



**PERMANENT MISSION OF NORWAY
TO THE UNITED NATIONS**

The Permanent Mission of Norway to the United Nations presents its compliments to the Secretary-General of the United Nations Conference on Housing and Sustainable Urban Development (Habitat III), and has the honour to submit, herewith, Norway's written comments on the Policy Paper Frameworks, as requested in the letter of the Secretary-General of 4 January 2016.

The Permanent Mission of Norway to the United Nations avails itself of this opportunity to renew to the Secretary-General of the United Nations Conference on Housing and Sustainable Urban Development the assurances of its highest consideration. *HAS*

New York, 4 February 2016



Dr. Joan Clos
Secretary-General of the
United Nations Conference on Housing and
Sustainable Urban Development (Habitat III)

Policy Papers Habitat III – Comments from Norway, 31 January 2016

General comments

- The Policy Papers covers a wide range of topics and gives a thorough description of the challenges towards a sustainable urban development. They are a valuable foundation for the discussions leading to the New Urban Agenda. They raise several questions that are relevant also for Norwegian housing and urban policy.
- We find that the Policy Papers in general are well structured, and we appreciate the common format, with tables listing challenges, priorities and implementation. Separate units have prepared the papers, so that they in some areas are overlapping and repetitive. The papers could have been shorter and more to the point.
- There are many overlaps between the papers, so that we would not suggest the same distribution of topics to be taken forward to the Habitat III outcome document. However, we find that they provide useful input to an appropriate structure.
- There are some topics that in our view did not get the attention they deserve in the Policy Papers. We suggest that these topics are appropriately reflected in the Habitat III outcome document:
 - We were quite surprised by the lack of mentioning of **public health** aspects throughout the documents (although some aspects were covered in PP 9). We find that public health is a very important topic for the New Urban Agenda, and we see that an important objective for action is to promote good health and prosperity for urban inhabitants. An attractive, functional urban environment is important for well-being and public health. Furthermore, easy access to frequently needed services, clean air, and safe and welcoming surroundings are all important to city-dwellers. Qualities such as these also encourage people to spend more time outside. The policy papers also lack a focus on the individual health implications of poor urban planning and environmental deterioration, and how this affects urban citizens unevenly both within and between cities. We suggest public health as one of the main topics of the HIII-OD, and have included some specific comments in the following.
 - **Environment: urban risks and opportunities.** We see that **climate change** is mentioned in several of the Policy Papers. This is positive, but we find that the issue could be more elaborated, explaining some of the specific risks to cities, including sea level rise, extreme events like heat waves, floods, storms, droughts, and health aspects such as disease outbreak etc. Preparing for and adapting to such impacts, and preventing the worst scenarios is also a fundamental part of urban planning, which could have been better covered in the PP, We further believe that there are additional environmental risks that deserve more attention. This includes **air pollution**, which is the second risk of mortality in the world at the moment according to the WHO with 7 million deaths annually. Ambient air

pollution is an enormous urban problem, only 12% of the world's cities have air quality that meets WHO's guidelines. but the issue is hardly mentioned in the Policy Papers. Other environmental risks include contaminated water, hazardous chemicals, toxic waste and degraded ecosystems.

- To solve some of the environmental challenges outlined above, **green development** including climate change mitigation is essential, and there are enormous opportunities in cities and metropolitan areas. If health benefits of such measures are taken into account, the economic gains could be substantial. Spatial planning processes are important in this regard, and it is important that cities have the means to implement measures and unleash the gains. Many of these environmental issues are included in SDG targets, but not all of these have been considered relevant in the PPS, something we have commented below. We think the need for green development and the specific actions required should be better reflected in the PPs, and emphasized in the Outcome document, including aspects related to climate change mitigation, and improving air quality.
- Related to the above, we also find that the papers would benefit from a more systematic approach to climate mitigation, climate adaptation and climate contingency planning respectively.
- The New Urban Agenda should have a strong focus on inclusive governance and increased participation in governance for civil society and in particular vulnerable groups. Children and youth should in our view be listed as vulnerable groups.
- An intergenerational life cycle approach is lacking in the PPs. We believe that there is a need for a holistic, interconnected approach to children, youth, adults and elders.
- Public space should be a main focus for urban planning within the New Urban Agenda as a tool for increased equality and equity between groups within cities. A safe urban environment with good local air quality and access to green areas for outdoor activities, will improve public health and make cities more attractive places to live in.
- The Policy Papers did not go into detail on today's main urban challenges. However, we find it important to explain the starting point for the New Urban Agenda, so we suggest that the Outcome document outlines and explains the challenges that have emerged since Habitat II, including environmental risks such as climate change and air pollution, which are linked to urban development, especially the growing numbers of cars in the cities, as well as population growth, demographic changes, inequality, migration etc. Further, it should include possible scenarios for the next 20 years (some scenarios are included in PP6). This would be the starting point for the NUA, and would clarify why we need to do things differently now than 20 years ago. And it should include recommended strategies and action to meet these challenges, including SDG 11 and other relevant goals and targets, both enabling policies at the national level (NUP) and urban/local authorities.

- We appreciate the focus on urban rural linkages in several of the policy papers, which in our view is an important aspect of the New Urban Agenda. Good communication between cities and surrounding areas is important to obtain sustainability in several areas.

Policy Paper 1 – The Right to the City and Cities for All

- We support the proposal to take the Human Rights as the starting point and that the Right to the city should be the Heart of the New Urban Agenda. This is in line with Norwegian policy in general. We also support emphasizing the link between social inclusion, participatory democracy and human rights with the territory to make inclusive, fair, democratic and sustainable cities.
- We believe that public space is particularly important for the New Urban Agenda, in order to ensure Cities for All. For a large share of the world's population, public spaces are the only spaces that cover basic and secondary needs. This is particularly apparent for vulnerable groups (as defined on page 3 in the policy paper), where youth should be added.
- Having the Right to the city as the heart of the NUA, requires that the citizens know their rights. We therefore suggest that awareness raising and capacity building regarding these Rights is addressed in the PP.
- The description of the *current urban development* model in para 1 needs to be more nuanced, to cover the situation in most European cities. We do not recognize the description of financial oligarchy at the expense of the majority of the population and the negative effect of gentrification. Gentrification is an effect of urban development also in Norway, but there are several examples that this can contribute positive to sustainable urbanization, for instance the renovation of slums. Norwegian policy for urban renewal and neighborhood upgrading have had a special focus on targeting the existing population.
- We do not recognize the description of "*the current pattern of urban development based on competitive cities;are not able to create a sustainable model of social inclusion and are rather exclusion-generators*". This may occur in small part of Norwegian cities, but this is not a general trend in cities in Norway.
- In para 3 there is also a reference to the "*current urban model*" as a model for profit. This is not a description that is adequate for the current urban model in Norway. Para 3 describes the right to the city, as a collective right for all inhabitants. It describes the right to access to resources, services, goods and opportunities, social justice, equity etc. We suggest that this para emphasize that this implies **equal rights**, as it will be very difficult to give everyone who wants to live in a city, the individual right to access to all resources, etc., for example affordable housing.

- The paper describes several important challenges that is relevant for Norway. We would like to emphasize the importance of **good governance**, particular local governance and participation on all levels. Livable cities, welfare and well-being are concepts in urban development that has been prominent in many European cities, including Norwegian cities.
- The paper describes several priorities. We support many of the policy proposals, but the proposal to de-commodificate urban commons and public goods, is a very difficult question and needs to be discussed further. It is important to secure public goods, but this can be done in many ways.
- We would like to stress the importance of the **right to habitat**, - land and housing, as a fundamental right, and one of the most important issues to be discussed at the Habitat III. This is a follow up of SDG 1.4, security of tenure. Secure right to land and housing can only be achieved by public registration, and have to be accessible and affordable for all.
- The PP lists different components of the paradigm “the Right to the City”. We propose emphasizing and expanding **the right to a clean environment** such as clean air, clean water, clean streets/managed waste, and green space for outdoor activities, as well as a **climate resilient city**. We see that these aspects are covered to a limited degree under 5.4 (under challenges) and suggest adding text, including on air pollution as the second risk of mortality and morbidity in the world, and the link to the right to health (see below). 5.4 energy consumption, here we miss the mentioning of household energy, such as cooking and lightning, and indoor air pollution (4.3 mill deaths annually from indoor air pollution, many of the in cities, e.g slums). Under 5 (priorities) The need for green development, and concrete measures to obtain clean air, clean water etc., as well as concrete adaptation measures should be added, some of the measures needed are listed, but avoiding waste burning should be added, as well as clean cooking (in line with WHO Guidelines for indoor air quality).
- **The right to health** is another important component in our view, which would include *inter alia* establishing adequate health systems and personnel with knowledge of the main risks of mortality and morbidity facing the citizens. This component should be added to the list of challenges, as well as among the priorities.
- 1.5 Mobility and accessibility, we agree that these are important urban strategies, and it should be added that these aspects are also important in an environmental context. If done right with clean transport alternatives, including possibility for non-motorized options, it could improve the environment and public health.

Policy Paper 2 – Socio-Cultural Urban Framework

- We support the key messages on page 2 as important elements for the NUA; to increase citizen participation in all levels of planning and implementation; to promote social justice, through e.g.

mobilizing excluded groups, and to allow for cultural differences and promote localized systems. However, we suggest including also the concept of making basic services and facilities more accessible to all.

- The PP's description of challenges is relevant for Norwegian policy, and the suggested priorities and implementation are mostly in line with our policy. However, as mentioned above, we regard making basic services more accessible to all as an important concept, and that the right to health services is very important as a part of such services. This is mentioned, but could be expanded.
- We support increased citizen participation, which should e.g. aim at leveling the disparities between groups. In particular, it should lift vulnerable groups to a level where they have a more equal representation than today. There should also be a strong focus on including those who for various reasons do not have a voice in the formal governance systems, in particular children and young adults with no voting rights.
- We support the mentioning of urban poor and unskilled migrants. We note, however, that governments must have the main responsibilities regarding integration.
- Norway has good experience in using "sports for all" as an approach in development cooperation, especially targeting children and youth. Sports is also important to improve health, both physical and psychological, and to ensure understanding across ethnical, cultural and ethnic borders. This aspect should also be addressed in this PP.

Policy Paper 3 – National Urban Policy

- In the introduction, it is explained how national urban policies can contribute to the implementation of a new urban agenda. We agree that NUPs should help to align sectorial policies that affect urban areas, and develop an enabling institutional environment, and in that way complement urban policies. We believe that another important point from the document, which could be added to the introduction on page 3, is that NUPs are critical to empowering cities, capacity building, financing and ensuring effective governance of administratively fragmented metropolitan areas.
- Norway agrees with the description that urbanization presents challenges and opportunities, and that legislation on national level, regional and local level must support local government in their effort to create sustainable cities. As must municipal finance.
- Norway finds the need to nuance the first sentence in the executive Summary: "*Urbanization is an increasing urgent global phenomenon, and is having a particularly dramatic effect on the landscape of all countries*". We do not recognize this description. We do however agree that there is difference in challenges between the cities in most European and Northern American countries and that in developing and emerging countries.

- Norway participated in producing the International Guidelines of Urban and Territorial Planning, and would like to promote these guidelines as a good framework for creating National Urban Policies, which has also been done in this paper.
- We support the focus on strengthening partnerships with civil society organizations, including youth and women's organizations.

Priorities

- Para 1, a1 on Issue Paper 5: Urban Rules and Regulation, recommends a rather substantial process in order to implement National Urban Policy (NUP). We are afraid that the amount of effort these three actions are proposing might be too much for countries with small resources and/or least developed countries.
- The Para 1 also talks of Urban law. We would like to emphasize that national legislation often applies to administrative borders and not city limits. These administrative borders might include one city and its suburban and rural surroundings, sometimes these administrative borders include more than one city. We acknowledge the importance of adequate legislation, but suggest this is taken into consideration in the process ahead.
- We support the listed crucial points of Issue Paper 6: Urban Governance.
- The important point no. 1 drawn from Issue Paper 7: Municipal Finance, states that "Often municipal finance capacity is closely tied to governance reform". We find that a rather strong postulate. It might need to be nuanced. We support the rest of the important points drawn from Issue Paper 7.
- Issue Paper 9: Urban Land. We support the need to control urban sprawl and protect sensitive areas and such take sustainability into consideration.
- Issue Paper 10: Urban-Rural linkages: We would again refer to the International Guidelines of Urban and Territorial Planning.
- We suggest adding text regarding environmental aspects/green development, in addition to aspects from issue paper 15 on resilience. The text concentrates on climate change, and we appreciate the fact that this is included, and that both mitigation and adaptation is mentioned. However, it is also important to include other environmental challenges, such as air pollution. The division between national and urban policies regarding such pollution should be discussed, often there are national policies in place, but also urban policies are needed in order to address the problem (e.g in case of emergencies when levels are dangerously high). An attractive, functional urban environment is important for well-being and public health. Easy access to frequently needed services, clean air, and green, safe and welcoming surroundings are all important to city-dwellers.

- Transport and mobility, Issue paper 19, page 8; important to address this also within an environmental policy context. Pollution and climate change aspects are important when designing urban transport policies. Compact urban development patterns are needed to make it possible to provide efficient public transport and encourage more people to walk and cycle. Promoting compact urban development is both sound climate policy and improves local air quality and people's health. The International Guidelines of Urban and Territorial Planning are relevant also here.
- Under SDG goals and targets where NUPs are important, Goal 3 is on Health, but here it says Gender, which is Goal 5. We believe health should be added, including target 3.9 on pollution, which is important, for example is air pollution largely a challenge for cities.

Challenges

a.2. Disagreements/controversies

- No 1: Norway agrees to the view that urbanization also represent opportunities and increase prosperity, productivity and well-being. We agree that a NUP that recognizes that, and captures the opportunities, is a crucial ingredient for building cities that are sustainable, productive, livable og inclusive.
- No 6. Balancing top-down and bottom-up approaches. Norway agrees that NUP must be developed through cooperation, dialogue, institutionalized participation and mutual respect. Knowledge and acknowledge of the real needs, aspirations and agendas of a variety of local people and organizations and the municipalities is crucial for a mutual understanding and acceptance of the NUP.

Priorities

- In general Norway agrees with the main identified criteria for defining policy priorities. We will however, suggest that the process in which the policy priorities are identified could be differentiated. We will not recommend that all countries must undergo the same vast process, as many countries already do have NUP.
- Criteria no 4 states that defining policy priorities should take into consideration realistic financial and legislative capacity.
- Norway agrees with the list of key transformations.
- Norway supports the list of key priorities, and suggest that the list is included in the summary/introduction on page 3. We further support the statement that NUP is highly dependent on context and will need to vary depending on the circumstances. We especially support no 6 where the International guidelines are being promoted, and no 7. where **the safety and security of children** are mentioned among the different vulnerable populations groups.

- Norway supports the idea that a NUP that places sustainability at its core can be an important tool for government to support cities in their adaptation and mitigation efforts in order to ensure that cities remain livable and resilient while facing the impacts of climate change and other environmental threats.
- List of other indicators, here we suggest adding indicators on environmental threats, for example urban air pollution levels, which are relevant for three of the SDG targets (3.9, 7.1 and 11.6).

Implementation

- Here, we suggest mentioning green development/creating a green vision, as a specific issue, alternatively mention it under point 3.
- Links with Agenda 2030/Paris Agreement, we suggest adding air pollution-opportunities here, in addition to climate change aspects. There are three A2030 targets on air pollution, which are relevant for cities.

Policy paper 4 – Urban Governance, Capacity and Institutional Development

- The Policy Paper is mostly in line with Norwegian policy in this area. We will however suggest that the paper make reference to the International Guidelines on decentralization and strengthening of local authorities, and the International Guidelines on basic services for all.
- This PP does not address how the building of capacity and institutions should be achieved. This is particularly challenging in secondary and tertiary cities where systems are weak. We suggest that this aspect is covered in the next version.
- We support that the need for increased participation is underlined, and the explicit mentioning of youth as an important stakeholder in urban governance. The paper mentions the increased use of SMART technologies as an approach to achieving this. The potential social implications of such SMART technologies should also be evaluated and highlighted, and the potential uneven access to such technologies or participation methods enabled by them should be considered.
- New 21st century challenges for metropolitan governance on page 7; here we believe that it's important to include environmental challenges, both climate change, air pollution and other environmental threats, which are linked to development and consumption. Likewise, capacity building related to these new threats should be included.
- Several SDG targets are mentioned under challenges, we suggest adding target 3.9 under Health on pollution.

- On page 18, different types of finance are discussed, we suggest adding green fees and taxes, which are linked to non-environmental friendly behavior, such as emissions of greenhouse gases and air pollutants, from transport, waste, housing and the energy sector. This could be rush-hour fees, parking fees, levies for burning waste, fees for delivering waste etc.

Policy paper 5 - Municipal Finance and Local Fiscal Systems

- The Policy Paper is mostly in line with Norwegian policy. We will however suggest that the paper also has a reference to the International Guidelines on decentralization and strengthening of local authorities, and the International Guidelines on basic services for all. These Guidelines also include guidelines that are relevant for municipal finance and local fiscal systems.
- We would like to emphasize the importance of transparency, the subsidiary principal and public private partnership. Sustainable urban development are dependent on local private investments.
- We further suggest that green fees and taxes are discussed in the paper, as well as remittances from abroad.

Policy paper 6 - Urban Spatial Strategies

- In general, we support the key messages of the paper. The description of challenges is relevant at a global level, but only partly relevant for Norwegian policy. The challenges related to poverty, social conflicts and unequal economic development are less dominant in Norway, but still valid at a global scale.
- Concerning the key recommendations for action, we support the adoption of the International guidelines for urban and territorial planning. We would like to stress the call for balanced territorial development by strengthening national and regional development planning, in order to secure sustainable and socially just development.
- We doubt whether the establishment of an Intergovernmental Panel on Sustainable urbanization is the best way forward in order to deal with the future challenges of sustainable urban development. We believe that directing resources into further development of existing organizations, e.g. UN-Habitat would be a better investment.
- We support the spatial strategy of planning environmentally friendly cities with low greenhouse gas emissions, and good air quality. Compact cities with walking, cycling and public transport as a focus for transport planning is a good strategy in this regard. Limiting the access to parking in cities, establishing car free zones and strategic taxation of car use are tools towards decreased emissions.

- There is a lack of focus on health and the individual implications of environmental deterioration in cities. The impacts of pollution in cities should be mentioned, including how it affects citizens unevenly both socially and geographically.
- The lack of or insufficient property registers, as well as unregulated tenure, should be addressed as an important obstacle to area planning.
- Although mentioned in other PPs, this policy paper should also emphasize that neighborhood renewal projects should have a strong social focus and not a focus on elements that fuels gentrification.
- Challenges related to humanitarian disasters should be addressed in this PP, including related to land tenure, property rights and land grabbing. Also women's rights regarding inheriting property and land should be addressed.

Policy paper 7 - Urban Economic Development Strategies

- The description of challenges and priorities are mostly in line with Norwegian policy. We have however some comments to some of the elements.
- *Cities are productive, drivers of growth; connectivity, knowledge and creativity.* We would like to nuance this statement, as we do not believe this is the case everywhere. Cities do not benefit their surroundings automatically.
- *Migration to the city is seen by many as a pathway out of poverty; as an opportunity for individuals and their families.* Experiences from Norway suggests that migrants motivated by working opportunities have a tendency to move from the main cities if they can find work other places. Refugees have a tendency to live in the proximity to their fellow countrymen.
- *... and urban success (to be defined):* Will this be a definition of the success of the cities or the nations? How to measure the difference?
- High income countries: ☒ Dealing with structural change (including transition toward a low-carbon economy) ☒ Segments of the population marginalized in labor market ☒ [rising income inequality] coupled with less tolerance of inequality.
- The increasing share of elderly is a challenge in Norway and many other European countries. The elderly is not a marginalized group on the labor market, but represent a group that puts pressure on the welfare system.
- *The potential of cities is released if people are enabled to invest – in developing skills, livelihoods, businesses and their homes -- and to benefit from such investments and the connectivity – the*

intensity of economic and social interactions – that cities offer. The principal role of public policy is to support the development of human potential, while seeking to compensate for market failures and providing safeguards to facilitate human and business interactions. Here, we propose including civil society and voluntary work. This is an important part of Norwegian society.

- Youth are particularly vulnerable to unemployment, exploitation and harmful employment practices, this should be considered under issues related to employment in the PP.
- *Recognition and integration of the livelihoods of the working poor will make those livelihoods more productive and urban economic growth more inclusive.* This statement could be more nuanced, recognition and integration could contribute, if the circumstances are right.
- *Strategic and land-use planning* ☐ *Develop medium- and long-term City Development Strategies and use these to coordinate land use, sectoral growth, infrastructure, and investment planning (including skills). Coordinate such strategies with national development strategies.* It is also important to include national and regional level.
- *Business support initiatives* ☐ *Adoption of a pro-business stance and capacity building of local officials in this regard. Local planners and decision-makers need to understand their tradeable sectors in regional and international markets and investigate whether there are specific actions that might improve their competitiveness. Identify comparative advantages and priority areas for investment to leverage and further develop the existing assets of the city.* ☐ *Tailoring support to the differing needs of different types of business, including the SMEs and the informal sector.* ☐ *Incentivizing the formalisation of informal businesses and employment.* We would like to include also attractiveness as an important factor to improving competitiveness.
- Aspects related to the strengthening of unions should be addressed, since this could help ensure social rights for workers, such as minimum wages, fixed working hours, working environment etc. In addition, the new concept of “sharing economy” should be addressed in this PP.

Policy paper 8 - Urban Ecology and Resilience

- The environmental dimension of the agenda must be stronger, and clear guidelines for reducing emissions of greenhouse gases, other pollutants and ecological footprint should be given. Climate change and air pollution are among the most pressing issue of our time, hence these challenges should have high priority and need a stronger presence in the New Urban Agenda than indicated by this policy paper. A good urban environment with good local air quality and access to green areas for outdoor activities, will improve public health and make cities more attractive places to live in.
- The New Urban Agenda and its approach to resilience must integrate all three dimensions of sustainable development; economic, social and environmental. It needs to recognize critical

thresholds in all these areas and operationalise the notion of nonlinearity while modeling them into actionable frameworks.

- Improved nature-based management can address a set of societal challenges in sustainable and resilient ways, including the potential to enhance green transitions and growth, climate-proofing society, fostering citizen health and well-being, providing new business opportunities and making cities more livable and attractive. Many nature-based activities thus enhance multiple co-benefits. They can be geared towards e.g urban regeneration, enhance coastal-, watersheds-riverine areas and agricultural resilience, serve to increase carbon sequestration, improve resource and energy availability. These aspects should be better addressed in the PP.
- Impact is defined as the first criteria to identify policies (Annex i), however there are often several and colliding impacts, and this challenge should in our view be discussed in the paper, and some guidance should be given. This is often the case related to green urban development.
- Under 1.b.1 Governance as a Key Challenge, «Overlapping and conflicting administrative structures» are mentioned. The lack of or insufficient property registers, as well as unregulated tenure, should be addressed as important obstacles to area planning. In addition, corruption may be an important obstacle and should be addressed.
- Acknowledging the role of civil society is crucial when building and implementing resilient systems in an urban context.
- We would like to add the following aspects:
 - Where disadvantaged groups like women and minorities are mentioned, children and youth should also be included.
 - In addition to green infrastructure, accessibility and mobility, public space should be included in the building of good urban form (re page 4 Vision v.). As part of the green infrastructure, continuous green and blue corridors that link green spaces and open water in urban districts with the surrounding countryside, will benefit people's health, biodiversity and climate change resilience.
 - In planning (Page 12, 2.b.4) a new point including the use of spatial designers should be inserted. This would follow up on point ix under the heading Policy (Page 11, 2.b.2)
 - Under the headline Environment (Page 13, 2.b.7) include a point concerning realization of the possibilities of the landscape in developing attractive and livable urban places. Also include the use of surface water as a quality in redesigning and developing public spaces.
 - Under the headline Implementing activities (Page 16, a.3), include good architecture and design.
 - Under the headline Indicators of success (Page 17, c.1), include attractiveness and livable cities.
 - Challenges: women and safety aspects should be considered.

Policy paper 9 - Urban Services and Technology

- We notice that environmental threats and how to deal with them hardly are mentioned in this PP. We suggest that climate change and air pollution are included among the overarching challenges in this PP. For example, climate change adaptation and resilience are very important strategies for the planning of urban infrastructure.
- This Policy Paper includes some health aspects, so it has a somewhat stronger health focus compared to other PPs. However, public health issues could be more elaborated also here.
- We support in general, the key messages of the paper, and acknowledge the need for sector-wise measures in a number of areas. In order to secure progress in these areas involvement by various stakeholders will be required. In Norway work in this field is taking place within the framework of binding agreements. The agreements involve national authorities, municipalities and other stakeholders, and the stakeholders commit themselves to development of holistic urban infrastructure, land-use and transport planning.
- The PP addresses in general terms necessary investments in energy, waste management, public health, education, water and sanitation, safety etc. We suggest that in the new version of the PP, also institutional aspects are addressed; who does what, and how does the choice of institutions/ organization impact the achievement of goals and long-term technical, environmental and institutional sustainability? How to ensure financing of necessary investments, including e.g. public private partnerships. In Norway, these issues are important parts of good governance, and should be considered in the PP.
- We support the suggestion of consideration of lifecycle costs when making investments as this serves as a tool for greater intergenerational equity.
- Within transport, cities needs a main focus on green modes of transport, and a modal shift that decreases the use of personal vehicles and enables walking, cycling and public transport. Increased and strategic taxation of car use is needed to achieve this.
- The concept of the 'urban [service] user' should be expanded to highlight nuances in gender, age, and other areas that might impact accessibility. The necessity of transforming urban infrastructure in order to achieve the Sustainable Development Goals (SDGs) should be made explicit.
- The principle of integrating land use and transportation planning should be extended to public transport funding.

Policy paper 10 - Housing

- The document is mostly in line with Norwegian housing policy, but we have some comments. In the national report, we highlighted the need to upgrade the existing housing stock. Energy efficiency, accessibility and affordability are some of the major challenges in Norway and in many European countries. The subject is mentioned indirectly in the bullet point;

"Support the development of energy-efficient housing and technologies, including green infrastructure" og "Address housing needs of special needs groups—the homeless, senior citizens, migrants, women, minority groups, and persons with disabilities—and prohibit housing discrimination".

- Energy-efficient housing is also mentioned as a challenge in I art 1 and 8. It is also mentioned that public buildings can discriminate physically disabled and elderly. This is an important part of the challenges in Norwegian policy, and in many other European countries. It is therefore important that these issues is included in the discussions at Habitat III.