmental Affairs and Development Planning: Development Planning  |
| Masixole  | Langa            | Department of Environmental affairs & Development Planning: Pollution Management  |
| Arabel  | McClelland       | Department of Environmental affairs & Development Planning: Pollution Management, Pollution and Chemicals Management                          |
| Etienne   | Roux             | Department of Environmental Affairs and Development Planning: Waste Management  |
| Gottlieb  | Arendse          | Department of Environmental Affairs and Development Planning: Pollution Management  |
| Belinda   | Langehoven       | Department of Environmental Affairs and Development Planning: Waste Management  |
| Evodia  | Boonzaaier       | Department of Environmental affairs & Development Planning: Waste Management  |
| Marlene   | Laros            | Department of Environmental affairs & Development Planning: Biodiversity Management   |
| <b>STATE DEPARTMENTS/AUTHORITIES _ CITY OF CAPE TOWN</b>  |                  |   |
| Debbie  | Evans            | City of Cape Town Municipality: Environment and Heritage Management;  |
| Morné   | Theron           | City of Cape Town: Environmental & Heritage Management: Acting Head Northern Region   |
| Reinhardt   | Avenant          | CCT: Northern Sub Environmental Health: Head of Department  |
| Brendan   | Abrahams         | City of Cape Town: District Roads Engineer  |
| Clifford  | Dorse            | City of Cape Town: Biodiversity Management Branch   |
| Claire  | Holderness       | City of Cape Town: Systems Planning and Modelling   |
| Crispin   | Barrett          | City of Cape Town: Spatial Planning and Environment Directorate   |
| Rashaad   | Shamaai          | City of Cape Town: Spatial Planning and Environment Directorate   |
| Deon  | Manuel           | City of Cape Town: Traffic Engineer (Central Region)  |
| Johan   | Meyer            | City of Cape Town: Project Planning and Conceptual Design   |
| John  | Spotten          | City of Cape Town: Systems Planning and Modelling   |
| Julia   | Woods            | City of Cape Town: Biodiversity Management Branch   |
|   |                  | City of Cape Town: Director Transport: Road Infrastructure & Management: District Roads Engineer  |
| Marissa   | Adams            |   |
| Mark  | Pinder           | City of Cape Town: Project Planning and Conceptual Design   |
| Mandisi Sidwell   | Sokolo           | City of Cape Town: Catchment Stormwater and River Management – Water and Sanitation   |
| Ben   | De Wet           | City of Cape Town: Catchment Stormwater and River Management – Water and Sanitation   |
| Rene  | Marillier        | City of Cape Town   |
| Simone  | Bergoff          | City of Cape Town: Urban Planning & Design  |
| Ronelle   | Clarke           | City of Cape Town   |
| Nausheena   | Parker           | City of Cape Town   |
| Zolile  | Basholo          | City of Cape Town: Water & Sanitation Department, Technical Services  |
| Andre   | Bester           | City of Cape Town: Senior Engineering Technician  |
| Andrew  | Greenwood        | City of Cape Town Municipality Representative   |
| Jaco  | De Bryun         | City of Cape Town   |
| Cynthia   | Minaar           | City of Cape Town: Recreation and Parks   |
| Dimitri   | Georgeades       | City of Cape Town:<br>Manager: Environment & Heritage Management  |
| Juliet  | Leslie           | City of Cape Town: Town Planning  |
| Bonginkosi  | Majavu           | City of Cape Town: Energy climate change Directorate  |
| <b>DFFE _ COMPETENT AUTHORITY</b>   |                  |   |
| Mishelle  | Govender         | Department of Forestry, Fisheries and the Environment: Chemicals & Waste Management: Hazardous waste Management & Licensing Chief Directorate |
| Varsha  | Naidoo           | Department of Forestry, Fisheries and the Environment: <b>CASE OFFICER</b>  |
| Darryl  | Colenbrander     | Department of Forestry, Fisheries and the Environment: Biodiversity and Conservation  |
| Samkelisiwe   | Dlamini          | Department of Forestry, Fisheries and the Environment   |
| Ephron  | Maradwa          | Department of Forestry, Fisheries and the Environment   |

|  |                  |  |
|--|------------------|--|
| Linda  | Poll-Jonker      | Department of Forestry, Fisheries and the Environment:Control Environmental Officer: Licensing   |
| Salome   | Membane          | Department of Forestry, Fisheries and the Environment  |
| Lucas  | Mahlangu         | Department of Forestry, Fisheries and the Environment: Licensing   |
| <b>STATE DEPARTMENTS/AUTHORITIES _ OTHER DEPARTMENTS</b>           |                  |  |
| Annette  | Geertsema        | Department of Agriculture, Forestry & Fisheries (DAFF)   |
| Bumani   | Maswanzane       | Dept of Labour   |
| Warren   | Dreyer           | Department of Water & Sanitation   |
| Harry  | Thompson         | Department of Transport and Public Works WCG   |
| Barend   | du Preez         | Western Cape Department of Transport and Public Works  |
| Jacqui   | Gooch            | Western Cape Department of Transport and Public Works  |
| Malcom   | Watters          | Western Cape Department of Transport & Public Works  |
| Mogale   | Sebopetsa        | Western Cape Government: DoA   |
| Phila  | Mayisela         | Western Cape Government: DHS   |
| Keith  | Cloete           | Western Cape Government: DoH   |
| Devlin   | Fortuin          | Transport and Public Works: Western Cape Government  |
| Mike   | Slayen           | SANParks   |
| Elton  | Le Roux          | South African National Biodiversity Institute (SANBI)  |
| Stephanie  | Barnardt         | Heritage Western Cape  |
| Rhinah   | Singo            | National Department of Water and Sanitation  |
| Marisa   | Alberti          | National Department of Water and Sanitation  |
| Solly  | Fourie           | Department of Economic Development and Tourism   |
| Mingie   | Zibi             | Dept of Labour   |
| Wilna  | Kloppers         | DWA  |
| Sipiwo   | Xongo            | DWA  |
| Bukelwa  | Mtandana         | DWA  |
| Nelisa   | Ndobeni          | Department of Water and Sanitation (DWS)   |
| M Lakay  | Fourie           | Western Cape Department of Economic Development & Tourism  |
| Dr Gilbert   | Lawrence         | Western Cape Department of Community Safety  |
| Fayruz   | Dharsey          | Department of Eco Dev & Tourism  |
| M  | Lakay            | Department of Eco Dev & Tourism  |
| Deon   | Stoltz           | Sub-Directorate: Waste Management Licensing  |
| Anzel  | Venter           | Department of Economic Development and Tourism   |
| Elize  | Lourens          | Department of Labour: Asbestos related matters   |
| C  | Fredericks       | Department of Environment, Forestry and Fisheries  |
| Thando   | Ndudula          | Department of Agriculture, Forestry and Fisheries (DAFF)   |
|  |                  | DEFF Part 8 Contact  |
| Derril   | Daniels          | DHSWS: Western Cape  |
| Mzukisi  |                  | DWS  |
| Miriam   | van der Heerver  | Eskom: Customer Serv Execs   |
| Abduragmaan  | Jacobs           | Eskom: Manager   |
| Wendel   | Morkel           | Eskom: Planning  |
| Owen   | Peters           | Eskom Distribution: Land Development Distributon   |
| Shaun  | Swanepoel        | Land Development Wayleave Team: Eskom  |
| Alana  | Duffell - Canham | Cape Nature  |
| Brandon  | Layman           | Department of Agriculture: Landuse Management  |
| Waseefah   | Dhansay          | Heritage Western Cape: Heritage Officer  |
| Dru  | Martheze         | Department of Transport and Public Works-PGWC - National   |
|  |                  | Senior Professional officer: Knowledge Manager Conservation Services Unit (CSU)<br>Biodiversity Management Branch (BMB)<br>Environmental Management Department<br>Spatial Planning and Environment Directorate |
| Penny  | Glanville        |  |
| Mary   | James            | Department of Agriculture, Land Reform and Rural Development   |
| David  | Morris           | Reserve Supervisor:Haasendal Nature Reserve Biodiversity Management Spatial Planning and Environment Directorate   |
| Phila  | Mayisela         | Department of Human Settlements: Head of Department  |
| Nathan   | Adriaanse        | Department of Human Settlements: Head of Communications  |
| <b>WARD COUNCILLORS</b>  |                  |  |
| Amelia   | Van Rhyn         | Subcouncil 2: Manager  |
| Brenda   | Hansen           | Subcouncil 2: Chaiperson, Ward 111   |
| Gabriel  | Twigg            | Subcouncil 2: Ward 7 (Brackenfell Industria, Everite Industria)  |
| Marian   | Nieuwoudt        | Subcouncil 2: Ward 08  |
| Rhynhardt  | Bresler          | Subcouncil 2: Ward 102   |
| Simpiwe  | Nonkeyizana      | Subcouncil 2: Ward 06  |
| Siyabonga  | Duka             | Subcouncil 2: Ward 101   |
| <b>RATEPAYERS, RESIDENTS &amp; CIVIC ASSOCIATIONS &amp; FORUMS</b> |                  |  |
| FH Conradie  | KPF Sutter       | Brackenfell Taxpayers (secretary & Chairman)   |
| Pieter   | Leroux           | Rate Payers  |
|  |                  | Brackenfell Community Policing Forum   |
|  |                  | Protea Heights South Neighbourhood Watch   |
|  |                  | Protea Heights North Neighbourhood Watch   |
|  |                  | Bellville South Community Police Forum   |
|  |                  | Brackenfell Forum  |
| <b>HERITAGE BODIES AND INTEREST GROUPS</b>                         |                  |  |
| Thea   | Weyers           | Friends of Bracken Nature Reserve  |
| Bennie   | Hobbs            | Friends of Bracken Nature Reserve  |
| Alan   | Wood             | Friends of Bracken Nature Reserve  |
| <b>OTHER I&amp;APs</b>   |                  |  |

|                  |                 |  |
|------------------|-----------------|--|
| Mr & Mrs FJF MDN | Alves           |  |
| Mnr N            | Cocofos         |  |
| Mrs I & Mr HJ    | Kellerman & Uys |  |
|                  |                 | African Cork Investments               |
|                  |                 | African Cork Suppliers                 |
|                  |                 | Alltech Industrial Park                |
|                  |                 | Altius Trading 112 PTY LTD             |
|                  |                 | Alwyn van Zyl Familie Trust            |
|                  |                 | Autospeed Investments Trust            |
|                  |                 | BJ's Trust                             |
|                  |                 | Blue 7 Core Drilling CC                |
|                  |                 | Born Free Inv 544 PTY LTD              |
|                  |                 | Bospoort Trust                         |
|                  |                 | Botha Saketrust                        |
|                  |                 | Brackenfell BK                         |
|                  |                 | ClarassonCC                            |
|                  |                 | Coalition Trading 440 BK               |
|                  |                 | CRD Holdings No 3 PTY LTD              |
|                  |                 | D & A Eiendoms Trust                   |
|                  |                 | Dahprop CC                             |
|                  |                 | Die Du Toit Familie Trust              |
|                  |                 | Die Theuns Greyvensteyn Familie Trust  |
|                  |                 | Dinid Eiendoms Beleggings CC           |
|                  |                 | Dirsa Trust                            |
|                  |                 | Domani Beleggings Veertied PTY LTD     |
|                  |                 | DPMM PTY LTD                           |
|                  |                 | Duiwelsnek Trust                       |
|                  |                 | Duroplastic Properties                 |
|                  |                 | Eden Trust                             |
|                  |                 | En Masse Propoerties 32 CC             |
|                  |                 | Ensalada Investments 106 CC            |
|                  |                 | ERF 13082 Paark EDMS BPK               |
|                  |                 | Flowerdew 143 CC                       |
|                  |                 | Gadget Import CC                       |
|                  |                 | Global Trust                           |
|                  |                 | Godfrey Park Properties CC             |
|                  |                 | Greenscape Irrigation CC               |
|                  |                 | HW Keil Familie Trust                  |
|                  |                 | IANMA Prop CC                          |
|                  |                 | Jadon Beleggingstrust                  |
|                  |                 | JJ Esterhuyse Familie Trust            |
|                  |                 | Joosten Vlake Valve Guides CC          |
|                  |                 | Jucar Family Trust                     |
|                  |                 | JWJ Business Park                      |
|                  |                 | Knysna Roofing Property CC             |
|                  |                 | Kommissaris Makelaars CC               |
|                  |                 | Kramred Investments CC                 |
|                  |                 | Kritzinger Trust                       |
|                  |                 | Marcelle Props 197 CC                  |
|                  |                 | Minchai Trust                          |
|                  |                 | Nadel Investments CC                   |
|                  |                 | New Heights 1328 CC                    |
|                  |                 | Newres Investments PTY LTD             |
|                  |                 | Nowlan Civils CC                       |
|                  |                 | NVM Trading (Proprietary Limited)      |
|                  |                 | P Ellis Vervoer CC                     |
|                  |                 | Platinum Business Park Body Corp       |
|                  |                 | Purples Moss 1016 CC                   |
|                  |                 | Quovest Eleven                         |
|                  |                 | Raindance Investments 108              |
|                  |                 | Raindance Investments 109              |
|                  |                 | Rapiprop 214 PTY LTD                   |
|                  |                 | Rapitrade 230 PTY LTD                  |
|                  |                 | Redlex 335 PTY LTD                     |
|                  |                 | Soleprops 77 PTY LTD                   |
|                  |                 | Speed Q Properties CC                  |
|                  |                 | Stephrusan Investments CC              |
|                  |                 | SVS Asset Managerrs CC                 |
|                  |                 | Tailored Property Management CC        |
|                  |                 | The Nqubeko Trust                      |
|                  |                 | The Orange Wizard Promotions CC        |
|                  |                 | The Trustees for the Time Being Of The |
|                  |                 | Tonata Prop Holdings CC                |
|                  |                 | Trip AG Electrical CC                  |
| Inge             | de Kock         | Van Wyk Plant Hire CC                  |
|                  |                 | Venezia Prop Trust                     |
|                  |                 | WC Metal Glass CC                      |
| Cornelis         | Amoraal         | Xinergistix Investments Prop           |
| Esther           | Bedeker         | Metro Web                              |

|                            |              |  |
|----------------------------|--------------|--|
| Anton                      | Brink        | BJS Trust  |
| Mnr Nicolas                | Cocofos      | Jakaranda Hardware (Pty) LTD.  |
| Carla                      | de Klerk     | Nampak   |
| Johan                      | du Toit      | Automotive Dynamix   |
| Bennie                     | Engelke      | Headzone   |
| Lindsay                    | Jeffhas      | Harkers Automotive Engineering   |
| Clinton                    | Johns        | Duroplastic Properties   |
| Fred                       | Jochems      |  |
| I                          | Kellerman    |  |
| Jan                        | Koegelenberg |  |
| Eugene                     | Louw         |  |
| Rene                       | Louw         | Sanlam Employee Benefits   |
| Smallbones                 | Petro        | Smallbones Properties  |
| Johan                      | Rautenbach   | Knysna Roofing Properties  |
| Somé                       | Roelofse     | Platinum Business Park Body Corp   |
| Gideon Johannes            | Serfontein   | Goeie Hoop Onderdele   |
| Neville                    | Smith        | Axxcess  |
| R G                        | Timmerman    |  |
| HJ                         | Uys          |  |
| J                          | Van Wyk      |  |
| Come                       | Van Zyl      |  |
| Charl                      | Visser       | Charl Visser Prop CC   |
|                            |              | The Taxshop  |
|                            |              | Xtranda  |
|                            |              | Tish and Shoo  |
| Edward                     | Smith        | Precision Plastics   |
|                            |              | NPC Painter & Renovators   |
|                            |              | Gen - Assist LTR   |
|                            |              | Industrial Pumps SA  |
|                            |              | Kitch Me UP  |
| Alan                       | Wood         | Agricultural Research Council  |
|                            |              | Abacus Administration Trust  |
| BR                         | Vos          | SA Shade CC & ERF 13012 CC   |
| Neil                       | Williams     | Crane Truck Hire   |
| <b>ADJACENT LANDOWNERS</b> |              |  |
|                            |              | Fastner Warehouse  |
|                            |              | Automotive Dynamix   |
|                            |              | Goeie Hoop Onderdele   |
|                            |              | Speed Grand Auto Spares  |
|                            |              | Engine Techniques  |
|                            |              | MNK Electrical Wholesalers   |
|                            |              | Top Carpets & Floors Brackenfell   |
|                            |              | Bluescape Water Solutions (Pty) Ltd  |
|                            |              | Comfort Car Hire   |
|                            |              | HME Service and Repairs  |
|                            |              | Unicon Crane Services  |
|                            |              | Willco Crane Hire  |
|                            |              | Surehatch Incubators & Elite Poultry Equipment   |
|                            |              | D Emci Filter  |
|                            |              | Jakaranda Hardware   |
|                            |              | Fundi Light & Living   |
|                            |              | Snyman 4x4   |
|                            |              | Meadowlands Family Pharmacy  |
|                            |              | PM Distributors CC   |
|                            |              | Nautilus Engineering & Supplies  |
|                            |              | Nautilus Engineering & Supplies  |
|                            |              | C-Max Security Services  |
|                            |              | Fusion Solutions   |
|                            |              | CAPE INDUSTRIAL FLOORING - Epoxy Flooring, Polyurethane Flooring and Industrial Flooring Solutions |
|                            |              | Core Tech  |
|                            |              | Precision Plastics   |
|                            |              | SA Garage Doors  |
|                            |              | MR SCHMIEDE  |
|                            |              | Final Touch Upholstery   |
|                            |              | Light Lounge Photography Studio and Productions  |
|                            |              | FABULOUS AIRE™   |
|                            |              | NRD Lighting Concepts  |
|                            |              | Diagnostics For U  |
|                            |              | Senses Spa   |
|                            |              | S. A. Shade  |
|                            |              | Harkers Automotive   |
|                            |              | POLY ISO Deco Board - Creative Corning - The Cornice Shop  |
|                            |              | CJ Auto Repairs  |