

# Sub-National Doing Business Reform Toolkit

## Registering Property: Titling of RDP and Low-Income Property

**2020/2021**



**WORLD BANK GROUP**



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## 1. Context and Background

South Africa is an active participant in the World Bank’s annual *Doing Business* survey, which provides a measure of the “ease of doing business” in 190 countries (measured for the country’s largest business city – Johannesburg in the case of South Africa). The survey draws on a set of objective indicators that focus on the impact of laws, regulations, and their enforcement for domestic firms in 10 key areas, including Registering Property, presenting country results in terms of an absolute ease of doing business score and a comparative country doing business ranking.

South Africa ranked 84<sup>th</sup> out of 190 economies in *Doing Business 2020*, and 108<sup>th</sup> on the Registering Property indicator. Of critical concern is that over the past decade South Africa has declined 50 places, sliding from a rank of 32<sup>nd</sup> in *Doing Business 2009*.

President Ramaphosa has committed South Africa to be a global top performer and among the top global economies by *Doing Business 2023*.

National Treasury is partnering with the Department of Trade, Industry and Competition (DTIC) Invest SA and the Presidency in advancing South Africa’s *Doing Business* reform programme at the national level.

Simultaneously, National Treasury is collaborating the World Bank and the eight (8) metropolitan municipalities to implement the *Sub-National Doing Business (SNDB)* reform programme, following the completion of the 2015 and 2018 SNDB surveys that measure the business regulation environment in (five) *Doing Business* indicators, including Registering Property in the eight (8) metropolitan (metro) municipalities and Msunduzi.

Figure 1 below displays the results of the second 2018 SNDB survey for two (2) aggregate measures: the ease of doing business (previously the distance to frontier or DTF) score and the ease of doing business ranking. The ease of doing business score shows the distance of each economy to the “frontier” or the global best performance. The ease of doing business ranking complements the DTF (or DB) score by providing a comparative assessment of a city’s performance in business regulation relative to the performance of the other 8 South African cities participating in the SNDB survey.

**Figure 1 Key results of Doing Business South Africa 2018**

Location	Dealing with construction permits		Getting electricity		Registering property		Enforcing contracts	
	Distance to frontier score (0–100)	Ranking (1–9)	Distance to frontier score (0–100)	Ranking (1–9)	Distance to frontier score (0–100)	Ranking (1–9)	Distance to frontier score (0–100)	Ranking (1–9)
Buffalo City (East London)	71.66	6	59.40	5	57.81	6	↑ 51.48	9
Cape Town (Cape Town)	75.48	1	↑ 79.81	1	54.69	7	54.71	7
Ekurhuleni (Germiston)	71.81	4	52.09	6	58.48	4	55.58	5
eThekweni (Durban)	73.65	2	↑ 69.40	2	54.58	8	55.74	4
Johannesburg (Johannesburg)	↑ 68.16	8	↑ 68.77	3	59.68	2	54.10	8
Mangaung (Bloemfontein)	↑ 71.25	7	59.82	4	↑ 59.73	1	59.01	1
Msunduzi (Pietermaritzburg)	↑ 73.17	3	↑ 47.59	8	52.78	9	58.78	2
Nelson Mandela Bay (Port Elizabeth)	↑ 71.70	5	↑ 42.19	9	57.93	5	54.85	6
Tshwane (Pretoria)	↑ 66.25	9	51.24	7	59.39	3	56.14	3

Source: *Doing Business SA 2018*

For Registering Property, Mangaung ranks 1<sup>st</sup> with a DTF of 59,73, with Johannesburg 2<sup>nd</sup> and Tshwane 3<sup>rd</sup> with DTF’s of 59,68 and 59,39.

Viewing these results, it is important to appreciate that the *Doing Business* efficiency components of indicator for *Registering Property* measure the entire value chain in registering property – that is, the number of procedures, time and cost as a percentage of the value of the property for transferring a small commercial property (a warehouse with less than 50 employees) from the time at which the sale is agreed through to the issuance of a registered title deed to the buyer.

Cities and municipalities are responsible only for the first of seven (7) procedures in the entire process – that is obtaining a municipal rates clearance certificate. The remaining six (6) steps involve the conveyancing profession and the deeds registry as the main institutions that affect the time, complexity and cost of registering property.

*Doing Business* also measures the quality of the land administration system in each economy. The quality of land administration index has five (5) dimensions: reliability of infrastructure, transparency of information, *geographic coverage of property titling*, land dispute resolution, and equal access to property rights.

The geographic coverage of property titling index has four (4) components: the percentage (%) coverage of formal property titling in the city measured by *Doing Business*; the percentage (%) coverage of formal property titling in the economy overall; the percentage (%) coverage of cadastral mapping of all privately held land plots in the city measured by *Doing Business*; and the percentage (%) coverage of cadastral mapping of all privately held land plots in the economy overall.

The geographic coverage of property titling index ranges from 0 to 8, with higher values indicating greater geographic coverage in land ownership and cadastral mapping. South Africa scored 2 out of 8 points in *Doing Business 2020*, with a score of 2 for complete cadastral mapping of all privately held land plots in Johannesburg, the largest business city in South Africa. All nine (9) participating cities recorded similar results in the second SNDB survey, *Doing Business South Africa 2018*, reflecting South Africa's weak performance on inclusive property titling.

Yet broad-based property titling is a critical structural economic reform that may boost South Africa's inclusive economic growth and development. Property ownership is a key income earning asset for many people, especially the poor. Access to property rights is therefore considered an important route out of poverty. Further, unclear or slow processes to register property titles reduces the incentive for businesses to invest and constrains overall economic growth and job creation. The Peruvian economist Hernando de Soto's seminal work on the importance of property rights to development talks about the weight of 'dead capital' – that is, assets that cannot easily be bought, sold, valued or used as an investment – that acts as a constraint on economic progress.

Internationally, the ease at which people and businesses are able to register their property is a key lever for inclusive urban economic development. Successful and inclusive economies articulate pathways out of poverty for poor people. Amongst others, they improve the efficiency and coverage of property titling and deeds registration services, raising the collateral value of assets owned by the poor, improving their access to credit and adequate housing. Poor people are thereby enabled to participate in the local economy and engage in business development and entrepreneurial activity. In turn, this raises municipal income from property rates in lower income areas.

The *Final Report of the Presidential Advisory Panel on Land Reform and Agriculture* raises the importance of improving performance in South Africa's property titling in both urban as well as rural areas. Urban property reform is particularly critical as South Africans are urbanising at an unprecedented pace, and by 2050 it is estimated that 8 out of every 10 South Africans will live in cities and towns.

The *Integrated Urban Development Framework (IUDF)* emphasises the importance of spatial reform and transformation towards more inclusive, productive and resource efficient cities and towns. This requires significant reform to urban planning, land use management and property titling processes to integrate urban property markets that shape spatial form and economic opportunities in our cities.

Key stakeholders across government, business, civil society and communities are all becoming increasingly attuned to the critical role that efficient property titling services play in spatially transforming urban space in a way that contributes to faster and more inclusive economic growth and development.

Bridging the spatial property divide requires government to introduce simpler, more accessible and affordable means to register property for the first time, as well as stimulating the residential resale market in the affordable housing market segment in South Africa.

Unlocking economic opportunities in townships and low-income neighbourhoods depends critically on extending property titling to low value properties in these areas, as changing land use to commercial zoning requires proof of property title. For instance, an informal spaza shop on an untitled property is able to upgrade and expand into a formal retailer or wholesaler with increased output and income if (s)he is able to provide proof of title required for a land use management or zoning application.

Unlocking the potential township economic development and strengthening the business environment in the areas of greatest economic need therefore depends critically on strengthening the property titling process in South Africa.

The SNDB reform agenda for the *Registering Property* indicator is therefore extending its focus from automation of the city/municipal rates clearance process to include property titling, specifically the *titling of Reconstruction and Development Programme (RDP) and low income properties*.

## **2. Title Deeds Restoration Programme**

In 2014, the national Department of Human Settlements introduced the *title deed restoration programme*, recognising that an increasing number of beneficiaries of state-subsidised housing were not being issued with title deeds on occupation of their houses. The department estimated that the title deeds backlog had reached almost 820 000 by 2014, of which just over 10 per cent related to title deeds before 1994 and 90 per cent to title deeds after 1994.

Under the previous Discount Benefit Scheme, tenants of pre-1994 state funded housing stock, who were denied property ownership under the previous regime, were given the opportunity to own their own houses. The main challenge in outstanding transfers from pre-1994 housing stock has been capacity limitations in provinces and municipalities to finalise the processes of transfer from provinces to municipalities and on to individual beneficiaries.

From 1994, state-subsidised houses were transferred into the name of the new home owners, but from 2004 a growing backlog in title deeds issuance led to the conceptualisation and implementation of the title deeds restoration programme.

The main cause of non-issuance of title deeds since 1994 was the failure to finalise the establishment and proclamation of new areas being development in the face of immense pressure on government to build subsidy houses at scale. These delays in township proclamation were largely because project developers had not followed through on the approval of a General Plan for the new area<sup>1</sup>. This then delayed the opening of a township register, which is a highly regulated process for bringing vacant, serviced and identifiable sites on the property market for transfer (Urban Landmark 2011).

The main obstacles were underlying land rights disputes for which the state had limited capacity to resolve. The second most prominent cause for delay has been the administration of beneficiaries and the allocation process.

In 2009 the national Department of Human Settlements published a Housing Project Process Guide that sets out very clear process flow charts, project schedules and checklists for land assembly, township establishment, and subsidy approval, amongst others. However, continued titling challenges led the Department to implement the titling restoration programme to accelerate fundamental policy and process shifts.

The new programme scopes key titling challenges at a project level, particularly for post-1994 housing stock, and develops targeted strategies to resolve various categories that are funded under the *Title Deeds Restoration conditional grant* that was introduced in 2018.

Reforms related to current and pipe-line projects included changing the way in which government payments were made to developers. Initial, a substantial payment was held back until title deeds had been registered in the name of the beneficiaries. From 2004, a final payment could be made before this had taking place, removing the financial incentive to complete the titling process. Introduce sequential milestone payments to developers therefore aimed to re-introduce the financial incentive to complete the titling process.

A further contributing factor was that some municipalities and provinces had held back title deeds because of the prohibition on selling RDP houses before eight years had passed, but then found that significant numbers of the original residents had moved, passed away, or sold their houses informally, without the title deed.

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<sup>1</sup> The *township establishment process* starts out with a *layout plan* that is prepared by a town planner and is approved by the relevant local authority. The layout plan must indicate the proposed land use (zoning) as well as provision for movement and mobility in the area. The next step is to develop a more detailed *survey plan*. The land must be surveyed and cadastre established in terms of the Land Survey Act (No. 8 of 1997).

Once approved by the Surveyor General, the survey plan becomes the *General Plan for the township*. The land constituting the township must then be consolidated into a single piece of land, and any underlying restrictions on the land relating to mining and mineral rights, or to historical servitudes such as aqueducts, rights of way, commonage rights etc. must be cancelled or removed in the Deeds Register.

The *township register* is then opened in the Deeds Registry in terms of which each of the individual sites available for registration is shown on the General Plan. *Freehold title* is then granted through the *property title registration of individual sites* in the names of their owners in the Deeds Registry (Landmark 2011).

Supportive policy and legislative reforms target bulk registrations, less complex surveying processes, and alternative tenure reforms.

The title deeds restoration programme therefore raises key interdependent responsibilities for provinces and cities/ municipalities in delivering on the geographic coverage of property titling sub-component of the quality of land administration index for the *Doing Business Registering Property* indicator.

### **3. Approaches to SNDB Reforms on Property Titling of RDP and low income properties**

Cities have been slow to take up the SNDB reform agenda for the *Registering Property: Titling of RDP and low income properties* with only eThekweni Metropolitan Municipality having developed and implemented reform actions plans in 2018/19 and 2019/20 in this regard.

This means that the *eThekwini approach and experience* offers clear lessons and peer learning for the remaining seven (7) metros as the SNDB team endeavour to encourage development of city SNDB reform actions plans on property titling in the 2020/21 financial year.

City SNDB teams are also able to draw on the experiences of the World Bank/International Finance Corporation (IFC) *Illembe Registering Property pilot project* in the Kwadukuza and Mandeni local municipalities in the Illembe district in Kwazulu-Natal, as well as the *Transaction Support Centre (TSC)* action research project in Khayelitsha established by 71point4 consulting company in partnership with the Centre for Affordable Housing Finance in Africa (CAFH).

#### **3.1. eThekwini case study on developing a SNDB Reform Action Plan for *Doing Business Registering Property: Titling of RDP and Low Income Properties***

In 2018 the National Treasury Cities Support Programme engaged the eThekwini SNDB focal point and coordinator to develop SNDB reform action plans on a property titling project as a pilot test case for the *geographic coverage of property titling component* of the *quality of land administration index* for the *Doing Business Registering Property* indicator.

After significant inter-departmental as well as inter-governmental discussions, eThekwini completed two separate reform action plans for *Registering Property: Titling of RDP and Low Income Property* for the *Cornubia Phase 1 B* catalytic human settlement project and the *Welbedagt East* project.

Cornubia is a strategically located human settlement development project in the northern corridor of Durban. A public-private joint venture between the national Department of Human Settlements, the Kwazulu-Natal provincial Department of Human Settlements, eThekwini Metropolitan Municipality and Tongaat Hulett Developments, the project aims to develop a mixed-use, mixed income urban settlement comprising a range of complementary uses over a 15 to 20 year period. The project is innovative in that it combines residential housing opportunities for approximately 125 000 people, retail and industrial facilities in walkable environment on well-located land close to the economic hub of Umhlanga town centre, King Shaka airport and the Dube Trade Port.

Phase 1 comprises 2 700 fully subsidised housing for qualifying beneficiaries. Phase 1A includes 482 sites and Phase 1B 2 180 sites and 1 200 affordable units. Subsequent phases will include low and middle income rental opportunities, and gap housing (partially bonded housing targeted at lower to middle income earners whose income is between R3 501 and R15 000 a month) and social housing, which would be available for those that do not qualify for fully subsidised housing or mortgage bonds.

Property titling transfers are then part of current RDP titling transfers, although the Cornubia project is unique in the level of scale of state subsidised properties being transferred to individual beneficiaries.

The first phase of housing has 2 662 units, which are complete and occupied. As at July 2020, a total of 450 transfers to qualifying beneficiaries have been registered for Phase 1A. All of the nine (9) General Plans for Phase 1B have been registered and the township registers opened on the Deeds Registry. To date, 836 transfers have been registered for Phase 1 B. Documentation for the remainder are currently being prepared by the appointed conveyancer.

The Welbedagt East project presents a different property titling modality. Situated in the western parts of Chatsworth, the project was initiated in the 1990s and identified as a suitable project with which to start the eThekwini slum clearance programme in 2001. It is also well located with regard to employment opportunities in the greater Chatsworth area and good accessibility to bus and minibus transport services.

The project's first phase has 4 900 sites, including community facility sites, religious sites, school sites, and sports fields. Of these 4 640 houses have been completed and occupied. The remaining sites were not suitable for development.

Property title transfers in the Welbedagt East project have proved challenging, as the project was established through the Less Formal Township Establishment Act (No. 113 of 1991) under which there was no requirement to circulate building plans for top-structures.

Further, the various eThekwini Metropolitan Municipality line departments did not monitor the construction of civil infrastructure and official handover processes were never concluded, which prevented opening of the township register in the Deeds Registry.

Given the long-standing nature of the project challenges and significant project management turnover in the intervening period, complete records were not handed over to current project management which in turn created challenges in establishing comprehensive project information. Given these challenges, eThekwini had not made significant progress on property titling transfers on the Welbedagt East project.

In 2018 eThekwini took up the challenge to include both Cornubia Phase 1 B and Welbedagt East in its development of City SNDB reform action plans for *Registering Property: Titling of RDP and Low Income properties*.

The challenges with the Welbedagt East project required that the eThekwini Engineering Department provide engineering clearances in order for the General Plan to be approved and the township register to be opened at the Deeds Registry. But given the high level of non-compliance of building practices on the project where houses were built over municipal servitudes in certain instances, eThekwini's engineers were not prepared to proceed with issuing these clearances.

eThekwini's Chief Engineer and the City's SNDB coordinator initiated an inter-governmental project steering committee between relevant departments in eThekwini Metropolitan Municipality (human settlement, conveyancing contractors, engineering, water, and revenue management) and Kwazulu-Natal province (human settlement in particular given their management of the title deeds restoration conditional grant programme).

The integrated inter-governmental project steering committee mapped out the processes and project challenges, identifying key activities, deliverables and outcomes for each stakeholder involved. These inputs were then drawn together to compile the eThekwini 2018/19 SNDB *Registering Property: Titling of RDP and Low Income Properties reform action plan for Cornubia Phase 1B and Welbedagt East*.

Led by the eThekwini human settlements cluster (human settlements, engineering services and transport), the inter-governmental human settlement project steering committee meets every two weeks and has been a significant institutional intervention to unblock the property titling challenges in eThekwini beyond the Cornubia Phase 1B and Welbedagt East projects. A key component to the unblocking has been the intervention of Kwazulu-Natal provincial Department of Human Settlements given their management of the funding provided under the title deeds restoration conditional grant programme. These funds in particular provided for the contracting of project specific town planners and other professionals required to unblock project specific title deeds restoration challenges.

The scaling up on property transfers has also had significant impact on eThekwini's receipt of property tax revenue in these areas as numerous properties had increased in value over time, but had not been re-valued in the City's valuation roll process as title had not been transferred.

### **3.2. Illembé Registering Property pilot project in the Kwadukuza and Mandeni local municipalities**

In 2019/20 the Illembé district municipality partnered with the World Bank/IFC to undertake a *Registering Property pilot project* in the Kwadukuza and Mandeni local municipalities.

Pilot A was aimed at establishing a simpler and more affordable registration system for low income areas after the first time title is issued, while pilot B was targeted at undertaking a mass systematic registration programme in order to issue the first title deed to the correct beneficiary or owner.

Starting in the Sundumbili township in Mandeni, the pilot A land titling project involved ascertaining the extent of practices such as informal land transactions using the affidavit system by establishing community centres and calling for claimants for specific areas, exploring ways to effect formal transfer of these properties, proposing a new affordable system that is able to cater for the scale of transactions involved, and proposing a business plan and approach that could be self-funding and sustainable to serve community needs.

Community halls were carefully selected as centres for the community to come forward. Councillor, ward committee and community awareness was raised through a multi-pronged communication strategy involving community meetings, flyers, loud-hailing, posters and even word-by-mouth. Centres were open for fixed and declared periods (with extensions of time). Each centre had two (2) stations – at the first station trained community-sourced staff collated

initial information and checked relevant documentation, while at the second station trained consultant staff ensured legal documentation checks and form validation.

As pilot B had a different focus on addressing the mass backlog in first time titling, the local municipalities nominated nine (9) legacy housing projects – six (6) in Kwadukuza and three (3) in Mandeni.

Most of the projects were older than 15 years with beneficiary challenges related to rapidly changing dynamics in the areas and the lengthy passage of time since project initiation. As such, the projects relied on the title deeds restoration conditional grant to appoint service providers where project implementing agents were no longer in place to deal with the project titling issues.

The pilot highlighted the importance of addressing these challenging first time titling issues, as they are critical to ensuring complete and accurate municipal valuation rolls that are used to ensure effective management of the municipal property rates based. Property titling regularisation is therefore critical to ensure that rightful owners may be held accountable for future property encroachments, zoning transgressions, and outstanding rates and services accounts.

Key recommendations of the project included regularising the ownership of land, particularly land held by national government; key municipal decisions related to special zones, rates and service amnesties and write-offs for legacy projects where encroachments, densification and non-payment for services and rates may have occurred; establishment of implementation protocols between key stakeholders, notably municipalities, the national departments of Cooperative Governance and Traditional Affairs (COGTA), the Agriculture, Land Reform and Rural Development (DALRRD), Justice, Human Settlements, and the National Treasury, as well as private sector (particularly the conveyancing community) to address the massive backlog of informal transfers in the low cost property market.

Both pilot A and pilot B have generated significant knowledge and understanding of the key challenges and way forward in addressing titling challenges in the low cost property market in South Africa, and the resultant project reports are a key peer learning knowledge product that cities may draw on to establish similar projects in developing their SNDB reform action plans for *Registering Property: Titling of RDP and Low Income Properties*.

### **3.3. *Transaction Support Centre (TSC) action research project in Khayelitsha***

The *Transaction Support Centre (TSC)* action research project established by 71point4 consulting company in partnership with the Centre for Affordable Housing Finance in Africa (CAFH) is a walk-in advice office located in Makhaza, Khayelitsha, which is a lower-income residential neighbourhood consisting mainly of subsidy properties built by government.

The TSC team assists clients to formalise their tenure and/or resolve other property-related issues. The team also documents client case studies, explores mechanisms to optimise current processes and identifies systemic challenges that impede formalisation. These are shared with various public and private sector partners in an effort to improve client experiences and

outcomes, and drive systemic change in regularising property transfer in the low-income property market<sup>2</sup>.

Operating for just under two years, the TSC has on-boarded 392 cases from walk-in clients who face a range of property related challenges that are primarily related to their title deeds. In addition to assisting walk-in clients, the TSC has piloted the application of an innovative blockchain-based property management system for 930 households in the area who have never received their title deed. This effort has yielded 656 cases where the TSC can facilitate the signing of sale agreements with the City of Cape Town, the first step in the process to transfer ownership to the beneficiary households.

The TSC action research project aims to address the challenge of complete lack of reliability of official record base of freehold title in formal low-income areas in South Africa. The low-income housing market problem has arisen due to the fact that the formal property registration system relies on costly legal professionals to vet identities, confirm ownership and transfer properties through paper-based systems and manual processes required by the Deeds Registries Act (no. 37 of 1937). The Electronic Deeds Registration Systems (EDRS) Act (no. 19 of 2019) now provides the legal framework that authorises the shift from a manual to an electronic deeds system; however, the hard work lies in undertaking the modernisation and automation of the Deeds Registry system and ensuring an integrated land administration system over the next three to five years.

While the current system protects the integrity of formal property transfer transactions for those that are able to afford such, it incentivises informal transactions or undocumented transfers to others, putting ‘owners’ at risk of losing properties that are not formally registered. This is exacerbated by current legislation under the Housing Act (no. 107 of 1997) that makes it illegal for beneficiaries to sell their state-subsidised houses for a period of eight (8) years after acquisition.

This means that data of property ownership in low-income neighbourhoods as reflected in the deeds registry, and consequently in other municipal administrative systems, is not aligned with reality on the ground. The implications for local level governance and individual property ownership are severe – local property markets are unstable, with competing systems to record and enforce property rights; municipalities are unable to identify and engage with property owners, impeding citizen-centric governance; and the financial sector is unable to support secured, housing-led investment, blocking a primary pathway for transformative financial and economic inclusion.

The primary transfer backlog on state subsidised ‘RDP’ properties is now estimated at over one million properties. These properties are still officially owned by the state but have been occupied for several years by beneficiary households or their descendants, subsequent informal purchases, tenants or other caretakers.

Transferring these properties to rightful owners is a complex endeavour. Despite the national deeds restoration programme, which provided R1,6 billion to eradicate the backlog by 2020/21, it appears that the primary transfer backlog is continuing to grow.

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<sup>2</sup> Listen to the August 2020 webinar recording at [http://housingfinanceafrica.org/documents/28753/?mc\\_cid=1e7786a50a&mc\\_eid=16aa248048](http://housingfinanceafrica.org/documents/28753/?mc_cid=1e7786a50a&mc_eid=16aa248048)).

Realistically, it is unlikely that the underlying policies, systems and processes that create this outcome can be shifted quickly. In the interim, it is critical that alternative mechanisms are created to maintain credible, visible records of who has taken occupation of subsidy properties.

Beyond this, beneficiary households need an accessible, trusted mechanism to keep those records up to date. With regard to existing registered stock, use of informal transaction mechanisms and failure to transfer properties to heirs after owners have died results in a gradual decay in the accuracy of ownership records as captured in the deeds registry over time. It becomes increasingly difficult to reconstruct the back-to-back transfers to enable registration in the deeds registry; registered owners or their heirs become difficult to trace, and facts become easier to dispute. Without intervention, areas that once were formal gradually become informal over time.

A key recommendation flowing from the TSC is the imperative for South Africa to develop a more accessible and affordable property registration and transfer system that does not increase risk for participants. This is not a new recommendation; it has been made by many entities for many years. As an action research project, the TSC therefore plays a critical role in offering a contained environment to test new solutions and to assess their potential impact (CAFH and 71point4 2020)

Cities may therefore consider replicating the TSC and establishing similar local action research projects as part of their SNDB reform action plans for *Registering Property: Titling of RDP and Low Income Properties* as they assess the challenges faced in scaling up formalisation of informal tenure of freehold properties in low-income neighbourhoods.