Development Action Group (DAG)

SUBMISSION TO THE CITY OF CAPE TOWN ON THE DISTRICT SPATIAL DEVELOPMENT AND ENVIRONMENTAL MANAGEMENT FRAMEWORKS

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1.   THE DEVELOPMENT ACTION GROUP / DAG

Established in 1986, the Development Action Group (DAG) is a leading non-profit, nongovernmental organisation working throughout South Africa to fight poverty and inequality and promote integrated urban environments.

DAG supports communities in need of adequate housing to lead, and engage with, their own development by enhancing their capacity and resourcefulness. DAG's strategies support pro-poor urban development practice using community-based development to foster social cohesion and strengthen citizenship and democracy.

DAG influences state policy and practice through four functional areas: research, advocacy and lobbying, partnerships and demonstration (projects). Critical partnerships with government, through a combination of policy advocacy and demonstration projects are central to DAG's strategies.

OUR VISION

The creation of human settlements through development processes which enable human rights, dignity and equity.

OUR MISSION

To create, implement and support opportunities for community-centred settlement development and to advocate for and foster a pro-poor policy environment which addresses economic, social and spatial imbalances.

OUR STRATEGIC OBJECTIVE

To demonstrate how working in partnership with citizens and other groups who share a pro-poor agenda can lead to creative and sustainable solutions that redress social, economic and spatial inequalities.

2.   INTEREST AND INTENT OF THIS SUBMISSION

This submission is in response to an invitation for inputs from civil society for the City of Cape Town's (CoCT/City) draft *Integrated District Spatial Development Framework and Environmental Management Framework* (referred to in this submission as the "SDF"). As a close partner of the CoCT for many years, DAG is pleased to present this submission. The formulation of the SDF presents civil society with a once-a-decade opportunity to help define the principles, policy objectives and implementation mechanisms to realise Cape Town's vision of socio-economic spatial transformation.

DAG's very keen interest in the SDF stems from our core mission and principles, as well as the policy measures and implementation mechanisms, which we believe will help realise the vision and the specific delivery objectives of the SDF. The realisation of spatial justice in the urban setting, with affordable housing as a central vehicle for realising this objective, must be at the centre of the long-term public policy goal of dismantling the legacy of the former dispensation. Through this submission, DAG is presenting suggestions on some policy considerations and instruments that can help achieve the set objectives and targets outlined in the draft SDF.

3.   SPECIFIC COMMENTS

3.1. OVERLAY ZONES

A key initiative of the SDF is the designation of *Overlay Zones* in strategic areas in which various incentives will be applied to facilitate the development of higher-density residential and commercial units. Such incentives will include the easing of zoning and building regulations which might otherwise impede this form of development.

3.1.1. INFRASTRUCTURE

A critical issue to be addressed in the context of development in the overlay zones is that of ensuring that there is sufficient bulk infrastructure, including water, sewerage, and electricity services. While the draft SDF favours the designation of overlay zones in areas that have sufficient bulk infrastructure capacity to accommodate densification, this will simply not be the case in many locations. Consequently, there will be a great many areas be in which upgrading will be required.

The National Urban Settlement Development Grant (USDG) programme affords municipalities funds for infrastructure and service development, but many have found this source to be limited in value compared to the overall costs and difficult to access.

DAG fully recognises the financial constraints faced by the City in terms of accessing capital funds for developing or upgrading bulk infrastructure and that development charges (DCs) provide the main funding source. However, it needs to be remembered that two core objectives of the overlay zone proposal are to: 1) Facilitate the development of micro-enterprises (which has great potential to stimulate local economic development and substantially alleviate poverty); and 2) Encourage the development of densified, low-cost residential units as a key component of meeting the long-term goal of delivering 650,000 new housing opportunities. As vital as it is to pool as much funding as possible for infrastructure development in overlay zones, the lack of any means to provide some financial relief to help micro-developers to enter the market (or expand their building activities) may greatly inhibit the realisation of both objectives.

3.1.2. MICRO-DEVELOPERS AND DEVELOPMENT CHARGES

DAG has always emphasised the need for the collection of appropriate development charges (DCs) for larger developers, especially in the City Bowl. It needs to be understood, however, that the single greatest impediment to the formal construction of additional residential units by micro-developers is the often-prohibitive levels of DCs, particularly in the case of developers who are themselves low-income earners (which so many are). The risk here is that without any mitigation of DCs whatsoever, many potential developers will simply build outside of building regulations in the overlay zones, thus replicating one of the very practices the SDF seeks to change. They will do so because the overwhelming demand for low-cost units (informal or not) will remain, as will the need for poorer homeowners to supplement their income. We are concerned that the regular schedule of charges for potential micro-developers will continue to be the prime factor militating against regulatory compliance.

Providing a much-needed means to help revive the manufacturing industry in Cape Town, the draft *Table Bay District SDF Implementation Plan* contains a proposal for discounted development contributions and development fee application waivers. This incentive for manufacturing investors is limited to six defined geographic areas and specific tertiary sectors. Discounted electricity tariffs are also part of this incentive package. There is a strong case to be made that micro-developers in overlay zones could be afforded some form of DC relief, at least in some circumstances, as they, like manufacturing investors, are playing a crucial role, not only in realisation the objectives of the SDF, but also of national human settlement and urban development goals.

It is noteworthy that most of the developers with whom DAG has worked understand the necessity of making a development contribution and have no objection in doing so. However, the payment of the entire charge up-front is impossible to meet for many and, therefore, the opportunity for the development of any number of units will be lost. It should also be noted that there are virtually no opportunities for micro-developers to obtain loans for the purpose of meeting DCs.

City officials have stated that they are willing to consider suggestions as to ways in which the DCs in the overlay zones could be modified. DAG offers the following possibilities:

❖ **Following an initial contribution, allow the DC to be paid in installments**. Repayment would become more feasible once the units are tenanted and rent is being collected.

❖ **Reduction or waiver of the application fee in qualifying cases.** This would represent an extremely small loss of revenue for the city, but for some aspiring micro-developers, might mean the difference in terms of being able to meet a higher portion of upfront costs.

❖ **Introduce a sliding scale of DCs which would give some up-front relief to micro-developers at the lower end of the market.**

Some components of the Atlantis Economic Zone, such as rebates and incentives for backyard development, could also be examined for possible replication.

Considerations around making DCs more affordable, as suggested above, should be part of a broader package of incentives for micro-developers. More research into the most effective incentives to facilitate the sort of development envisaged in the overlay zone needs to be undertaken.

3.1.3. INCLUSIONARY HOUSING

The anticipated release of the Inclusionary Housing Policy for the CoCT will be a core mechanism to help realise the ambitious residential development objectives of the SDF, particularly regarding

affordability. Inclusionary Housing (IH) provides an important opportunity to promote Land Value Capture and meet several core objectives such as densification. However, there are issues that need to be addressed to ensure that the policy is implemented in a way that promotes clarity and participation.

DAG is concerned about the heavy administration burden the City will need to take on in order to implement the IH Policy. For example, the City will need to inform every single property owner in the designated zones that they have additional rights. Owners in some areas already have significant rights and there needs to be clarity as to how the new IH Policy will affect these existing provisions.

We further contend that more direct involvement, on the part of the public, is needed throughout the IH policy development process. Civic organizations and the broader community must be able to fully engage in instances where additional rights are being considered. This specific need is not really addressed in the draft SDF.

Overall, the SDF District Plans could more clearly set out the spatial mechanisms to be put in place in order to give expression to, and maximize the impact of, the IH policy. This should also be a core issue on the agenda for Local Area Plans (LAP) consultation. A prime issue to consider is how local communities would benefit from both the on-site development contributions and / or the development in lieu of contributions (as set out in the IH Policy).

3.1.4. URBAN FORM

DAG maintains that there needs to be greater attention placed on the issue of urban form at the neighourhood level. Instigating the overlay zones and providing incentives for densification is critical, but it is not entirely clear as to the effect this will have on the local urban form. Will this, for example, lead to the development of large blocks of flats and, if so, will there be plans in place to guide and monitor such development? We also need to ensure that the overlay zones are well integrated into the broader District Plans and that community participation is facilitated in terms of co-design. These are vital issues to address at the LAP consultations as well as other forums.

In terms of the typology of the new units facilitated through the overlay zones, the City indicated a preference for the development of double stories and semi-attached expansion. The addition of a second story will usually require significantly higher expenditure as well as a higher level of building skills, than the development of backyard structures. For a micro-developer with limited finances, and limited engineering and architectural skills, this does present a significant challenge. This preference, although fully understandable, cannot be approached in such a way as to result in the exclusion of some developers or discourage the development of quality, unattached structures. City officials have noted that the preference for double stories and attached structures of rooms presents them with a significant policy challenge. Among other issues this underlines the importance of expanded technical capacity at the local offices and a higher level of technical assistance for micro-developers.

3.1.5. CAPACITATION OF LOCAL DEVELOPMENT MANAGEMENT CASE OFFICERS

The successful implementation of the proposals outlined in the SDF will require considerable staffing capacity across several municipal departments in different locations. This is particularly vital at the local planning offices in order to ensure effective implementation of the overlay zone policy.

DAG, therefore, applauds the City's intention to promote a change of mindset among its officials in terms of promoting densification and the building of additional units in the overlay zones. The intention to re-define the role of local development case management officers and, in particular, the role of building Inspectors, from one of policing agents to one of facilitation agents, will, if effective, be a key factor in ensuring the success of the overlay zone initiative.

As a core intervention to bring about these shifts, this City proposes to develop a comprehensive training package for staff who will be involved in the administration of the overlay zones. As of June 2021, there are still a number of elements of the package to be identified and DAG would like to have the opportunity to make inputs. We are concerned, however, that there needs to be an adequate allocation of financial resources to ensure that the package is both comprehensive and that it includes as many staff, in as many local offices, as required to have the maximum impact. To a large extent, the level of the new SDF's success will depend on how effectively the overlay policy is managed. The CoCT, therefore, needs to outline what budgetary resources will be earmarked for this purpose, in addition to developing a major internal training and capacitation programme. The City also needs to build its staff capacity to provide hands-on, appropriately skilled, and ongoing support to micro-entrepreneurs to ensure that units are developed, and to standard.

Currently, the local development management case offices have different levels of capabilities when it comes to applications by micro-developers, with some already being well-functioning and facilitative. Others, however, struggle to provide an acceptable standard of service in terms of their current building-related obligations and their ability to take on the new requirements pursuant to the overlay zone initiative must raise some doubts. The City needs to keep this in mind when developing the training package and other capacitation interventions. Perhaps this opportunity could be used to help improve functioning and standards at the less-functional offices, even beyond capabilities around the overlay zones.

3.1.6. INTERNAL MECHANISMS AND INTER-DEPARTMENTAL COLLABORATION

In addition to training and related interventions to bring about mind shifts and the redefinition of roles and practices, it will be vital to ensure that formalised internal mechanisms and procedures are put in place to make the new roles meaningful. For example, there must be clear administrative provisions to facilitate the fast-tracking of applications and to ensure that the developers have everything they need up front.

The new facilitation roles need to be focused on such things as minimizing rejections. As a prime example, it should be a procedure that a designated staff member works closely with the developer to minimize the chances of rejection of the plans, through making necessary amendments.

The level of success of the SDF will, in various ways, be contingent on the full collaboration with other municipal departments which have key interactive roles. The SDF could set this out more clearly and describe some of the important contributions that will be necessary from other departments. Key here will be an outline of how the departments will work together towards specific objectives. To the extent relevant, the SDF could also cite possible sources of support from, or collaboration with, institutions operating in the provincial and national spheres of government. Our strong emphasis on this issue is based on our experience that transversal agreements in terms of the release of land for human settlement development have not always been effective in Cape Town.

3.2.   LAND, HOUSING, AND INFORMALITY

3.2.1. LAND IDENTIFICATION

The draft SDF sets out human settlement development project pipelines and identifies the pieces of land reserved for these pipelines. While this clearly makes the process realistic and workable, DAG strongly asserts that land acquisition under the auspices of the SDF needs to be translated back into a broader, overarching City policy. Among several advantages, such a policy would provide a consistent framework for acquisition and disposal rather than an ad-hoc procedure. There are important factors that such a policy would address on a citywide basis including the utilisation of a range of land instruments and conditions by which land would either be excluded from, or disposed to, the open market.

DAG acknowledges that the City is already making significant efforts to identify suitable land to meet a core SDF objective of addressing the massive housing backlog. As one example, the City is committed to investigating areas in which new growth could be accommodated, and has invited civil society to help with such identification (This information will be utilised for a land use model which, in turn will inform sector plans – to determine if existing infrastructure can support or if upgrading is needed.

We believe, however, that more could be achieved in terms of unlocking suitable sites for this purpose. A stated aim of the SDF is to bring more municipal departments on-board to help ensure its full implementation. There needs to be directives from the highest levels of the municipal structure that all departments work collaboratively towards the single goal of unlocking sites. The Planning Department has shown a great willingness to work with organisations and communities to identify suitable sites, and this enthusiasm needs to be reflected across all departments.

The recent identification of up to three golf courses for possible mixed-use development is an excellent step and indicative of the City's commitment. Such efforts need to be broadened to include more such courses and a range of other under-utilized publicly-and privately-owned sites. But an ad-hoc site-by-site method is not sufficient and the City needs to consider an overall programmatic approach. Such a commitment could be more clearly outlined in the SDF as it is unclear whether the rationalisation of golf courses and other sites is part of a broader plan.

However, whether there is a current plan or not, DAG asserts that the process of planning for development on public land and private sites (golf courses, among others) needs to occur with the utmost transparency and be fully accountable. The criterion for such sites to be considered, and the process by which they will be brought "on-line," needs to be outlined. Such a process could be formalised in the SDF. DAG also strongly supports the notion of including this issue as a core component in the consultations around the development of the LAP's.

Finally, it must be noted that in many instances, the ability to implement programmes to help meet the ambitious development objectives of the SDF will depend on the ability to unlock suitable pieces of land.

3.2.2. GROWTH AND AFFORDABILITY

DAG maintains that the City needs to take a more pre-emptive approach in terms of how affordability will be ensured in the context of growth in the residential section of the market. Too often, the implementation of growth plans has ended up with no affordability component. While this issue is partially addressed in terms of the promotion of small-scale development in the overlay zones, and the Inclusionary Housing Policy the commitment to implementing a range of subsidized housing typologies, more safeguards to ensure affordability need to be considered.

DAG is concerned that the City's planning practices are not functioning in such a way as to help ensure that affordability within the anticipated 650,00 new housing opportunities over the 10-year period of the SDF, as envisaged, will be ensured. A stronger overarching policy of promoting affordability in the context of the delivery of these opportunities need to be outlined, as does a solid description of how planning processes will facilitate this. A prime example of where this is needed is in public-private partnerships, an area in which affordable housing policies and the actual delivery is often misaligned.

3.2.3. FINANCIAL TOOLS

City officials have asserted that several financial tools will be utilised and have affirmed that funding sources for the building of other typologies are to be used in land settlement areas. While many areas have already been identified, officials also note that "another layer of work will be required in terms of where upgrade happens." Once again, DAG underlines the importance of ensuring that there is an ongoing process of direct community involvement and transparency in undertaking the "extra layer of work" for this purpose.

At least two of the SDF District Plans refer to the CoCT facing "extreme pressures on budget and human resources" (particularly in the delivery of community facilities). While this is an honest and realistic appraisal, it does not engender a sense among stakeholders that the implementation of the draft SDF is fully viable. A general vagueness around the overall issue of finance in the documents, and in engagements with officials, is unsettling. The need for expanded financing to effectively implement many of the SDF proposals, is also not really acknowledged and addressed.

3.2.4. NEW INFORMAL SETTLEMENTS AND LAND MANAGEMENT

City officials recognise widespread informality as a major challenge with an estimated 225,000 informal structures (in informal settlements and backyards). The City estimates that these will increase to approximately 500,000 between 2030 and 2040. In the context of the SDF, City Officials summarise the challenges as: 1) determining if there is a sufficient amount of land (in adequate locations) to build enough units; 2) addressing the low rate of delivery; and 3) determining whether appropriate housing typologies are linked to the needs of various income groups.

The inevitable creation of new informal settlements is acknowledged in the SDF draft to the extent that it recognises that the housing backlog will dramatically expand in the coming years. In SDF consultations, City officials indicated that they have given some thought to the issue of addressing the emergence of new informal settlements. However, the overall policy approach to new informal settlements, and the expansion of existing ones, is not comprehensively outlined in the draft SDF, or indeed, in other municipal polices.

The need for more effective land management will become more and more vital in meeting the challenges brought by new and expanding informal settlements. The City needs to plan for this and consider the demands this shift will create for its land management operations.

3.3. LOCAL AREA PLANS (LAP'S)

DAG recognises that the complex technical nature of the draft SDF's, in addition to the large geographic and highly varied areas encompassed by each district, makes consulting with local civic groups difficult for the City to undertake. However, meaningful, structured engagement with such civic groups around the development of the subsequent LAP's is critical.

DAG cannot emphasise strongly enough, the importance of undertaking meaningful, broadly inclusive and impactful engagement with local communities around the development of LAP's. It is at the local level where the "rubber hits the road" and where the overall impact of the SDF will play out. Solid community engagement at the local level strengthens every aspect of planning and implementation. The pay-off from such consultations will include well-informed spatial planning over long term, better targeting of expenditure and budgetary accountability, and appropriate local project identification and development.

City officials are looking for innovative ways to engage communities around the development of the LAP's. Efforts have included the use of social media, local newspapers and radio. Understandably, COVID-related restrictions substantially limit the opportunities for community meetings. Videos are being created as an alternative and these must be distributed widely, with a clearly expressed means of feedback.

The City needs to set a clear agenda for the LAP consultations and clearly spell out the issues which will be addressed in this process, as well as set out the specific issues into which community inputs are of particular importance. It is vital that the outcomes of the consultations be applied in such a way to guide local investment. As a guiding principle, the LAP consultations should be structured in such a way to capture and interpret the range of experiences and concerns of the affected communities and to translate these into concrete objectives which the plan itself needs to address.

The City's own limited resources notwithstanding, it is important for the City to appoint trained and capacitated coordinators in as many areas as possible to conduct the consultations in creative and participatory ways.

City officials have stated their intention to, over the longer term, develop a campaign of community education around the issue of local planning, what its functions and aims are, how planning is critical local planning is for communities, and how civic groups can make meaningful inputs. This effort will include working with community leaders, forming civic alliances, and the development of a training package. It would be preferable to have had this initiative fully implemented by the time of the five-year review.

DAG also asks the City to consider ways in which ongoing engagement around the implementation of the LAP's, and the SDF itself, could be structured. This could include mechanisms for stakeholders, including NGOs and civic groups to feed into the monitoring process. The development of the new Monitoring and Evaluation (M&E) Framework could provide an opportunity and a structure for this. The SDF itself could note the need for this form of ongoing engagement and, to the extent feasible, enable the processes to be integrated into the monitoring function of the M&E Framework. This could provide relevant information for the five -year (mid-term) review of the SDF.

Although not part of the draft SDF, the City has recognised the importance of not only community consultation, but also of community organisation and training in the context of developing the necessary institutional arrangements for delivery. This should be reflected more clearly in the SDF.

3.4. BARRIERS TO IMPLEMENTATION

The City has been realistic in its identification of possible barriers to effective implementation which include market forces (such as land pricing, speculation and gentrification), political agendas, inadequate funding, decisions over prioritization, and ensuring community buy in / community preference. Importantly, City officials have asserted that further research is needed to better understand these potential pitfalls.

DAG strongly concurs and maintains that each of these potentially seriously inhibiting factors need to be further unpacked in much more detail. Scenarios in which blockages are likely to present themselves need to be anticipated and strategies developed to address these, including pre-emptive interventions.

3.5. MONITORING AND EVALUATION (M&E) FRAMEWORK

A highly significant new proposal for the SDF is the development of a Monitoring and Evaluation (M&E) Framework. The use of the framework, over the long term, will help measure the success of the SDF (at all levels from sub-districts to citywide) in terms of meeting its objectives, improve transparency and public accountability, and provide useful information for programme improvement (which may be particularly relevant at the five-year review mark). The model outlined in the SDF is scientifically sound and would be relatively easy to administer given the provision of the necessary IT (Information Technology) skills and interactive programmes.

While the model will measure outputs of new units (and new facilities) in terms of numbers, proportions and ratios in specified zones compared to non-specified zones, there is a key measurement component missing; that of actual socio-economic spatial transformation. For example, this model would tell us how many new units have been delivered in the particular overlay zone but not how many of them are affordable to households in lower-income brackets. Information about changes in racial dynamics would also be important to know as would information as to whether the households moving into the specified areas have better access to employment, services and amenities compared to their previous residences.

However, it would be difficult to develop sound indicators to measure such shifts, even as spatial transformation is the core objective of the SDF itself. The range of variables which could influence changing demographics may not be fully attributable to SDF interventions and this would compromise the reliability of the indicators. This form of research would require advanced skill sets to undertake as well as an outlay of significant resources, especially if undertaken by external consultants. Also, sample sizes in some smaller zones may be too small to be statistically significant.

It would be preferable, therefore, to look to qualitative means of monitoring demographic changes, rather than quantitative, to obtain a sense as to whether the zones have undergone socio-economic transformation in terms of accommodating lower-income households, over the medium- to long term. The City could take a case study approach to help determine micro-area demographic shifts. Such case studies could be undertaken in close collaboration with community-based organisations, NGOs and learning institutions. One possibility is for the City to accommodate Masters-level planning and urban development students undertaking theses on the issue of socio-economic spatial transformation in key overlay zones.

The City could consider using some of the following tools to help determine the extent to which demographic change is occurring in particular zones.
❖ Basic surveys community interviews
❖ Local focus groups
❖ Interviews with school principals (and examining school enrollment)
❖ Interviews with other key local figures such as community leaders, businesspeople, landlords, religious leaders etc.
❖ Identifying shifts in the types of goods purchased at local shops.
❖ Consulting sources which advertise local available rentals such as gumtree and others
❖ Utilising on-line platforms and local community WhatsApp groups (a rich source of information).

Such sources can be triangulated to formulate a well-founded anecdotal picture. Again, such an approach underlines the importance of working closely with local civic organisations.

4.   SUMMARY AND RECOMMENDATIONS

OVERLAY ZONES

❖   **INFRASTRUCTURE, MICRO-DEVELOPERS AND DEVELOPMENT CHARGES**

— As vital as it is to pool funding for infrastructure development in overlay zones, the lack of any form of DC relief to enable micro-developers to enter the market may greatly inhibit the realisation core overlay zone objectives.
— The City should could consider:
  o Allowing the DC to be paid in installments (which will become feasible once rent is being collected).
  o Reducing or waiving the application fee in some cases.
  o Introduce a sliding scale of DCs which would give some up-front relief to micro-developers at the lower end of the market.

INCLUSIONARY HOUSING (IH)
— Direct involvement, on the part of the public, is needed throughout the IH policy development process. Civic organizations and the broader community must be able to fully engage in instances where additional rights are being considered. This specific need is not really addressed in the draft SDF.
— The SDF District Plans could more clearly set out the spatial mechanisms to be put in place in order to give expression to, and maximize the impact of, the IH policy.

URBAN FORM

— The SDF should address the impact of measures outlined in the SDF on urban form at the neighourhood level. The impact that the range of incentives provided through the overlay zones will or may have on the local urban form is not clear.

CAPACITATION OF LOCAL DEVELOPMENT MANAGEMENT OFFICERS

— The proposed training package is a critical measure but there needs to be an adequate allocation of resources to ensure that it is comprehensive and includes as many local office staff as possible.
— The City needs to build staff capacity to provide hands-on, appropriately skilled, and ongoing to support micro-entrepreneurs, to ensure that units are developed, and to standard.
— The package's implementation needs to ensure that local offices which already struggle to meet their obligations are identified and are provided with additional capacity building to enable them to take on the added responsibilities required by the overlay zone initiative.

INTERNAL MECHANISMS AND INTER-DEPARTMENTAL COLLABORATION

— Innovative internal mechanisms need to be implemented to ensure that the new facilitative roles envisaged for local development case management officers and building inspectors are embedded in formal administrative processes and procedures.

— The SDF could clearly set out the important contributions that will be necessary from other City departments and outline how they will work together towards specific objectives.

LAND, HOUSING, AND INFORMALITY

❖ **LAND IDENTIFICATION**

— The basis for, and process of, land acquisition under the auspices of the SDF, needs to be translated back into a broader, overarching City policy. The policy would, inter alia, provide a consistent framework for acquisition and disposal.
— There needs to be directives from the executive level that all departments work collaboratively towards the goal of unlocking sites for human settlement development.
— The process of planning for development on public land and private sites needs to be inclusive and be undertaken with the utmost transparency and accountability.

❖ **GROWTH AND AFFORDABILITY**

— The City needs to take a clearer, more pre-emptive approach in terms of how affordability will be ensured in the context of growth in the residential section of the market, in the period of the SDF.
— A stronger overarching policy of promoting affordability in the context of the delivery of the anticipated 650,000 housing opportunities need to be outlined, as does a clear description of how planning processes will facilitate this.

❖ **FINANCIAL TOOLS**

— Issues of finance and financial sources could be better-addressed in the SDF. The draft, and engagement with officials, leave a sense that a greater range of funding sources will need to be identified to deliver on key objectives. This could at least be acknowledged and defined as a long-term objective.

❖ **NEW INFORMAL SETTLEMENTS AND LAND MANAGEMENT**

— The inevitable emergence of new informal settlements will underline the need for more effective land management. The CoCT needs to plan for this and consider the demands this shift will create for its land management operations.

LOCAL AREA PLANS (LAP'S)

— In-depth, structured and direct involvement of communities and civic groups around the development of the LAP's is critical and DAG acknowledges the efforts of the City in planning to undertake such engagement.
— The City needs to set a clear agenda for the LAP consultations, spell out the issues which will be addressed in this process and flag issues into which community inputs are of particular importance.
— The outcomes of the consultations need to be applied in such a way as to guide local investment.

— The importance of community organisation and training in the context of developing the necessary institutional arrangements for delivery (something to which the CoCT is committed) could be reflected more clearly in the SDF.

BARRIERS TO IMPLEMENTATION

— The City has identified possible barriers to effective implementation of the SDF. Each identified factor needs to be unpacked in much more detail, barrier scenarios anticipated, and pre-emptive strategies developed.

MONITORING AND EVALUATION (M&E) FRAMEWORK

— While the proposed SDF M&E Framework is well structured in terms of measuring housing and facility outputs, there also must be means to determine the extent to which actual demographic spatial transformation has taken place in the overlay zones.
— The City needs to consider qualitative means of monitoring demographic change as a core function of the M&E plan (various possible methods are listed in 3.5). The City needs to bring in some of its own capacities to this effort (such as undertaking surveys) and other evaluation methods that could be undertaken in collaboration with Community-based Organisations (CBOs), NGOs and learning institutions.

5. CONCLUSIONARY REMARKS

The CoCT's draft *Spatial Development Framework (SDF) 2022-2031* sets out an ambitious programme aimed at realising the overarching goal of bringing about urban spatial justice through the dismantling of legacy of apartheid-era planning and restructuring the city. From the human settlement perspective, the SDF's envisaged overlay zone initiative, targeted for a number of interventions, will contribute significantly towards the objective of creating 650,000 new housing opportunities.

The Development Action Group largely concurs that the draft SDF is generally on the right track but that further, specific considerations and provisions need to be made to ensure that the strategy truly has the foci and the components it needs to bring about the changes it envisions. As outlined in this submission, some of these considerations and provisions include ensuring that micro-developers have maximized opportunities to contribute and that local offices have the necessary capacities to provide support and implement all components of the overlay zone model. Identification and procurement measures need to be undertaken to ensure the use of land for affordable development is maximized, potential blockages need to be anticipated and addressed, as do issues of potential finance shortfalls. Communities must be afforded every possible opportunity to participate in planning decisions that affect them and the SDF's progress towards achieving spatial transformation needs to measured using meaningful and viable methods. Finally, alignment with other policy development processes such as land assembly work, Human Settlements policy, etc., cannot be emphasised enough.