

## RESPONSES TO ASSESSMENT

### RESPONSES IN RESPECT OF THE ASSESSMENT OF MUNICIPAL SPATIAL DEVELOPMENT FRAMEWORKS AS SUBMITTED FOR THE MKHAMBATHINI LOCAL MUNICIPALITY SDF (2014 SDF)

KZN DEPARTMENT OF CO-OPERATIVE GOVERNANCE AND TRADITIONAL AFFAIRS

DATE OF COMMENTS: November 2018

KZN SPLUMA COMPLIANT SDF ASSESSMENT CRITERIA- Section 1: Submission of the SDF

CRITERIA	KEY FINDINGS	COMMENT / RESPONSE
<b>SECTION 1: MINIMUM REQUIREMENTS FOR THE SUBMISSION OF AN SDF</b>		
<p>Was the SDF submitted as part of the IDP? Is an abridged version included as a section in the IDP? Is a detailed SDF attached as an Annexure to the IDP?</p>	<p>SDF was submitted as stand-alone document. No abridged version of SDF was included in the IDP document. The SDF is referred to as annexure 1 of the IDP.</p>	
<p>Does the SDF submitted include text and the associated Maps?</p>	<p>Texts and maps are provided within the SDF</p>	<ul style="list-style-type: none"> <li>- Maps have been included</li> </ul>
<p><b>Does the SDF clearly indicate a strategic focus?</b></p>	<p>The detail of the SDF and primary node maps (pp156-157) together with the substantial legend linked with the text does not reflect strategic focus.</p>	<ul style="list-style-type: none"> <li>- Maps indicating strategic focus included in the Strategy section of SDF.</li> <li>- Status quo report - Local municipal directives section 3.6 reflects the Mkhambathini Municipality Sector Plans that articulates the long-term vision and strategic programmes for the municipality</li> <li>- The SDF objectives have been included in Sections 1.4 and 3.3. Further, Section 3.4: Spatial Planning Concepts does discuss 9 aspects that form the focus of the SDF</li> </ul>

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<b>SECTION 1: MINIMUM REQUIREMENTS FOR THE SUBMISSION OF AN SDF</b>		
		<ul style="list-style-type: none"> <li>- Draft IDP strategies and how they inform the SDF is included in the Draft SDF – section 3.3.1</li> </ul>
Does the SDF clearly show how the comments from the previous assessments have been addressed?	Lack of capital investment framework and lack of information on public participation were concerns raised in the previous MEC comments. These shortfalls were not remedied in the current SDF review. This need to be addressed in the next SDF review.	<ul style="list-style-type: none"> <li>- Capital Investment Framework included. Some projects have not been assigned budget due to lack of updated records in the IDP and non-provided by the municipality</li> <li>- Public participation report included as Annexure E.</li> </ul>

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<b>SECTION 2: MINIMUM LEGAL REQUIREMENTS FOR LEGAL COMPLIANCE</b>		
Does the SDF promote the desired direction and nature of growth	The desired direction and nature of growth is clearly shown in the text and associated diagrams/ maps at Pp110-129 of section 5 and the SDF map itself.	<ul style="list-style-type: none"> <li>- Desired growth is depicted and discussed in the strategic section. The desired direction and nature of growth is discussed in Section 4.1: Spatial Restructuring and Spatial Planning Systems in terms of nodes and corridors. The document further expands on the type of development that is envisaged at each level of the hierarchy of nodes.</li> <li>- Gateway node land uses- see section 4.1.2.4.</li> <li>- Facilities reflects the type of facilities that should be located in the node.</li> <li>- Secondary Development Nodes – MAP 4: Nodal map indicates the location of each node discussed in this section. The edges of each</li> </ul>

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		<p>nodes provides additional information on the extent of the nodal area, which will provide developers and govt dept with enough information.</p> <ul style="list-style-type: none"> <li>- Densification: The different methods/ strategies for achieving densification are discussed (p 38)</li> <li>- Identification of where densification should occur – included under section 4.1.5.2</li> <li>- Land reform is addressed in the Status Quo report (section 5.5)</li> </ul>
<p>Does the SDF promote conservation of the built and natural environment</p>	<p>SDF promotes conservation of the natural environment at Pp 48-51. Environmentally sensitive areas are clearly indicated on Map 9 and on figure 13. The conservation of the built environment (areas and buildings of heritage significance) is however not discussed or spatially depicted</p> <p>And enhanced environmental analysis has been included. However, the SDF is silent on strategies, programmes and projects to address the identified environmental challenges</p> <p>To enhance the environmental analysis included in the SDF, it is required that the analysis include; terrestrial, aquatic and marine Critical Biodiversity Areas (CBA), ecological support area (ESA) and corridors identified in the 2014 Umgungundlovu Biodiversity Sector Plan, terrestrial CBAs, ESAs, Aquatic CBAs and ESA, Corridors, protected area and CCA. The analysis could also include wetlands, rivers, threatened ecosystems and current level of natural transformation.</p>	<ul style="list-style-type: none"> <li>- Heritage area are discussed in the status quo</li> <li>- Section 4.3: Protection and Enhancement of the Natural Environment discussed Protected Areas and the various levels of Critical Biodiversity Areas.</li> <li>- Natural Environment - has been dealt with and included in the Status Quo report section 9</li> <li>- Agricultural land and categories are in Status Quo report – section 7.4</li> </ul>

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	<p>The municipality should apply the information and analysis from the district’s latest EMF plus a host of other information mentioned later in this document in its strivings to conserve the natural environment.</p> <p>No cognisance has been taken of agricultural land and projects. Detailed interpretation and interrogation of information and spatial analysis needs to be undertaken. The link between Provincial agricultural development policies (e.g. poverty eradication projects, land care. Agricultural infrastructure projects, agri-parks, agri-villages, catalytic projects as per PGDS) and those of the National Strategic Objective of Unleashing Agricultural Potential (NDP), needs to be fully developed.</p>	
Does the SDF take cognisance of and proposes strategies to address informal settlements?	<p>Although SDF in many places highlights the plight of those living in informal settlements and the risks which those very settlements pose at the agricultural and environmental resources, it does not develop any strategy to address those areas and their growth.</p> <p>It is recommended that the next SDF review expressly address the matter of informal settlements and develop strategies to directly address their emergence/ establishment and growth, appropriately deal with their existence.</p>	<p>The SDF provides spatial directives to guide slum clearance projects.</p> <ul style="list-style-type: none"> <li>- the SDF includes strategies for informal settlements, and slums Clearance, the Urban Edge and Housing Delivery</li> <li>- Informal settlement strategies – section 4.2.3</li> <li>- Inclusionary housing – section 4.2.7</li> </ul>
Does the SDF promote Areas where development intensity is to be increased or decreased?	<p>Development intensity is mainly encouraged within the primary node (Camperdown-Umlaas) and within the Opportunity Points and it hopes that further development in the rural settlements will occur or be planned within the existing outer perimeter of those settlements.</p> <p>Areas where intensity is to be decreased are not discussed or shown.</p>	<p>The SDF identifies take on a nodal hierarchy where it identifies nodal areas where development should be directed. Tolls such as settlements edges are discussed as a measure in controlling growth.</p>
Does the SDF indicate Urban Edges and Development Edges and discourage “sprawl?”	<p>The SDF does not discuss urban growth boundaries, development growth boundaries and an urban edge for the Camperdown node.</p> <p>It is recommended that the next SDF review develop the appropriate approached / tools (Recommend modifications to the Rural Land Use Management Policy)</p>	<ul style="list-style-type: none"> <li>- Urban edge has been delineated and spatially depicted. Section 4.1.3: Urban Edges notes that the edges have been depicted and Section 4.13 includes settlement edges.</li> </ul>

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	which the municipality may use to secure/ hold these urban edges or growth boundaries.	<ul style="list-style-type: none"> <li>- Clustering Public Facilities and Economic Activities in Development Nodes.</li> </ul>
Does the SDF identify, quantify and provide location requirements of engineering infrastructure and services provision for existing and future development needs for the next five years?	<p>The SDF does not quantify or map engineering infrastructure even though the IDP includes some current information on capital projects by sector departments</p> <p>The SDF does identify existing social service provision for most nodes and the existing needs within the nodes but does not expressly do so for the next 5-year period.</p> <p>It is recommended that the next SDF review identify, quantify and provide location requirements for engineering infrastructure and services provision for existing development needs and future development needs for the next five years</p>	<ul style="list-style-type: none"> <li>- Infrastructure assessment has been done in the Status Quo report – section 8</li> <li>- The SDF discusses and maps out infrastructure existing within the municipality. It also discusses the need to provide infrastructure in areas where there backlogs as discussed in the status quo.</li> </ul>
Does the SDF entail Strategies, programmes and projects for the development of land?	<p>Table 23 sets out a number of SDF objectives aligned to the 7 strategic goals of the PGDS, some of which relate to the development of land but none of which is worked into a project for the development of land.</p> <p>It is recommended that the net SDF review develop strategies, programmes and projects specifically for the development of land.</p>	<ul style="list-style-type: none"> <li>- The document makes mention to several strategies related to the development of land in terms of nodal and corridor areas as well as areas to be densified, agricultural land, development of land through agrarian reforms, environmental management.</li> <li>- Some programmes are included in the CIF.</li> </ul>
Does the SDF include and integrate previously disadvantaged areas, areas under traditional leadership, rural areas, informal settlements, slums and land holdings of state owned enterprises and government	<p>The SDF includes and integrates areas which were previously disadvantaged (rural areas, informal settlements etc.) through, for example, having identified certain rural areas for adventure tourism and routes for tourism, through recommending certain development, tarring of roads, involving local communities in afro-processing.</p> <p>It is recommended that the next SDF review develop detailed strategies to integrate the disparate parts of the municipal area.</p>	<ul style="list-style-type: none"> <li>- Section 3.4.3: Rural-Urban Interface does discuss rural and smaller urban areas whilst providing broad strategies to promote the functionality of these areas.</li> <li>- The SDF proposes that nodes and corridors, identified in Section 3.4.1: Development Corridors as Investment Routes and Section 3.4.2: Focusing Development in Strategic Nodal</li> </ul>

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agencies, into the spatial, economic, social and environmental objects of the Municipality?	It is also noted that through the inclusion of projects aimed at providing services to rural communities such as sanitation and water infrastructure, roads and agriculture projects, the municipal SDF addresses the issue of rural development. Although the document considers the provisions of the Comprehensive Rural Development Programme (CRDP) the municipality needs to unpack the Programme in more detail and dedicate a section in the SDF to rural development specifically.	<p>Points, be used as a tool to reduce spatial marginalisation and increase the equitable access to all levels of service.</p> <ul style="list-style-type: none"> <li>- Certain of these rural and smaller urban areas are unpacked as part of Section 4.1 in terms of nodes and edges. Section 4.1.8: Integration of Traditional Land Allocation Processes with Municipal Spatial Planning does try to integrate the institutional arrangements of both the Municipality and the presiding Amakhosi.</li> <li>- The SDF, in its strategies, includes the development of human settlements within the municipality. These include housing and slum clearance. Housing project within the municipality have not been mapped due to there being no location provided for these in the IDP or by the municipality.</li> </ul>
Does the SDF take cognisance of any environmental management instruments adopted by the municipality?	<p>The SDF makes no mention of any environmental management instruments it has adopted.</p> <p>It is recommended that the municipality considers developing an SEA for its municipal area and use its guidance in the formulation of the SDF at its next review.</p>	<ul style="list-style-type: none"> <li>- Addressed as per comments received from EDTEA</li> </ul>
<p>1) Does the SDF provide a Capital Investment Framework?</p> <p>2) If a Capital Investment Framework was</p>	<p>The SDF does not provide a Capital Investment Framework and says so at P151. The Text on this page which introduces Map27 Capital Projects states that the projects depicted “have been undertaken”, that is, they are in the past and cannot suffice as any part of a Capital Investment Plan/ Framework.</p> <p>It is recommended that the next SDF review include the kind of comprehensive Capital Investment Plan/ Framework conceived of as section 7.1.2 in the IDP.</p>	<ul style="list-style-type: none"> <li>- A Capital Investment Framework has been included and mapped accordingly. Included in final draft SDF section 6.4</li> </ul>

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included, is it also depicted spatially?	It is recommended that the next SDF review include mapping which depicts the Capital projects to be undertaken within the municipal boundary.	
Does the SDF include a strategic assessment of the environmental pressures and opportunities within the municipal area, including the spatial location of environmental sensitivities, high potential agricultural land and coastal access strips, where applicable?	<p>A strategic assessment of the environmental impact of the draft SDF was provided.</p> <p>It is recommended that the next SDF review provide a substantive strategic assessment for the expected environmental impact of the SDF proposals and importantly, that it be demonstrably undertaken by an independent person/s i.e. one or more people who were not party to the SDF's very compilation.</p> <p>The limited environmental assessment ought to be enhanced using available information namely; territorial and aquatic Critical Biodiversity Areas (CBAs); Ecological Support Areas (ESAs); corridors identified in the UMgungundlovu Biodiversity Sector Plan; 2015 Protected Areas data layer; the updated stewardship layer, the stewardship areas of investigation ; and gazetted Community Conservation Areas; and the fine scale biodiversity mapping and EMF information in hand, in the municipality will be able to develop a finer appreciation of these environmental assets and the pressures on them and the opportunities which could be responsibly explored.</p> <p>An agricultural Sector Plan must be developed in collaboration with the KZN DARD with a vision for agriculture in the municipality, in which high value agricultural land is identified, prioritised and protected from non-productive land uses. The sector plan must also contain goals, developing strategies, value-adding opportunities and improved production systems or interventions for prioritised area which will unleash agricultural potential.</p>	<ul style="list-style-type: none"> <li>- An independent party has been appointed to undertake the strategic assessment of the SDF which addresses the comments raised from the previous SDF.</li> <li>- Included in final draft SDF as per comments from EDTEA</li> <li>- Status Quo report section 9.6</li> </ul>

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	It is recommended that the next SDF review include a strategic assessment of the pressure arraigned against the environmental and agricultural assets so as to develop strategies to protect them and provide for their most appropriate use.	
Does the SDF provide a strategic assessment of its Proposals/ interventions impact on the environment?	<p>A strategic assessment of the environmental impact of the draft SDF was not provided.</p> <p>It is recommended that the next SDF review provide a substantive strategic assessment of the expected environmental impact of the SDF proposals and importantly that it be demonstrably undertaken by an independent person/s i.e. one or more people who were not party to the SDF's very compilation.</p>	An independent party has been appointed to undertake the strategic assessment of the SDF which addresses the comments raised from the previous SDF.
<p>1) Does the SDF provide clear indication on how the SDF is aligned with the planning of neighbouring municipalities?</p> <p>2) Is the alignment of the initiatives with those neighbouring municipalities depicted spatially?</p>	<p>The subject of alignment with neighbouring municipalities is satisfactorily dealt with at P145-150 save the last two of the SDF maps of the other municipalities are not they submitted. Although this is out-of-datedness is understandable because the SDF is a few years old.</p> <p>No maps shows initiatives of neighbouring municipalities and so no alignment of this type can be demonstrated.</p> <p>It is recommended that the next SDF review include maps of the spatial initiatives of its neighbours and alignment of these be examined for congruency.</p>	<ul style="list-style-type: none"> <li>- The SDF contains an alignment section that discusses the alignment and include an SDF of each municipality.</li> <li>- Section 6.1 discusses Alignment of Spatial Development Frameworks in terms of surrounding Municipalities.</li> </ul>
Does the SDF provide a clear indication on how the SDF is aligned with National Plans, policies and legislation?	<p>The SDF refers to national policies and legislation (discussed at section 2 p4-11). Alignment with some, but not all, is noticeable.</p> <p>It is recommended that the next SDF review specifically demonstrates in what way and to what degree the SDF actually gives expression to the direction and guidance of national plans, policies and legislation.</p>	<ul style="list-style-type: none"> <li>- The SDF includes a policy alignment section where it demonstrates and discusses the alignment of its strategies with national and provincial policy and legislative requirements.</li> <li>- Status Quo report section 5.4</li> </ul>



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		<ul style="list-style-type: none"> <li>- SDF section 4.8: SDF Alignment with Policy and Legislation includes national policies, plans etc. in relation to the prepared SDF.</li> </ul>
Does the SDF contain Scheme Guidelines that promote where particular land uses are to be encouraged?	<p>The SDF sets out guidance for the only scheme (Camperdown inclusive of Umlass road).</p> <p>The SDF contains some guidance for only the Scheme but the guidance which includes a proposed minimal expansion of that scheme is limited. No rural scheme is proposed.</p> <p>The SDF examines the import of provincial plans, policies and legislation including the PGDS but alignment is itself not clearly demonstrated.</p> <p>It is recommended that the next SDF review specifically demonstrates in what way and to what extent the SDF actually gives expression to the direction and guidance of provincial plans, policies and legislation.</p>	<ul style="list-style-type: none"> <li>- SDF Section 6.2: Land Use Management Framework does include guidelines for the development of a Scheme including content and links with the SDF and IDP</li> <li>- The strategy section opens with a general alignment with national and provincial policies and legislation. This alignment is further indicated in the section that is specific to expressing the alignment of strategies with national and provincial policy and legislation.</li> </ul>
Does the SDF provide clear evidence of public participation as is required in terms of the MSA chapter 4?	<p>No evidence of public participation is provided in the SDF</p> <p>It is recommended that the next SDF review include information as to where and when the Draft SDF underwent public consultation.</p>	<ul style="list-style-type: none"> <li>- Public participation was yet to be undertaken when the Draft SDF was assessed.</li> <li>- A public participation report has been included as Annexure E to the Final SDF.</li> </ul>

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Does the SDF include a longer term spatial development vision statement for the municipal area which indicates a desired spatial	<p>The IDP vision, is set out in a and reads as following:</p> <p>“By the year 2020 Mkhambathini will be a sustainable developmental municipality with improved quality of life for its entire people in areas of basic services, social, economic and environmental development.”</p>	<ul style="list-style-type: none"> <li>- A Spatial Vision has been included as part of Section 3.1: Municipal Spatial Development Vision with alignment to the IDP vision and mission.</li> </ul>

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growth and development pattern for the next 10 to 20 years?	<p>Whilst the “Long-term Spatial Vision” (SDF 1000) reads:  “A municipal spatial structure which promotes the sustainable use of land, biophysical and infrastructural resources for the economic and social growth and development towards the most equitable distribution of local opportunities to various role-players within the municipality.”</p> <p>The latter is not specific as to the final year for which it plans but a reference at SDF P21 conceives a long term being 10-15 years. No matter the period being considered, the SDF vision does not have an expressed time dimension.</p> <p>It is recommended that the next SDF review contain a vision statement which has a geographic element which expresses the desired growth and development pattern for its next 20 years.</p>	<ul style="list-style-type: none"> <li>- The SDF includes a vision that indicates the desired spatial growth and development pattern of the municipality.</li> <li>- 5year and 20 year vision for primary node is included</li> </ul>
Does the SDF include a written spatial representation of the five-year spatial development plan for the spatial form of the municipality.	<p>The narrative within the SDF document and the mappings indicate the desired spatial form of the municipality. The SDF does not state or describe or show the spatial form to be achieved by 2020.</p> <p>It is recommended that the next SDF review contain a ap which shows the desired form of the municipal area for that SDFs next 5 years.</p>	<ul style="list-style-type: none"> <li>- The SDF provides a written and spatial representation of the desired form for the municipality.</li> </ul>
Is the SDF keeping with the broader IDP Vision?	<p>The substances of the IDP visions are not out of kilter save for the IDP vision being particularly short-term.</p>	<ul style="list-style-type: none"> <li>- The SDF keeps in line with the broader IDP vision.</li> </ul>
Are the SDF objectives, strategies, programmes and projects in keeping with the vision and the IDP?	<p>Objectives and strategies proposed in the SDF are aligned to the IDP objective</p>	<ul style="list-style-type: none"> <li>- SDF Section 3.3: Spatial Planning and Development Objectives does align the IDP and SDF objectives</li> </ul>
Does the SDF set out to redress imbalances of the past?	<p>The SDF includes and integrates areas which were previously disadvantaged (rural areas, informal settlements etc.), through, for example, having identified</p>	<ul style="list-style-type: none"> <li>- The SDF integrates previously disadvantaged areas through identifying these settlements</li> </ul>

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	certain rural areas for adventure tourism and routes for tourism, through corridor development, tarring of roads and involving the local communities in agro-processing. By discussing in some detail of the rural nodes and by identifying their social and other services shortfalls, the SDF does set out to redress. See also Map 28 or P156	as nodal areas where development must be directed.
<p>a) Does the SDF provide appropriate strategic guidance in respect of the location and nature of the development within the municipality?</p> <p>b) Discuss the extent to which objectives strategic, programmes per a) above are shown in the SDF strategic mapping.</p>	<p>The SDF provides strategic guidance by indicating areas where what development should occur; in addition, Map28 spatially depicted these areas, mainly within the proposed nodes and along corridors.</p> <p>Objectives and strategies are depicted on the SDF strategic mapping.</p>	<ul style="list-style-type: none"> <li>- The SDF provides strategic guidance in respect of eth location for development through development nodes and corridors. These are discussed and spatially depicted in eth strategic section of the SDF.</li> <li>- See response for Question 8: Legal Compliance.</li> </ul>
Does the SDF identify current and future significant structuring and restructuring elements of the spatial form of the municipal area, including development corridors, activity spines and private investment will be prioritised and facilitated?	Public and private investment is encouraged within nodes, opportunity points and along corridors (these locations are depicted spatially in figure 22 and at P 110-118). Current structuring elements and new proposed nodes are spatially indicated.	<ul style="list-style-type: none"> <li>- Public and private investment is encouraged within nodes, opportunity points and along corridors</li> <li>- See response to Question 1: Legal Compliance.</li> </ul>
Does the SDF address historic spatial imbalances in development?	Areas with high level of poverty are indicated and spatially depicted on P87 (and on P28 of annex 2). Section 5.3's table 23, spelling out land development objectives, finds expression in the SDF Map28 at P156.	<ul style="list-style-type: none"> <li>- Areas of poverty are discuses in the SDF's status quo</li> </ul>

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		<ul style="list-style-type: none"> <li>- See response for Question 8: Legal Compliance and Question 5: Spatial Restructuring.</li> </ul>
<p>Does the SDF give effect to the development principles and applicable norms and standards set out in chapter 2(7) of SPLUMA which include;</p> <ul style="list-style-type: none"> <li>• Principle of spatial justice?</li> <li>• Principle of spatial sustainability?</li> <li>• Principle of efficiency?</li> <li>• Principle of spatial resilience?</li> <li>• Principle of good administration?</li> </ul>	<p>The development principles set out in SPLUMA are provided at P104. Th SDF does not seem to be in conflict with these principles but so important are they, that it would be helpful if the SDF clearly demonstrated their expression.</p> <p>It is recommended that the next SDF review explicitly refer to where, in its text, and how the SDF gives effect to the SPLUMA principles set out at paras 7(a)-(e) inclusive.</p>	<ul style="list-style-type: none"> <li>- The SDF provides a section where indicates which of its strategies pertain to which SPLUMA principle. Most of the strategies proposed respond to at least one of the SPLUM principle, this is elaborated in the different strategies proposed. SDF Section 3.2: Spatial Planning Principles provides a comprehensive discussion on SPLUMA principles</li> </ul>
<p>Dos the SDF align with the SDFs reflected in the IDPs of neighbouring municipalities?</p>	<p>The subject of alignment with neighbouring municipalities is satisfactorily dealt with at P145-150 save that at least two of the SDF maps of the other municipalities are not those which they submitted. Although this out-of-datedness is understandable because this SDF is a few years old.</p>	<p>The SDF is aligned with the SDFs of neighbouring municipality. The Alignment is discussed and the SDFs of each municipality are included.</p>
<p>IS there a sound and up to date economic analysis in the SDF inclusive of estimates of economic activity and employment trends and locations in the municipal area for the next five years?</p>	<p>The matter of economics is discussed via texts and graphic images. The analysis does use the latest economic data but does not develop projections or trends in specific locations for the next five years.</p> <p>It is recommended that the next SDF review include a comprehensive and up-to-date economic analysis, and that it develops economic and employment trends and generate estimates in specific location over its next five years.</p>	<ul style="list-style-type: none"> <li>- The SDF status quo provides up-to-date economic analysis and employment trends within the different sectors in Mkhambathini.</li> <li>- Status quo report – section 7</li> </ul>

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<p>a) Do the objectives strategies. Programmes and projects address the implications of the demographic analysis?</p> <p>b) Discuss the extent to which objectives, strategies, programmes per (a) above are shown in the SDF strategic mapping.</p>	<p>It is recommended that the next SDF review's demographic analysis's findings and projections demonstrably find expression in the SDF geographically-specific, and mapped, strategies, programmes and projects.</p>	<p>The SDF strategies are a response to the demographic analysis findings as set out in the status quo.</p>
<p>Is there a sound and up to date demographic analysis in the SDF, containing and including population growth estimates for the next five years?</p>	<p>A demographic analysis based on the census 2001 and 2011 is provided as part of the situation analysis. No population growth estimates for the next five years is included</p> <p>It is recommended that the next SDF review include a comprehensive up-to-date demographic analysis inclusive of population projections, based on the three census years, for its next five years.</p>	<ul style="list-style-type: none"> <li>- The Status quo provides a sound and up-to-date demographic analysis using the latest community survey (2016) results. Five year Population projections are included in the status quo. Status quo report – section 7</li> <li>- SDF section 4.6-unlocking economic development potential – includes LED strategies</li> </ul>
<p>(a) Do the objectives strategies, programs and projects address the implications of the demographic analysis?</p> <p>(b) Discuss the extent to which objectives strategies, programs as</p>	<p>It is recommended that the next SDF review's demographic analysis's findings and projections demonstrably find expression in the SDF's geographically specific, and mapped, strategies, programmes and projects.</p>	<ul style="list-style-type: none"> <li>- The Strategies proposed in the SDF are a response to situational analysis. The demographic analysis speaks to the demands in the population in terms of age, gender and socio-economic dynamics. The strategies proposed provide an inkling into how the identified trends can be addressed including proposals for the provision of educational</li> </ul>

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<b>SECTION 3: MINIMUM REQUIREMENTS FOR THE DEVELOPMENT OF A VISION AND SPATIAL RESTRUCTURING STRATEGIES</b>		
per (a) is shown in the SDF strategic mapping		<p>facilities and employment opportunities to address the out migration of young people.</p> <ul style="list-style-type: none"> <li>- Status quo report – section 4</li> </ul>
Does the SDF include estimates of the demand for housing units across different socio-economic categories and show the planned location and density of future housing developments?	<p>Estimates for housing demand are not provided.</p> <p>It is recommended that the next SDF review include estimates for housing demand across different socio-economic categories and show where and what residential densities these will be developed.</p>	<ul style="list-style-type: none"> <li>- The status quo includes a section on housing where it discusses the municipality's housing backlog and further discusses rural housing demand as per the housing sector plan.</li> <li>- Status quo report – section 7</li> <li>- Draft SDF responds to growth trends identified in the demographic analysis, e.g. growth of Camperdown/ Umlaas road node, Opokweni and Maqonqo area.</li> </ul>
Does the SDF identify designated areas where national or provincial inclusionary housing policy may be applicable?	<p>Since this matter is not dealt with, the next SDF review should identify (in texts and maps) any areas which have been designated (if they have been) for the application of a national or provincial inclusionary housing policy in satisfaction of the requirements of SPLUMA 21(1).</p>	<ul style="list-style-type: none"> <li>- The SDF identifies human settlements projects within the municipality and discusses the different housing opportunities as provided by the Department of Human Settlements.</li> <li>- Housing plan does not include inclusionary housing</li> <li>- Inclusionary housing SDF section 4.2.7</li> </ul>
<p>Does the SDF identify areas in which:</p> <p>(1) More detailed local area plans must be developed; and</p>	<p>The SDF does at Table 35 on P153-154, identify areas where more detailed plans should be developed.</p> <p>It does not identify designated areas where shortened procedures to achieve scheme amendments might be applied.</p>	<ul style="list-style-type: none"> <li>- As per SDF Section 4.1.7: Hierarchy of Plans the SDF proposes LAPs for the Camperdown/Umlaas Road area and discusses the aim of document. In terms of Shortened Land Use Development Procedures, Section 6.2.6 notes that this</li> </ul>

CRITERIA	REQUIRED COMMENTS ON EXTENT TO WHICH QUESTION IS ANSWERED	COMMENTS
<b>SECTION 3: MINIMUM REQUIREMENTS FOR THE DEVELOPMENT OF A VISION AND SPATIAL RESTRUCTURING STRATEGIES</b>		
(2) Shortened land use development procedures may be applied to amend land use scheme?	It is recommended that the next SDF review depict any areas which have been designated in which shortened procedures may be applied in order to change the planning scheme.	would be applicable in the rural parts of the Municipality.
Does the SDF determine the purpose, desired impact and structure of the scheme to apply in that municipal area?	<p>The SDF does not determine the desired impact and structure of the scheme applicable within the municipal area.</p> <p>It is recommended that the next SDF review satisfy the requirements of Section 21(1) od SPLUMA.</p>	<ul style="list-style-type: none"> <li>- The SDF includes a section for scheme guidelines and land allocation within traditional council areas.</li> <li>- Housing Sector Plan, Disaster Management Plan discussed in Status Quo.</li> <li>- See response for Question 17 and 18: Legal Compliance.</li> </ul>
<p>Does the SDF include an implementation plan comprising of:</p> <p>a. sectorial requirements, including budgets and resources for implementation?;</p> <p>b. necessary amendments to scheme/schemes?;</p> <p>c. specification of institutional arrangements necessary for implementation?;</p> <p>d. specification of implementation targets, including dates and monitoring indicators?; and</p>	<p>The SDF does not include an implementation Plan.</p> <p>It is recommended that the next SDF review include a comprehensive implementation plan in satisfaction of SPLUMA 21(p) requirements.</p>	<ul style="list-style-type: none"> <li>- SDF Section 6 of the document is the Implementation Plan and discusses elements such and Monitoring and Evaluation as well as Scheme development</li> </ul>

CRITERIA	REQUIRED COMMENTS ON EXTENT TO WHICH QUESTION IS ANSWERED	COMMENTS
<b>SECTION 3: MINIMUM REQUIREMENTS FOR THE DEVELOPMENT OF A VISION AND SPATIAL RESTRUCTURING STRATEGIES</b>		
specification, where necessary, of any arrangements for partnerships in the implementation process?(SPLUMA 4:21(p))		

CRITERIA	KEY FINDINGS	COMMENTS
<b>SECTION 4: MINIMUM REQUIREMENTS FOR BUDGET ALIGNMENT</b>		
Is there evidence of good alignment between the SDF and the Capital Budget of the Municipality	<p>The IDP contains some information relating to budget at about 90% through the IDP on some un-numbered pages. No information could be found on the municipal Capital Budget allocations for 2015/6. In consequences, it is impossible to find alignment.</p> <p>It is recommended that the next SDF review specifically demonstrates the degree to which the SDF does or does not align with the municipality's capital budget.</p>	- The CIF is included in Final draft
Is the three year MTEF reflected on the SDF maps?	<p>No three year MTEF or CIP/CIP was included in the SDF (or the IDP) and so it could not be mapped.</p> <p>It is recommended that the next SDF review include a three year MTEF depicting capital expenditure on development programmes and projects and that this information be mapped.</p>	- A CIF is provided in the SDF and is mapped accordingly. Project from sector department are also included in the CIF and mapped, where location was provided.
Are the budgets of sector departments reflected spatially on the SDF /CIP Maps?	<p>No budget of a sector department budget was indicated spatially.</p> <p>It is recommended that the next SDF review include maps on which the projects and expenditure of sector department budgets are shown.</p>	- Budgets of sector departments are indicated in the CIF.



CRITERIA	KEY FINDINGS	COMMENTS
<b>SECTION 5: MINIMUM REQUIREMENTS FOR THE ALIGNMENT OF PROVINCIAL SPATIAL POLICY AND GUIDELINES</b>		
Does the SDF take into account Provincial spatial planning guidelines 1 to 9?	<p>Are not addressed.</p> <p>It is recommended that the next SDF review specifically address the Provincial Spatial Planning guidelines for application in the SDF formulation.</p>	<p>- This has been addressed in the SDF</p>
<p>Is the SDF aligned with District Municipal and Local Municipalities in relation to:</p> <p>a. Cross Border SDF Planning</p> <p>b. The Millennium Development Goals;</p> <p>c. Climate Change Focus areas;</p> <p>d. The 2015 State of the Nation Address;</p> <p>e. The 2015 State of the Province Address;</p> <p>f. National Development Plan</p> <p>g. The Provincial Growth and Development Strategy of 2011; and</p> <p>h. Outcomes 9, 13 and 16</p>	<p>The following is noted in respect of this requirement:</p> <p>Only the matters of “cross border alignment” (which is adequately addressed) and an examination of the import of the PDGS, as a founding document, none of the other matters (Millennium Development Goals; Climate Change; 2015 SONA; 2015 SOPA; the NDP; and Outcomes 9, 13 and 16) are referenced.</p> <p>It is recommended that the next SDF review demonstrate alignment with all of the above.</p>	<p>- The SDF includes a policy alignment section where it demonstrates and discusses the alignment of its strategies with national and provincial policy and legislative requirements.</p>