Input from the International Institute for Environment and Development to the Second session of the Open-ended Intergovernmental Expert Working Group on Adequate Housing for All, UN-Habitat Headquarters, Nairobi

Agenda item 3. Consideration of the outcomes of the preparatory intersessional meetings, including draft recommendations [INFORMAL SETTLEMENTS AND TENURE SECURITY] (22 October, 2025)

Honourable Co-chairs, Madame Executive Director, Delegates, and experts,

My name is Paula Sevilla and I speak on behalf of the International Institute for Environment and Development, where we collaborate with many networks of civil society organisations and academic institutions advancing a justice-led vision for housing policy and practice. In that spirit, I would like to offer a few reflections on the recommendations presented today.

My reflections on **tenure security** emphasise that ensuring secure tenure must go beyond the legal realm. It requires a broader effort to create **preventative systems** that address the multiple drivers of housing insecurity and injustices before they lead to forced evictions and displacement. Three points are important for this:

- Firstly, mitigating eviction risks requires recognising that forced evictions result from **different types of drivers**, including conflicts over private land but also public land, from conflicting or weak land systems, as well as from different public and private responses to urbanisation and the climate crisis. The **institutional approaches to conflict resolution referenced in paragraphs 99 and 100 need to be tailored to** recognise this diversity of dynamics and consider the role of different actors – governmental and otherwise - in advancing or preventing forced evictions in different cases.
- A second point relates to **how tenure security is integrated into broader urban interventions**—from infrastructure development to climate resilience planning. Too often, these interventions proceed without considering their implications for tenure. A recent IIED report shows that **urban climate interventions that overlook housing rights can unintentionally drive dispossession, displacement, and speculation**. In some cities, these dynamics have led to what has been called "green gentrification" or "renovictions"—further entrenching housing injustices. To achieve just and sustainable urban transitions, **tenure security must be integrated as a guiding principle** in all forms of urban interventions.
- Third, we must strengthen the **preventative role of the state** in regulating speculative urban dynamics that deteriorate housing conditions and jeopardize tenure security efforts. Building on recommendations 65 and 70, greater emphasis needs to be placed on the central role of public authorities in employing more intentionally tools like **urban zoning, regulation of private sector practices, and monitoring of land markets** to prevent forced displacement and establish mechanisms to ensure the social function of land and housing, including through promoting non-speculative, community-led solutions to housing.

Regarding the recommendations on **informal settlements**, I would like to raise two brief points.

- First, we need to recognise the **diverse expressions of informality and informal housing**. While this is recognised in the framing of the document, recommendations should be more explicit about this diversity. Paragraph 37, which opens the recommendations, should also **recognise that informality encompasses a large diversity of living arrangements**— ranging from backyard units to occupied vacant buildings – and call for interventions that are not limited to one narrow model of regularisation or upgrading. For this, paragraph 94 could be strengthened by **promoting a commitment for the development of approaches for upgrading that respond to these different expressions of informal housing**, with adequate mainstreaming of responsibilities and building of capacities to effectively fulfill these mandates.
- Second, even where **institutional frameworks** for upgrading informal settlements exist, they are often **too rigid to respond** effectively to local realities and leave little space for contextualisation. The institutionalisation of support for upgrading outlined in section A.2 of the recommendations **requires frameworks that expand, rather than restrict, opportunities to engage with diverse expressions of housing informality, urban realities and local needs, tenure systems and locally-driven responses, and that enable solutions that address all criteria of the right to adequate housing**, including a specific focus on cultural adequacy.

Lastly two points on housing finance.

- First, a strict focus on affordability might **provide limited solutions that continue to leave some groups**, including those of the lowest incomes, **behind**. It is important to not normalise the use of the concept 'affordable housing' as a proxis to housing policies, and instead pursuing **housing justice approaches that actually meet the needs of those that have been experiencing housing injustices**.
- Secondly, we **welcome the focus on community-led forms of housing finance** throughout the recommendations, though **the role of additional actors**, such as multilateral, national and subnational development banks and LRGs**, in supporting these mechanisms could be strengthened in the text.**

In conclusion, we appreciate the efforts made to draft these useful recommendations, and hope that these points help ensure their operationalisation contribute to the advancement of the right to adequate housing for all.

Thank you,