

**German Comment**  
**on the Draft Policy Paper Framework of the**  
**Third United Nations Conference on Housing and Sustainable Urban**  
**Development**  
**As of 28.01.2016**

**Introductory Note**

Germany congratulates the Policy Units and the Habitat Secretariat for the successful organization of a very challenging task and for the substantial results achieved so far. We appreciate the rich technical expertise from a broad variety of experts from around the world reflected in the “Draft Policy Paper Frameworks”. They represent a very significant contribution to the overall Habitat III process and the New Urban Agenda. Germany encourages the Experts and the Secretariat to continue their efforts. The Policy Papers will be an excellent foundation for discussions among member states and other stakeholders about concepts of urban development and priority actions to take.

Germany appreciates the recognition of the role of cities as actors for development and the corresponding need to strengthen their enabling frameworks and capacities. We also appreciate the emphasis placed on integrated, cross-sectoral and human-centred approaches as indispensable principles of sustainable development. In this context, we suggest to further strengthen the linkages between general topics dealt with in different Policy Papers and to pay due attention not only to the 2030 Agenda but also to the Addis Ababa Action Agenda (AAAA) and the Paris Agreement.

Germany further appreciates the emphasis given to implementation, especially in form of policy recommendations. Framing and focusing the Policy Papers as well as the consistence of their arguments towards implementation will significantly facilitate the mission of the Habitat process to develop an actionable New Urban Agenda.

Germany would also like to make some suggestions to individual Draft Policy Paper Frameworks as specified below.

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**Policy Unit 1: The Right to the City and Cities for all**

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To achieve inclusive urban development, we suggest elaborating more on the demands of specific vulnerable groups with a special focus on the recommendations towards implementation:

- Discrimination and racism of/against women and other disadvantaged groups, e.g. child labour
- Focus on migrants and refugees as a particularly vulnerable group in cities, e.g. considering migration patterns to ensure informed planning
- In the migration context, Germany suggests to also emphasize circular migration of workers, economic exchange between place of origin and destination, the emergence of refugee cities and economic incentives for the integration of migrants
- In regard to accessibility and inclusion, informal settlements and the urban poor may get more explicit attention.
- Urban safety and crime prevention e.g. concerning the issue of trafficking

Germany is looking forward to further elaboration of the section on implementation, the linkage to SDG targets/indicators and criteria and targets for policy priorities. We further suggest considering the overlap with Policy Unit 2.

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**Policy Unit 2:**

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Germany particularly considers citizens participation in planning and implementation as a crucial element for a future sustainable urban development. We recommend integrating the following aspects to the key messages and key actions:

- Stimulate dialogue and promote horizontal consultation and coordination
- Strengthen the just distribution of access to resources and power in order to close the gap between the rich and the poor.

Further we suggest elaborating more on the following aspects:

- Specific governance challenges in contexts of fragility and violence
- Capacity development for enhanced multi-level consultation and coordination as well as for sustainable urban management on all levels
- Gender aspects, e.g. enabling the participation of women in planning processes e.g. public spaces
- The role of media accompanying socio-cultural development and multi-level governance processes
- Financing of activities and how financial implications should be considered (Policy Unit 5)

Germany suggests mentioning the Agenda 2030 in general and target 16.7. especially. With reference to the thematic range Germany suggests considering the overlap with Policy Unit 1 especially on rights and duties of urban poor and unskilled migrants or refugees.

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**Policy Unit 3: National Urban Policies**

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Germany would like to underline National Urban Policies (NUP) as central prerequisites for effectively strengthening local level actors and implementing the New Urban Agenda. Adding to the draft framework, Germany would like to suggest

- Emphasizing the enabling conditions for local governance in the policy priorities
- Clearly promoting the principle of subsidiarity within NUPs
- Considering the issues of safer cities, internal migration, and urban resilience
- Emphasizing the inclusion of urban poor and vulnerable persons
- Elaborating on opportunities for intensified peer-exchange and knowledge sharing between countries with NUPs and countries that have just started to develop NUPs (e.g. as pursued by Germany through its “Urbanization Partnerships”)

National Urban Policies should include specific capacity development measures to address complex urban management challenges. We therefore suggest considering the overlap with Policy Unit 4. In addition, links to finance mechanisms are necessary in order to enable local governments to act according to their mandates. We therefore suggest considering the overlap with Policy Unit 5.

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**Policy Unit 4: Urban Governance, Capacity and Institutional Development**

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Germany considers strengthened urban governance and capacity a core priority for the realization of sustainable urban development. In general, we suggest that this policy paper should elaborate more on how the 4 areas of action (multi-level governance, participation and equity, metropolitan governance, capacity development) can be implemented and who the main responsible actors in this policy fields are (referring to persons, institutions and systems at different government levels). We further suggest to also elaborate on the following details:

- Building capacities for fiscal decentralization and domestic resource mobilization. Here we suggest to consider the overlap with Policy Unit 5 in particular
- Necessary legal reforms and efficient regulation mechanisms to improve multi-level governance and sustainable development (environmental protection, equality, social development, land management, building codes, spatial frameworks, public private partnerships)
- Governance related challenges in different contexts, e.g. high fragility states, different stages of decentralisation
- Opportunities of e-governance

In terms of monitoring and reviewing implemented policies, we suggest emphasizing:

- Improved statistical capacities and systems at different levels of government.
- Gender aspects both in key actions and in monitoring, e.g. disaggregation of data according to gender
- National legal frameworks as an indicator of success (e. g. decentralization, enforcement of equity, land control, environment protection)

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**Policy Unit 5: Municipal Finance and Local Fiscal Systems**

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Germany suggests elaborating further on some thematic areas (across the levels of challenges, priorities and implementation) and reflecting additional cross-cutting issues:

- The issue of municipal creditworthiness as major constraint for municipal borrowing including financial control, accountability mechanisms and transparency standards
- The aspect of fiscal autonomy should be emphasized in the policy recommendations
- Supporting and strengthening financial intermediaries at the regional and national level (e.g. Development Banks, Development Funds)
- The crucial aspects of local capacity development and legal frameworks should be elaborated towards concrete policy recommendations
- Explicit link to Local Economic Development and balancing intergovernmental transfers as a mechanism to address different territorial/urban environments
- Specific requirements of different types of cities and different national contexts

We suggest explore the linkages with Agenda 2030 beyond Goal 11 as well as the Addis Ababa Action Agenda (AAAA), including:

- Reference to goal 16, targets 16.6. and 16.7 and goal 17, target 17.1
- The follow-up of the AAAA (e.g. Addis Tax Initiative and Global Infrastructure Initiative)

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**Policy Unit 6: Urban Spatial Strategies: Land Market Segregation**

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Regarding the challenges and priorities mentioned in the draft we recommend emphasizing:

- The notion of spatial strategies as closely connected with governance-related aspects like national urban policies, legal framework, finance and participation (integration with Policy Papers 3, 4 and 5)
- Overcoming the urban-rural dichotomy towards a urban-rural continuum
- The role of land policies for spatial planning and strategies (tenure, land rights and mechanisms for re-plotting to achieve sustainable urban structures and spatial justice)
- The importance of green spaces and spatial strategies for recreational reasons, but also to reduce the impact of climate change in terms of both adaptation and mitigation.

In addition we suggest to elaborate on the following aspects:

- The Land Governance Assessment Framework (LGAF, Worldbank) and the Social Tenure Domain Model (STDM, Global Land Tools Network) as performance indicators
- The Intergovernmental Panel on Sustainable Urbanization proposed by PU6 and its role in the international institutional framework. This proposal should be carefully assessed particularly with regard to aligning monitoring and review of the New Urban Agenda with corresponding mechanisms for the 2030 Agenda.

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**Policy Unit 7: Urban Economic Development Strategies**

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Germany suggests developing the recommendations with a focus on implementation strategies rather than the identification of key areas. In detail, Germany would like to suggest:

- Emphasizing the role of city networks and metropolitan regions as lever for urban economic development (see e.g. OECD (2015): The Metropolitan Century)
- Emphasizing the importance of private sector development challenges
- To elaborate further on local financial system which needs to function in order to promote local business (integration with Policy Paper 5) as well as innovation and the role of cities as hubs for innovation
- To add language on gender equality to the section on strategic and land use planning
- To integrate into the specific action recommendations:
  - o Decent work (sufficient income opportunities, meeting social & labour standards)
  - o Green economy aspects
  - o Smart Cities (Potential of ICT for urban economic development)
- To elaborate further on interrelations with the 2030 Agenda
- To also consider and further integrate the COP 21 Paris Agreements (e.g. mitigation strategies of urban economy) and the Addis Ababa Action Agenda



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**Policy Unit 8: Urban Ecology and Resilience**

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Germany would like to recommend that, in general, the Policy Paper should elaborate further on the concept of urban ecology including considerations of climate change. In this context, both adaptation and mitigation are core concerns that should equally be addressed and its interdependencies should be outlined. None of the other papers explicitly elaborates on the role of cities in this regard. Especially after COP 21, and considering that cities are said to be responsible for 70% of global GHG emissions, this paper should consider this issue. We further suggest adding language or emphasizing recommendations on the following aspects:

- Limitation of natural resources, the irreversible loss of biodiversity and externalization of costs of environmental degradation as key challenges for urban environments
- Ecosystem services, their role for urban functioning and resilience, as well as the protection of ecosystems and ecosystem-based adaptation to climate change
- Improve resilience of the urban poor and integrate informal settlements into urban planning
- Recognizing the mitigation of greenhouse gas emissions not as a cost driving factor only, as there are chances of substantial economic benefit in introducing an integrated low-carbon urban policy (linked to Policy Unit 7)
- Protect critical infrastructure and ensure their maintenance and resilience but also low-carbon/climate neutral development, avoiding long-term lock-in effects
- Integrate resource management across sectors and levels (urban nexus)
- Strategies to implement the COP 21 Paris agreement on the local level

In addition, we recommend that some terms are sharpened:

- Resource efficiency incl. all natural resources (not only with regard to energy or buildings) with the aim of protecting resources and ecosystem services, improving access to resources for the urban poor and enhancing provision of urban basic services;
- The key terms “resilience”, “adaptation” and “mitigation” in the context of climate change;
- Integrated planning without limitation to housing, transport, energy and green systems, but incl. other topics, e.g. water and waste management, land-use planning, food security, etc.
- Include awareness raising for environmental effects of urban lifestyles into local capacity building among various stakeholders including citizens

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**Policy Unit 9: Urban Services and Technology**

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Germany would like to emphasize the synergetic potential of urban infrastructure and service provision. Especially considering the fact that basic services and infrastructure oftentimes have not yet been build and provided, we recommend to elaborate further on the following issues:

- Underlining the need for energy efficiency (sectors with energy savings and greenhouse gas reduction potential, i.e. buildings or the service sector are underrepresented)
- Promoting public and non-motorized transport towards a significant modal shift and sustainable urban transport. In this regard, a greater emphasis could be given to the potential of synergies between policy objectives that sustainable mobility can unlock
- The relation between basic services and poverty reduction considering basic services as the prerequisite for improvements in personal, social and economic opportunities for people
- The relation between urban services and public safety and security
- The importance of sustainable maintenance and operation
- Taking into account the increasing level of digitization and making best use of available knowledge, data and “smart” technologies

We further recommend reflecting important cross-cutting issues in all aspects of urban services and technology:

- Fulfilling the imperatives of human rights and universal access (Policy Paper 1)
- The growing need to include aspects of climate adaption and resilience in the design of urban services and infrastructure (Policy Paper 8)
- Necessary support in increasing the corresponding capacities on the level of local governments. (Policy Paper 9).
- Access to sufficient financing sources for local actors. (Policy Paper 5)

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**Policy Unit 10: Housing Policies**

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Germany welcomes the integration of financing aspects adequately addressed in the draft. In addition to the points included in the policy paper, we suggest to elaborate more on the following:

- The role of the private construction sector and NGOs, who play a prominent role in informal housing processes
- A clear statement that cooperation between different kind of institutions is needed (Financing Institutions, Private Construction Sector, NGOs, public institutions)
- The role of energy (in)efficiency for housing costs
- Linkages between housing policies and other key issues of sustainable urban development, especially urban ecology and resilience, and urban infrastructure and services, including energy
- Recommendations for implementation that built on lessons learnt after Habitat II
- The Intergovernmental Panel on Sustainable Urbanization proposed and its role in the international institutional framework should be carefully assessed particularly with regard to aligning monitoring and review of the New Urban Agenda with corresponding mechanisms for the 2030 Agenda.

Germany suggests adding or changing language on the following:

- Add “women and girls” to the list of vulnerable and special needs groups (e.g. under 1.1)
- Instead of the word “ghettoization” the word “segregation” could be used