On the 27th of January 2016, the City of Johannesburg published for comment its draft Spatial Development Framework (SDF). As described by the City:

*The SDF for Johannesburg 2040 is a city-wide spatial policy document identifying the main challenges and opportunities in the city, setting a spatial vision for the future city, and outlining a set of strategies that would lead to the realisation of that vision.*

The SDF is an important document, designed to set the spatial agenda for Johannesburg for the next 25 years. SERI has prepared and submitted comments on the draft SDF in line with the organisation’s areas of expertise. The SERI submission focuses on three topics: Spatial Justice, Provision of Affordable Housing, and Informal Work.

SERI argues that while the SDF’s focus on the development of a compact polycentric city model is a welcome intervention, this is not sufficient in a provincial context where the Gauteng Provincial Government has committed itself to so-called housing “Mega-projects”, which entail massive peripheral and green-field developments far from existing jobs and social amenities. The SDF should place greater emphasis on how peripheral green-field development has historically failed to transform South African cities, and explicitly recognise that continuing on this developmental path will entrench Apartheid-era spatial planning.

Informal settlement upgrading is not discussed with sufficient detail in the SDF, and some key omissions deserve greater attention. Most glaringly, there is no discussion of the “Special Zones” concept introduced in the Spatial Planning and Land Use Management Act, 16 of 2103 (SPLUMA). These zones can be used to regularise tenure and land use, and facilitate *in situ* upgrading. The possibilities for development should be discussed explicitly. Additionally, the SDF should graphically and textually identify the location of current Johannesburg informal settlements, consider and discuss the effect of new form-based coding on informal settlement upgrading, identify and incorporate existing policies, instruments and mechanisms for *in situ* upgrading, and an explicit commitment should be made to engagement with residents when upgrading settlements.

The SDF identifies so-called “Priority Transformation Areas” which are to receive the bulk of new infrastructure spending. While SERI recognises the necessity of high-level spatial planning and resource allocation policies, some allowance should be made for local realities which do not neatly fit into the SDF’s plan. The SDF should identify investment for “non-priority” areas where people currently live in inadequate conditions, including *in situ* informal

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settlement upgrading. This does not constitute an endorsement of green-field peripheral
development similar to Gauteng’s housing “Mega-projects”.

While the SDF makes an explicit commitment to the provision of affordable housing, the
document is unclear as to what constitutes affordability and how much of the housing stock in
Johannesburg should be affordable. SERI argues that consistent benchmarks should be set
based on an analysis of the prevailing distribution of household income in Johannesburg.
SERI presents statistics showing that approximately half of all households in Johannesburg
have a monthly income below R3 500 per month (in 2011 Rands), with many households
significantly poorer than this. Affordable housing policy should be responsive to this reality.

Affordable housing proposals in the SDF make no mention of affordable public rental
accommodation. SERI argues that market-provided and social housing are inadequate to
meet the demand for affordable housing in Johannesburg, and affordable public rental
accommodation should be identified explicitly as an implementation intervention in the priority
development areas identified in the SDF, such as the inner city and transport corridors.

While the SDF discusses extensively the effect that spatial form has on formal jobs and
livelihoods, there is almost no discussion of informal work in the document. This is despite
spatial form having significant implications for the livelihoods of informal workers, and the
existence of informal work having implications for Johannesburg’s spatial form. SERI argues
that the SDF should expand its definition of work and livelihoods to include informal work, and
in particular it should align with the approach contained in the Inner City Transformation
Roadmap. Additionally, the SDF should address its current gap regarding informal trade by
reviewing the likely implications of its proposals for informal livelihoods. In particular, regarding
the spatial vision for the streets, the SDF should promote a balance between the needs of
pedestrians and commuters and people who make a living there.

SERI submitted its comments on the 29th of March 2016, after having participated in an “SDF
feedback session” run by the City of Johannesburg on 1 March 2016.