

An urgent call to rethink de-densification as the dominant proposed strategy in the context of COVID-19

11 April 2020

We represent civil society organisations with extensive experience in the human settlements sector and in working with informal settlement communities.

We are deeply concerned about COVID-19 and its devastating implications on vulnerable communities, livelihoods, the health sector, the economy and the state.

We are committed to collaborating with communities, government and other stakeholders in addressing the challenges posed by the COVID-19 pandemic and associated lockdown measures through actions which are appropriate and locally-responsive.

The COVID-19 pandemic has exposed the risk and severity of living conditions in informal settlements, which have always threatened the health, dignity and safety of residents. The implications of these living conditions during an outbreak present an imminent life and death situation. The protocol for slowing down the spread of the virus – hand hygiene, social distancing and behaviour change – are very challenging in areas where there is a lack of clean water, overcrowding and inadequate shelter.

We recognise the efforts of the human settlements sector, led by the National Department of Human Settlements (NDHS), in responding to the epidemic by rolling out basic services to informal settlements at a pace and scale never witnessed before.

We also recognise the effort to coordinate at national level a localised response to the epidemic, through the establishment of a COVID-19 Informal Sector Task Team and Engagement Platform and through the Minister's engagements with CSOs. While by no means perfect, these efforts show that meaningful engagement leads to accountability, responsiveness and improved outcomes in local communities.

Nonetheless, we are deeply concerned about the second strand of the NDHS response, which is de-densification. High density (resulting in overcrowding) has been identified as a contributing factor to the risk of contagion. High density also creates challenges to the provision of basic and emergency services in informal settlements.

We acknowledge that in specific contexts and under specific conditions de-densification may be possible and even necessary. These conditions include, amongst others, informed consent, processes of deep facilitation, the availability of well-located and serviced land, and minimal disruption on people's lives and livelihoods in the long-run.

Our concern is to caution against making de-densification a central thrust of the human settlements response with the intention of pursuing it at scale.

We do not stand alone in this regard. The informal settlement communities we work with have expressed deep concerns about the social, political, economic and technical impact of de-densification and the disruption it is likely to cause. Similarly, international experts and leading organisations, such as the UN Rapporteur on the Right to Housing, UN-Habitat and Amnesty International, have taken a strong stance against relocations and evictions of any kind as a response to COVID-19.

A. Why de-densification as a programmatic response to COVID-19 is inappropriate and problematic

Our concerns with de-densification as a programmatic approach is based on social, technical, resource, capacity, and developmental (risks/unintended consequences) considerations.

SOCIAL CONSIDERATIONS:

1. **De-densification and relocation can equate to eviction and forced removal, unless the principle of informed consent is strictly adhered to.** The issue of consent raises questions about what informed consent really means and what information people need to make a decision to relocate. Previous experience shows that even when consent is given, people change their minds, especially when the implications of the relocation become manifest. The national de-densification approach seems to acknowledge that consent is critical. The question remains what government will do when not enough people are willing to relocate to the identified sites, which then may legitimise evictions/forced removals.
2. **De-densification is socially complex and contested.** It requires significant social facilitation and ‘deep’ participatory processes to clarify the purpose and negotiate acceptable outcomes with affected communities. It is obvious that such processes cannot be facilitated during a lock-down period. Even once the lock-down has been lifted, it is not a quick and easy process, but requires a well-mediated, iterative process of engagement to manage local interests and expectations and avoid manipulation by local powerbrokers and elites.
3. **Relocation is highly disruptive, particularly to people’s livelihoods and social networks, and can result in further marginalisation from urban opportunities.** Lessons from past relocations shows that people often end up being further removed from work/income-generating opportunities, schools and other social/community amenities, which creates additional costs and burdens on these households. COVID-19 is already impacting most severely on the livelihoods strategies of the urban poor and relocation will most likely aggravate the situation. Informal settlement residents will need to rely, more than ever, on their social networks and internal social capital to survive the health, social and economic impacts of COVID-19 and relocations will undermine and disrupt these networks.

TECHNICAL CONSIDERATIONS:

4. **Relocation is not a quick or emergency intervention.** While de-densification is being conceptualised as a rapid response to addressing health vulnerabilities in informal settlements resulting from crowded conditions, the reality is that this is not a quick intervention. Any attempt to fast-track relocations is likely to cause serious secondary problems such as those outlined previously. In addition to the social processes, the technical process of land identification, planning and environmental approvals, construction of services and land release usually take a minimum of 12 months to be completed, and often even longer.

RESOURCE AND CAPACITY CONSIDERATIONS:

5. **De-densification and relocation will redirect scarce resources from existing/planned informal settlement upgrading efforts.** De-densification is a costly exercise (not taking operating expenditure and medium to long-term management implications into account), especially at the scale and speed envisaged. A conventional TRA unit typically costs

approximately R50k to deliver, but adding National Building Regulation compliance will mean units along the lines of conventional BNG housing. This added to the improved service standards is likely to triple per unit costs to at least R150k excluding land costs. There may also be bulk services costs which need to be factored in. In situ upgrading and risk mitigation measures (e.g. essential services improvements) are far more cost effective.

6. **De-densification efforts and relocations will redirect limited capacity and human resources towards planning, implementing and maintaining TRAs/host sites.** This has negative implications for the prospect of upgrading existing informal settlements, which needs to remain the central priority.
7. **De-densification uses scarce capacity and resources that could be directed toward priority interventions to prevent the spread of COVID-19** (basic services that are reliable and well maintained, other basic protective measures, food and other improvements in the living conditions in informal settlements, education and information sharing) **and respond to health needs** (the treatment or isolation of those who are ill but do not need to be in hospital).

RISKS AND UNINTENDED CONSEQUENCES:

8. **TRAs/host sites are not temporary and tend to become new pockets of exclusion and vulnerability.** In addition, given the identified priority relocation groups (e.g. the elderly, people with disabilities, child-headed households) for relocation, the resultant TRA settlement may be particularly at risk of becoming a hotspot of extreme vulnerability. While state support is critical, people's social capital (their networks and relationships of support) is a more important asset for atomised new communities and a precondition for state investment to succeed.
9. **It will be near impossible for government to control informal growth** in both the existing settlements (post-decanting) and the recipient TRA sites, which will undermine the de-densification effort. There is a real risk that force could be utilised to prevent this organic growth and re-densification from occurring.

All these considerations **challenge the notion that de-densification and relocation can/should be delivered at scale**, based on factors outlined above, including contextual realities, cost, land availability, capacity, etc.

To us the conclusion is clear: De-densification as a large scale dominant mitigation strategy for the COVID-19 outbreak has been identified as a highly contested, globally repudiated and ultimately ineffective strategy in terms of a long-term developmental agenda that upholds the rights of vulnerable groups and optimises scarce funding and other resources.

High density is but one factor that creates an environment of risk and susceptibility for informal settlements in the context of COVID-19. The functionality of the living environment, including access to services, adequate shelter, economic activity, education and information sharing, and social safety nets, are equally important. Even if a settlement's density is reduced, these other factors will continue to need an urgent and appropriate response. Isolating high density as the key factor to tackle in responding to COVID-19 overlooks these other equally important factors.

ALTERNATIVE APPROACHES

The following section proposes a set of short/medium/long term alternative and more sustainable responses for informal settlements in the face of COVID-19. These proposals are grounded in decades of experience working with informal settlement communities from across the country,

international recommendations and as part of a broader agenda to sustain community-driven development. The slow and significant gains that have been made in this sector must not be undermined.

B. What Informal Settlement COVID-19 response priorities should focus on

CONTEXT:

There are at least 1.2million vulnerable households residing within more than 2,700 informal settlements in South Africa who are acutely at risk as a result of the COVID-19 pandemic. The impacts flow not only from the anticipated effects of the disease itself, but also from the lockdown measures which have largely shutdown the local economy resulting in substantial loss of income to already-poor residents and resultant food security and livelihood impacts. The urban poor live hand-to-mouth and have limited or no savings to fall back on. In addition, residents are currently confined within settlements 24 hours a day which places increased pressures on the local services which were already in many settlements deficient or absent. Residents no longer make use of outside services such as sanitation, cooking, electricity and solid waste disposal at places of work (whether formal or informal).

Against this backdrop, it is critical that there is clear prioritisation of responses so that limited financial, human and other resources can be optimised and so that responses can be achieved at sufficient scale to meaningfully mitigate various negative outcomes. There also needs to be clear separation of short term/emergency responses, medium term responses and longer term responses. The understanding that the responses we are putting in place now are critical to mitigating and adapting to COVID-19 in the medium to longer term, should inform our responses. Informal settlements should not be framed in a dominantly negative or catastrophic way in the COVID-19 pandemic, but they should also be recognised for the opportunities they offer in dealing with this national crisis for the most vulnerable in South African society.

ASSUMPTIONS AND KEY PRINCIPLES:

- **Timeframes:** COVID-19 impacts and related mitigations will be necessary for at least a 6 – 12 months if not more, not only for the period of the initial lockdown.
- **Community mobilisation:** Communities need to be mobilised and organised – government and support organisations cannot mitigate this crisis without communities co-driving local actions.
- **Programmatic, scale-able response:** Responses need to be programmatic and at scale. We need to reach and support all of the 2,700 informal settlements in South Africa, not only a select few.
- **Incremental in-situ upgrading:** The national upgrading programme (as informed by UISP policy and NUSP and supported by CSOs) with priority on incremental in-situ upgrading, essential services provision, functional tenure and partnerships needs to be maintained and intensified during COVID-19.
- **Maintaining the economy and livelihoods:** We need to keep as much of the economy going as possible whilst we deal with COVID-19 and prioritise livelihood security. COVID-19 and the economy are concurrent national crises. We must deal with both or the poor will suffer severe consequences.
- **Partnerships:** Effective upgrading requires partnerships involving communities, municipalities, support organisations, research institutions and other government departments in order to be successful. Choices and decision making need to flow from and between these partnerships.

- **Context specific responses:** Informal settlements share common challenges, but their ability to mitigate and adapt to risk is shaped by their context. The main principles and protocols for preventing and managing COVID-19 can help guide particular responses in each settlement, but what works will depend substantially on the local context and will need to be locally adapted.
- **Locally responsive actions:** Many small, locally responsive actions (informed by and done with local people) will make the telling difference in managing COVID-19 and achieving effective in-situ upgrading, not large top down interventions.
- **Long term durability:** Responses should make sense long term. We must avoid actions now (e.g. installing low quality services where there are viable alternatives or relocations to new TRAs) which will create more problems later.
- **Densities:** It has long been accepted that we need to promote dense, compact and efficient cities. The density of informal settlements thus has both advantages and risks. Density risks can be largely managed/mitigated e.g. via essential services provision and opening up space for services through partial re-blocking. The alternative of relocating households to de-densify them to poorly located TRAs would perpetuate spatial inequalities and sprawling settlement patterns. The alternative of alternative, affordable, double story, self-built housing typologies should also be explored.

Response priorities – short term (0-3 months):

1. **UP FRONT PROGRAMMATIC PLANNING AND PRIORITISATION**
 - **Identify and include all settlements** – It is important that all settlements are included in response measures.
 - **Prioritise settlements based on response type** – E.g. some settlements may warrant a higher priority for water supply and hygiene, whereas all will require responses relating to communications, behaviour and information.
 - **Identify and mobilise partners** including Metros and their line departments, communities, support organisations, social networks and governance platforms. This is in progress.
 - **Decentralise** the response - Planning and implementation should rest as much as possible at the local level with national and provincial spheres playing a supportive role. Responses need to be driven in a bottom up fashion mainly by Metros and local support organisations and social networks, with data and information sharing with the other spheres of government.
2. **SUPPORT AND PRIORITISE STATE-CITIZEN PARTNERSHIPS, CO-PRODUCTION OF KNOWLEDGE AND LOCALISED INTERVENTIONS (GOOD GOVERNANCE):** Continued support for an approach which recognises that the state and communities in informal settlements, with support from other organisations (NGOs, private sector, research institutions), will need to work together, sharing resources and responsibility for preventing and managing the impacts of COVID-19. Informal settlements are highly organized, responsive and adaptive. We need to recognise, understand and draw on local community organization structures to support the state in COVID-19 responses. Community leaders and structures can provide information, collect and record data, and develop and implement responses through the co-production of knowledge for reducing exposure to and managing the impact of COVID-19.
3. **COMMUNICATIONS, BEHAVIOUR CHANGE, EDUCATION AND INFORMATION:** The biggest success factor in managing the containment and treatment of COVID-19 is human behaviour

across many areas (e.g. hygiene, isolation and infection management, responding optimally when symptoms emerge, managing fear and stress etc.). Communications, education and information flow are not only critical for COVID-19 management but also for incremental upgrading, effective essential services provision, operating and maintenance of services, and data.

- **Communications** - Good two-way communication with every community in order to: a) monitor key issues (e.g. water, toilets, solid waste, vulnerable persons (children, aged, disabled), hunger, disease outbreaks etc.; b) disseminate information; c) enable data collection; d) support community mobilisation for COVID-19 and upgrading. WhatsApp Groups have proven to be effective.
- **Education and behaviour change** – Education and information sharing of clear, simple messages which answer the question of *why* people need to change their behaviour. Messages on *how* this can be achieved, which can be applied to each local context. Inspire and support a ‘clean, safe households; clean, safe community spaces’ programme. Use posters, WhatsApp groups within communities, TV and the radio. Support community leaders to be early adopters, for example by being provided with and wearing masks/PPE.
- **Community organisation** - Including monitoring, data collection, co-planning, organising for implementation, responsible utilisation and maintenance of services.
- **Data management** – See above. Data on key local issues needs to be collected and analysed on an ongoing basis. Responses as they unfold need to be informed by data on needs and issues. Systems for doing this need to be developed. Data needs to move along the data information chain to inform decision making and responses. Supporting flow of data from the community level to the correct decision makers is critical.
- **Permits to move** - For community organisers/workers and those in government and support organisations who work with them.

4. FOOD SECURITY: Food security is the most immediate crisis facing the urban poor. Most households have lost all or most of their income and have limited or no savings to fall back on. Many local spazas have closed down. Public transport to travel to shops has been severely disrupted. Many households do not have a SASSA number.

- **Food aid** – This may be direct (provision of food supplies) or indirect (e.g. via SASSA). It is noted that many going hungry are not SASSA registered however. There is also a need to consider the impacts of hunger on the most-vulnerable and needy including young children, disabled and older persons.
- **Income** – Responsibly and selectively de-restricting certain economic and livelihoods activities which most impact the urban poor will enable some households to generate much-needed income again.
- **Informal food traders:** Education and support for informal food traders to increase hygiene practices in the trading of food. Food is an exposure pathway and water provision, good hygiene and behaviour change can reduce this risk significantly.
- **Micro and informal enterprises:** Many livelihoods are derived from these. Responsible and appropriate de-restriction of certain local MIEs with low COVID-19 risk will greatly assist.

5. WATER, SANITATION AND HYGIENE:

- **Hygiene** - Sufficient disinfectants for cleaning shared toilets, door handles, standpipes and taps on an ongoing basis and preferably after every use. Face masks

and personal sanitiser for those who are working in the settlement e.g. local coordinators, communal ablution supervisors, etc.

- **Water** – Maintenance of existing standpipes and other taps. Additional pipes or temporary tanks. Water storage tanks either mains-fed or as a last resort regularly refilled by tanker. Community champions to be trained and supported to monitor supply levels and frequency.
- **Toilets** – Maintenance of existing communal ablutions. Additional CABs where possible, or smaller kits that can be delivered to site by bakkie; otherwise temporary solutions, e.g. chemical toilets. Provide disinfectants and sanitizers at communal toilets and try to avoid crowding inside ablution blocks. Ensure communal toilets are open for longer hours and provide additional funding for supervisors to continue to maintain them. Protect and educate communal ablution block supervisors who are the foot soldiers in this battle.
- **Solid waste** – Additional bins inside settlement. Improved collection and containment point (fenced). Supply of sufficient refuse bags. Local workers to move waste from decentralised bins to collection point 2-3 times a week (basic stipends may be necessary). Municipal collection 1-2 times a week.

6. **DISEASE MANAGEMENT:**

- **Early warning and hotspot ID** - Re suspected infections and hotspots, referral to Dept. Health.
- **Management of hotspots** – Assist Dept. Health where necessary.
- **Appropriate behaviour when sick** – Protocol for what community members need to do if someone becomes ill. Steps to follow for treatment of infected people, data to be collected and information on who to send information to.
- **Temporary isolation and primary care facilities** – Including locally in or near to the community, e.g. unutilised buildings previously used for other purposes (small ‘field-hospitals’). This could include the use and re-purposing of taverns or other larger structures within settlements that do not increase contagion due to their location. Possible repurposing of unutilised government buildings in other precincts for larger temporary facilities.

7. **VULNERABLE GROUPS:** It is likely that there will be increased risk for most vulnerable groups during the lockdown (including children, older and disabled persons and victims of gender-based violence). Monitoring and data are required. DSD social workers need to be empowered and protected so they can continue to play their normal monitoring and support functions within communities.

- Children – Children are especially vulnerable during the lockdown, including in respect of hunger and exposure to diseases (not only COVID-19), psychological stress and domestic violence. It is particularly important that child nutrition is ensured.
- Older persons, disability and gender-based violence – monitoring and DSD response necessary. Also the prioritisation of food support where necessary.

Response priorities – medium term (3-24 months):

1. **IMPLEMENT AND ACCELERATE IN-SITU UPGRADING AND UISP/USDG PROJECT PIPELINES:** The pandemic has highlighted the importance of accelerating incremental, in-situ upgrading, including the provision of improved essential municipal and social services for the urban poor, reworking space via re-blocking and other means, and functional tenure.

This is accepted as being the primary programmatic and scalable upgrading response. The momentum of the existing UISP/USDG project pipelines needs to be maintained and accelerated, including progressing work streams related to planning, design, participation, procurement and construction of essential services. Sufficient budget needs to be allocated and constraints relating to procurement and statutory and regulatory constraints as well as norms and standards for shared services and pedestrianised layouts need to be resolved.

2. **INTEGRATE AND OPTIMISE INCREMENTAL SERVICES PROVISION:** Establishing optimised and better integrated services models for settlements is a priority, including establishing a main ‘services frame’ wherever possible within dense settlements to improve services access and mitigate various health and safety threats. Water, WASH facilities, toilets, fire hose points etc. can all be provided on the frame which also establishes the potential for individual services connections in the future. The ‘services frame’ approach significantly mitigates risks without necessitating large scale relocations (only limited relocations are required from the required service lanes).
3. **REBLOCKING TO FREE UP SPACE:** Re-blocking means moving and realigning the position of some or all structures in a settlement (partial versus full re-blocking) in order to open up access ways for the provision of services. This is often necessary in dense informal settlements. In very dense settlements, this might require people building upwards (double story structures) to accommodate everyone on site (as occurred at Mshini Wam in Cape Town). Otherwise (and potentially in addition), it may at time require the relocation of some households on a voluntary basis, preferably onto adjacent or nearby land so as to prevent the disruption of livelihoods and social networks.
4. **APPROPRIATE REGULATORY FLEXIBILITY:** Statutory and regulatory inflexibility in respect of such issues as service standards, environmental and planning approvals, and zoning and building plans pose a major constraint to incremental in-situ upgrading. Without appropriate solutions/flexibility in these important areas, incremental upgrading projects are either severely delayed or else become entirely blocked. Examples include: slow Water Use Licence (WULA) processes; municipal services standards which are unviable e.g. in terms of road or footpath widths, shared services or pedestrianised access; restrictive conventional RDP housing slope categories; normal zoning and National Building Regulation requirements being unviable within most informal settlement environments; conventional township establishment being either impossible or too slow.
5. **DESIGNATION OF SETTLEMENTS IN MUNICIPAL SDFS:** All settlements need to be designated within municipalities’ Spatial Development Framework (SDF) according to their categorisation (developmental trajectory – i.e. formal housing project versus in situ upgrade versus deferred relocation versus imminent relocation – A/B1/B2/C). This is a key first step in including settlements within the SPLUMA framework and starting to meet SPLUMA requirements regarding informal settlements and informality.
6. **NEW BYLAWS FOR INCREMENTAL UPGRADING ZONES:** This is closely related to the above and is also key for SPLUMA implementation and alignment. Much work has already been done in this area, including a land rights and planning protocol contained in NUSP’s National Programme Management Upgrading Toolkit (informed by multiple senior counsel opinions). Responses may include the use of a statutory bylaw for municipal services on private land as well a more general bylaw for incremental development ‘zones’ which establishes recommended norms, standards and practices, especially those which address health and safety threats, as well as environmental impacts (e.g. regarding sanitation, building materials, fire management, responsible use of services by residents etc.). There

will need to be significant flexibility (within defined limits) within these incremental zones regarding conventional (formal) town planning, servicing and building norms. The principle of recommended norms implemented via social compacts and monitored over time rather than a regulatory and compliance approach should be considered in these zones.

7. **ECD AND OTHER ESSENTIAL SOCIAL SERVICES:** Social services such as ECD, mobile clinics, and communal spaces to work and play are important. ECD is a particular area of concern. There are large numbers of vulnerable children in informal settlements and large numbers of less formal under-resourced ECD centres, most of which are not yet registered with the DSD and most of which face significant infrastructural and funding deficits.
8. **ALTERNATIVE DENSE HOUSING TYPOLOGIES:** Building on significant work already done in this area, there is the need to support the urban poor in finding ways to build upwards to maximise the use of scarce land. This would usually go hand-in-hand with re-blocking (e.g. Mshini Wam in Cape Town). Ideally these typologies need to be low cost, structurally and thermally functional, and easy for the urban poor to build for themselves. The typical concepts based on precedent and research are lightweight, double story, wood frame structures, clad with sheet metal, and with adequate fire, structural and thermal performance. They typically utilise pile rather than conventional platform foundations and can accordingly function on steep slopes or where drainage is poor (these being typical of many informal settlements). Flexibility or relaxation of the National Building Regulations will however be necessary given that structures of this sort fall outside the conventional building envelope. Current pilots and innovation should be identified in communities and testing of new financing mechanisms developed to test scaling up of these solutions across sites.
9. **FINANCIAL AND TECHNICAL SUPPORT FOR SELF-BUILD:** There is a need to revisit Phase 4 of the UISP and in particular the link with the housing subsidy instrument. Instead, appropriate funding mechanisms that support and enhance self-build on a much larger scale and that enable incremental building through savings and technical support should be explored. This could include the establishment for housing support centres.
10. **MANAGED LAND SETTLEMENT:** Government has committed to a major shift in budget over the next 5 years toward informal settlement upgrading and the Enhanced People's Housing Process/Zenzeleni programme. Managed land settlement is where the municipality provides land, essential services and a planning framework and where beneficiaries will build their own housing. This is viewed as a necessary alternative to the construction of more BNG green-fields type housing projects. Land for such purposes needs to be suitably located. It may be allocated to those who, by agreement, are prepared to move out of existing settlements, e.g. to enable re-blocking and opening up of space for essential service. In the latter instance, alternative land should be located as close as possible to existing settlements from which people are moving.
11. **PROCUREMENT AND DELIVERY SOLUTIONS:** The timeframes for municipal procurement of services as well as for construction, are slow and inflexible in terms of accommodating the typical variations in scope and requirements which arise in most upgrading projects. Conventional tenders typically take 6-9 months for all SCM processes to be finalised and contracts signed. Framework contracts offer potential solutions, but are also slow to setup and also insufficiently flexible. More work is required to put in place solutions which can deliver more quickly, flexibly and in a better integrated fashion. The use of partnership arrangements with suitably capacitated support organisations and communities (PHP

concept or using community upgrading funds) are alternatives which could also be explored.

12. **BUDGETARY REFORM AND OPTIMISATION:** Further engagement is required across the spheres of government regarding how to optimally utilise limited budget from the fiscus to achieve better human settlement outcomes in the area of upgrading. Currently, incremental upgrading (essential services provision and public realm investment) is still underfunded relative to conventional BNG housing. In addition, there is insufficient budget for operational purposes. Capital budget allocations tend to dictate decision making but Metros cannot sustain the ongoing operating and maintenance costs given residents inability to pay sufficiently for services.
13. **DATA AND INFORMATION MANAGEMENT:** Building on work already in progress in most Metros, there need be improved systems which manage informal settlement data including information relating to: demographics, site constraints, services delivered, services planned, services still required / services deficits. Improved data sharing and management/updating in real time is key. Communities need to be part of the data process. Protocols for community data collection needs to be developed along with the development of a resourcing mechanism for communities to feed data into a responsive government system. This should be co-developed with communities, support organisations and social movements who collect this data. More importantly, this nation-wide community collected data system should allow for updating of information every 1 to 2 years and feed directly into planning systems.
14. **INSTITUTIONAL COORDINATION:** Improved institutional coordination (transversal between Metro line departments and intra-governmental between the spheres of government) is a critical enabling success factor and this needs to be addressed and resolved in the medium term. There also needs to be more effective coordination with communities and support organisations. Municipalities need to set up a sector engagement platform that allows for informal settlement communities participation on an ongoing basis beyond the crisis. Informal settlement dwellers themselves have proven to be the greatest source of monitoring and reporting on real time situations on the ground. This needs to be built into an enduring feature of monitoring and coordination for all municipalities.
15. **CAPACITY BUILDING AND SUPPORT FOR COMMUNITY ORGANISING:** It is critical to capacitate informal settlement communities to tackle future crises as well as enhance their ability for communal facility management, maintenance and fault reporting. The level of capacity building can feed into municipal coordination platforms where communities can participate in.

Response priorities – long term (24+ months):

The long term responses build on the short and medium term responses and should include, amongst others:

1. Accelerating responses to informal settlement upgrading and upscaling nationally.
2. Regulatory reform and alignment across various fiscal instruments and policy frameworks.
3. Strengthen urban management and area based management.
4. Ongoing learning and documentation.

C. Ways in which we can best support NDHS COVID-19 response measures

As civil society organisations playing various roles, the following are some of the ways in which we can most effectively and appropriately support the NDHS in its COVID-19 response measures in the short to medium term:

1. Community engagement, communications, participative planning and supporting community mobilisation and community-led development to ensure that responses are appropriate and locally-responsive.
2. As the main priority and short term emergency action, supporting (by means of the above) the provision of water, sanitation and solid waste management (which are a primary Human Settlements mandate), along with supporting food security, behaviour change, and disease management.
3. As medium term actions, accelerating incremental, in-situ upgrading project pipelines (in line with the UISP and NUSP principles) and supporting moving to scale in this regard. This includes improving the way in which settlements are serviced and planned, re-blocking of settlements where this is necessary in order to open up space for services and better access, and exploring alternative self-build housing typologies.
4. Learning, research, documentation, data and information related to the above.

This submission is informed by our shared commitment to social justice, equitable development and community agency. It is offered in the spirit of constructive engagement, in the hope that it will inform a thoughtful, broad-based national conversation about what constitutes an appropriate human settlements response to COVID-19. We remain committed to finding joint solutions to the complex and urgent challenges facing us and to work collaboratively and in partnership with all stakeholders that share common values and principles. We stay open to engaging on these issues.

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