



**APPENDIX J3 – APPLICANT RESPONSE TO
PRE-COMPLIANCE NOTICE AND PRE-
DIRECTIVE (3 JULY 2025)**

Prepared by: PHS Consulting

Prepared for: WABD Investments (Pty) Ltd



2025-07-03

DEA&DP ref: 14/1/1/E2/8/9/3/0894/24

Attention: Yena Gunguluzi

Per e-mail: Yena.Gunguluzi@westerncape.gov.za

Department of Environmental Affairs & Development Planning

Directorate: Environmental Law Enforcement

Private Bag X9086

Cape Town

8000

**RESPONSE TO PRE-COMPLIANCE NOTICE AND PRE-DIRECTIVE; PORTION 54 OF THE FARM
POTTEBERG ESTATES NO 516**

1. Your Pre-Compliance Notice (PCN) and Pre-Directive (PD), addressed to Mr Warwick Leslie of WABD Investments (Pty) Ltd, dated 30 June 2025, respectively refers.
2. WABD Investments (Pty) Ltd appointed PHS Consulting on 3 July 2025 to address the request from DEA&DP to provide representation within seven calendar days of receipt of the PCN and PD on their behalf.
3. We were requested to analyse the allegations regarding the commencement of NEMA Listed Activities.
4. PHS Consulting needs to verify the allegations and request information from our client, in order to formulate an opinion for the landowner to make an informed decision about the best way forward.
5. We are currently inundated with investigative cases, therefore to analyse this case and

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to compile a report that will inform our client on the preferred way forward will take us longer than seven days.

6. WABD Investments (Pty) Ltd has the right to administrative action that is lawful, reasonable and procedurally fair, therefore based on the above, written representation to DEA&DP will be provided on or before 15 July 2025.
7. We therefore request an extension until 15 July 2025 to provide the written representation to DEA&DP.
8. As such we kindly request that DEA&DP do not issue a Compliance Notice or Directive until we have had time to complete our investigation and representations.

Please confirm receipt of this letter.

Yours truly,



PAUL SLABBERT

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