COMMENTS ON THE PROPOSAL TO CREATE NEW LOCAL GOVERNMENT AREAS IN FREETOWN
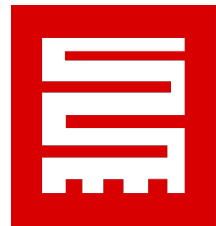
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COMMENTS ON THE PROPOSAL TO CREATE NEW LOCAL GOVERNMENT AREAS IN FREETOWN[1]

1. Introduction

We note with concern the proposal to subdivide Freetown and create new local government areas. Single-tier local governments that are responsible for an entire city are more efficient and equitable than fragmented local government systems in which cities are divided between multiple local government authorities. Below we discuss the advantages of citywide/single-tier local government and examine the example of the City of Cape Town. This is followed by a detailed table commenting on the points raised and examples used in the Ministry of Local Government and Community Affairs' presentation on the creation of new local government areas for Freetown.

2. The advantages of citywide/single-tier local government

Arguments in favour of a citywide/single-tier local government typically focus on efficiency, clarity, and more equitable resource distribution. In this model, a single authority carries out all local government functions within an entire city and its suburbs, in contrast to a fragmented local government system in which a city is split into multiple local government authorities or into multiple tiers of local government. Key arguments supporting having only one local government authority for an entire city include:
- Improved efficiency and cost-effectiveness through avoiding duplication of costs and through ensuring economies of scale
- Equitable resource allocation and cross-subsidization
- Enhanced economic growth
- Improved integration and coordination of services
- Stronger expertise/ specialized expertise to address complex urban challenges
- Potentially enhanced accountability and clarity
- Increase in social cohesion

2.1 Improved efficiency and cost-effectiveness through avoiding duplication of costs and through ensuring economies of scale

The most tangible benefit of having a single local government authority for a city is improved efficiency and cost-effectiveness through avoidance of duplication of costs and through economies of scale (Community Law Centre, 2007). By eliminating the duplication of political structures and bureaucracies, costs can be saved, for example, the cost of local government offices, the cost of senior local government officials, the cost of running new councils, etc. It removes the extra costs associated with staffing and managing another set of elected officials and administrative processes.

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There are also economies of scale in providing services on a larger scale. Economies of scale exist when the average cost of producing a good or service fall when output is expanded. Economies of scale don't necessarily apply to all local government services, but it does apply to many. In particular, economies of scale are more likely in capital-intensive services due to the associated fixed cost and in highly specialized, seldomly used services where there is room for labour specialization (Blank & Niaounakis, 2021).

In addition to economies of scale, providing services at a citywide scale also helps in terms of managing externalities. Externalities (also known as spillovers) are where the benefits or negative impacts of a specific service in one local government area spill over to residents of another local government area. For example, a road in one local government area can provide benefits to residents of neighbouring areas who also drive on it. There can also be negative externalities. For example, if a city is subdivided into different local government authorities, one local government authority may choose to locate a facility such as a landfill site on the edge of its area, where it may have a negative impact on the residents of the adjoining local government area. By making decisions at a citywide scale for all residents of the city, decisions like these can be made in the interests of all residents not just residents of part of the city. As a result, many functions of local government are best handled at the citywide/metropolitan scale rather than by fragmented local governments, as shown by Table 1.

Table 1: Functions of local government which are best handled at the citywide/metropolitan scale

Function	Reason
Regional land use planning	Externalities
Water supply system	Economies of scale
Drainage/flood protection	Economies of scale; externalities, e.g. drains)
Piped sewerage system	Economies of scale
Solid waste disposal	Economies of scale (e.g. landfill); externalities
Tourism promotion & management	Externalities
Promotion of major events	Externalities
Police protection/ security	Externalities; economies of scale

Source: GIZ, 2015, pp. 20-21

2.2 Equitable resource allocation and cross-subsidization

Cities are usually unevenly developed, with clusters of economic activity and pockets of wealthier residents, and often with low-income residents concentrated in particular parts of the city. Fragmented local government can mean that there would be some local government areas with large concentrations of low-income households and low revenue bases. By incorporating all of a city within one unified local government authority, this creates a single financial resource base. This can facilitate the redistribution of funds from commercial/industrial areas and higher-income areas to provide cross-subsidies for services in lower-income communities.

In the case of Freetown, revenue potential and collection in Freetown is not evenly distributed across the city. Of the NLe22.8m property rates collected in Freetown in 2024,

NLe4.6m or 20% was collected from the 24 wards in the east of Freetown (with a compliance rate of 34%) while NLe18.2m or 80% was collected from the 24 wards in the west of Freetown (with a compliance rate of 55%). This shows that the eastern part of the city, which has two thirds of the city's population, has a considerably lower revenue collection rate and a much lower revenue collected per capita. Residents living in the east of the city will therefore be directly disadvantaged by a city split in respect of its own source revenue collection potential and thus service delivery.

2.3 Enhanced economic growth

A number of studies have suggested that having a citywide local government can increase economic growth compared to fragmented local governance (Slack, 2019) . A study of metropolitan areas in Germany, Mexico, Spain, the United Kingdom, and the United States found that cities with fragmented governance structures (measured by the number of municipalities in the metropolitan area) tend to have lower productivity (measured by wage premiums) (Ahrend et al., 2014). The main reason for this that fragmentation can negatively impact transportation investment and land use planning with the result that congestion is increased and the city's overall attractiveness for investment is reduced. In addition, fragmented governance structures can impede growth because they discourage firms that must face the additional bureaucracy associated with overlapping business and environmental regulations across a number of local governments in the city/metropolitan area. Another study found that cities with single authorities have denser developments and higher per capita GDP, attract more people, have a higher level of satisfaction with public transportation, and are subject to less pollution than cities with fragmented governance (Ahrend et al., 2016).

2.4 Integration and coordination of services

A single local government authority can create a single, integrated plan for urban development and service delivery for the city/metropolitan area as a whole, preventing conflicts and competition that can arise between two different authorities. "There is legal certainty about who does what, eliminating never-ending turf battles" (Community Law Centre, 2007: 7). This coordination is particularly beneficial for large-scale projects like infrastructure development and public transport. A lack of citywide coordination can result in numerous problems, such as transport infrastructure and services that are not seamless across local boundaries (Slack, 2019).

In addition, as mentioned in the previous section, many services have negative externalities, and if decision making on service delivery is fragmented amongst different local government authorities within a city, there may be negative impacts on residents in the city (e.g. through decisions on the location of landfill sites). Ineffective governance in one local government area could also have a negative impact on residents in another local government area, for example, inadequately maintained storm water drains in one local government area can result in flooding in other local government area (Slack, 2019). By making decisions at the city/metropolitan scale, decisions can be made in the interests of all residents and the negative externalities can be better managed.

2.5 Stronger expertise/ specialized expertise to address complex urban challenges

A large single-tier local government will have a large staff complement and will be able to have specialized skills, thus enabling them to address complex urban challenges. Smaller local government authorities with smaller staff complements will be less able to have specialized staff focusing on particular issues. "Without having to share jurisdiction with another tier of local government, an urban municipality can develop the necessary expertise to deal comprehensively with the key developmental issues that urbanization poses" (Community Law Centre 2007: 6).

2.6 Potentially enhanced accountability and clarity

With only one local government authority to deal with in a city, the lines of responsibility are clearer for both citizens and local officials as compared to cities fragmented local government or with multiple tiers of local government. This removes confusion over which authority is responsible for a particular service, simplifying public participation and making it easier to hold decision-makers accountable. With all services and facilities handled by one organization, the public can also potentially access services and information more easily. "From the residents' point of view, having a single service provider allows for greater accountability; the urban municipality will be closer to the communities they serve than a distant district municipality." (Community Law Centre 2007: 7). The larger size of the unified local government does mean that there need to be small scale participatory processes (e.g. at ward or district scale) in addition to city-wide participatory processes.

Having one single local government authority available for a city can also potentially increase its attraction to investors. "It reduces the transaction cost of having to work with a second layer of local government, which often delays decisions and flows of funding. It could arguably also increase the status of the municipality – for investors there is only one level of local government to work with" (Community Law Centre, 2007: 7).

2.7 Increase in social cohesion

Social cohesion can be defined as the level of congruence and unity among divergent groups in society, typically expressed in terms of the sense of belonging felt by members of society (Easterly et al., 2009). There is widespread agreement that social cohesion contributes to socio-economic development and that it is important for local government to help nurture a more cohesive society (Van der Waldt & Fourie, 2022). Advancing social cohesion as a government imperative implies inclusive and transparent democratic practices to promote social justice and prosperity and it also implies addressing social inequality and disparities among groups (Pervaiz et al., 2013; Hino et al., 2019). Having single local government authorities for entire cities/ metropolitan areas can help build social cohesion through addressing local needs in a participatory way and creating a shared sense of common good (Udenta & Onah, 2023). If different socio-economic groups within a city are segregated into different local government areas this may have a negative impact on social cohesion within the city.

3. Case study of citywide/single-tier local government in Cape Town

There are many examples of citywide/single-tier local government in the world, e.g. Toronto and Istanbul, but South African cities are one of the most notable instances of the formation of single local government authorities for entire cities. South African cities such as Cape Town face enormous challenges in terms of inequity and poverty, and one of the key strategies to address these was to transform cities with fragmented local governance systems into citywide local government authorities.

Prior to the democratic transition in the 1990s, Cape Town metropolitan area was fragmented into 57 different local government bodies and one regional authority. There were 1 regional services council, 3 city councils, 16 municipalities, 10 local councils (with fewer powers and functions than municipalities), a management board with local authority status and 26 management committees directly administered by the Cape Provincial Administration (Schmidt, 1998).

As in other South African cities during the 1980s, there had been campaigns for local government restructuring under the banner of "One City, One Tax-base", and there had been many calls for a single metropolitan or "megacity" government in the Cape Metropolitan Area, to help ensure greater integration and spatial reallocation of resources (for example, Todes & Watson, 1986). There was no meaningful progress in this regard, however, until the period of South Africa's transition to democracy from 1990 onwards. The Local Government Transition Act (LGTA, No. 209 of 1993) (RSA, 1993) made provision for the establishment of a two-tier system of metropolitan governance, called Transitional Metropolitan Councils. In terms of the LGTA, negotiations to establish metropolitan government in the Cape Metropolitan Area commenced, The Municipal Demarcation Board proposed six metropolitan sub-structures, or Metropolitan Local Councils (MLCs). The two largest MLCs were Cape Town (which included the historic core of the former Cape Town City Council area) and Tygerberg (based on the former Bellville City Council area), and the other four MLCs were Blaauwberg, Oostenberg, Helderberg and South Peninsula. Creating these MLCs involved the bundling and unbundling of existing municipalities. The WCRSC became the basis of the Cape Metropolitan Council (CMC), which was the new metropolitan authority.

At national level, meanwhile, the view on the future of metropolitan government was moving away from two-tier metropolitan government towards single big-city governments, known as "unicities" or "megacities" (Mabin, 2006). This was first expressed in the Green Paper on Local Government (Ministry of Provincial Affairs and Constitutional Development, 1997) and then in the White Paper on Local Government (DPLG, 1998). A Unicity Commission was established to oversee this merger in Cape Town. The seven existing councils were merged into one unicity, subsequently named the City of Cape Town, in December 2000. The new City of Cape Town, responsible for the entire Cape Metropolitan Area, had 26,000 staff members and an annual budget of about US$1.2 billion (Pieterse, 2002).

Table 2: Changes in local government in Cape Town

Types of local government body	Early 1990s	1996–2000	Since December 2000
Metropolitan-level authority	Western Cape Regional Services Council	Cape Metropolitan Council	City of Cape Town
City Councils	Cape Town City Council, Bellville City Council, Ikapa City Council	City of Cape Town, City of Tygerberg,	
Other Municipalities	Milnerton, Pinelands, Goodwood, Parow, Durbanville, Brackenfell, Kraaifontein, Kuils River, Somerset West, Strand, Gordons Bay, Fish Hoek, Simon's Town, Old Crossroads, Lingelethu West, Mfuleni, Lwandle.	Blaauwberg, Oostenberg, Helderberg South Peninsula	
Sub-municipal authorities	10 Local Councils 1 Management Board 26 Management Committees	None	None (but there are 20 'Sub-Councils' consisting of clusters of 4-7 wards each to enable greater engagement of residents with councillors and officials at the local scale).

4. **Points raised and examples used in the proposals for new local government areas in Freetown**

Below is a detailed table showing the points raised and examples used in the Ministry of Local Government and Community Affairs' presentation on the creation of new local government areas for Freetown with some comments on each point/example.

Table 3: Comments on points/examples raised in proposal for the creation of new local government areas in Freetown

Issue raised in Ministry of Local Government and Community Development's presentation on the creation of new local government areas for Freetown	Response
Factors that trigger the creation of a Local Government Area (LGA) in	There are many local government functions that can best be done at the metropolitan scale, i.e. for the city as a whole, including its peripheral suburbs. Ensuring effective and

a capital city: A capital city usually has a high population density and diverse communities. Managing services (waste, health, market, fire force, etc.) for millions of people requires smaller administrative units.	equitable service delivery across the city as a whole is usually best done by having one unitary local government authority for the metropolitan area. Larger local government administrations are able to have specialized expertise that smaller local government administrations are unable to have.
Reasons for creating new local government areas within existing cities	
Why can local government areas be created within existing cities (1): Population Growth & Density. When a section of the city grows too large for effective management by one council, new LGAs may be carved out.	Certain local government functions for cities, such as water supply, can only be efficiently provided at the scale of the whole city/metropolitan area. As cities/metropolitan areas grow larger, the need for citywide governance becomes even more crucial. Even for megacities, with populations of more than 10 million people, it has been noted that citywide governance is essential: "To succeed, megacities need governance structures that allow them to balance a regional vision and the ability to coordinate and deliver services across the metropolitan area while maintaining local autonomy and accountability. They also need adequate powers and resources to deliver services and infrastructure" (Slack, 2021: 11).
Why can local government areas be created within existing cities (2): Urban Expansion & Settlements. As new residential, commercial and industrial areas develop, new LGAs may be created to serve them.	All cities expand over time as population increases. New suburban areas are generally functionally linked to the rest of the city, though, e.g. residents of new residential areas often work in the centre of the city. In many countries the boundaries of cities expand over time to incorporate new growth on the periphery and to extend service delivery to those areas. The formation of new local government areas on the periphery of cities usually would have insufficient local revenue base to effectively provide services in their areas and would often be unable to finance major infrastructure like water treatment works.
Why can local government areas be created within existing cities (3): Service Delivery Needs. To improve access to health, education, sanitation and infrastructure, new LGAs are sometimes established in underserved parts of the city.	Cities typically are uneven in terms of revenue generation capabilities, so in order to ensure equitable service delivery across a city is it best to have one single authority rather than a number of different authorities with different revenue raising abilities and different capacities. Fragmented local government in a city can result in uneven service delivery and provision of facilities across the city, especially for local government areas located in the poorer part of a city.
Why can local government areas be created within existing cities (4): Political Representation. Communities may demand their own LGA so	This is a valid point, but ensuring greater community participation can happen in multiple ways, for examples through having participatory forums at district or ward scale within the unitary local government at which residents can directly engage with their ward councillors and the officials responsible for service delivery within that particular district or ward. Setting up

they can elect their own local leaders and have a stronger political voice.	new local governments to promote citizen participation is not the most cost-effective way of increasing participation.
(5): Administrative Efficiency Smaller LGA make it easier to plan, collect local taxes, property rates, enforce bylaws, enhance waste management and implement development projects.	Many functions are best down at the metropolitan scale in order to maximise efficiencies of scale, for example, having one large water treatment facilities or sewage works or landfill site is usually more cost efficient than having a number of small facilities. Many functions also require significant investment regardless of the population served, e.g. setting up a digitized system for property tax, and thus doing it at a larger scale is much more cost-effective rather than duplicating this in multiple authorities within a city.
Legal & Constitutional Provisions: The creation of an LGA must usually follow the laws of the country (e.g., an Act of Parliament (LGA 2022 S.2(2), Presidential Proclamation or constitutional provision).	Section 2 (2) of the Local Government Act grants the Minister of Local Government and Community Affairs the power to "declare any area as a locality", but subsection (3) states that the Minister of Local Government and Community Affairs, the Minister of Finance and the Electoral Commissioner shall, in making any recommendation to him, consider population and population density, as well as geographic contiguity, topography and the future growth or expansion of the area". As noted by the World Bank (2018), Freetown's coastal position, located on a peninsula and surrounded by mountains, provides limited space for the city to expand, and as a result Freetown is a fairly compact city. The same report suggests that Freetown has a strong central business district with high levels of demand for land, which strongly indicates that Freetown is a monocentric city with a single core surrounded by suburbs that are inextricably linked to the centre (World Bank, 2018); it is therefore particularly essential to keep the entire city under one local government authority and avoid splitting it up.
Security & Law Enforcement: Manageable administrative units enhance the ability of law enforcement agencies to maintain security and public order. It makes it easier to establish police stations, courts, and other security apparatus closer to the communities they serve.	Policing is generally not a local government function in Africa. In Sierra Leone, policing is a national government responsibility, and the Sierra Leone Police is under the jurisdiction of the Sierra Leone Ministry of Internal Affairs.
Examples Of Cities with Local Government Areas	
Abuja, Nigeria: The Federal Capital Territory is divided into six area Councils (equivalent to LGAs).	The sub-national governance structure of Nigeria is not easily comparable to that in Sierre Leone. Nigeria follows a federal republic system with power shared between the federal government, 36 States, and the Federal Capital Territory (FCT) which comprises area councils. While the FCT contains the national capital, Abuja, it is directly administered by the federal

	government via the FCT administration, and is headed by a Minister of State nominated by the President of Nigeria. The mandates of the FCT include: provision of critical infrastructure; provision of services to the FCT residents; and provision of a safe and secure environment. In a dual function as a Federal Ministry and a State Government, the FCT carries out many of the functions via departments, agencies / secretariats operating under the FCT administration. The Area Council Services Secretariat oversees all administrative and supply matters for the Area Councils, including the inventory and distribution of various projects, coordinating the development process in the Area Councils, providing health service delivery, and oversees community development, and chieftaincy affairs. Area Councils do some local operations, but with oversight and coordination from the Secretariat. It should also be noted that five of the six Municipal Area Councils within the FCT are largely rural (Abaji, Kwali, Gwagwalada, Kuje, Bwari), most of the actual city of Abuja is contained within the Abuja Municipal Area Council. (Source: Federal Capital Territory Administration, 2025)
Nairobi has 11 counties within the capital city.	This is incorrect. Nairobi is governed by the Nairobi City County, which is one authority for the entire city. The Nairobi City County governs a population of 4.6 million people. Nairobi City County was consolidated and created by the 2010 Constitution of Kenya. Administratively, the Nairobi City County is divided into 17 constituencies/sub-counties and 85 wards, but these are not separate authorities, the entire area is administratively governed by the Nairobi City County, which is charged with the responsibility of providing a variety of services to residents within its area of jurisdiction. The metropolitan area of Nairobi does spill over in the surrounding counties Kiambu, Kajiado and Machakos, but 62-68% of the population of the Nairobi metropolitan area is within the Nairobi City Council area (the 2019 population of Nairobi City Council was 4.4 million, whereas estimates of the metropolitan population vary from 6.5 to 7 million).
Kampala is divided into five, with each area having a status of a local government area with an elected mayor	While it is correct that Kampala is divided into five, the divisions are administrative subdivisions of the city under the Kampala Capital City Authority (KCCA). Kampala Capital City has a 2025 population of 4.2 million inhabitants (World Population Review, 2025). According to the Kampala Capital City Act (KCCA, 2011), the KCCA "is the governing body of the Capital City and shall administer the Capital City on behalf of the central government". The Lord Mayor is the political head of the Capital City. The five divisions (Central, Kawempe, Makindye, Nakawa and Rubaga) are not fully autonomous local government areas in their own right, as their powers are limited and subordinate under the KCCA. For example, funding, law enforcement, planning and the provision of services are still coordinated via the KCCA. While each division has an elected division mayor, their executive powers are constrained as major strategic, financial and

	administrative control rests with KCCA. KCCA has overarching governance, financial, and administrative authority over the city.
The traditional Accra Metropolitan Assembly (AMA) has been subdivided in recent years to improve local governance and service delivery. Today the Accra Metropolitan Area is divided into six local government areas.	Accra has a two-tier metropolitan government structure, with a metropolitan authority responsible for city-wide functions and Sub Metropolitan District councils. Accra Metropolitan Assembly (AMA) is the political and administrative authority for the Accra Metropolitan District, which has the same boundary as the City of Accra. The Assembly has three sub-metropolitan district councils which are subordinate to the general assembly: Ablekuma South Sub Metropolitan District Council, Ashiedu Ketek South Sub Metropolitan District Council, and Okaikoi South South Sub Metropolitan District Council. They are under the jurisdiction of the Accra Metropolitan Assembly, and are not standalone local government authorities. According to the Constitution in Article 241, as per the Accra Metropolitan Assembly website, the Sub-Metropolitan District Councils "are subordinate bodies of the Assembly performing functions assigned to them by the instrument that sets up the Assembly or delegated to them by the Assembly." While parts of the Greater Accra Region have become separate Municipal Districts, the original city of Accra is still under one authority, the Accra Metropolitan Assembly. (Source: AMALI 2025)

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