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Habitat 3 Policy Paper Frameworks WRI Cities Response

The World Resources Institute and the WRI Ross Center for Sustainable Cities greatly appreciate the opportunity to review and respond to the Habitat 3 Policy Paper Frameworks. By including Civil Society in the discussion, the impact of the Habitat 3 process will be magnified and more comprehensive. WRI encourages UN Habitat to continue along this path of inclusive and meaningful discourse as the development of the New Urban Agenda progresses.

Herein, the WRI Ross Center for Sustainable Cities provides an institutional response to the Policy Paper Frameworks as a whole, followed by a brief review of each Framework individually. This feedback is intended to inform future drafts of the Policy Papers and the forthcoming negotiations and New Urban Agenda produced as part of the Habitat 3 process.

The Policy Paper Frameworks as a set were well received and provided a comprehensive, largely inclusive vision for the equitable, sustainable cities of the future. By viewing each of the subsequent Frameworks through the lens established by the first Policy Unit, future drafts of the Policy Papers and the eventual New Urban Agenda can promote urban policies and practices anchored in inclusive, equitable, sustainable development. WRI sees this first draft of the Policy Papers as providing a strong foundation for a New Urban Agenda rooted in the concept that development that provides for and improves quality of life for the underserved segments of society improves quality of life for all residents of the city. In future drafts, special attention should be given to the inclusion of women, indigenous peoples, the elderly, and other marginalized populations in the development discourse. By engaging with diverse groups of stakeholders, decision-makers are more likely to create systems that serve the entire citizenry better.

A related overarching theme is that of capacity building. Only by providing adequate capacity and education to relevant stakeholders can cities foster the kind of informed discussion necessary to create equitable cities. While this includes technical capacity building – helping citizens understand the decisions that they are being asked to inform – building capacity around the importance of stakeholder group participation and its potential impact is also necessary. This kind of capacity development can help bring otherwise uninterested parties into the discussion where they may otherwise not have understood the value of their unique perspectives.

Governance, transparency, and accountability were also recurring themes across all the Frameworks. Inclusive governance and stakeholder participation is one key aspect of this theme.

Additionally, transparent processes, open data availability, and financial accountability of governing bodies should be emphasized by every Policy Unit. This kind of free and open governance structure leads to more positive and long-lasting impacts for cities that improve the quality of life for more stakeholder groups. Power relationships between levels of government should also be considered. While Habitat 3 primarily focuses on urban issues and solutions for improving urban life, the primary actors crafting negotiations and making commitments are at the national level. The Policy Units should also work to show national governments what they can do for cities, and how to create enabling environments in which cities can thrive. This can include national urban policies that create large-scale urban change in all cities in a country, or they can include financial commitments that specifically fund sustainable urban projects that align with the priorities set out in the New Urban Agenda.

Implementation mechanisms, technological, financial, and otherwise, need increased emphasis in future drafts. To create a New Urban Agenda that is actionable and specific, the text will require specific recommendations for implementation of the ambitious principles set forth in the Agenda, Policy Papers, and Issue Papers. These implementation and finance mechanisms will have to come from all sectors of society – civil, private, and governmental – and will require new collaboration across sectors. Similarly, achievement of the priorities set out in the New Urban Agenda will require innovative technological and organizational solutions. It is important that policies and funding commitments coming out of the New Urban Agenda and other Habitat commitments do not set restrictive constraints on the types of solutions proposed. Each city and country will solve its challenges in unique ways, and by allowing municipal governments, businesses, and civil society to innovate and experiment, new solutions will be developed that challenge the status quo and can create rippling impacts across geographies.

In order to pull all of these themes together, the Policy Papers need stronger, more explicit linkages between the Frameworks in order to create a cohesive, comprehensive, and holistic New Urban Agenda. Only by thinking in a cross-sectoral manner will the cities of the future find the innovative, resilient, sustainable solutions they need to provide for citizens across the board. For example, greater linkages could be drawn between Resilience, Urban Services, and Finance. The mobility systems of the future must not only be sustainable and accessible, but they must also be resilient in the face of a changing climate and financially sustainable for cities to implement. Without drawing explicit connections between the ten Policy Papers, there exists a risk that each of these important themes could be forced into silos that would eventually mute their impact. Truly holistic, cross-sectoral solutions are more impactful and create greater value than the sum of their parts.

An additional theme missing from the Policy Paper Frameworks is climate action. Climate is key, and it is not mentioned as a central focus. After the success of COP21 in Paris, it is urgent and prudent to build on the momentum of those victories, especially with respect to the new 1.5 degree target. Countries will be looking for solutions to achieve their Nationally Determined Contributions, and cities will be well positioned to help countries achieve those goals. By linking the commitments from COP21 with the New Urban Agenda and with the Sustainable

Development Goals, countries and cities can work together to create solutions that satisfy commitments across the board and leverage resources from a wide spectrum of sources. By incorporating climate into the Habitat goals and priorities, it is more likely that the New Urban Agenda will get buy-in from local and national actors who are already enthusiastic about working towards both the SDGs and their NDCs. The implementation mechanisms and specific indicators created for the SDGs and NDCs can also help to inform relevant implementation mechanisms and indicators within the New Urban Agenda. Initiatives coming out of the LPAA, like the Compact of Mayors, have made great strides in uniting cities around common goals to create meaningful commitments to change. A similar or linked Action Agenda for the Habitat process can leverage the momentum from other international processes to create a stronger, more actionable New Urban Agenda and solidify a positive legacy for Habitat 3.

Lastly, one key topic missing from the Policy Paper Frameworks was urban road safety. Urban road safety is a key cross-cutting issue, and innovative solutions have the potential to improve quality of life for millions around the world every year. Building on momentum from the UN Decade of Road Safety and the recently adopted Brasilia Declaration on Road Safety, WRI proposes the following considerations into the Policy Paper Frameworks.

Under Section 4.2: Safer Cities in the “The Right to the City and Cities for All”, it is recommended that traffic safety and reduced threat of traffic death and serious injury be included. If this section is to address “safer cities” beyond violence and security, traffic safety is a necessary component that is aligned with other global development and policy development for safer cities. We therefore recommend the following:

- Under “key transformations,” the following edit is suggested: “Combat violence, gender, racial, religious and all other forms of discrimination, ensure day-to-day security, reduce risk of traffic death and serious injury, and foster community support in urban populations.”
- The policy recommendations would benefit from the addition of “reduce traffic deaths and serious injuries in cities, particularly for vulnerable populations and road users such as the young and old, pedestrians, bicyclists and those accessing mass transport” and “promote traffic safety through safer and more sustainable mobility systems.”
- As overall support for including this, we point to the inclusion of road safety as a Sustainable Development Goal target, as well as mentioned specifically in Goal 11 on cities; and the recent Brasilia Declaration on Road Safety championed by the WHO for the UN Decade of Action on Road Safety.

In relation to the aforementioned role of reducing traffic fatalities and injury in creating safer cities, as well as in improving mobility, we generally recommend that traffic safety and security be mentioned when discussing the need for improving mobility and safety in cities.

We support the full integration of the Sustainable Development Goals (3.6 and 11.2) as they relate to the Transport and Mobility sections. “By 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by

expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities, and older persons” and “by 2020, halve global deaths and injuries from road traffic accidents”.

In the Urban Services section, we support the current inclusion of the SDG that includes issues related to traffic safety and health issues related to mobility

In general throughout the document, we support linking of health and quality of life issues to transport and urban growth policies, such as air quality and access to quality walking, bicycling and public spaces – both connected street networks with public spaces and public green spaces.

POLICY PAPER FRAMEWORK 1 – RIGHTS TO THE CITY AND CITIES FOR ALL

WRI encourages the Policy Unit to position the Rights to the City as the primary framework for the New Urban Agenda. The “Rights to the City” framework has the potential to guide the work in other policy areas. For example, the “Rights to the City” framework provides clear direction in terms of prioritizing social values and the needs of all people above economic exchange value. It provides a clear focus on equity of rights and access to opportunities for all people.

The policy paper should focus on the value of viewing all other urban issues through this framework. The policy paper should avoid covering topics dealt with more thoroughly in other policy papers, for example, urban governance, cultural rights, and housing. Covering these topics in an ad hoc manner makes the policy paper redundant and mutes its potential contribution.

The Rights of the City policy paper has the potential to make a contribution if it clearly articulates a solutions-based approach and the relevant challenges and removes references to a wide array of diverse urban issues. As it is currently written, the policy paper reads like a long list of urban issues. It is unclear how the framework guides what is included in the list, how to prioritize these issues, and how to approach these issues, nor does it provide any explanation about why some issues are left off the list.

The priorities of the framework should stay focused on clearly articulating the necessary and sufficient conditions for the approach to guide action. The current priorities of the policy unit are so varied and policy recommendations so vague and open to diverse interpretation that is hard to imagine them guiding action. It is recommended that in further iterations of the document, specific action-focused priorities are clarified in greater detail so as to encourage concrete action.

One key item for emphasis is the enabling environment needed to ensure that cities can take action based on the Policy Papers and New Urban Agenda coming out of Habitat 3. Many countries in the developing world recognize the importance of cities as a society’s primary

organization, though this recognition does not necessarily translate into more financial support to cities. It is important to highlight the need for new priorities for revenue distribution that will allow cities to meet commitments and fulfill their responsibilities to their citizenry.

The “Rights to the City” framework provides a unique opportunity to express the values and approach that all other policy units should take when dealing with specific urban issues. The power of this framework and the utility of the approach is lost when the policy paper does not clearly articulate the added value of the approach and covers so many other diverse areas (covered by other policy units) in a relatively superficial manner.

Regarding mobility and accessibility, it is important to highlight the potential for introducing inclusive Transit-Oriented Development concepts into the policy- and decision-making frameworks as a way for cities to develop in a more sustainable way using existing transit hubs as centers for public spaces, employment opportunities, and residential neighborhoods.

One of the biggest challenges in developing countries is to include civil society in the planning discourse. The local government should allow and encourage different types of engagement; both online and regular meetings should be considered as valid participation. Another challenge: the local government should create tools to prevent political groups from capturing the participation and disallowing new people and CSOs to engage. Capacity-building for CSOs and community members on urban sustainability topics and projects should be pursued in order to promote a fruitful debate. Especially important is including women in participatory processes towards the design, development, and maintenance of mobility, due to the lack of strong policies of gender protection.

Similarly, the right to access essential basic services and infrastructure should also refer to virtual and connected access. Providing access to information is essential to creating an equitable environment. Technology can be used as a tool to provide high level services especially to the most vulnerable people.

It should also be noted that the sentence on the bottom of page 2, “It includes the urban space as well as the rural or semi-rural surroundings that form part of its territory....” only adds ambiguity to the understanding of cities and urban areas within the context of the “New Urban Agenda.”

POLICY PAPER FRAMEWORK 2 – SOCIO CULTURAL URBAN FRAMEWORK

The key messages are well defined and essential to consider in the New Urban Agenda, though they may be more aspirational and less evidence based than is constructive. The messages would benefit from a definition of inclusion and a discussion of how to mediate tradeoffs amongst the socio-cultural priorities presented and other sustainable development goals. The discussion of migrants, refugees, and other vulnerable stakeholders is essential and should be integrated

throughout the other policy unit papers. The tension between cultural heritage and human rights and the challenges inherent to working in post-conflict and corrupted states are also issues that this policy unit may be best suited to address. It is essential to consider the role the contributions of new cultures and migrants have in urban planning and form and how decisions should consider multiculturalism and diversity. It would be interesting also to explore in greater depth the drafter's assertion that there is a "growing fear of the other in cities and towns."

This Policy Paper could also benefit from a clearer presentation of challenges and a clearer linkage to other policy units. It is unclear how the challenges presented in this policy unit are disparate from the challenges presented by the Urban Governance or Cities for All frameworks. These presentation of these challenges should so be supplemented with suggestions for policies to address them. For instance, it recommends enhancing and developing participation and suggests consultation processes as a way to do so. It is important to move beyond just consultation of citizens and put money towards the institutionalization of participatory processes and get them into law/regulation. It is key to speak to the accountability and implementation of that law – as many countries have mandatory participatory mechanisms in law but rarely are they appropriately implemented or beyond consultative. Moving beyond consultation could look into co-production of service delivery, capacity building of civil society and citizens, and management of vested interests. In talking about 'rehumanizing' cities, the urban design element should be highlighted, as reducing large highways, increasing human scale development, and taking back public spaces can support this rehumanization. Additionally, the paper could benefit from providing references and indicators to the challenges it brings up.

The recommendation to "advocate, assist and reward participatory systems of sustainable urban planning and local government development, which respect laws and regulations, listen to the needs of people (including the powerless and disadvantaged) and reduce disparity between rich and poor" is too broad. It addresses inclusive decision-making processes and then tacks on wealth inequality. These are very different issues and inclusive decision-making does not necessarily mean greater income equality. Similarly, the key action "acknowledge and protect cultural differences as a heritage of urban development" is too broad. The space for such acknowledgement is not identified, and the manner in which acknowledgement and protection are enforced and result in real impact is not defined.

POLICY PAPER FRAMEWORK 4 – URBAN GOVERNANCE, CAPACITY AND INSTITUTIONAL DEVELOPMENT

WRI finds the Urban Governance Framework to be well thought out with a strong backbone of core concepts, but lacking in several key areas, including accountability in urban governance structures, resource management, open governance, and inclusive stakeholder engagement. Firstly, governance does not have a specific SDG target and as such is considered a cross-cut or enabler across the SDG targets. The Policy Unit rightly lists the many targets and goals that rely

on good urban governance however they do not speak to the challenges that are rife in attempting to apply good governance practices across the many sectors and silos evident in the SDGs. Additionally, there is a focus on democracy within the Framework, particularly on page 11. Democracy is not a prerequisite for good governance and should not be placed as a requirement in the priorities.

As acknowledged by the Policy Unit, accountability is a key factor in good urban governance. However, there is a need for all governments to be “open and accountable”, not just local governments. With regard specifically to municipal government accountability, there are two types often lacking in cities in developing countries. The first relates to internal accountability: municipal staff of all categories, ranging from managers and planners to accountants and bill collectors often maximize personal gain, rather than the public welfare, which is required from city employees to ensure optimal outcomes for all. The second factor, accentuating the first, is a lack of external accountability. City officials' career and salary structures are not necessarily linked to development outcomes that matter to residents and other stakeholders, which can create the impression that the city officials do not have resident interests at heart.

Measurement for management is also key to good urban governance. This can be addressed in the Framework in a number of ways. First, with regard to resources: typically, cities in developing countries receive much of their investment resources from higher levels of government, and there is no inherent incentive for local governments to seriously mobilize resources using their taxation powers. Cities need to more closely monitor how far development outcomes in their respective jurisdictions match the flow of funds coming into the city. Secondly, data disaggregated around gender, ethnicity, and other demographic factors can be a way to truly evaluate participation and equity across the board.

Additionally, there is an opportunity to strengthen the links between the Habitat 3 agenda with the priorities of the Open Government Partnership, which include open data and access to information, the inclusion of women and marginalized/disadvantaged actors in the participation and equity aspects, the importance of the role of local government actors (particularly within the Habitat 3 negotiations), and civil society engagement and capacity building as a sustainable mechanism for continuity of policy and projects in the urban context. The Policy Unit rightly identifies the need for civil society capacity building but wrongly places the capacity building needs solely on civil society. There is a need for a mandate and capacity building at the subnational government level for city officials to meaningfully engage with civil society.

However, it should be noted that metropolitan governance is not the only way to approach institutional fragmentation. Instead, it should be portrayed as one mechanism for addressing regional inequalities and overlapping/missing jurisdictional challenges. There are concerns with relation to how metropolitan governance can re-centralize service delivery, remove accountability mechanisms from the citizens, and add an additional scale of governance in an already crowded space of institutions. Therefore, the policy unit should consider the challenge not as metropolitan but as “institutional fragmentation” or “institutional alignment of scale of

governance” as a way to move focus away from the metropolitan authorities and focus on the many opportunities for cooperation and regional planning that can occur.

POLICY PAPER FRAMEWORK 5 – MUNICIPAL FINANCE AND LOCAL FINANCE SYSTEMS

Overall, WRI agrees with the primary challenges and priorities set out by the Municipal Finance and Local Finance Systems Policy Unit. Local governments are operating in the context of often constrained capacity-to-act (macroeconomy, national and regional contexts, etc.), and that these are somewhat context-specific. For example, ‘rapid urbanization’ may not be a universal challenge in many middle income countries (such as Brazil or Colombia, for instance). The paper could benefit from a more nuanced approach and reflect the challenges faced in different contexts; thereby providing a more nuanced assessment of challenges. For instance, how does the municipal finance challenge change in second and third tier cities compared to capital regions?

Specifically regarding revenue sources, the Framework rightly states on page 6 that debt is not a revenue source. Therefore, debt should be removed from the three basic pools of funds that are attributed to cities (along with OSRs and intergovernmental transfers). OSRs could be broken down into taxes, fees, fines; IGTs into restricted/fungible.

We also agree that efforts to implement proposals for improved municipal finance performance must draw on international practice but that policy objectives, reform processes, and outcomes are typically country-specific. Indeed, for a strong fiscal foundation there is need to strengthen national, regional, and local policies and systems. Here again, a more nuanced approach to local context would be welcome – the Framework identifies many important priorities in the focus areas but does not propose a hierarchy of measures that would support a differentiated understanding of their relative merits. For instance, “establishing the rule of law” (page 11) is a qualitatively different measure to be implemented compared with a much more specific priority such as “Promoting efficient and effective user fees, subsidies, and other charges” (page 12).

In the section on “Implementation”, it would be useful if more detail were provided on the municipal finance-related implications of global processes such as SDG11 and COP21 and the role of initiatives like CCFLA and the Compact of Mayors. It is not immediately clear if these provide adequate guideposts for the area of municipal finance specifically. In this context, municipal finance could be positioned as a means to an end for achieving SDG11 and COP21, but a clearer link could be provided to the specific targets (e.g. “enhancing capacity for participatory, integrated and sustainable human settlement planning and management”). While we agree that “Studying, documenting, and sharing experiences” is valuable, it is not immediately clear how it

can be ensured that changes on the ground take place within municipal departments and city fiscal management.

In the section on “Borrowing”, the significant role that both sovereign and multi-lateral guarantees can play in helping cities access finance should be made more explicit. It should also be emphasized that debt enhancement should always be accompanied with capacity building.

We would encourage the Policy Unit to make a strong statement on priorities revolving around (at least) the following: building responsibility, aligned incentives, and resilience into municipal finance and local fiscal affairs and cultivating strong relationships with both higher tier governments and the private sector (e.g. institutional committees, chambers of commerce; for the former see also Framework 3: National Urban Policies and for the latter, Framework 7: Urban Economic Development Strategies)

While we strongly agree that healthy municipal finance is essential for thriving cities, we would also like to see a stronger acknowledgement that municipal finance is not an end in itself. Rather, responsible public finances serve to improve the lives of citizens, the performance of local businesses, and slow the increase in environmental impacts.

Where we see opportunities to improve the current framework paper is in acknowledging the diversity of urban experiences around the world and providing more nuance in the different measures that are proposed. Understandably, there is a lot of ground to cover, however to make a stronger statement on municipal finance it would be helpful if the Framework would provide not only an exhaustive list of what measures could be implemented, but also a stronger statement on where these apply and how they might be implemented given significant barriers, in doing so strengthening the link between the Challenges section and the Implementation section.

An additional note on the structure of the framework: The organization into Challenges, Priorities, Implementation and additional focus areas is useful, and it makes sense that these should be “focus areas”. Yet, it would be useful if the Framework would somewhere explain to the reader why these headings were chosen and how they were derived. This is because five-six headings can be slightly unwieldy, result in some duplication, and at times risk reading like laundry lists of items. In terms of structure, much of “financial management” seems to fit into “Rules of the Game and Capacities” too. Perhaps they should be merged. If not, there are two major issues currently in financial management that are key to include in rules of the game -- citizen participation in budgeting; and general discussion on transparency, accountability, and monitoring. Also, in rules of game, in the implementation section, it would be helpful to mention the need to ensure that financial decision makers understand the policy sector context and vice versa.

While many of the individual bullet points in each of the sections are important, at present the paper does not attempt to draw out a hierarchy of measures; or which measures may be most applicable in different contexts (e.g. devolved vs. centralized systems). A greater reflection of

hierarchies, relative importance of measures, and applicability to at least a high level distinction of different urban contexts would strengthen the paper considerably. Equally, it would be useful to include a reflection of how the “special issues”, which are currently treated separately, could be mainstreamed into municipal finance.

Finally, this paper seems less connected to the Policy Frameworks, but it is a key linkage to move from concept to implementation because of resource needs. Moving forward, the Policy Unit should work to integrate and link to other topics.

POLICY PAPER FRAMEWORK 6 – URBAN SPATIAL STRATEGIES: LAND MARKET & SEGREGATION

On the whole, this Framework includes many essential issues. It links to the Sustainable Development Goals and integrates well with other topics. It reconceptualizes the rural-urban dichotomy into a continuum and reflects that in institutional structures and relationships. Also notable is the emphasis on the role of reciprocal community in self-help slum upgrading and the emphasis on importance of the function of land markets, including informal land rules and common goods.

As the policy unit addresses the various aspects of sustainable development, several of the directions indicated are universal and logical such as inclusive and sustainable urbanization, participatory processes, environmental protection and social justice etc. When it comes to indicators and priorities however, there is a gap in what cities in the developed world would choose and what emerging and under-developed cities would choose. Additionally, the recommendations could be layered to hold greater relevance to cities at different stages of development. Also notable is a lack of discussion around localized innovations and alternates. Case studies, which would help illustrate the individual challenges and solutions applicable to local contexts are conspicuously absent. This is a challenge across the board in the Policy Frameworks, and should be considered in future drafts of the Policy Papers.

Also with regard to considering local contextualization, universal indicators are often not applicable across board. For example, the city of Mumbai has a per capita open space of 1.09m². This is considering open spaces that are completely public and are accessible to all such as playgrounds, recreational grounds, parks and gardens, and even promenades and beaches (Draft Development Plan - 2034). If a standard such as a minimum of 9 m² green space within a 15 min. walking distance is recommended, it becomes unrealistic to achieve in the near future.

While private exclusive land ownership may not be preferable, involving private developers in developmental works should be addressed. With municipalities and development agencies often being resource deficient in emerging and under developed economies, competent and equitable contractual mechanisms could be formulated to attract private capital at reasonable profits.

Public-Private Partnerships and other alternates could help in city building activities such as the construction of affordable housing and infrastructure etc.

There is a need for alternative land policies in light of market failure, as mentioned on page 16. However it is not just because of land overutilization or underutilization, but also due to information asymmetries which should be mentioned.

Public space has been rightly acknowledged in the Framework but could be further explored around hierarchy of distribution such as size, nature of use, distance and targeted age group. The nature and use of public spaces could also vary at different times and be versatile to multiple uses based on the needs of the community that it serves. Overall, however, public space is overemphasized in the Framework. While it is important, so are other things, and the number of references as well as space dedicated to public space takes needed oxygen from other areas. Insufficient attention is paid to the challenge of horizontal and vertical cooperation within government to align policies on land.

Priorities for spatial planning can vary widely based on stage of development and local context. Capacity and capability, for example, are key priorities in developing countries. For example, in India there is inadequate planning and municipal staff per capita of the population and inadequate technical capabilities. Policy in India does not mandate any kind of spatial or urban design plans at local area scales. These are critical first steps that are needed to enable participatory processes. Participatory frameworks would subsequently need to ensure parity of gender, age, socio-economic status, and other demographic variants.

Another key priority highlighted in the Framework is security of tenure. The rights of landless laborers whose livelihoods are dependent on a particular parcel of land that is being acquired for developmental purposes must also be recognized. Rehabilitation and resettlement components for landless project affected people should be considered in schemes of land readjustment as well, which seems to be one of the policy directives.

WRI sees several key opportunities for improvement of the Policy Paper Framework. A case study approach would better highlight what has worked in a particular context given several other determining factors present in that context. This could be a logical next step to setting out universal principles and policies.

Accessing planned and serviced land for developmental purposes is a critical need in rapidly urbanizing contexts such as India. While the Framework discusses this growth in urban footprint having massive land delivery and management implications, innovative alternates need to be addressed to access land. These include land readjustment such as Town Planning Schemes and Land Pooling Schemes, PPP models, and the use of Transferable Development Rights, among others.

While participatory mechanisms have been referred to in planning process, they should also be employed when it comes to implementation and maintenance of projects such as public spaces.

Participation can be addressed to encourage community ownership and hence upkeep of the space. Other means of revenue generation should also be explored within public spaces to lessen the burden on resource deficient municipal agencies.

Public spaces should also be viewed as opportunities to house ecological and physical infrastructure as an added layer. Such a provision to house civic amenities while maintaining the recreational nature of the open space will further enhance its multi-functional value and be a sustainable practice.

In the conclusion, it would be useful to focus on guidance; governance, legislative and financial framework for both growing and shrinking cities; and interesting proposal for IP Sustainable Urbanization for follow-up. It would be wise to link these explicitly to tracking the relevant SDGs.

POLICY PAPER FRAMEWORK 7 – URBAN ECONOMIC DEVELOPMENT STRATEGIES

The Urban Economic Development Strategies Framework explicitly mentions the other Policy Units and shows the linkages between the issues. However, two issues are overlooked or insufficiently covered in the discussion. First, the discussion on urban sprawl and inefficient land use on page 6 talks about density as a good thing, but then talks about congestion as a negative. This discussion should be clarified, as density and congestion can be conflated by many non-experts. It is suggested that the conversation focus on “connected density” to solve this challenges. Second, the discussion on governance on page 8 should mention alignment of public finance and public sector capacity, as this alignment is a key challenge.

There are several areas that would be well served by increased attention or clarification.

In the introduction on page 9 and mitigation of critical constraints, as well as in effective exploring of synergy and linkages effects, mention should be made of promoting management approaches that value knowledge and their knowledge, which is often missing in prevailing management styles.

When discussing the working poor on page 12, it would be useful to add a sentence reading “upgrading plans need to take this reality into account.” The last bullet on the page should add a mention of rental market. Also, helpful to include would be “and other key services” when

talking about proximity to public transport. While public transport is the top priority, proximity to other services to negate the need for transport and enable citizens to walk is more sustainable.

In the discussion on taxation of land values on page 14, it is recommended to highlight the capture of increased value resulting from public investment.

On page 16, increased attention should be given to information sharing with residents and other levels of government and to the idea that some services may be better managed at a regional or metropolitan level than at the local level.

When discussing Compact Cities, the Policy Unit may be well served by referencing OECD, 2012, “Compact City Policies: A Comparative Assessment” in OECD Green Growth Studies series. Increased focus should also be given to connectivity, echoing the idea that “connected density” perhaps would work. Mention should also be made of the provision of more sustainable financial infrastructure.

Lastly, crowdsourced data and community efforts should be included on page 21 in the discussion on monitoring and evaluation mechanisms.

POLICY PAPER FRAMEWORK 8 – URBAN ECOLOGY AND RESILIENCE

This Framework approaches resilience from a holistic perspective. It appreciates the interactions between livelihoods, wellbeing, natural ecosystems and socio-political drivers. It could be well served by greater emphasis on the role of distribution of resources and social equity, and how these factors contribute and maintain social inequality, which ultimately drives vulnerability. Adequate trainings and capacity building efforts will enable different stakeholders (i.e. private, public, women, the elderly, the marginalized, indigenous peoples, civil society etc.) to engage with the knowledge and institutions thus created.

Additionally, the Framework has a very wide scope, with many challenges and opportunities and next steps listed. However, not all are directly related to the overlap between urban ecology and resilience, and thereby the document loses its ability to have a focused impact. For example, under 2.b.4. “Planning”, items i, vii, viii, ix and x are more specific and critical to urban ecology and/or resilience than the others, and if these were more focused, the document could be more helpful. Clarity could also be used around the two central topics of the Policy Unit; the Framework makes the case for the overlap between urban ecology and resilience, and while these fields do have overlapping characteristics, not much has been included about what is overlapping and importantly, what is not – and this is also not reflected throughout the

document. There are many points covered in the paper that don't reflect his overlap, for instance references to resilient infrastructure.

The Framework would be well served by taking a longer term view of the urbanization process and its associated resilience challenges. There is little mention of long time horizons in the document, which is a critical issue for both ecological improvement and resilience building, especially considering incentives and monitoring over a long time horizons. The document seems to idealize urbanization a little, and portrays it as a very structured and malleable process when it is in fact a very uncertain, organic process. The recommendations and list of key transformations would improve if they reflected the organic and uncertain nature of urbanization. Urbanization is driving two phenomena world over—one, the migration of rural people to urban areas, and two, rapid expansion of urban areas into existing and self-sufficient rural landscapes. These trends are resulting in a massive capacity gap, where rural migrants/residents are required to develop new skills to take up urban jobs, or improvise their livelihoods to continue their rural livelihoods, but in more resource efficient ways. Similarly, planning institutions and administrative capacities need to be augmented in small cities to enable sustainable and resource efficient urbanization.

Data that can support resilience building is also a critical need, but ultimately resilience requires a shift in attitude and mindsets, which data can help inspire. There needs to be a mix of incentives, mandates and awareness building to elevate the importance of resilience in urban planning and policy making. There is also a need to highlight the importance of a robust monitoring, evaluating and learning process to continuously improve the planning and implementation process in cities.

There is an opportunity to highlight the role of retrofitting as a strategy to transform cities. The introduction mentions that “seventy percent of the urban infrastructure that will exist in 2050 has not yet been built, so there is a significant opportunity to create new urban landscapes”. It is important not to omit the role that retrofitting existing structures has to play, as this strategy especially creates benefits in temperate countries. In mega-cities that are rapidly expanding into peripheral rural landscapes, planning institutions assume a largely urban vision for rural settlements invested in primary, climate dependent livelihoods. To enable a sustainable and equitable spatial transition from rural to urban, planning authorities need adequate capacities to plan for rural communities that are resource dependent, socially and economically weaker, and live in fragile ecosystems. Hence, addressing the capacity gap at the rural-urban interface to plan for urban transformation is essential.

The vision section that precludes the list of challenges is very comprehensive and provides a great vision for our Future Cities. It could be strengthened by highlighting the opportunity for passive design, ecological technologies (solar pumps, solar heating, rain gardens, and rainwater

harvesting), and zero carbon design, i.e.: *“The future city should aim for zero carbon design and integrate passive technologies.”*

Overall, WRI agrees with the key challenges areas identified but finds that Financing as a key challenge was missing from the list. As mentioned above, it is also unclear if this document is supposed to cover only those challenges related to the overlap between urban ecology and resilience, or all challenges related to both. It seems to be the latter, in which case there are so many challenges identified that they need to be prioritized in order to make progress in a systematic way. Not all the challenges (and opportunities and recommendations) can be implemented at one time, and the paper would benefit from prioritizations and/or sequencing. Prioritization is also important because there can be trade-offs (e.g. point i under Vision: a city may not be able to simultaneously address long-term economic development, social equity and environmental quality to the same degree).

To implement an ‘ecosystems oriented approach’ key livelihood resources (natural, physical, social, human, financial, and political) should be identified, impacts of climate change and unplanned urban development on these resources should be quantified, and relevant resilience actions should be mandated. As cities continue to grow in area and density (due to natural growth and/or migration) planning authorities should be required to adopt an urban environment management approach addressing natural environments (coastal regions, lakes, rivers, alluvial cultivation belts, forests, and hilly terrains), infrastructure provision (transport, housing, amenities, and communication), and essential livelihood resources (food, water, soil, markets, labor, and finance). This is possible with adequate interdepartmental coordination, community participation, and capacity building at all levels.

Section 1.b.1 (Governance) does not adequately address a key challenge facing developing countries and emerging economies, namely that of corruption and weak institutions. Public perception and trust in government institutions is extremely low. As a result, perception of environmentally-positive policies can be tarnished by a poor governance track record. For example, this is a particularly relevant governance challenge facing Brazil. While Fernando Haddad, the current mayor of São Paulo, has implemented an array of pioneering urban policies that have transformed the city’s urban mobility network, his party’s huge corruption scandal the big oily (*Petrolão*), has set the public against any action taken by him, simply due to his membership of the Worker’s Party (PT).

A further governance element is the lack of credible, high-quality data that can accurately inform policy decisions. In Brazil, data is not always public nor open, and many third party service providers, such as municipal bus companies, do not always make key data public or hand it to the authorities. What is more, many municipalities in Brazil lack the hardware to correctly collect, store and analyze data.

Section 1.b.2 (Policy): These were also comprehensive. To make them even more relevant to emerging economies, the Policy Unit could opt to include the lack of a clear, transparent and

well-communicated/accessible policy development process. What is more, many policies are not well-informed by research and evidence and can be influenced by industry standards and needs. For example, at the height of the state's worst drought in history, the state government of São Paulo passed a new law that would increase deforestation along water sheds, which would invariably contribute to a worsening drought, to the advantage of agribusiness and farmers.

Section 1.b.3 (Capacity): These were well structured, however there is space to explicitly address that environmental concerns are not a priority issue when basic needs are not met. In São Paulo, ecosystems are being compromised to build social housing at large scale, thereby killing off vital water spring sources and green space. Further, municipal planners and staff do not always have strong knowledge and skills in environmental and ecological issues.

Section 1.b.7 (Culture, livelihoods and consumption) is good overall. The Policy Unit could consider including the importance of social cohesion and the municipal's opportunity to create more cohesive societies. It failed to address the impact of crime and security, which can be a huge limitation to create public spaces and green areas (as these would require greater investment in security in a country with higher crime rates like Brazil). While a clear process for top down planning from – regional, city, to local scales – is well developed and already being implemented, a formal process for bottom-up planning needs to be co-developed to ensure community concerns and local aspirations for safety, security and overall resilience are addressed by the planning process.

The Policy Unit could also consider specifically highlighting how the linear consumption pattern (extraction, production, shipment, usage, discarding of products) creates significant externalities (waste, pollution) and downward pressures on environmental resources. It is important to underline that common industry production processes are a key source of environmental and ecosystem degradation.

In general, Section 2.b.2 (Policy) focused sufficiently on the short-term urgency of rendering society and the environment resilient. However it did not make a sufficient link to how policies will not only help urban communities and ecosystems recover, but also continue to flourish. The Policy Unit could consider how policies will link to sustainable development and contribute to create socio-economic opportunities and drive down social inequity and create social mobility in the context of climate change.

Section 2.b.3 (Capacity) is in general very comprehensive and could benefit from a further bullet point on investing in key existing institutions, in particular the civil guard/defense, emergency response and public health agencies. Urban and urbanizing settlements have existing adaptive capacities and technologies to manage contested resources, climate uncertainty, disaster risks, and extreme health events. These capacities and the kinds of technologies must be mapped, understood, and augmented instead of resorting to new technologies that are not native to the area. For example, water scarcity and unequal access to clean water has always been a challenge in Indian cities, especially in urban poor communities. Residents often have informal or formal

means to access water through political, religious or market linkages. Moreover, engineers in the water department who actually work on the ground with communities and technicians understand the existing infrastructure, its challenges (or deficits), and have the ability to inform reforms to augment the existing system of water provision. Hence, capacity building trainings or new technological innovations must include ground level actors, their recommendations, and their ease of adopting/ adapting to reforms.

Priorities stated in this policy framework cover the necessary indicators of sustainability, resilience and urban ecology, and are focused on clear goals, commitments and actions. However, it would be useful to elaborate upon the capacities gap within the governance sector, specifically highlighting the need to build both urban administrative capacities while inculcating a culture of respecting and working with rural aspirations. For example, in India administrators and bureaucrats mostly receive their training in remote rural villages and are transferred to complex urban environments with extremely high densities, and resource and capacity deficits, resulting in gaps in urban environment management. Hence, urban administrators should be trained in urban areas exposed to different urban conditions and challenges.

Conversely, municipal planners and engineers treat natural resources like lakes, rivers, and rivulets, within city limits, with hard concrete edges building ‘urban parks’ around water edges. These often result in a contamination or drying up of these water bodies. Since city dwellers are serviced with piped water the contamination of these sources doesn’t impact their lives as devastatingly. Urban villages within the metropolitan region are highly dependent on their natural water resources for their life and livelihoods; a similar treatment to water resources in urban villages inhibits their resilience capacities making them more vulnerable. Hence, planners and administrators need to develop a sensitive approach towards urban ecology management in rural and urbanizing areas to conserve livelihood resources for dependent communities.

Section 2.b.8 (Culture, Livelihoods and Consumption) has the potential to address the opportunity for cities to stimulate innovation and entrepreneurship. For example, this section could address the role that cities have to play in encouraging a sharing economy (through shared transportation, for instance). The role of job security and employment should be addressed as an important driver to create resilient and cohesive communities that respond well to shocks and are able to recover quickly.

Some additional notes and recommendations that may improve the impact of the Policy Paper:

- There are multiple institutions and agencies that constitute a structure of governance in cities, and metropolitan regions. Integrating civil society members, parastatal agencies, religious and community groups, and political parties into the process of conceptualization of projects and resilience strategies, will enable faster and long-lasting decision making.
- The crux of this document is the Key Recommendations, and it would help to better understand what an “enabling framework” applicable to all cities would really look like, and how it could be implemented across cities globally.

- Section 2.b.4 (Planning) omitted the need to integrate climate data and risk assessments into urban planning.
- Much more action at the city level is occurring and the document notes that “ex ante evaluations for interventions to identify expected and unexpected, direct and indirect impacts” should be done. It is especially important to note that the “additionality” of adaptation benefits are harder to prove, and the discussion of whether interventions that have climate co-benefits are adequate (versus adaptation interventions with other co-benefits) is an important one to have.

POLICY PAPER FRAMEWORK 9 – URBAN SERVICES AND TECHNOLOGY

The Transport and Mobility section rightly emphasizes the role of public transport, walking and cycling, as well as the compact development that can help facilitate these modes. WRI supports the embrace of the sustainable modes of transport, as our research and work shows that they can reduce emissions, reduce road fatalities, foster physical activity, reduce exposure to air pollution, and improve overall quality of life when they are of high quality. It would be useful to also include walking and bicycling in the general policy statement on page 10.

This, however, presents a challenge to cities to actually provide high-quality public transport, walking and cycling infrastructure. We suggest that the role of high-quality sustainable mobility infrastructure be emphasized, particularly by editing the following bullet point as follows: “prioritize sustainable modes of transport, by supporting higher quality public transport, walking, and cycling infrastructure and services, and manage the demand of private motorized transport (sustainable urban mobility plans).” By higher quality, we mean safe, secure, efficient and well designed to address citizen mobility needs. If “non-motorized” transport is to be a priority, we may need to call it as it is, walking and cycling, as this is largely the two modes that make up non-motorized transport.

It should also be noted that in many low and middle income countries, residents already have access to public transport, either in the form of jitneys or are captive walkers and bicyclists that would otherwise prefer private motorized modes or improved public transport. Cities can explore the practical use of tools, such as mapping informal transit routes, to help measure access to public transport, as well as improve it to better serve residents. When discussing the informal sector, it is essential to include the concept of placing user needs first, as attempts to improve the informal sector often ignore that the ultimate goal is to provide good quality services to the user.

In order to promote the full range of sustainable mobility, it will be necessary to shift financing and create new financing mechanisms at the local, national and international level to allocate resources toward high quality public transport and particularly walking and cycling facilities. In the section on “adequate funding,” it is recommended to add “consider the role of national governments in enabling conditions and providing direct finance, as well as international

funding mechanisms”. It is unclear what is meant by “and also indirect beneficiaries,” as taxpayers are already taken into consideration. One solution put forth is that national governments can enable local authorities to collect funding from demand management mechanisms and charging externalities like congestion, air pollution, and traffic incidents.

We also reference the growing challenge of motorcycles to sustainable and safe mobility. The ITF indicates that regions such as Africa and Latin America will experience very large increases in motorcycle fleet sizes, with Asian cities also with already (and still growing) fleets (ITF Transport Outlook 2015). This poses a significant challenge to the above goals, particularly in competing with public transport and bicycling, as well as posing a grave road safety trend. Local, national and international governments will need to understand and address these issues.

It is also important to include within the text “coordination beyond municipal boundaries through the creation of adequate planning, regulation, and oversight mechanisms for urban conurbations”.

In the section on Public spaces in the “urban services” framework, on page 14, it is suggested to include the context of how cities can provide public spaces to residents, from the need for identifying public space inventories and planning for a range of resident needs and public space types. For example, most public space planning today involves mapping the inventory of spaces a city has in order to identify how it can improve the system, as well as compare to other cities. In addition, value has been found in a range of public spaces, from the ecosystem services and interface with nature found in natural areas and large parks to the vibrant activities found in central squares to the recreational value of neighborhood parks and playgrounds. Therefore, we suggest to add the following:

- Establish inventories, preferably in GIS, that can be used to assess where public space is being provided and where new spaces can be created as well as how cities can use existing spaces (e.g. schoolyards or excess street space) as public spaces available to all residents.
- Aim to provide a spectrum of public spaces available to residents and fitting to residents’ needs and desires, from natural areas and neighborhood parks to plazas and sidewalks.

POLICY PAPER FRAMEWORK 10 – HOUSING POLICIES

Overall, this paper is a well-conceptualized, comprehensive approach that takes into consideration pertinent elements to build an argument/align with the ‘Cities for All’ concept. It provides wonderful linkages to important issues covered by other Policy Units, and eloquently shows how essential the linkages are for effective policy and progress. There is good focus on

the most vulnerable, which is essential to equitable, sustainable cities. It also shows progress on attention and awareness of the issue, while not downplaying the need for significantly more.

The biggest factor missing in the challenges section is the link of housing location to connectivity. While the paper says that “accessibility to services” is important, the indicators don’t seem to link to those services, and transit (which can provide access to other services) is not mentioned at all. Additionally, pointed focus on infrastructure and energy seems to be lacking and need to be included as they are very crucial interlinks to the provision of affordable housing, especially in the developing world.

The “habitability” discussion is especially useful, mentioning the local of social housing, and the budget shortfalls that impact housing. The discussion on density could be strengthened by talking about “connected density” as it just mentions density within the accompanying services that makes density work.

In the discussion on housing affordability, the role that insufficient development of mortgage market has played in the growth of informal settlements is overemphasized. While it is one part of the story, it certainly is not the whole story. The figure on page 8 stating that the mortgage market accounts for just 1.5% of mortgages worldwide lacks context. It is unclear which mortgage market is being referred to, and it is illogical to state that mortgages, which are the items under discussion, are only part of the mortgage market. Additionally, that figure is not found in the referenced text.

However, the discussion of incremental housing, social rental, the challenges of high eligibility requirements for low income potential purchasers, and the focus on security of tenure are welcomed and useful.

While the Framework covers the key challenges of affordable housing well, its perspective seems rooted in academic references that perhaps do not reflect country-specific challenges. For instance, the specific legal and financial complexities of India are not very clearly reflected in the Framework. Conflating the challenges in Latin America with those in the India may not be accurate or desirable. Moreover, the unique financial systems/tools/mechanisms in different geographies, the relevant implementation mechanisms, and locally-specific tenure security challenges need more in-depth scrutiny in order to reflect the problems more accurately due to the complications and inherent pros and cons.

The proposed outcome and process indicators for accessibility should be adjusted to include access (and perhaps improved access over time) to key services, starting with transit but also health, schools, water, sanitation and the full range of services. Other process indicators should be % increase in projects/efforts in improving access in these areas.

While the Framework nicely lays out key transformations, external factors, targets and actions, it may be a bit unrealistic or impractical to “solve” the problem given the scale of numbers presented, even though the numbers probably are realistic in terms of the scale of the challenge.

It is also necessary to recognize that the rural will still remain a focus from a political and policy standpoint for many countries. Creating solutions to balance urban needs with the political pull of rural development, especially in developing countries, is of utmost importance.

Finally, a truly country-specific research/focus which addresses disparities and does not lump all the geographies in the 'global south' under a uniform umbrella would help make this framework more impactful. Recognizing that certain areas in certain countries need more attention or lack proper policy, tools, and engagement due to the often present dichotomy in the system, especially for implementation would greatly elevate this study further. For example, the habitable land/population ratio in India is very low. Thus, in light of new federal missions such as the Smart Cities and Housing for All, changes that could be beneficial to creating affordable housing for the most citizens and governance mechanisms that must change or be implemented in order to achieve the national goals should be investigated as important background material.