

Attention: Director General
Department of Rural Development and land reform
224 Helen Joseph Street
Pretoria
0001
By email: nsdf@drdlr.gov.za

13 February 2020

Attention: Mr Rajesh Makan

Comments on the draft National Spatial Development Framework

Thank you for the opportunity to make comments on the draft National Spatial Development Framework (NSDF) April 2019.

Firstly we would like to congratulate the department on developing a very good draft National Spatial Development Framework. This framework plan is long overdue and when it is finally approved will go a long way towards providing a clear national spatial framework for spatial development across the whole country.

We only have one comment to make at the moment relating to the concept of incremental settlement development.

Incremental settlement development is the process through which legally recognised settlements are created over time in an incremental manner through the involvement and actions of a range of role-players including government, communities and the private sector. It includes the development of such settlements from:

- an in-situ context where people have already occupied the land in an unauthorised manner and the area is then formalised and upgraded over time (This is called Upgrading of Informal Settlements); as well as
- a greenfield context where previously undeveloped land is identified and prepared for future settlement, people occupy this land in a managed way and then the area is upgraded over time (this is called Managed Land Settlement – MLS).

(See <http://afesis.org.za/managed-land-settlement/> for more information on this)

Contact information:

9 Wynne Street, Southernwood
PO Box 11214, East London, 5213
Tel: +27 43 743 3830 Fax: +27 43 743 2200
Fax2Email: 086 5145 624
Email: info@afesis.org.za
Website: <http://www.afesis.org.za>

Company Information:

Company nr: 1999/006881/08
Vat nr: 4010213900
NPO nr: 022708
PBO nr: 18/11/13/3517

Directors:

G. Vengadajellum (Chairperson)
N. Ngamlana (Executive Director)
E. Fakir
F. Hendricks
C. Aucamp

We note that section 12.1(j) of SPLUMA states that any Spatial Development Framework (SDF) needs to *“identify the long-term risks of particular spatial patterns of growth and development and the policies and strategies necessary to mitigate those risks”*.

We contend that the NSDF does **NOT** adequately recognize informal settlements as an existing reality at the moment and as an ongoing reality of this country for the foreseeable future. The development of RDP housing is not keeping pace with the demand for new housing and settlement development and people are having to resort to further unauthorized land occupation to find shelter for themselves. (See <http://afesis.org.za/unauthorised-land-occupation/> for more information).

We therefore motivate that the NSDF should specifically recognize that informal settlements are likely to remain a feature of our spatial landscape for the foreseeable future and that left unchecked they pose a risk to future development in this country and that special strategies need to be mentioned in the NSDF to mitigate this risk.

Two important strategies that specifically need to be mentioned in the NSDF to respond to informal settlements are the upgrading of informal settlements and managed land settlement strategies. The sections of the NSDF dealing with urban regions, urban nodes, regional development nodes, and transformation corridors in particular need to mention the importance of incremental settlement approaches as being part of the strategies available to government to respond to informality.

The NSDF also needs to require all SDF's at scales below the national level to indicate where and how they will establish incremental settlement areas where informal settlements can be upgraded and managed land settlement areas can be developed.

These strategies will go a long way towards responding to section 12.1 (h) of SPLUMA that says that all SDFs need to *“include previously disadvantaged areas, areas under traditional leadership, rural areas, informal settlements, ..., and ensure their inclusion and integration into the spatial, economic, social and environmental objectives of the national sphere of government.”*

We trust that you will take seriously our comments and recommendations relating to informality and incremental settlement development. Please contact us if you have any questions or need more information. Please keep us updated on progress with regards to the finalization and implementation of the NSDF

Yours faithfully



Ronald Eglin
Specialist : Sustainable Settlements