

**PORTFOLIO COMMITTEE :**  
**INFRASTRUCTURE & PLANNING**

**This item was considered  
during the Portfolio Committee  
meeting of 22 June 2021**

**Refer to Page 75a**

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**2.**

**HERMANUS, A PORTION OF REMAINDER ERF 4771 KNOWN AS “DUTCHIES RESTAURANT”: DEVIATION FROM PARAGRAPH 18 OF THE ADMINISTRATION OF IMMOVABLE PROPERTY POLICY OF 2015 ALLOWING THE MUNICIPALITY TO RENEW THE LEASE OF MUNICIPAL PROPERTY TO TASOCLOX (PTY) LTD**

**7/2/3/1**

**A Le Roux**

**10 May 2021**

**Manager: Property Administration**

**(028) 316-5623**

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**1. Executive Summary**

To obtain approval from the Executive Mayor to enter into a further lease agreement with Tasoclox (Pty) Ltd in respect of a portion of Remainder Erf 4771 Hermanus, ±895m<sup>2</sup> in extent, for the purpose of managing the restaurant known as “Dutchies” at Grotto Beach, Hermanus; and

To obtain approval from Council for the deviation from paragraph 18 of the Administration of Immovable Property Policy (as approved by Council on 25 November 2015) allowing the Municipality to enter into a further lease agreement with Tasoclox (Pty) Ltd in respect of a portion of Remainder Erf 4771 Hermanus for the purpose of managing the restaurant known as “Dutchies” at Grotto Beach, Hermanus, without following a competitive bidding process.

**2. Service Delivery and Budget Implementation Plan - IGNITE**

Infrastructure and Planning  
Property Administration

**3. Compliance with Strategic Priorities**

Provision of democratic, accountable and ethical governance  
The encouragement of structured community participation in the matters of the municipality  
Promotion of tourism, economic and social development

**4. Delegated Authority**

Partly delegated to the Executive Mayor

**5. Legal Requirements**

- Municipal Asset Transfer Regulations (R. 878 of 2008)

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- Administration of Immovable Property Policy of the Overstrand Municipality, as amended

## **6. Background/Discussion/Evaluation/Conclusion**

### **Background**

Following a call for tenders, a lease agreement in respect of a kiosk/restaurant known as “Dutchies” situated at Grotto Beach, Hermanus on a portion of Remainder Erf 4771 Hermanus (the “Property”) was entered into between the Overstrand Municipality and Superfecta Trading 608 CC. The lease agreement was for a two-year period from 1 October 2013 to 30 September 2015.

The lease agreement afforded the Municipality, at its sole discretion, to consider the renewal of the lease agreement for a further period of one year provided that the lessee gives the necessary notice in writing to the Municipality of their desire to renew the lease three months prior to the expiration of the lease agreement. The necessary notice was provided by the lessee and the lease agreement was renewed for another year until 30 September 2016.

After an application for renewal of the lease, Council on 28 April 2016 approved to further lease the Property to Superfecta Trading 608 CC for a two-year period from 1 October 2016 until 30 September 2018. During the period of this lease agreement, Superfecta Trading 608 CC sold its business and pursuant thereto, the lease agreement was ceded to Tasoclox (Pty) Ltd (the “Applicant”). It was envisaged that during the currency of this lease, that the user department for the tender of the envisaged development (Town Planning) would finalise and advertise a new tender in respect of the Property.

When the lease agreement ending on 30 September 2018 was nearing its expiry date, the relevant user department could not place the development of the Property out on tender as certain processes still needed to be completed before the tender could be placed for the development. The Applicant applied to further lease the Property. On 27 June 2018 the Executive Mayor at a Mayoral Committee Meeting approved the application to further lease the Property to the Applicant for a two-year period from 1 October 2018 to 30 September 2020 and on same date Council approved a deviation from the competitive bidding process in respect of the Property, in order for the Property to be leased directly to the Applicant.

### **Discussion**

The Applicant has applied for the renewal of the lease agreement for a further period of three years from 1 October 2020 until 30 September 2023.

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The Municipality planned to place the lease and development of Grotto Beach, which includes the Property, out on tender during the 2020 calendar year. However, the Covid-19 pandemic and resultant hard lockdown regulations have left the South African economy and especially the restaurant market in shambles.

The situation for the restaurants in the Overberg area were especially bad because the Overstrand area is a popular travel and leisure destination with tourists forming a large part of restaurants' customers. With leisure travel not permitted for a substantial amount of time during the 2020 calendar year and later only relaxation for intra-provincial, tourists were not frequenting restaurants as would have been the case normally. Furthermore, the regular customer base of residents residing in the Hermanus area has a considerable amount of older people who have been strongly advised to avoid gatherings and places like restaurants because they are in the high risk group of people that can develop severe and/or fatal Covid-19 complications.

A tender call for the lease and development of Grotto Beach during the Covid 19 pandemic would have found the market at an extremely low point and it would only be reasonable to expect that unfavourable bids would have been received at that point in time. With South Africa's projected slow economic recovery rate, the restaurant market has not and will not come near recovery in the immediate future. As the lease of the Property will be for a long term, the Overstrand Municipality could have missed out on a very good revenue generating opportunity that would only be capable of rectification after a long period of time. The Overstrand Municipality will be placed in a better position to receive favourable tenders should it call for tenders at a time when the restaurant and tourism industries and the South African economy in general, have recovered.

The tender for the proposed lease and development must also be revisited by the Town Planning Department as to what is envisaged on the property (if it is still applicable taking all factors into account) and to ensure that the Environmental Record of Decision is still valid and applicable.

The last agreement was for a period of two-years which expired on 30 September 2020. The current rental is R5,357.03 (FIVE THOUSAND THREE HUNDRED FIFTY-SEVEN RAND AND THREE CENTS) (VAT excluded) per month, which represents the original tendered amount in 2013 with the annual CPI escalations. No valuations were done with previous renewals. Although the process for the renewal of the agreement was commenced with timeously, the process could unfortunately not be completed before expiry of the agreement due to the Covid-19 pandemic and resultant hard lockdown regulations and lastly due to the objection received against the renewal that had to be dealt with. In the interim, for administrative and audit purposes, a written lease agreement was signed that is subject to (i) the

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Executive Mayor's approval (as delegated authority) for the further renewal, (ii) a public participation process being followed and (iii) Council's approval for a deviation from the competitive bidding requirements to allow the Municipality to enter into the long term agreement directly.

**Evaluation**

A: Administration of Immovable Property Policy of the Overstrand Municipality:

The following paragraphs of the Administration of Immovable Property Policy are applicable:

**Paragraph 4: “No application for the purchase, lease of or encroachment on immovable property (save for the instances mentioned in paragraphs 58 to 62 and 64.1 below) shall be processed unless the prescribed application fee as per tariff approved in the annual budget for that financial year has been paid, nor shall any proposed lease or encroachment (save for the instances mentioned in paragraphs 58 to 62 and 64.1 below) be advertised unless the applicant has confirmed, in writing, that he/she will bear all costs involved in such transaction including – but not limited to – legal, survey, re-zoning, sub-division, consolidations, advertisement, relocation or provision of services and, where applicable, a deposit as per prescribed rate to cover incidental costs has been paid.”**

As the application for renewal was received before the expiry of the last agreement there is no need for a formal application form to be completed and no application fee is payable.

**Paragraph 17: “Taking into consideration the nature and duration of the lease to be entered into, the leasing of immovable property may be affected by means of either:**

**17.1 a competitive process, which may include a closed or public tender or proposal call, specifically in circumstances listed in paragraph 18 below; or**

**17.2 a direct lease.”**

**Paragraph 18: “A competitive process must at all times be followed in circumstances where:**

**18.1 the lease is for a long term with an income value in excess of R10 million;**

**18.2 the lease is for a formal business premises with a market related rental;**

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***18.3 more than one party, in discretion of the municipality, is interested in the lease of the subject property; and/or  
18.4 by discretion of the municipality, a competitive process will best serve the interests of the community”.***

The proposed lease renewal period is three years which, if taken together with the previous lease agreements, results in a long-term lease period, but the collective income value will not exceed R10 million.

The restaurant is a formal business and the proposed rental, discussed in detail below, is market related.

The Property Administration Department has not received any other applications for the lease of the Property.

It is the Property Administration Department’s view that a competitive process will not best serve the interests of the community at this stage and accordingly a deviation from paragraph 18 is sought in this report. Adherence to this paragraph will in this instance not serve a useful purpose as it will result in a great cost and from experience, it is most likely that a tender process will result in the tender having to be cancelled without awarding it as prospective bidders (lessees) will not be willing to enter into a lease agreement for a lease period of three years that requires them to invest money in needed upgrades and time. Further upgrades to the lease area pending the upcoming tender for bigger development will not be wise.

Cognisance should also be had to the fact that should the Property be vacant until a tender process has been completed, the Property would most likely be vandalised resulting in damages, insurance claims to be made and in all likelihood impacting on the time line of the envisaged development.

Furthermore, the property is an important attraction, not only for tourists visiting the area but also the community of the Overstrand Municipality. Should the lease agreement not be renewed it would entail that the restaurant is closed, consequently having a negative economic impact and could be construed as the Overstrand Municipality not using its available resources effectively, efficiently and/or economically as the interest of the community will not be served at best.

It is therefore recommended that the Property be leased directly to the Applicant without following a competitive process.

**Paragraph 20: “Long term lease of municipal immovable property with an income value less than R10 million:**

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**20.1 The Municipality may grant a long term lease of municipal immovable property with an income value of less than R10 million only after:**

- (a) the Accounting Officer has approved the lease in principle;**
- (b) in the case of a direct lease, the proposed lease was advertised in terms of paragraph 10.1 and 10.2 above to invite the local community and other interested parties to submit comments or representations; and**
- (c) the Executive Mayor, as delegated authority, has subsequently approved that the right may be granted."**

The Accounting Officer (Municipal Manager) approved in principle the renewal of the lease of the Property to the Applicant for a three year period, subject thereto that the approval of Council is obtained as to the deviation from paragraphs 18 and 24 of the Administration of Immoveable Property Policy. The in-principle approval of the Accounting Officer envisaged a request that the rental amount of the previous lease be used together with a consumer price index escalation, subject to the Council's approval for a deviation from paragraph 24 of the Administration of Immoveable Property Policy, because the previous rental was based on the original market value used with the tender, after annual escalations in terms of the consumer price index. This request has subsequently been abandoned due to a valid objection that was received from the public. The amount offered originally was market related at that point in time.

**B: Advertisement/Notification**

An advertisement for the lease of the Property was published in The Village News on 30 September 2020 for a 30 (THIRTY) day objection/comment period.

One objection to the proposed renewal was received from Carol Judge & Jo Campbell, who leases property from the Municipality to manage the Milkwood Restaurant situated in Onrustvriër and is attached in full as Annexure "B". The main gist of the objection is summarised in the first paragraph of the conclusion on page three thereof, which reads: "*In conclusion we object to the proposed lease extension in it's present form as we believe that the decision not to utilise the services of a commercial valuer to determine a fair market rent would mean that the Municipality would be failing in it's core function of protecting the financial interests of it's ratepayers and constituents*".

The objection was sent to the Applicant for their response. After consideration of the objection and several discussions with the Applicant,

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the Applicant agreed thereto that a valuation of the fair market rental be done at its cost as stipulated in the relevant policy.

Boland Valuers, a registered property valuer in terms of the South African Council for Valuers, valued the market related rental for the Property at R23,436.00 (TWENTY-THREE THOUSAND FOUR HUNDRED AND FORTY-SIX RAND) (VAT excluded) per month. The valuer arrived at his valuation by looking at comparable restaurants (e.g Milkwood Restaurant, Bientangs Cave Restaurant, etc.) in the Hermanus and surrounding areas and then discounted that rate by 50% (fifty-percent) because of the infrastructure used by the Dutchies Restaurant, consisting partly of a prefab as well as a container being used as a kitchen. After the aforementioned methodology was applied, Boland Valuers valued the market related rental to be R84.00 (EIGHTY FOUR RAND) (VAT excluded) per square metre per month, for the lettable restaurant area of 279m<sup>2</sup> (TWO HUNDRED AND SEVENTY-NINE SQUARE METRES) (VAT excluded). The valuer indicated that the whole lease area of ±895m<sup>2</sup> (EIGHT HUNDRED AND NINETY-FIVE SQUARE METRES) cannot be used as in effect only the building and outside usable areas can be used for seating and restaurant purposes. Thus, the right to use the Property was valued.

As the Applicant was not satisfied with the valuation, it also obtained another valuation for the Property. Mr John Leppan of Hermanus Property Sales ("HPS"), valued the market related rental for the Property at R16,215.00 (SIXTEEN THOUSAND TWO HUNDRED AND FIFTEEN RAND) (VAT excluded) per month. Mr Leppan arrived at this amount by considering the following factors: the current rental rate for a seafront restaurant in town and the service and infrastructure quality. Mr Leppan further considered that, in his opinion, the open-air seating at Dutchies is only capable of being used for 7 (SEVEN) months of the year and that this reduces the tradeable area to 70m<sup>2</sup> (SEVENTY SQUARE METRES). Mr Leppan further commented on the on-going maintenance duty of the Applicant and the proposed lease term of three years with no option to renew. Mr Leppan concluded that with these factors taken into consideration, he values the market related rental for the Property to be R115.00 (ONE HUNDRED AND FIFTEEN RAND) (VAT excluded) per square metre per month, for a lettable restaurant area of 141m<sup>2</sup> (ONE HUNDRED AND FORTY SQUARE METRES). However, the Administration of Immovable Property Policy is quite clear that the value must be obtained by making use of a registered valuer. No records could be found that Mr Leppan is a registered valuer.

Whilst the two valuers both looked at comparable restaurants in the area and rated the Dutchies Restaurant with a lower rate per square metre than other restaurants, Boland Valuers arrived at a higher monthly rental



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amount than HPS. This is a result of Boland Valuers arriving at a lower rate per square metre based on a larger lettable floor area.

Property Administration Department View:

The current rental amount payable by the Lessee of the Milkwood Restaurant is R44,452.15 (FORTY-FOUR THOUSAND FOUR HUNDRED FIFTY-TWO RAND AND FIFTEEN CENTS) (VAT excluded) per month. The current rental amount payable by the Lessee of the Bientangs Cave Restaurant is R54,717.46 (FIFTY-FOUR THOUSAND SEVEN HUNDRED SEVENTEEN RAND AND FORTY-SIX CENTS) (VAT excluded) per month. However, as rightly stated by Boland Valuers, the areas, infrastructure and usable areas (for seating) are different. The above were both offered rental amounts when the tenders were advertised with the annual escalations.

The small lettable floor area used by HPS is not accurate in the Property Administration Department's view because the Applicant still has beneficial use of the outside area on rainy and/or windy days. The total difference between the two valuations amount to R7,221.00 (SEVEN THOUSAND TWO HUNDRED AND TWENTY-ONE RAND) (VAT excluded).

What is quite clear, is that the current monthly rental in the amount of R5,357.03 (FIVE THOUSAND THREE HUNDRED AND FIFTY SEVEN RAND AND THREE CENTS) (VAT excluded) is not market related as the restaurant is a well visited restaurant situated at a prime spot. However, if the valuation as obtained from the registered valuer is used, it will be a drastic increase and most probably have the effect that the Applicant will not be able to proceed with the lease which will be detrimental to the public and area as well as the Municipality. In this regard, the current economic climate must also be considered as well as the fact that most restaurants are still and will for a while have to recover from the effect of COVID-19.

It is thus recommended that a midway be found to ensure that the Applicant can proceed with managing the restaurant pending the upcoming tender for the whole development of the area. It is suggested that the difference between the two valuations be used to find the middle ground which will result in a rental monthly amount of R19,825.50 (NINETEEN THOUSAND EIGHT HUNDRED AND TWENTY-FIVE RAND AND FIFTY CENTS) (VAT excluded).

**Conclusion**

Taking the above into consideration, it is recommended that:

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- (a) The Executive Mayor approves the renewal of the lease of a portion of Remainder Erf 4771 Hermanus to Tasoclox (Pty) Ltd, ±895m<sup>2</sup> in extent, for a period of 3 (THREE) years from 1 October 2020 to 30 September 2023 for the purpose of managing a restaurant at Grotto Beach, Hermanus, at a rental amount of R19,825.50 (NINETEEN THOUSAND EIGHT HUNDRED AND TWENTY-FIVE RAND AND FIFTY CENTS) (VAT excluded) per month, escalating annually on 1 July by a percentage equal to the Consumer Price Index (all items); and
- (b) Council approves the deviation from paragraph 18 of the Administration of Immovable Property Policy in order to renew the current lease agreement with Tasoclox (Pty) Ltd for a further period of 3 (THREE) years without following a competitive process.

#### **7. Financial Implications**

The Municipality stands to gain a rental amount of R19,825.50 (NINETEEN THOUSAND EIGHT HUNDRED AND TWENTY-FIVE RAND AND FIFTY CENTS) (VAT excluded) per month escalating annually on 1 July by a percentage equal to the Consumer Price Index (all items) as well as service charges.

#### **8. Staff Implications**

None

#### **9. Comments from other Departments, Divisions and Administrations**

Senior Manager: Expenditure and Assets, Mr J Vorster - (028) 313 8046

*“As this application is dealt with in terms of the Administration of Immoveable Property Policy and it relates to a revenue generating project, with no intension of disposing of the asset, there is no objection to the application.”*

#### **10. Annexures**

- Annexure A: Locality Map
- Annexure B: Objection to Proposed Lease

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**RECOMMENDATION TO THE EXECUTIVE MAYOR:**

1. that the renewal of the lease of a portion of Erf 4771 Hermanus, ±895m<sup>2</sup> in extent, to Tasoclox (Pty) Ltd for a period of 3 (THREE) years from 1 October 2020 to 30 September 2023 for the purpose of managing a kiosk/restaurant at Grotto Beach, Hermanus, at a rental amount of R19,825.50 (NINETEEN THOUSAND EIGHT HUNDRED AND TWENTY-FIVE RAND AND FIFTY CENTS) (VAT excluded) per month, escalating annually on 1 July by a percentage equal to the Consumer Price Index (all items), **be approved**; and
2. that the abovementioned approval be subject to Council approving a deviation from paragraph 18 of the Administration of Immovable Property Policy of 2015.

**RECOMMENDATION TO THE COUNCIL:**

that the deviation from paragraph 18 of the Administration of Immovable Property Policy in order to renew the current lease agreement with Tasoclox (Pty) Ltd for a further period of 3 (THREE) years without following a competitive process, **be approved**.

<b>RESPONSIBLE OFFICIAL :</b>	<b>R MARINUS</b>
<b>TARGET DATE FOR IMPLEMENTATION :</b>	<b>31 JULY 2021</b>
<b>TARGET DATE TO INFORM APPLICANT :</b>	<b>9 JULY 2021</b>
<b>TARGET DATE TO INFORM OBJECTOR :</b>	<b>9 JULY 2021</b>

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**2.**

**HERMANUS, A PORTION OF REMAINDER ERF 4771 KNOWN AS “DUTCHIES RESTAURANT”: DEVIATION FROM PARAGRAPH 18 OF THE ADMINISTRATION OF IMMOVABLE PROPERTY POLICY OF 2015 ALLOWING THE MUNICIPALITY TO RENEW THE LEASE OF MUNICIPAL PROPERTY TO TASOCLOX (PTY) LTD**

**7/2/3/1**

**A Le Roux**

**10 May 2021**

**Manager: Property Administration**

**(028) 316-5623**

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**THIS MATTER SERVED BEFORE THE JOINT PORTFOLIO COMMITTEE ON 22 JUNE 2021, WHICH COMMITTEE RECOMMENDED AS FOLLOWS:**

**RECOMMENDATION TO THE EXECUTIVE MAYOR:**

1. that the renewal of the lease of a portion of Erf 4771 Hermanus, ±895m<sup>2</sup> in extent, to Tasoclox (Pty) Ltd for a period of 3 (THREE) years from 1 October 2020 to 30 September 2023 for the purpose of managing a kiosk/restaurant at Grotto Beach, Hermanus, at a rental amount of R19,825.50 (NINETEEN THOUSAND EIGHT HUNDRED AND TWENTY-FIVE RAND AND FIFTY CENTS) (VAT excluded) per month, escalating annually on 1 July by a percentage equal to the Consumer Price Index (all items), **be approved**; and
2. that the abovementioned approval be subject to Council approving a deviation from paragraph 18 of the Administration of Immovable Property Policy of 2015.

**RECOMMENDATION TO THE COUNCIL:**

that the deviation from paragraph 18 of the Administration of Immovable Property Policy in order to renew the current lease agreement with Tasoclox (Pty) Ltd for a further period of 3 (THREE) years without following a competitive process, **be approved**.

**RESPONSIBLE OFFICIAL :**

**R MARINUS**

**TARGET DATE FOR IMPLEMENTATION :**

**27 SEPTEMBER 2021**

**TARGET DATE TO INFORM APPLICANT :**

**11 SEPTEMBER 2021**

**TARGET DATE TO INFORM OBJECTOR :**

**11 SEPTEMBER 2021**

ANNEXURE A



14th October 2020

**Objection to Proposed Lease Extension - ERF 4771 KNOWN AS  
"DUTCHIES RESTAURANT":**

Dear Madeleine,

Thank you for your speedy and comprehensive response to our questions. Please find outlined below our comments on the proposed lease extension.

If this formally needs to be labelled an objection then so be it, however we would prefer for it to be viewed as comments seeking to properly protect the interests of the ratepayers and constituents of the Overstrand Municipality.

1. If approved this lease extension will be the fifth extension for ERF 4771 covering a ten year period. Since 2015 these extensions have required deviations from paragraph 18 of the Administration of Immovable Property Policy of 2015 and from paragraph 24 of the Administration of Immovable Property Policy of 2015. The first deviation allows the award of the lease without following a competitive tender. The second deviation allows the award of the lease at a price that has not been subject to a fair market value by not being required to appoint a professional valuer to determine said fair market value. The rental levied may reasonably be described as peppercorn amounting to R4,209.85 in June 2016 and escalating each year since then by CPI (all items). It seems rather extraordinary to deviate from Municipal policies on so many occasions relating to the same lease.

2. The reasons cited for the approach adopted above are that as the time periods for the lease are so small that it is not commercially attractive enough to entice the private sector to bid and that the Municipality may lose the existing tenant. These are fair considerations to take into account when viewing the lease. However, they begin to lose traction after the third extension of the lease and the continuing deviations from Municipal policy..

3 The area under ERF 4771 has been proposed for development by the Municipality and in actual fact the proposal was to be tendered in 2020 - the



impact of Covid on the local economy has put paid to this and the Municipality now believe; 'The proposed tender must be revisited by the Town Planning Department as to what is envisaged on the property and if it is still applicable taking into account the lapse in time and to ensure that the Environmental Record of Decision is still valid and applicable. The proposed tender will be put out during the last year of the lease agreement, this will provide the Municipality with sufficient time to do the necessary investigations and amended applications if necessary.' Clearly, there is no guarantee that the proposed development will go ahead in its present; or amended form and we could, once again, be in the situation of extending the lease in 2023 - this extension would presumably be based upon the rationales given to date as cited in point 2 above.

4. A further complicating factor to extensions to the lease from July 2015 onwards was the award of a lease for similar premises by the Municipality.

Once the competitive tender process for the Milkwood Restaurant in Onrus was complete the Municipality had a concrete example of two things; firstly, the commercial demand for such premises and secondly, the market value associated with such premises as determined by the commercial tender applications for the Milkwood. It beggars belief that the Municipality then went on to award two further leases (in 2016 and 2018) at a rent of R4,209.85 in June 2016 escalating by CPI (all items) each year. This rental level is approximately 800% lower than that achieved for the Milkwood via a competitive tender process.

5. The Municipal Finance Management Act promotes a more strategic approach to financial management, linking the municipal budget, the IDP and resources. The framework adopted in relation to ERF 4771 undermines this desire for a more strategic approach.

6. We can certainly see how the Covid pandemic could provide a basis for extending the current arrangements without a tender, however, the pandemic ought to require the municipality to generate as much income as possible to mitigate against losses from struggling ratepayers. This would be best achieved by employing the services of a commercial valuer. The cost of undertaking a commercial valuation is circa R4,000. This would probably be the best R4,000 the Municipality has spent in a long time.

#### Conclusion

In conclusion we object to the proposed lease extension in its present form as we believe that the decision not to utilise the services of a commercial valuer to determine a fair market rent would mean that the Municipality would be failing in its core function of protecting the financial interests of its ratepayers and constituents.

The area governed by the Municipality is home to a large number of restaurants, bars and cafes. The peppercorn rental levied for ERF 4771 could be construed by some as providing an unfair playing field in this sector. This is something we are sure the Municipality would be keen to avoid.

Furthermore we would urge the Municipality at its earliest convenience to regularise lease arrangements in relation to ERF 4771 to meet the terms of both paragraph 18 and paragraph 24 of the Administration of Immovable Property Policy of 2015.

If you require any further information in this regard please do not hesitate to contact us.

Best regards

Carol Judge & Jo Campbell