

PUBLIC COMMENTS MADE

WRITTEN SUBMISSIONS

**PUBLIC COMMENTS RECEIVED ON DRAFT 2024/2025 (REVISED) INTEGRATED DEVELOPMENT PLAN (IDP)
AND DRAFT MEDIUM TERM REVENUE AND EXPENDITURE FRAMEWORK BUDGET**

**FOR CONSIDERATION BY THE TOP MANAGEMENT TEAM, BUDGET STEERING COMMITTEE AND
COUNCIL**

Community Need / Issue	Description	Management Comments
DRAFT RATES POLICY 2024/2025		
Comments on Draft Rates Policy 2024/2025	<p>1 General</p> <p>To avoid confusion, it is suggested that reference to the Municipal Property Rates Act, (Act No. 6 of 2004) should be consistent. In this policy, both “MPRA” and “The Act” are used.</p> <p>There are more than 20 instances where “MPRA” is used in the policy. “The Act” is used in the last bullet of clause 9.3.4 and should be replaced with “MPRA”</p>	9.3.4 Amended to replace the Act with MPRA
Comments on Draft Rates Policy 2024/2025	<p>2 Clause 7: Definitions</p> <p>2.1 “Business and commercial”</p> <p>2.1.1 The inclusion of properties that are used for the trading and hunting of game in the definition will have a devastating effect on the financial viability of these properties. The monthly rates on a farm where game is hunted will increase by a factor of 10 or 1 000%. It will wipe out game farms.</p>	Properties used for trading and hunting game are included in this category as they are explicitly excluded in the definition of

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	<p>The rating of these farms should not be different from a farm that is used for the grazing of livestock. It should be noted that the unit value of a game farm is typically higher than a farm that is used for the grazing of livestock and more rates are collected from game farms.</p> <p>The explicit exclusion of these properties from the definition of agricultural properties does not mean that they must be included in the “Business and commercial” category</p> <p>2.1.2 There is no rationale to include hostels, flats, communes and old age homes in the category ‘Business and commercial’.</p> <p>Hostels typically provide inexpensive lodging for a specific group of people, such as students or workers.</p> <p>A commune is a group of people living together and sharing possessions and responsibilities.</p> <p>Flats can be described as a suite of rooms forming one dwelling within a larger building containing several such dwellings.</p> <p>Old age homes, also referred to as retirement homes or old people’s homes, are multidwelling facilities intended for the elderly. Old age homes that are not owned by a Public Benefit Organisation will not qualify for the 100% rebate (refer to clause 9.3.3)</p> <p>All of the above are used for human habitation and it is in principle not different from the building for human habitation on an erf in a township.</p> <p>The fact that rental may be paid by the occupants of these properties cannot be the criteria to categorise these properties as “Business and commercial”. The use of these properties remains for residential purposes.</p>	<p>agricultural properties in the act.</p> <p>Hostels, Flats, communes and old age homes are included in the business and commercial category as there is rental income generated from the use of the properties.</p> <p>Old age homes also qualify for 100% rebate in terms of the rates policy.</p>

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	<p>The view that properties that are used for residential purposes and are rented out should be as categorised as “Business and commercial” should also apply to dwellings that are rented out. There must be a distinction between the use as a normal place of habitation and the use for holiday purposes.</p> <p>This definition conflicts with the definition of “residential property” in the MPRA¹ and should be removed because the definition in the MPRA takes precedence over the definition in the rates policy. Section 3(1) of the MPRA states that the policy must be consistent with the MPRA.</p> <p><i>A property used for residential purposes must be categorised as “Residential property”.</i></p> <p>2.2 “Residential property”</p> <p>The definition could be ultra vires as it conflicts with the MPRA definition. There are numerous judgements confirming that a rates policy is subject to the MPRA and regulations.</p> <p>The definition should reflect the amendments to the definition in the MPRA.</p> <p>The MPRA definition refers to “residential purposes”. It is suggested that a definition for “residential purposes” be included in the policy and the MPRA definition be included verbatim in this policy.</p>	<p>The definition is correct. BCMM policy is subject to verification by National Department of COGTA and has been found to be compliant with the provisions of the MPRA.</p>

1 MPRA definition: “residential property” means a property included in a valuation roll in terms of section 48(2)(b) in respect of which the primary use or permitted use is for residential purposes without derogating from section 9

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Comments on Draft Rates Policy 2024/2025	<p>3 Clause 8.1: Categories of properties</p> <p>In terms of section 8(2)(i) of the MPRA, the category for multiple purposes is compulsory and must be created. If the category is not created this policy will not be consistent with the MPRA.²</p>	In terms of Section 8, the municipality must create the categories of property listed, if they exist within a municipality.
Comments on Draft Rates Policy 2024/2025	<p>4 Clause 8.2: Criteria for categorising properties for multiple purposes</p> <p>The category 'Multiple purposes' is compulsory which means that there is no longer the discretion provided for in sections 9(1)(a) & (b). These properties must be dealt with in terms of sections 9(1)(c) and 9(2).</p> <p>The values of properties that are used for more than one purpose (e.g. Business & Commercial and Residential) must be apportioned between the different uses based on the area occupied by them.</p> <p>The principle to apportion the value based on the extent of the different uses was confirmed by the Supreme Court of Appeal in <i>The City of Johannesburg Metropolitan Municipality v The Chairman of the Valuation Appeal Board of the City of Johannesburg</i> (282/2103) [2014] ZASCA 5.</p> <p>Leach LE, held that <i>"The obvious intention is that where a property is used for multiple purposes, those categories of use – in respect of which different rates are to be applied under s 9(2)(c) – should be determined and recorded, as should the values be apportioned to each such category. This is all to be done by the municipal valuer who is, after all, the person possessed with the necessary skill, expertise and experience to do so (which the municipal council lacks) Moreover, although s 48(2) does not specifically state that the market value apportioned between categories of use should be recorded</i></p>	<p>This clause was verified by COGTA and BCMM was rendered compliant with the provisions of the MPRA.</p> <p>Clause 9: Rates relief measures relating to categories of property and categories of owners of property. BCMM policy is subject to verification by National Department of COGTA and has been found to be compliant with the provisions of the MPRA.</p>

² MPRA section 3(1).

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	<p><i>in instances of multiple use properties, the provision in s 48(2)(g) that the valuation roll is to include ‘any other prescribed particulars’ in addition to those specifically mentioned, reinforces my conclusion that the Act, properly interpreted, requires it to be done.”</i></p> <p>It was also stated that in the case of properties used for multiple purposes, it is the function of the municipal valuer to determine and record those uses and apportion the market value of the property between them.</p> <hr/> <p><i>The market value of the property that is used for more than one purpose must be reflected in the valuation roll with the category “multiple purposes”.</i></p> <p>The market value must be apportioned between the different uses of the property.</p> <p>The manner of apportionment has not been prescribed as provided for in section 9(2)(a) of the MPRA and until it is done, the precedent set by the Supreme Court of Appeal must be followed.</p> <p>This clause must be removed from the policy or redrafted to refer to section 9(2) of the MPRA.</p>	
Comments on Draft Rates Policy 2024/2025	<p>5 Clause 9: Rates relief measures relating to categories of property and categories of owners of property.</p> <p>5.1 Municipal owned properties must be removed from this list</p> <p>The municipality has the discretion, in terms of section 7(2)(a)(i) of the MPRA, not to rate properties of which the municipality is the owner.</p> <p>The municipality must exercise the discretion not to levy rates on its properties. It is not part of the relief measures.</p>	Policy amended. Separate clause created for municipal properties.

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	<p>A new clause should be introduced to exercise the discretion. It should not be a sub-clause under clause 9, but it should have a separate number.</p> <p>The proposed wording:</p> <p><i>Properties owned by Buffalo City Metropolitan Municipality will not be levied rates in terms of Section 7(2)(a)(1) of the Act; except for the where:</i></p> <p><i>(a) Where Council owned property is leased to a third party and the lease agreement provides for the levying of property rates; or</i></p> <p><i>(b) Where Council owned land is sold to a third and the deed of sale provides for the levying of property rates.</i></p> <p>5.2 Clause 9.1 Exemptions</p> <p>5.2.1 Municipal properties</p> <p>Municipal properties are not exempted in terms of section 15.</p> <p>A new clause should be created:</p> <p><i>‘Municipal properties’</i></p> <p>The clause should be moved because it does not belong under clause 9.</p> <p>5.3 Clause 9.2 Exclusions</p> <p>Section 17(1) of the MPRA lists the properties that may not be rated or are excluded from the payment of property rates.</p>	

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	<p>Why are only religious properties and the R15 000 exclusion on residential properties mentioned?</p> <p>The clause should be moved because it does not belong under clause 9.</p> <p>5.4 Clause 9.3.1 Pensioners and Disabled Persons</p> <p>5.4.1 Clause 9.3.1(i) states that the senior citizen must own the property, the words '<i>The applicant must be the registered of the property</i>' could be deleted from clause 9.3.1(ii). The alternative is to delete clause 9.3.1(i).</p> <p>5.4.2 Clause 9.3.1(iii) could be deleted because a 'Senior Citizen' is defined as a person '<i>who is sixty (60) years or older.</i>'</p> <p>5.4.3 Clause 9.3.1(iv) – it does not make sense to include the alternative effective date (on which the application is received) The date on which the applicant turned 60 will always be the oldest date and should be the only applicable date.</p> <p>The reference to '<i>retired person</i>' should be changed to '<i>person</i>'. There is no requirement in this policy that the person must be retired.</p> <p>5.4.4 Clause 9.3.1(v) – The drafting can be improved.</p> <p>Proposed wording:</p> <p>'(v) Submit an application <u>Apply for the 2023/24 financial year and thereafter when the age category changes or a person qualifies as a Senior Citizen</u>'</p> <p>5.4.5 Clause 9.3.1.1 states the obvious and can be deleted.</p> <p>5.5 Clause 9.3.2: Disabled or medically boarded persons</p>	

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DRAFT RATES POLICY 2024/2025		
	<p>5.5.1 The reference should be to clause 7 and not Section 7.</p> <p>5.5.2 Clause 9.3.2.1 states the obvious and can be deleted.</p> <p>5.6 Clause 9.3.3 Public Benefit Organisations and not for gain institutions</p> <p>5.6.1 The subclauses should be numbered (i) to (xi) to align them with the numbering format in the policy.</p> <p>5.6.2 Is it realistic to set a deadline of 30 June, a realistic deadline of 31 August is suggested.</p> <p>It also means that the applications must be submitted before the rates policy is approved.</p> <p>5.6.3 Exemptions should be backdated to the beginning of the financial year or the date of qualification.</p> <p>5.7 Clause 9.3.5: General Relief</p> <p>5.7.1 The numbers A and B should be replaced with 9.3.5.1 and 9.3.5.2 to align the numbering with the format applied to other clauses.</p> <p>5.7.2 Clause 9.3.5 B – The rebate will apply to properties where the services listed are not available.</p> <p>Will the test not apply to individual properties?</p> <p>It is not clear why it is stated that <i>'This rebate will not be granted on an individual basis'</i>.</p>	<p>Clause 9.3.1.1 and 9.3.2,1 will not be deleted.</p> <p>Policy Amended.</p>

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Comments on Draft Rates Policy 2024/2025	<p>6 Social housing</p> <p>The metro should take cognisance of the judgement by Hartle J in Own Haven Housing Association NPC and Lorles CC v Buffalo City Metropolitan Municipality and Minister of Human Settlements, Water and Sanitation (Case No. 1217/2019).</p> <p>The policy should provide for a rebate or other suitable relief for the providers of social housing who are accredited with the Social Housing Regulatory Authority.</p> <p>National Treasury’s MFMA Circular 128 (8th of March 2024) showed the CPI projections as follows:</p> <div><p>Table 1: Macroeconomic performance and projections, 2022 – 2027</p><table><tr><th>Fiscal year</th><th>2022/23</th><th>2023/24</th><th>2024/25</th><th>2025/26</th><th>2026/27</th></tr><tr><td></td><td>Actual</td><td>Estimate</td><td colspan="3">Forecast</td></tr><tr><td>CPI Inflation</td><td>6.9%</td><td>6.0%</td><td>4.9%</td><td>4.6%</td><td>4.6%</td></tr></table><p>Source: 2024 budget review.</p></div> <p>The current economic challenges in the country place pressure on households’ ability to pay municipal accounts, therefore municipal revenue generation is affected.</p> <p>However, tariff increases for other services should be cost-reflective and may change above or below this CPI. Increases above the guidelines above should be justified in the municipal budget.</p> <p>KEY ASPECTS OF THE BUDGET.</p> <p>The proposed tariffs:</p> <p>Property rates - 3.90%</p>	Fiscal year	2022/23	2023/24	2024/25	2025/26	2026/27		Actual	Estimate	Forecast			CPI Inflation	6.9%	6.0%	4.9%	4.6%	4.6%	The recommendation to consider reducing rates has been duly noted and considered in the Final Budget.
Fiscal year	2022/23	2023/24	2024/25	2025/26	2026/27															
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DRAFT RATES POLICY 2024/2025														
	<table> <tr> <td>Electricity</td><td>-</td><td>12.70%</td></tr> <tr> <td>Water</td><td>-</td><td>8.54%</td></tr> <tr> <td>Sanitation</td><td>-</td><td>5.20%</td></tr> <tr> <td>Refuse</td><td>-</td><td>5.20%</td></tr> </table> <p>It is commendable that the City has endeavored to keep tariff increases in line with the CPI.</p> <p>Recommendations:</p> <p>It is commendable that the tariff increases are in line with the National Treasury guidelines, an effort should also be made to reduce the water tariff increase.</p> <p>That the following be noted and the budget be reconsidered:</p> <p>It is important that all role players create an environment which minimise the negative effect and set the stage for renewed economic growth.</p> <p>As such, it is our plea to the City to take cognizance of the dire state of the economy and the financial predicament of many of its ratepayers and to adjust its proposed budget accordingly. This is not a time for a “business-as-usual” budget.</p>	Electricity	-	12.70%	Water	-	8.54%	Sanitation	-	5.20%	Refuse	-	5.20%	
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Community Need / Issue	Description	Location (Ward/Area)	Management Comments
SERVICE DELIVERY			
Service delivery backlog	Establish partnerships with non-governmental organisations and community-based organisations. This is critical to leverage external resources and expertise to tackle the service delivery backlog.	Whole metro	
Bulk infrastructure	Invest in the development of bulk infrastructure, such as water and sanitation systems, to enable the timely development of earmarked land for housing.	Whole metro	The development of bulk water infrastructure is hampered by the limited budget availability as a result the Water Services in conjunction with the Directorate of Finance is pursuing other available avenues for funding of bulk water infrastructure for major projects (e.g., New Border Post Water treatment works for Bisho, Qonce, Berlin and surrounding villages).

Community Need / Issue	Description	Location (Ward/Area)	Management Comments
WATER, SANITATION AND STORMWATER			
Toilets	Increase the allocation for sanitation in informal settlements to ensure that all residents in these settlements have access to adequate sanitation, including ensuring that a toilet is not shared by more than 10 households. The Metro should also show which settlements will benefit from the project and show how many toilets will be delivered to each settlement.	Informal Settlements	The budget has been increased in the past year. The Municipality need to look at the underlying cause of the mushrooming of informal settlements.
Sanitation R&M allocation	Increase the allocations for repairs and maintenance of sanitation and water infrastructure, as well as for overall repairs and maintenance in the Metro to bring it closer to 8% of the value of Property, Plant and Equipment, as proposed by the National Treasury.	Informal Settlements	This is understood and noted. Infrastructure vandalism is the main issue that cause the R & M budget to deplete in early months of the financial year.
Sanitation R&M ringfencing	Ring-fence a budget allocation for repairs and maintenance of basic services infrastructure in informal settlements to ensure that residents in informal	Informal Settlements	It is impossible to do such as these are not revenue generating services. The equitable share does not cover all that is required to be done in

Community Need / Issue	Description	Location (Ward/Area)	Management Comments
WATER, SANITATION AND STORMWATER			
	settlements have access to adequate water and sanitation.		terms of maintenance due to physical conditions on the ground
Informal Settlements Sanitation	Ensure that informal settlements in rural areas are prioritized when delivering VIP toilets. The Metro should also show in its budget how much of the allocation for VIP toilets is set aside for installing new toilets, and how much is set aside for the desludging of VIPs.	Informal Settlements	Everyone is considered equally when it comes to delivering of VIPs. The budget split is determined by the competing needs, to split it will make one side suffer.
Informal Settlements Water	Publish the names of settlements who will benefit from the informal settlements water projects, as well as indicate how many taps will be delivered through these projects.	Informal Settlements	The following informal areas have benefited in the installation of standpipes: <ol style="list-style-type: none"> 1. Barcelona Informal Settlement in Zwelitsha, installed 2 standpipes 2. Grassmere and Silkerk Squatter Camps in Parkside – ward 1, installed 2 standpipes. 3. Bompini – to install 9 standpipes.
Sanitation in Crisis	A total of 63% of residents surveyed in August indicated that they used communal flush toilets provided by the Metro. However, residents consistently raised challenges with these toilets, including that	Informal Settlements	Ablutions are provided as the requests received from either Councillors or communities. This is the outcome of infrastructure vandalism.

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WATER, SANITATION AND STORMWATER			
	up to 30 households must share one toilet, which is much higher than the Metro's own target of 10 households per toilet. The lack of repairs and maintenance is another major challenge and in August 2023, 60% of residents who used communal toilets reported that their toilets were unusable. Specific issues included leaking toilets, broken or missing toilet seats and covers, toilets doors not locking from the inside and insufficient lighting inside.		
New sanitation in informal settlements	While the Metro's increase to the draft 2024/25 allocation compared to the adjusted 2023/24 budget is welcomed, there are concerns that this allocation might not be enough to make a significant contribution to address the sanitation backlog in the Metro. It is also questioned whether this allocation will improve the households per toilet ratio in	Informal Settlements	Provision of infrastructure in informal settlement is seen as a temporary measure so Human Settlement Directorate should accelerate housing delivery to mitigate this challenge

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WATER, SANITATION AND STORMWATER			
	<p>Buffalo City's informal settlements.</p> <p>It is also worrying that the Metro reduced its 2023/24 allocation for this project by R2 million in its adjustment budget. Does this mean that the Metro is not able to spend the available funding for sanitation services to informal settlement communities?</p> <p>The Metro should also indicate which settlements will benefit from this Programme in 2024/25, as well as say how many toilets will be installed.</p>		
Addressing the rural sanitation backlog	<p>The draft 2024/25 budget allocation for this project has increased marginally from the adjusted 2023/24 estimate.</p> <p>It is not clear from the allocation how much of the budget is set aside for the installation of new VIPs and how much is set aside for the desludging of these toilets.</p>	Rural Areas	Everyone is considered equally when it comes to delivering of VIPs. The budget split is determined by the competing needs, to split it will make one side suffer.

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WATER, SANITATION AND STORMWATER			
	The Metro also does not indicate how much of this is allocated towards providing VIP toilets to informal settlements in rural areas.		
Sewer spillages	<p>Request to amend IDP/Budget for the 2023/2024 financial year, as approved by the Council to include projects and a Budget to execute the 3 court orders:</p> <ul style="list-style-type: none"> • 25 January 2022: A court order against BCMM with regards to spillages from the silt trap and a manhole in Lower Ridge Road, to clear the silt trap and maintain it; to provide and alternative overflow that occurs at the manhole; to provide a backup power supply for the pump station • 25 January 2022: A court order against the BCMM with regards to spillages from the Maldives Pump Station, to repair the sewer pump station serving the 	Ward 18, Nahoon	<p>The city is exploring options to augment Nahoon Bulk Outfall Sewer, a PSP is appointed, and the quick wins are being implemented.</p> <p>Sewer blockages are cleared on an ongoing basis as and when required.</p> <p>Maldives issue is being looked at by legal department.</p>

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WATER, SANITATION AND STORMWATER			
	<p>Maldives Housing Development, and to maintain it in a working condition.</p> <ul style="list-style-type: none"> 5 April 2022: A court order against the BCMM to develop and implement a contingency plan for the accidental sewerage releases at Nompumelelo and contain sewerage spills and to prevent it from entering the stormwater system at Nompumelelo; to develop and implement an inspection and maintenance plan for sewerage infrastructure in Nompumelelo. 		
Ageing infrastructure	Prioritise upgrading and expanding the metro's water and wastewater systems.	Whole metro	<p><u>Sanitation</u> Exploration of Long-Term Infrastructure Investment Planning is being looked at.</p> <p><u>Water</u> The ageing water infrastructure is a huge challenge, and the Department is implementing a limited infrastructure replacement programme based on available budget.</p>

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WATER, SANITATION AND STORMWATER			
Water losses	Implement swift action to leak repairs so as to effectively conserve water resources.	Whole metro	Leak repairs are attended to on daily basis as part of operations and maintenance. The Department is currently renewing a 5-year water conservation and water demand management strategy, which will assist in reducing the non-revenue water in the institution.
Vandalism of water infrastructure	Constant vandalism at Da Gama and Zwelitsha pump station which pumps water to Bhisho leading to water outages, constant pipe bursts at Bhisho and da Gama Reservoir resulting in water outages at Bhisho, especially Bhisho Central.	Ward 43	These pump stations are owned by Amatola Water and the city has been engaging with Amatola Water to ensure that there is adequate security at these pump stations. Amatola water has since appointed a security service provider that has completed the installation of the security alarms at vulnerable sites and is monitoring each site 24/7.
Water	Water Reticulation: Access to clean and reliable water is essential for the health and well-being of our community. We urge for improvements in water reticulation infrastructure to ensure equitable access to this necessity.	Siyathemba Village, Ward 44	There is existing water infrastructure at Siyathemba village. Additional 10 standpipes were provided for village extension in the 2023/24 financial year.

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ELECTRICITY, HIGH MAST LIGHTS, STREETLIGHTS			
Electricity meters	Actively pursue and rigorously implement metering systems.	Whole metro	The metering system project is under review, and will commence once a service provider is appointed
Electrification of informal settlements	Tackle the electricity backlog, by implementing strategies to electrify informal settlements safely and promptly.	Informal Settlements	SPD to undertake updated feasibility study of informal areas pertaining to suitability for development approval (land ownership, environmental issues, servitudes, density, alternative land I required when informal areas is on undevelopable land etc) and electrification planning can then be considered thereafter based on information provided, by the study
Electricity grid expansion	Invest in grid expansion and upgrades to meet the rising demand for electricity and to ensure equitable access for all residents.	Whole metro	The electricity and Energy department implement a upgrading, refurbishment and renewal capital program. The projects implemented are based on available funding and network requirements.
Electrification of informal settlements	Electrification of Ezizeni informal settlements at Tyutyu	Ward 43, Tyutyu	Before ESKOM can be given permission, to electrify BCMM Spatial Planning would need to confirm land ownership and future planning ie is the area to remain as a rural village or will it be town planned. A bilateral meeting is held with Eskom, Councillor, and department to identify projects and to align with IDP. Councillor also needs to indicate if it a new area, extension of existing area or infills.
High mast lighting	Request for High Mast at Ezizeni, Tyutyu	Ward 43, Tyutyu	Eskom do not provide lighting within their area of supply. BCMM is engaging ESKOM on this matter at the IGR level to find a lasting solution.

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ELECTRICITY, HIGH MAST LIGHTS, STREETLIGHTS			
Streetlights	Dysfunctional streetlights at Bhisho / Tyutyu / Wodehouse / Kaffrarian Heights	Ward 43, Bhisho / Tyutyu / Wodehouse / Kaffrarian Heights	Planned Maintenance is carried out twice a year within the ward, generally in the 2 nd and 4 th Quarter. However, due to the nature of streetlighting faults can be reported to the 24-hr call Centre on the number 043-0505683 and the fault will be attended too. Theft is in addition a major contribution.

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ILLEGAL DUMPING SITES, REFUSE REMOVAL			
Refuse bags	Allocate a budget for refuse bags for informal settlements.	Whole Metro	For the 2024/2025 financial year, the Directorate has set aside funding for distribution of refuse bags for formal and informal settlements.
Waste Dumping Sites	Allocate budget for designated waste dumping sites for alternative waste such as grass and rubble.	Ward 14 and Ward 37	For the 2024/2025 financial year, the Directorate has set aside funding for establishment of garden transfer stations for management of garden waste, soil and builders' rubble.

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SAFETY & SECURITY			
Theft & Vandalism	Prevent or limit theft and vandalism, by enhancing security measures in key areas through increased surveillance, deploying visible policing and security personnel, and working closely with the community to identify perpetrators.	Whole metro	The provision of armed private security guards was prioritized to safeguard municipal assets and infrastructure that provides essential services to the City such as Water Treatment Works (WTW), Wastewater Treatment Works (WWTW), Cemeteries and Electrical Sub-Stations to ensure that essential services to the City are uninterrupted. The alarm monitoring and armed response to various municipal buildings and installations has been reinstated by securing the services of private alarm monitoring companies. BCMM Law Enforcement personnel and other law enforcement agencies have collaborated to increase visible policing and increase foot patrol in hot spot crime areas. Community Policing Forums and the roll out of Community Safety Forums from BCMM will assist communities in keeping their areas safe through regular meetings etc. The roll out of CCTV security cameras is currently being finalised through ICT. This security measure will further enhance safety and security at all major municipal infrastructure assets through CCTV surveillance which will be monitored 24/7 at the BCMM control room.
Theft & Vandalism	Develop or erect barriers like fencing and lighting at critical infrastructure to help deter vandalism and theft.	Whole metro	Fencing and other security measures are currently being rolled out and implemented at most critical infrastructure throughout BCMM.

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LAND & CONSTRUCTION OF HOUSES, RECTIFICATION OF HOUSES, TITLE DEEDS			
Land use management	Take concerted efforts to control urban influx in certain areas to limit the pressure on existing infrastructure	Whole metro	These matters are comprehensively dealt with in the BCMM Land Management Policy and Strategy developed by Property Management of which all Directorates are responsible for implementing. All Directorates must coordinate efforts, budget for and implement the approved BCMM SDF Spatial Strategy which focusses on the development of Mass Housing areas and the development of the Catalytic Land Development Strategy
Land use management	Prioritise effective urban planning and land management strategies.	Whole metro	All Directorates are responsible for the implementation of the BCMM Land Management Policy and Strategy. This matter is comprehensively dealt with in the BCMM Spatial Development Framework (SDF). All Directorates must coordinate efforts, budget for and implement the approved BCMM SDF Spatial Strategy which focusses on the development of Mass Housing areas and the development of the Catalytic Land Development Strategy
Land use management	Focus on implementing land-use planning policies that prioritise the allocation of land for housing development, particularly in accessible locations close to amenities and public transport.	Whole metro	This matter is comprehensively dealt with in the BCMM SDF. Well located BCMM land must be released for development. Well located State land must be released for development. All Directorates must coordinate efforts, budget for, and implement the approved BCMM SDF Spatial Strategy which focusses on the development of Mass

Community Need / Issue	Description	Location (Ward/Area)	Management Comments
LAND & CONSTRUCTION OF HOUSES, RECTIFICATION OF HOUSES, TITLE DEEDS			
			Housing areas and the development of the Catalytic Land Development Strategy
Informal settlements land tenure	Regularise informal settlements through land tenure regularisation programmes. This will enable the provision of essential services and infrastructure. This approach meets immediate community needs while laying the groundwork for sustainable development.	Whole metro	Spatial Planning and Development's Property Management function is to prioritise the upgrading of informal settlements to enable tenure and to initiate the process of transferring immovable property in favour of approved beneficiaries or qualifying beneficiaries. In case of where land is not available to settle qualifying beneficiaries, Spatial Planning and Development acquires privately owned land for human settlements purposes.
Proactive settlement planning	Transition from reactive to proactive measures to manage the rapid expansion of informal settlements. This requires comprehensive community engagement and participatory decision-making processes to involve residents in urban planning initiatives.	Whole metro	This matter is comprehensively dealt with in the existing BCMM Informal Settlement Strategy approved by Council in 2011. As this Strategy is outdated to a certain degree, the Human Settlements Directorate in conjunction with all other relevant Directorates are in the process of procuring the services of a service provider to prepare an Updated BCMM Informal Settlement Upgrading Strategy and Settlement Growth Management Strategy in order to prioritise and proactively plan for the formalisation/ relocation and development of new settlements within the jurisdiction of the city. Comprehensive public engagement is done by the Directorate of Spatial Planning and Development at the stage when the draft layout is developed as part of the Township Establishment process.

Community Need / Issue	Description	Location (Ward/Area)	Management Comments
LAND & CONSTRUCTION OF HOUSES, RECTIFICATION OF HOUSES, TITLE DEEDS			
			<p>The implementation of the approved township layouts requires that all Directorates must coordinate efforts, budget for, and implement the approved township development.</p> <p>All Directorates must proactively budget for and implement the approved BCMM Informal Settlement Strategy and the SDF Spatial Strategy which focusses on the development of Mass Housing areas and the development of the Catalytic Land Development Strategy</p> <p>The Directorate of Spatial Planning and Development is continually conducting Feasibility Studies on land parcels which have been identified for housing development in order to determine if the land in question is suitable for future housing development.</p>
Land invasion	Allocate funds to fill vacant positions dedicated to addressing issues related to land invasion, providing the municipality with the resources needed to combat this problem effectively.	Whole metro	To prioritise the establishment of the land invasion unit and the filling of posts.
Land invasion	Establish a specialised unit focused on preventing and addressing land invasions along vulnerable areas.	Whole metro	To expedite the establishment of the unit to combat the scourge of land invasion that's confronting the Metro.
Housing	Conduct comprehensive housing needs assessments to	Whole metro	

Community Need / Issue	Description	Location (Ward/Area)	Management Comments
LAND & CONSTRUCTION OF HOUSES, RECTIFICATION OF HOUSES, TITLE DEEDS			
	identify the specific requirements and preferences.		
Housing	Implement inclusive housing policies that cater to diverse needs and ensuring equitable access to housing opportunities.	Whole metro	
Housing	Collaborate with relevant stakeholders to inform the design and implementation of tailored housing solutions.	Whole metro	
Housing	The re-blocking of informal settlements project must be extended to the Midland Region of BCMM as it has a larger population size in the metro.	Midland Region	
Housing	Housing: there is a pressing need for affordable housing solutions to address the housing shortage within our community, providing adequate shelter for all residents	Siyathemba Village, Ward 44	
Maintenance of ponds along flood line	Ponds on the flood line: Proper plan, management and maintenance of ponds along	Siyathemba Village, Ward 44	

Community Need / Issue	Description	Location (Ward/Area)	Management Comments
LAND & CONSTRUCTION OF HOUSES, RECTIFICATION OF HOUSES, TITLE DEEDS			
	flood lines are crucial for mitigating flood risks and preserving our natural environment.		
Land Use Management	Designate land and zone: for the following purpose: town hall, Clinic, Community Police Forum, police station, schools, retail and Agri Industrial park, municipal office/s, Recreational Facilities (i.e Combi Courts) , SASSA, Water Reservoirs or Borehole, Electricity Transformer, Cell phone tower, Grave site, fencing grazing pastures and fields and etc.	Siyathemba Village, Ward 44	SPD to undertake updated feasibility study of informal areas pertaining to suitability for development approval (land ownership, environmental issues, servitudes, density, alternative land I required when informal areas is on undevelopable land etc) and electrification planning can then be considered thereafter based on information provided, by the study.

Community Need / Issue	Description	Location (Ward/Area)	Comments
ROADS, BRIDGES, PAVEMENTS, PEDESTRIAN BRIDGES, POTHOLES, SPEEDHUMPS, FOOTPATHS			
Roads	Upgrade of Mdantsane Roads: our roads are in dire need of improvement and regular maintenance to ensure safe and efficient transportation for residents and goods.	Siyathemba Village, Ward 44	<p>The department undertakes the Gravel Road maintenance and road rehabilitation programme annually, based on budget available by BCMM.</p> <p>A portion of Sweetwaters Main Rd has been surfaced. Roads in Breidbach have been resurfaced on a priority basis in conjunction with ward councillor. Rural Road re-gravelling have been undertaken in Tshatshu and surrounding areas. The project is currently at construction stage for upgrading of Stormwater at Sweetwaters. More roads will be attended in the next financial year in consultation with the ward Councillor</p>
Roads	Pothole patching and overlaying required at Bisho, Kaffrarian Heights and Wodehouse. Road regravelling at Tyutyu and Peelton – the state of gravel roads is very poor. Pedestrian sidewalk required at Sinako Primary School	Ward 43	<p>The department undertakes the Gravel Road maintenance and road rehabilitation programme annually with our in-house teams and based on budget available.</p> <p>Patching programme has been developed for potholes to be attended and some roads have been patched in Bisho.</p> <p>Resurfacing of roads at Tyutyu has been completed with the available budget. More roads will be attended in the next financial year in consultation with the ward Councillor.</p>

Community Need / Issue	Description	Location (Ward/Area)	Comments
COMMUNITY HALLS, LIBRARIES, INFORMATION CENTRES, RECREATIONAL PARKS/FACILITIES, YOUTH CENTRES			
Sport and Recreational Facilities	Sport and Recreational Facilities: investing in sports and recreational facilities will not only promote physical health (i.e Gym Park Equipment) but also foster community cohesion and provide constructive outlets for our youth.	Siyathemba Village, Ward 44	The Directorate is rolling-out the establishment or development of Recreational Parks as per Ward Priorities. Ward 14 priorities do include Sport Field for Siyathemba Village and the upgrade of the Sport Field will be undertaken in the 2024/25. Recreational Parks (Playground and Outdoor Gym) are not on the Ward Priorities.

Community Need / Issue	Description	Location (Ward/Area)	Comments
ECONOMIC DEVELOPMENT, JOB CREATION, SKILLS DEVELOPMENT, EMPLOYMENT, LEARNERSHIPS, SHOPPING CENTRE/MALL, SMMES, TOURISM, TRAINING			
Economic Development	Support for community projects: A plea to BCM LED for infrastructure development, we also advocate for support and investment in community driven projects such as livestock rearing, crop cultivation, craft production, and other income generating activities. These projects not only provide livelihood opportunities for residents but also contribute to the economic empowerment and self –	Siyathemba Village, Ward 44	

Community Need / Issue	Description	Location (Ward/Area)	Comments
ECONOMIC DEVELOPMENT, JOB CREATION, SKILLS DEVELOPMENT, EMPLOYMENT, LEARNERSHIPS, SHOPPING CENTRE/MALL, SMMES, TOURISM, TRAINING			
	sustainability of our community.		
Training and Employment	Training and Employment: we plead with BCM to consider our community and especially those designated groups for accredited training opportunities that will open doors to employment opportunities.	Siyathemba Village, Ward 44	

ISSUES THAT CUT ACROSS GOVERNMENT SPHERES OR RESIDE UNDER THE FUNCTIONS OF A GOVERNMENT ENTITY AT PROVINCIAL OR NATIONAL LEVEL			
Community Need / Issue	Description	Location (Ward/Area)	Comments / Feedback
CLINICS			
Clinic	Mobile Clinic Monthly Visit: Regular visits from a mobile clinic will enhance access to healthcare services, particularly for those who face challenges in accessing traditional healthcare facilities.		

WRITTEN SUBMISSIONS RECEIVED FROM:

1. Nahoon Estuary Management Forum (NEMF)
2. Nahoon Estuary Management Forum (NEMF)
3. Rates Watch (Pty) Ltd
4. South African Property Owners Association (SAPOA) - submitted by Rates Watch
5. Common Cause NPO and International Budget Partnership South Africa as part of the Asivikelane Campaign
Representing informal settlements communities in Buffalo City Metropolitan Municipality
6. South African Property Owners Association (SAPOA) - submitted by Urban Econ
7. Siyathemba Village, Ward 44 settlements communities in Buffalo City Metropolitan Municipality
8. Siyathemba Village, Ward 44