



Input for Draft White Paper (WP) on Human Settlements

As the South African Slum Dwellers International Alliance (SA SDI Alliance), we submit four key areas that we consider critical to the delivery of adequate housing opportunities and access to basic services.

The four key areas requiring more consideration are:

1. EPHP has demonstrated success in communities building better quality and bigger houses. Whilst the WP makes reference to community driven processes, EPHP and its enabling grant funding must be given priority, especially at Provincial and Local Government level.
2. Self-built in the context of informal settlement upgrading, including the adaptation and application of EPHP in an informal settlement context.
3. Building a capable local government to effectively implement national policy and deliver at scale.
4. The need for a national and provincial multi-stakeholder platform to ensure ongoing engagements, monitoring and accountability.

In terms of the White Paper's definition of adequate housing, we welcome the inclusion of location, affordability and security of tenure as some of the key components. Further we also welcome the shift from a focus on housing / top structures to an expanded definition of sustainable human settlements.

There are however a few omissions and concerns which we would like the Department together with key stakeholders to take a closer look at in the focus group discussions.

The shift from, "the state should gradually shift its role from a direct housing provider of last resort to a housing facilitator" implies greater agency on the part of beneficiaries. The Federation of the Urban and Rural Poor has a long history in self-built housing through the EPHP mechanism and this experience and knowledge could be supported in housing delivery as well as adapted to the ISU context.

Context and evidence-based inputs

Not enough is mentioned about the state of local government and its inability to be effective in implementing national policy. Failure to appreciate why there is a gap between policy and implementation will lead to us missing the mark. It is therefore important to ground the WP in evidence based and case study data, for example, Rapid Assessment of Informal Settlements Report and the report on the State of Local Government.

Further, the contractor driven approach to the delivery of services, i.e. portable toilets, cleaning and maintenance of services is often challenging, with the contractor underperforming and still getting

paid. Municipalities appear to lack mechanisms to monitor, there's a need to involve communities in the evaluation and monitoring of services. The Asivikelane Campaign is a relevant case study.

Regarding the number of people with access to services, according to the WP, every municipality shows a decrease in percentage of informal settlement households. Is this a realistic picture? What other evidence exists? In terms of budget planning, will this mean less budget allocation for informal settlements?

The White Paper mentions an enabling environment for municipalities, however, there is also a need to create an enabling environment for communities to drive the development beyond mere Service Level Agreements.

Corruption is one of the factors impacting effective implementation. In the WP there is a downplay on the impact of corruption and extortion. It is alluded to but not explicit and sufficiently addressed in the WP.

We welcome the transversal approach but not enough is mentioned in relation to how this approach will be implemented in relation to informal settlements upgrading other than the reference to the Department of Home Affairs.

Having listed our concerns and comments, please take heed of the following recommendations:

1. There's a need for the establishment of a platform made up of various stakeholders to oversee implementation as well as play a monitoring role. This platform is needed at both national level as well as in various Provinces.
2. Another purpose of the multi-stakeholder platform is holding officials and politicians accountable for non-delivery.
3. An example of an area of accountability speaks to the Deputy Minister's target of 40% Women in Construction. Most of the Provinces are not implementing the 40% set aside for women in construction.
4. The WP needs a clear recommendation on EPHP and how it will rectify poor performance in respect to the delivery of PHP Housing in the last 15 years. To this end, appropriate grant funding is required to support EPHP processes like social facilitation, capacity building and technical support which is normally covered by NGOs
5. The WP needs to refer to the UN Informal Settlement Framework and how the Department of Municipalities will prioritise the implementation of this Framework.
6. There's a need for a municipal and partnership-based approach with communities, CBO's CSO's beyond mere Service Level Agreements and contracts. The WP needs to expand on how communities will be involved in the pre, during and post implementation phases.
7. There is a need for subsidies that work across different housing opportunities and a subsidy that enables self-built regarding Informal Settlements Upgrading.
8. The need for credible data in relation to informal settlements is important because often the bulk services are inadequate to meet the existing and future demands. This also highlights the need for communities to collect their own data and be included in the planning and design phase, the implementation phase and community-based maintenance programs.
9. Credible data is also necessary to ensure that adequate budgetary provision is made for the required bulk services.
10. The WP is committed to creating an enabling environment but not enough unpacking of what this means in the context of informal settlement upgrading.

11. There is a need for a clear communication strategy in relation to the role of government in the delivery of housing opportunities. Specifically, what are the strategies for those eligible while waiting for the delivery of houses?
12. Expand the definition of vulnerable communities to include those living on the streets and in hostels.
13. The WP supports the setting up of social compacts, but it needs to take cognisance of competing leadership structures, especially during implementation. Not enough is invested in social facilitation at the inception of projects.
14. There is a need to scrutinize the split application, especially when looking at BNG houses and a review of the municipal rental allocation process.
15. Review the clause that speaks to people selling their house to government if sold within the first 8 years. Greater scrutiny of beneficiaries is required to limit the sale of houses.
16. The selling of houses is an issue that needs to be investigated. Perhaps verification of beneficiaries needs to be done before houses are handed over to the beneficiaries
17. More needs to be done regarding the provision of access to housing for backyarders.
18. There's a need for a transversal/ integrated approach to informal settlements beyond basic services provision. In the context of ISU, priority should be given to the provision of good quality public spaces, amenities, infrastructure, schools, good networks of pedestrian and vehicular networks close to public transport. Informal settlement can't be seen as transit camps or temporary relocation areas.
19. The WP needs to make provision for the consistent application of national legislation and policy across all Provinces.
20. Given the high rate of unemployment amongst youth, more provision needs to be made to create opportunities for this vulnerable group.
21. There needs to be greater flexibility and creativity on the part of Government when they are operating in the space between formality and informality than just simply laying down the regulations.

Other enabling policies that the WP needs to prioritise:

- Urban Land Policy which identifies both large tracks of public land and infill sites ringfenced for affordable housing opportunities. This urban land policy will identify fiscal and regulatory tools to transform Apartheid spatial patterns and generate much needed revenue for Municipalities.
- Inclusionary housing policy.
- Policy guidelines on gentrification and trading of public housing.

This submission made as the SA SDI Alliance made up of the Federation of the Urban and Rural Poor (FEDUP), the Informal Settlement Network (ISN), the Community Organisation Resource Centre (CORC) and uTshani Fund.

