Chairperson,

We wish to express our support for recommendations of Policy Paper 3, while adding the following important points to the discussion.

Policy Paper 3 rightly notes that a national urban policy must complement and not replicate sectoral strategies and local government policy and legislation. A key objective of a national urban policy must be to achieve some sort of coherence in government’s approach in urban areas. Given that different spheres of government are responsible for different functions, often national, sub-national and local policies end up contradicting each other or running at cross purposes when the rubber hits the road at local level. Policies which have rationale at national level might undermine local objectives on the ground, or vice versa. A key goal of a national urban policy is therefore to create an overarching framework which aligns purposes while setting out clear roles and responsibilities for each level of government, so that when all policies are operationalised in a single urban space, a common goal is achieved.
The pivotal importance of **land use planning** cannot be over-emphasised. Land use planning and transport planning underpin human settlement planning and deserve recognition as key drivers in spatial transformation. Thus **coordination** between the spheres of government responsible for these two critical functions is paramount. The only effective way to rectify dysfunctional urban land markets is through alignment of zoning regulations, tax regimes, spatial plans, and planning approval processes.

Second, Policy Paper 3 highlights the need for legal protection for households lacking **tenure security** and/or whose homes are informal. Local regulation must recognise the reality of informal structures while ensuring minimum safety standards for households. Simultaneously, governance approaches must be innovative in affording households in informal settlements with some form of tenure security, while still striking a balance in the protection of property rights, which create the stability and security in the property market to attract investment by the private sector.

With regard to issues of financing and resourcing, it’s important that we plan for the **full life-cycle cost of needed infrastructure**, including the resource requirements for refurbishment and **long-term maintainence**. Again, coordination between spheres of government is critical to avoiding situations of once-off investment by national government which leave municipalities without the resources or revenue-raising capacity to maintain the infrastructure down the road.

Finally, a **differentiated approach** to the development of cities is required—recognising the variant capacity needs of secondary cities vs. more developed urban centres. Effective national urban policies should accommodate and support different growth paths for different cities, building their capacity as appropriate and building upon their relative advantages. Pillar 8 of the African position on Habitat III agreed to in Abuja acknowledges the importance of addressing the human settlements continuum as a driving force for structural transformation.

I thank you.