

Comments from the European Union and its Member States on the Policy Paper Frameworks

As a contribution to the preparation of the Habitat III Conference

Preliminary remarks

This contribution to the work of the experts of the policy units builds on comments from a technical nature and does not prejudge the position that the EU and its Member States will take on the zero draft outcome document and the ensuing negotiations.

The following specific comments focus on a selected number of policy papers. The comments previously submitted in response to the issue papers remain valid. The short time frame provided to analyze the various, often too lengthy, papers made it a challenge to mobilize relevant experts and gather their contributions. Efforts were made to focus comments on those areas where a better definition of the challenges, solutions and means of implementation were considered of greater added value. A specific reflection on the mobilization of resources needed for implementation will also be needed and the regional redistributive model of resource mobilization for funding project in less favored sub-regions could provide some examples of good practices.

A reference to the content of previous plans of actions (Habitat I and II) could have helped underline the innovative aspects of the new Habitat Agenda.

The New Urban Agenda should contain concrete suggestions to tackle the challenges raised by an unprecedented rapid growth of urban populations. It should promote an integrated strategy of sustainable urban development, fully consistent with the 2030 Agenda and the climate change agreement. Building on a mutual reinforcement between the economic, social and environmental dimensions, this new Agenda should draw on and share the best practices from cities that are: innovative, efficient and productive, green and resilient, socially inclusive; and ensure that good governance, human rights and gender equality remain core considerations.

General comments

As a general comment with regard to all the policy papers, it should be noted that there is significant overlap in the priorities presented. Therefore, there is a need to align those overlapping priorities in order to ensure a coherent and coordinated approach to areas that are important under more than one area, thus setting the scene for a consistent set of actions under the New Urban Agenda.

As regards the suggestion of establishing a **High level panel on urbanization**, it will need to be assessed carefully, against the need to ensure an effective linkage between the New Urban Agenda and the 2030 Sustainable Development Agenda and its review mechanism.

1 THE RIGHT TO THE CITY AND CITIES FOR ALL

The **right to adequate housing** is recognized in international instruments. Despite global recognition of the importance of adequate housing, as part of the **right to an adequate standard of living** and to human welfare, almost a billion people live in slums and more than a hundred million are homeless. With increasing urbanization we are facing growing challenges, including rising inequalities, poverty, migration trends, etc.

The Habitat III Conference presents the opportunity to further discuss and more importantly, further elaborate, concretize and give meaning to the commitment to provide adequate housing within the 2030 Agenda.

The report of the Special Rapporteur on the right to adequate housing as a component of the right to an adequate standard of living highlights these important developments, which will also guide our discussions in the preparations for the Habitat III Conference. Policy Paper number 1 makes the case for the **Right to the City** without clearly explaining what such a right would entail. It is not clear whether, in so doing, it draws on the work of the UN Special Rapporteur.

A more systematic reference to various principles flowing from human rights (rights to information, participation, transparency, accountability, redress, empowerment, equality & non-discrimination etc.) which broadly contribute to the realization of sustainable development would have been helpful.

In addition to the effects of **spatial segregation** or gentrification, the effects of informal settlements on spatial planning should be taken in account. They go hand in hand with social inclusion, which explains overlaps with the related Policy Paper Framework. Ways to foster **public participation** in the design and implementation of policies could be more strongly explored and documented. **Access to public spaces** and the focus on vulnerable populations and the issue of safer cities, especially for women and vulnerable groups, while rightly making the link with root causes such as social inclusion, do not encompass other important policies that should be sensitive to the local context,.

The **mainstreaming of the human rights dimension** should guide the definition of priorities and recommendations, not only on housing, social inclusion and governance but also in other areas including access to services and infrastructures or decent work.

2 SOCIO-CULTURAL URBAN FRAMEWORK

The shaping of an inclusive socio-cultural urban framework is connected to a large extent to the rights based approach supported in Policy Paper Framework 1 and the general concern of good governance and participation in the design and implementation of policies.

Among specific aspects to tackle, integration of migrants and refugees and the promotion of culture as a driver of social inclusion and cohesion, are key.

Social inclusion will benefit from the respect towards the **diversity of cultures**, without giving up on fundamental human rights, such as freedom of expression, equal rights for women and men, non-discrimination, etc. and on the objective of universal access to quality basic services, and taking into account the "genius loci". In pursuing the objective of making cities more inclusive achieving the "people-planet-prosperity" nexus, **digital communication** should be considered as an accessible means.

The concept of preservation of **cultural heritage** should be completed with the documentation, conservation and valorization dimensions. Moreover, it is important to include the need to protect the natural, environmental and cultural resources not only in the cities but also in their vicinity. The role of educational institutions and universities and research centers, including as observatories of the urban landscape and the urban context, places of encounter, productivity and employment, should be mentioned.

3 NATIONAL URBAN POLICY

Good urban governance is enabled by a **legal and policy framework at central level** (national urban policy) that both enables local authorities to effectively implement national urban policies and empowers them as policy makers benefiting from a sufficient level of autonomy in decision-making in accordance with the principle of subsidiarity. The resulting **multi-level governance** system requires political will from all echelons of government. Inter-municipal co-ordination typically requires support from higher levels of government.

There has been increasing attention in recent years to the benefits of governing cities as **functional economies** rather than administrative units. The **Functional Urban Areas** method, applied in the framework of the European Union's regional development, rely on collaborative place-based approaches that allow for a closer relationship between territories and their economic base, which can combine planning and development policies.

Besides the challenges identified by the Policy Unit, a NUP, in order to respond adequately to the challenges and opportunities of urbanisation, should support **urban poverty reduction** and promote the role of cities in sustainable development. However, there is often a lack of information both at national and local on urban poverty, so that **comprehensive studies** are required in order for this complex issue to be addressed in a NUP.

When developing the NUP, it is suggested to adopt both qualitative and quantitative analysis methods to conduct adequate and **effective assessment** of the status quo, which should cover several areas.

Defining the scope of a NUP and achieving **co-ordination** across sectorial policies needs to be underlined as highly important. NUPs need to provide the structure for coordination among ministries to ensure a multi-sectoral approach for cities, and support cooperation between national and local governments to allocate the necessary resources for public and private interventions.

In addition to the suggested **indicators**, additional key criteria could be: ensuring the use of spatial planning tools; preparing holistic land management; protecting public space and cultural and natural heritage conservation/restoration and rehabilitation. In addition, instead of "increasing local fiscal space" it is important to clearly **define the local fiscal space**.

Besides the financial and legislative capacity, policy priorities should be defined keeping in mind a realistic interpretation of the **institutional capacity**, including an assessment of the technical and managerial skills of the existing human resources, and of the understanding of the national leaders and decision makers and other stakeholders on the role and value of sustainable urban development.

We fully agree on the transformational character of the process leading to the NUP (not only the product) and support most of the **priorities** suggested, including connectivity among cities, urban, peri-urban and rural interaction (including management of ecosystem services) and the need for support from the central government.

NUPs should also focus on the need to define **clear financial mechanisms** to facilitate national and local authorities' access to financial resources; to attract domestic and foreign direct investment; to establish and improve revenue generation and collection systems at sub-national level; and to engage in a transparent and productive way with the private sector. There is also a need to develop and implement **monitoring and evaluation** mechanisms (including disaggregated data) to monitor progress and to document impacts of NUPs. This includes the need of expanding and updating the information of the national and local cadastre.

Key recommendations for action should aim at "**integrated sustainable urban development**".

While **coordination** across all governments' departments/sectors, and between national and local government and other relevant stakeholders/institution (including the academia and utilities providers) is highly important, this coordination is much more than the sharing and exchange of information. It implies an **integrated approach to decision-making** so that each sector reinforces other sectors within and across different departments. Another asset for success is the existence of a good **leadership** within the national and local governments, aware of the short and long term benefits of sustainable urban development.

This includes in particular **support national governments** in developing institutional (governance, administrative organization, human resource development) and financial reforms to support the development and implementation of a NUP. In particular, support is needed to promote well-structured partnerships with multiple stakeholders (private sector, other levels of government, civil society, local communities) in decision-making and participatory planning.

Support is also needed in the establishment of **proper land management and planning systems**, as they are critical to establishing the conditions necessary to improve security of tenure and more effective implementation of local planning laws and investments in services. The development and implementation of a national and municipal geographic information system, for instance, and the effective coordination of institutions involved in urbanization and the provision of infrastructure are key assets.

NUPs also foster **economic activities** and employment opportunities, along with equity and social integration in order to improve global living conditions of citizens, and to promote inclusive and sustainable economic growth for all.

We agree on the recommendations on financial resources. **Transparency in budgetary processes** should be added. The adoption of a clear and transparent policy and legal framework for public-private partnerships, in order to leverage private sector investments, is necessary. Key is also the establishment or update of national and local cadastres that brings together physical and fiscal information pertaining to the land of all the main cities.

4 URBAN GOVERNANCE, CAPACITY AND INSTITUTIONAL DEVELOPMENT

For local governments dealing with sustainable development on the ground, **the New Urban Agenda cannot be separated from the 2030 Agenda**, particularly SDG11. Local governments have a number of particular characteristics: a) **proximity** to citizens; b) link to a **geographical area**; c) flexibility and **responsiveness**; d) ability to promote citizen **participation**. This gives them the potential to play a unique role in the implementation of the New Urban Agenda.

Political commitment to the value of localization is needed in the design, implementation and monitoring stages of all international agendas. Policies/actions proposed in the New Urban Agenda should follow a **territorial** approach that takes into account the broader regional context (peri-urban and rural areas). Affirming the centrality of urban development in the growth policies is also an important objective, currently included in the European structural policies and new forms of associations, possibly differentiated by area, can result from a review of procedures and performances of metropolitan and municipal areas. The establishment of **metropolitan cities** as a new level of local government can be seen as an opportunity to reform the administrative systems and adapt tasks, while ensuring an effective use of resources to respond to people needs.

Good governance at local level is necessary to achieve sustainable urban development and equitable outcomes. **Good urban governance** is enabled by various factors: First, a **legal and policy framework**, with accompanying financial resources at central level that both enables local authorities to effectively implement national urban policies and empowers them as policy makers benefiting from a sufficient level of autonomy in decision-making in accordance with the principle of subsidiarity. The resulting multi-level governance system requires political will from all echelons of government. Consultations and other forms of inclusion and commitment bringing together local institutions and private actors should also be promoted.

Second, the quality of local governance is also related to the way Local Authorities manage and implement public policies and services on the basis of **local policy-making processes** and interactions with other public institutions, citizens and private sector and through the allocation of available resources. Both at political and technical level, a sufficient level of capacity has to be in place to ensure efficient, accountable and transparent implementation of these local policies. Effective programming tools for managing urban governance in a strategic way are also necessary to integrate various roles, financial sources and institutional dynamics that can promote economic development. The topic of open data policies could be further developed, including with reference to new forms of collaborative governance.

Special attention should be paid to **land access** as a pre-requisite to sustainable urban development. Urbanization has a profound effect on land values, so it is important to ensure that municipal finance can benefit from the increased values of land in order to be able to finance services and facilities. Therefore, improving the administrative ability of Local Authorities to register land rights is important for the effective and efficient management of urban land (cadastres, urban property registers). Improving urban land will open property markets. Property and transactions will become more transparent and fiscally taxable, increasing fiscal capacities of Local Authorities, which is a prerequisite for developing urban infrastructure and improving overall quality of life.

6 - URBAN SPATIAL STRATEGIES

We agree with the comments provided by the Policy Unit on the **definition of spatial planning**, but consider this definition not complete and comprehensive. Spatial Planning, in fact, should be considered not only as a decision-making process that “*aims at facilitating and articulating political decisions and actions that will transform the physical and social space and affect the distribution and flows of people, goods and activities*”. Spatial planning should be seen as a **coordinated system of methods, approaches, practices and policies used by the public and private sector to influence and affect the distribution and organization of people and activities in spaces of various scales**. Spatial planning is at the same time a scientific discipline, an administrative technique and a policy developed as an interdisciplinary and comprehensive approach directed towards a balanced regional development and the physical organisation of space according to an overall strategy. The social and revenue generation aspects of land planning and management is also not to be neglected. Spatial planning gives geographical expression to the economic, social, cultural, ecological and environmental policies and needs of society.

It is also suggested to include the **cultural and ecological dimensions** amongst the contributions of spatial planning mentioned, by saying that spatial planning contributes to “*economic growth, social and cultural development and ecological and environmental sustainability and resilience*”. Spatial planning could be instrumental to influence the urban capacity of our cities to design sustainable and climate resilient cities in the (near) future.

The understanding of local leaders and decision makers and other stakeholders of the role and value of urban planning for local development is critical to support effectiveness in spatial planning. This participatory approach must be integrated with the establishment of transparent and appropriate institutional and legal frameworks. Urban design and a collaborative approach can play an important role in spatial planning. It works as a tool for research, debate and decision making and search for alliances.

Greater attention should be paid to the promotion of good multi-level **urban governance**, as a key ingredient to enable the development and implementation of plans that promote well-managed, economically prosperous, socially inclusive, safe and resilient, as well as resource-efficient and environmentally sustainable cities. Urban governance can be improved by strengthening or building the capacity of local authorities in integrated planning and management; creating a shared knowledge basis; developing effective, accountable, transparent

institutions; and by ensuring inclusive and participatory decision making. In addition, policies should be based upon **scenario planning and forecasting** instead of reacting to occurring events. Insight in the long-term effects of different trends (such as demography and economic development) on the physical environment can create more robust spatial policies.

Areas such as land use and tenure rights, access to basic services and network infrastructure (including urban mobility and solid waste management), access to public and green spaces, promotion of resilient, safe and inclusive cities are central. This **integrated approach** seeks to promote innovative, productive, green, compact, resilient and inclusive cities. Renewed focus is also proposed to be put on ecosystem services including food production; the technical, administrative and legal work concerning slum upgrading/prevention and social housing; as well as the protection and management of natural and cultural heritage, which help conserve regional and local identities and cultural diversities.

Clearly defined **financial mechanisms** should facilitate local authorities' access to financial resources; attract domestic and foreign direct investment; establish and improve revenue generation and collection systems at sub-national level; and engage in a transparent and productive way with the private sector. The need of developing and implementing **monitoring and evaluation** mechanisms to monitor progress and document impacts of spatial plans should also be highlighted. This includes the need of expanding and updating the information of the local authorities' cadastre.

Support should be provided to local authorities in developing coherent and implementable urban **management tools** and parameters (i.e., spatial plans, regulations), in order to provide the territorial framework within which governance tax and fee collection, infrastructure provision, environmental management, and service provision are prioritized and implemented.

The creation of a municipal **cadastre** or, if already in place, the expansion and updating of its information, as it is a prerequisite to update the properties' value within the municipal jurisdiction, to increase municipal revenues, and promote the participation of the private sector. The **definition of land tenure** needs to cover with more emphasis topics related to slum upgrading and prevention, land regularization and titling, including the need of developing and implementing integrated, gender-sensitive, methodologies to address these complex issues. More emphasis needs to be put on the linkages between land tenure and climate change, in particular on how resilience can be integrated in urban planning; and on how adaptation can be mainstreamed in land policies and building standards

The proposed **definition of Urban-rural linkages** is too focused on the function of rural and peri-urban areas as a suburban trading area for the cities, for food production and resource conservation. Rural and peri-urban development involves a wide variety of spatial trends, schemes and influencing factors. The definition does not consider the different dynamics that occur in the rural-urban relationship in densely populated regions and in sparsely populated regions.

Supporting positive economic, social and environmental links between urban, peri-urban and rural areas

While all the recommendations provided on this topic are valid, it should be pointed out that, in order to support positive links between urban, peri-urban and rural areas, it is essential to formulate and successfully implement regional development concepts in partnership-based collaboration. **National and regional developing planning** need to take renewed and innovative steps in order to satisfy housing, basic services, socio-economic and infrastructure demand from specific social groups (i.e., social housing, “compact city” approach, food production, creation of development corridors in relatively urbanised areas). For instance, spatial planning can support the developers and private sector to expand their offer, and cater for the emerging segments of society, contributing for instance to housing for the poorest. Spatial planning must take into account the functional urban area and/or metropolitan vision, including territories, which provide opportunities or risks beyond the administrative boundaries of cities and building on urban/rural linkages.

Local authorities need support to shift the approach of **informal economy**, identifying ways to improve services delivery (i.e., water supply and waste collection) while generating employment. Also, it is necessary to promote **decentralised polycentric development in rural areas**, through access to new information and communications technologies; good infrastructure facilities; and the establishment of stable and secure socio-economic conditions.

Access to safe, inclusive and accessible green and public spaces

In addition to the recommendations, we would suggest the inclusion of the followings:

- **Foster participation** with professionals, city administrators and interested citizens not only for green and public spaces development and implementation, but also for creating innovative arrangements for service delivery and for their operation and maintenance. For instance, local authorities need support in implementing public-private partnerships (PPP) for the design, management and maintenance of green and public spaces, including municipal parks gardening, parking lots, public sanitary facilities, and waste collection.

- **Mainstream security and crime prevention in urban planning**, making this a priority in the agendas across municipal departments, in combination with coordinated policy and action in spatial planning, transport and urban design. For instance, integrate transport and social infrastructure (i.e., libraries, schools, public spaces water and sanitation), in order to address issues of accessibility, inclusiveness and security.

Spatial planning and land

In addition to the recommendations, we would suggest the inclusion of the followings:

- Support local authorities in establishing proper **land management and planning systems**, as they are critical to establishing the conditions necessary to improve security of tenure and more effective implementation of local planning laws and investments in services.

- Support local authorities in developing or **strengthening land administration procedures**, the formulation, dissemination and implementation of urban plans for land use, zoning, urbanization, and environmental management. The development and implementation of a municipal geographic information system and the effective coordination of institutions involved in urbanization and the provision of infrastructure are required.
- Support local authorities in promoting and strengthening the **regulation of land tenure and land registration**. in peri-urban areas, including the development of methodologies for plot demarcation and land registration.
- Support local authorities in developing and implementing integrated methodologies for the **improvement of informal settlements** in high-density and peri-urban neighbourhoods, including integrated slum upgrading plans, in support of the regularization of land tenure.
- Support local authorities in the expansion and updating of information in the **municipal cadastre**, which is a prerequisite to update the properties' value within the municipal jurisdiction, to increase municipal revenues, and promote the participation of the private sector.

8 – URBAN ECOLOGY AND RESILIENCE

Concerning Urban Ecology, the paper makes a very comprehensive listing of practically every aspect that can go wrong with regard to urban development (war, corruption and endemic disease do not feature, but that would perhaps not be appropriate in the present context). The list includes unemployment, poverty and cultural/ethnic constraints: an eventual development of the paper will no doubt need to identify more precisely which elements from these and several of the other listed issues actually align with which Urban Ecology problem. As it stands, the paper seems to be so comprehensive that there may be simply too much taken on board, that any expectation of delivering effective remedies will inevitably be impossible.

A strategic identification of priority actions should be guided by the local conditions and capacities and resources. They should include emergency as well as preventive measures.

Despite the reasonable definition of Urban Ecology up-front, the concept of **nature-based solutions** is mentioned just once and buried somewhere in the middle. This is one of the apparent weaknesses. In order for solutions to be sustainable, the first choice conceptual basis for improvements to any urban setting, including post-conflict ones, should be to work in concert with the local ecosystem and with the examples that nature provides as durable answers to persistent challenges. Building with nature can help cities to adapt to climate change continuously, by using the formative power of nature. For that reason, nature-based solutions should be far more clearly championed in this paper.

There should also been made further mentions of **green-blue infrastructures**: spatial frameworks for combinations of long term water- and nature sensitive urban environments with short term economic and social initiatives. Open spaces in urban areas, wet and dry and vegetated, provide an alternative way to design synergies among nature, infrastructure and users. They provide a new balance among the maintenance, storage and discharge of storm water,

resulting in a stabilization of groundwater levels and stopping the process of land subsidence. Moreover, these infrastructures have proved to play a role in urban revitalization, economic development and community building by citizens. Just like nature-based solutions, it aims at delivering multiple ecosystems to people, and should be considered at the planning and designing phases of interventions. Green spaces' functionalities should be increased by nature-based solutions in order to deliver multiple benefits. The policy process should include landscape and visionary architects at earlier stage, and urban planning models should be systemic and include innovative multi-benefit solutions. It should be mentioned that private and public benefits will result, if urban residents are to be more directly consulted at an early stage. Finally, **green tax shifts** should be proposed as an example of financial instruments to support policies.

At first reading, the paper comes over as more than somewhat idealistic. It presents a learned treatise on what makes urban settings go wrong, presents a range of indeed well thought out but (among experts at least) somewhat off-the-shelf solutions. There should be a far more erudite effort to align types of urban setting (i.e. express some support for establishing an urban typology, as one further basis for progress) with problems typical of one or more urban types. Then, typical solutions for that type can draw more easily on experience with best practices. To an extent, the annexes proceed in that direction, but starting with a **typology** of cities and working from there seems more logical.

In line with this we would like make plea to identify specific categories of urbanization which require more attention. One example could be **delta cities**. Urbanizing deltas belong to the most promising regions of the world. At present, deltas are magnets for urbanization and economic development more than ever. In 2050, ca 650 million people will live in delta and coastal urban regions. In many nations, delta and coastal regions are the engines of the national economies with the highest contributions to national GDPs. At the same time, these regions are dealing with extreme vulnerability and face multiple threats related with increasing flood risk, water scarcity, ecological and economic damage. Therefore the challenge is how to combine sustainable economic utilization of these regions with a substantial improvement in the quality of life for all social groups. Urbanizing deltas offer excellent opportunities for smart combinations combining social, economic and environmental aspects of development which are of interest as an example for all cities around the world.

Following on from that, it is worthwhile considering equipping cities with a tool or system that enables them to very simply (i.e. using existing or cheaply acquired data) **benchmark** where the city stands at a single point in time. Only on the basis of assessing a situation at a single point in time can a fresh start be drawn-up – indeed an essential start-point if investment is to be sought. Moreover, a benchmarking tool can also be used again to assess either progress over time (again, essential for proving progress has been achieved) or for comparison with other cities of a similar type. This latter factor can also usefully generate sharing of best practices.

Where resilience is concerned, the framework should make better reference to the most pressing priority areas and related actions on urban resilience in the **Sendai Framework** for Disaster Risk Reduction adopted in March 2015. Sendai targets notably include the need to 'substantially reduce disaster damage to critical infrastructure and disruption of basic services, among them

health and educational facilities, including through developing their resilience by 2030'. It is also necessary to include both nature-based and technological as well as social solutions.

The paper does not include any vision on the **aspect of water in urban ecology and resilience**, whilst it is central to both. Many cities are located at either a river, sea or lake; and very often at the interface: delta-cities. Water links cities with its hinterland (for trade, but also for drinking water, water quality, flooding, etc.) as well as with different sectors, like energy, food, ecosystems. Urban water poses **opportunities** for ecology and resilience, as it adds to the recreational aspects and livability of a city, as well as to its trade/shipping opportunities, thereby increasing its economic position. But it also poses serious **threats**: the impact from **flooding** from river and seas is exacerbated by climate change, since the majority of its impacts are channeled through water (sea and river level rise; salinization; droughts; extreme weather events like heavy rainfall). Given the high concentration of people in cities – as well as economic activity – this can have disastrous results. Furthermore, many cities use groundwater for the provision of drinking water to their citizens. However, as a result cities located in areas with soft sub-soils, like in river/coastal/delta areas, face the issue of compacting soils, **subsidence**. Subsidence often occurs at a higher rate compared to sea level rise. The concentration of people also affects **water quality**, affecting the **access to clean drinking water** and human health. **Therefore, water should be included in urban strategies on urban ecology and resilience: integrated management of water (including on an energy-water-food nexus basis) provides a firm basis for urban development**

Furthermore, the paper may reflect better that the **city as being an entity not in isolation**, but dependent on regional circumstances. Especially in the case of water, it should be noted that water (flooding, pollution, etc.) does not respect the city boundaries. A river basin approach is key for achieving a resilient city. This is why we suggest adding the catchment area to the scale of the future cities and it is also something to consider in light of disaster risk governance.

The identification of challenges should also point at the lack of **disaster risk governance** and make a reference to the need to educate residents on consumption patterns. As regards planning, the risks associated with rapid and unplanned urbanisation, affecting the most vulnerable, should also be mentioned, as the challenge of integrating temporary, unplanned construction that results from a crisis. Furthermore, **planned urban development is also a means to increase resilience of cities** against natural and man-made disasters. Planning should be aimed at anticipation of expected or possible effects of climate change, i.e. by safeguarding the location of vital infrastructure like hospitals and evacuation routes; by putting hard infrastructure in place for prevention; creating multifunctional and open spaces, etc. Under key transformations related to governance, the following point should be added: 'Disaster risk governance should be strengthened through encouraging the establishment of necessary mechanisms and incentives to ensure high levels of compliance with the existing safety-enhancing provisions of sectoral laws and regulations, including those addressing land use and urban planning, building codes, environmental and resource management'.

In addition, the paper does not specifically reflect the need to invest in **prevention of disasters**, whilst investment in prevention of disasters is often proven to be a very sensible action as it decreases the number of livelihoods at stake and protects the economic assets of the city.

However, due to lack of discipline and long-term vision, financial resources are not always invested as such. Resilience should be at the core of urban strategy as it is a prerequisite for safe and economically viable cities, and preventive actions should be central to that strategy.

Overall, from the perspective of humanitarian aid, the document should pay sufficient attention to the fact that in the most vulnerable, least resilient and least developed towns and cities, a significant amount of **construction** happens in the recovery phase of a crisis, either by aid agencies, the private sector, or people rebuilding their own homes. Even if conceived as transitional temporary shelters, they often become permanent. As this is unforeseen construction, it's rarely integrated into the urban planning and long-term infrastructure plans that are mentioned as crucial in the document. And of course it tends to happen in isolation from urban development, according to humanitarian practice and within humanitarian cluster systems.

Other transformations should also include improving the mapping and **pooling** of existing knowledge, data and networks on urban resilience and risks; as well as recognising the importance of developing and implementing a **standard** to disaster-proof cities (e.g. ISO 37120).

9 – URBAN SERVICES AND TECHNOLOGY

We find the notion that “a system-wide perspective becomes particularly important as new infrastructure technologies evolve and become increasingly connected” and that “the elements are inter-linked and their co-evolution needs to be considered holistically if cities are to full optimize the overall benefits of evolving urban infrastructure systems” very important. We would therefore suggest **more emphasis on technology** in the framework since is a crucial element of urban infrastructures and offers many opportunities. The availability of (digital and physical) infrastructure and, open and the use of big data can be seen as important for the future development of cities and their ability to cope with challenges like sustainable mobility, water management, energy consumption, etc. We would in addition like to address **standardization** as a crucial condition for scaling. International standardization would very much contribute to strengthening the possibilities for the utilization of technology for urban challenges and should also contribute to create open (source) infrastructures or open ecosystems.

We would also like to emphasize the importance of policy learning in a triple helix context and approach. Urban infrastructure and technology demand cooperation amongst various stakeholders. Civil-society organizations and private organizations and individuals, next to the government must be given equal opportunity to develop and apply smart solutions. It also requires experimenting with and learning from the social possibilities of new technology through a ‘learning by doing’ approach and urban living labs.

Last but not least we would like to support and underline the importance of issues like urban metabolism and **circular economy** in the paper.