

# FISH HOEK VALLEY RATEPAYERS & RESIDENTS ASSOCIATION

*(Incorporating Fish Hoek, Clovelly and Sun Valley)*

~~Central Circle, Fish Hoek 7975~~

Web: <https://www.fhvrra.org.za/> Facebook: [www.facebook.com/FHVRRRA/](https://www.facebook.com/FHVRRRA/)

Heritage Western Cape: Conservation Body

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[https://docs.google.com/forms/d/e/1FAIpQLScgsXIpndQW0\\_flMeyjPtuV5WCf\\_1E9J0u0Gm-Px59fJ9KReQ/viewform](https://docs.google.com/forms/d/e/1FAIpQLScgsXIpndQW0_flMeyjPtuV5WCf_1E9J0u0Gm-Px59fJ9KReQ/viewform)

SUBJECT: INDEPENDENT MUNICIPAL DEMARCATION AUTHORITY BILL

DUE DATE: 24 MARCH 2023

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The Bill proposes to provide for the establishment, functions and powers of the Independent Municipal Demarcation Authority; to provide for the criteria and procedures for the determination and redetermination of municipal boundaries; to provide for the delimitation of wards; to provide for the establishment of the Demarcation Appeals Authority and to provide for municipal capacity assessments.

It does seem odd that the Board is to be independent and competent in related areas, but the selection panel consists of many under political influence:

- a person with specific knowledge of demarcation designated by the Minister **after consultation with the MECs for local government**;
- a person with expert knowledge of demarcation **designated by organised local government**;
- **the Chairperson of the Portfolio Committee in the National Assembly responsible for local government, or a member of the Portfolio Committee designated by such Chairperson**;
- **the Chairperson of the Select Committee in the National Council of Provinces responsible for local government matters, or a member of the Select Committee designated by such Chairperson**; and
- **the Chairperson of the National House, or a member of the National House designated by such Chairperson.**

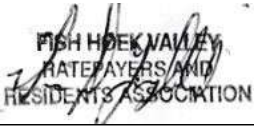
We are concerned about the political influence as designated in **bold** above, as the complaints levelled at previous changes related to the possibility of undue political influence.

For any decision-making procedure to be considered to be fair and transparent, it must be incorporated into this bill and made available for public comment.

Determination or redetermination of municipal boundary objectives' section 23 can be replaced with the requirement for a municipal "urban edge", which then includes the municipal's objectives of democratic, equitable, sustainable, social and economic development, safe and healthy environment as it would then fall within the municipal boundary and thus, be eligible for these objectives. Otherwise, it would be adrift in rural South Africa. As 24.(a)(i) pattern of human settlement expands, the local municipal's urban edge must also expand.

Section 35.(1)(b) and (c) and (2)(a) to (c) must be rewritten to rather include section 23's objectives in order to mitigate political influence. For ward delimitation to be considered to be democratic and fair, each ward must cut along economic strata for grouping together as similar economic groups usually have shared values and priorities for issues needing resolution and for service delivery. The representative ward councillor can then focus on serving their community better based on addressing this limited prioritised set of issues. Total property value (land and improvements – buildings) can be a good proxy for economic strata.

If a city / town does its property valuations fairly, regularly and on-time, municipal capacity does not need to be assessed. Summons for people to attend public meetings will then not need to be called.

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<b>DATE</b>	16 March 2023