



SALGA

South African Local Government Association

**SALGA comments on the Draft Simplified IDP
Framework for smaller (B4) municipalities
(October 2011)**

1. Introduction

The draft simplified IDP for smaller municipalities is an attempt to address some of the challenges that were identified in the 2009 state of local government report, that indicated that a number of smaller municipalities were having difficulty in delivery services to communities. The development of differentiated IDPs was seen as a possible intervention that may assist smaller municipalities in focusing on the key service delivery challenges and hopefully indirectly deal with capacity challenges as the little resources are focused on key deliverables. Thus, whilst the simplified IDP framework will not be a panacea for all the service delivery problems being faced by B4 municipalities, there should however be an expectation that the draft simplified IDP framework will be capable of adequately dealing with the challenges associated with the both the preparation and implementation of the IDPs.

The differentiation of municipalities based on the various criteria as per the Municipal Demarcation Board, National Treasury and the Auditor General's opinion is a positive starting point that can always be further refined. The comments made in this document are must be viewed as preliminary comments. Municipalities have been requested to study the draft simplified IDP framework and make submissions via SALGA, on or before 31 January 2012.

2. Consultation process

SALGA supports initiatives to improve municipal IDP processes given the importance of the IDP in facilitating service delivery. Any support initiative such as the proposed simplified IDP framework therefore requires meaningful and effective consultation with the local government sector. In that regard, consultation with municipalities should have been undertaken on the onset through SALGA and ensured that municipalities give their input to the proposed framework. Even though SALGA has now been requested to provide input to the draft framework by no later than 31 January, it must be noted that the timing for the request for comments as well as the time period allowed will not be adequate for the SALGA governance structures to make informed comments on the draft simplified framework. In view of the importance of the proposed simplified IDP framework, SALGA requests that the draft framework be work shopped with municipalities across the country as part of

the consultation process. The commenting period should only commence after workshops have been conducted with municipalities through SALGA.

3. Legal implications

The process and content of the IDPs is mainly regulated by the provisions of the Municipal Systems Act. The proposed IDP framework must therefore comply with the minimum requirements of an IDP as provided for by the applicable legislation. Failure to comply with the minimum legislative requirements may expose municipalities to non-compliance and affect the audit outcomes.

4. Simplified framework

Whilst the proposed simplified framework gives an impression that B4 municipalities will be able to offer better service delivery due to increased focus on 10 critical services, it is doubtful as to whether the proposed framework will indeed make a difference. The minimum requirements for the proposed framework together with other supporting plans that are required in the simplified framework raises questions as to whether this proposal is really simplified. It would be interesting to undertake an exercise that shows the difference between a simplified IDP done in terms of the proposed framework and a non simplified IDP. Without that analysis being done, it is difficult to assess the extent of “simplification” as proposed.

5. Municipal planning capacity

It would appear as if the challenges faced by B4 municipalities with regard to the IDP process include both the development of the IDP and its subsequent implementation. As pointed out by the Municipal Demarcation Board in their assessment report, with only 36% of managers responsible for the IDP processes having the relevant planning qualifications, the development of a simplified IDP framework without building the necessary capacity will not address the real challenges. Given the minimum requirements as proposed in the simplified framework, it is very likely that unless issues of capacity are adequately addressed, the proposed framework is not going to make a difference.

6. Differentiation within the current legal framework

As previously pointed out, the processes and content of IDPs is primarily regulated by the provisions of the Municipal Systems Act. The minimum requirements for an IDP are therefore set out in the provisions of the relevant legislation. If substantive IDP differentiation is to take place, it may be necessary for amendment of the

relevant legislation that regulate the content and processes of IDPs to make provision for such differentiation. Meaningful IDP differentiation within the current legislative framework may not be possible.

7. Conclusion

Whilst SALGA supports initiatives that will make it easier for municipalities to improve service delivery to their communities through the development of credible IDPs, municipalities must be properly consulted before such initiatives are rolled out. The key question of municipal capacity to develop and implement IDPs must be at the core of any initiative to facilitate the development of credible IDPs.