

Finland's National Habitat Committee

Comments on the Policy Paper Frameworks

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 coordinate the priorities of all policy papers in order to provide a coherent, more concise input to the New Urban Agenda.

1 – THE RIGHT TO THE CITY AND CITIES FOR ALL

Key Priorities for the right to the city and cities for all

- **Deter urban sprawl**
- **Mixed use of land and buildings**
- **Diverse ways to access housing**
- **Women, elderly, handicapped, youth, vulnerable groups**
- **Public and green space**
- **Walking, cycling and public transport, mobility for all**

In the Policy Paper “The Right to the City as a Heart of the New Urban Agenda” we would like to **support the new paradigm of the right to the city** in which special attention is paid to marginalized groups and people living under vulnerable conditions (such as the urban poor, informal workers, ethnic groups, the handicapped, youth, women).

In this regard, **tailored solutions need to be developed for vulnerable groups in order to strengthen inclusiveness in the use and benefits of urban space.** In addition, **mixed residential settings and housing option-enhancing strategies should be considered in growing cities when planning new neighborhoods.**

Finland supports the following policy priorities stated in the Policy Paper:

1.1 Urban form – right to access the benefits of city life

- To develop planning policy mechanisms that **deter urban sprawl**

1.2 Urban planning and practice – right to participatory and inclusionary urban planning

- To promote **urban mobility and public transport** that enables access to the city **for all**
- To promote policies to attract development in small and medium size cities

1.3 Social function of land and housing – right to habitat

- promote the **social diversity and mixed use** of land and buildings to promote compact cities
- To promote **diverse ways to access housing** (property, rent, leasing, cooperatives, social production of the housing, others)

- To provide housing options in locations that allow citizens to remain close to existing social networks and city services
- To promote **positive actions for women headed households** and other groups as elderly, handicapped, youth, others

1.4 Public space – right to public space as a component of the urban commons

- To develop **policy on public space** and the urban commons and promote universal access for all to such spaces
- To integrate **green infrastructure** into urban planning visions and priorities

1.6 Right to mobility and accessibility

- To promote **safer walking and cycling** in support of wider urban health goals
- To promote bike paths and green corridors
- To promote **public transport over private**
- To assure **public transport that is affordable, secure and free from violence** for women and children.
- To incorporate affirmative actions to **integrate public transportation with non-motorized modes** of transportation
- To develop and promote positive **actions to stimulate the non-motorized transport**

3.1. Urban livelihoods

- Develop new spatial city forms to promote decent job creation, **well connected urban areas** with higher density; that integrate work and residence, reduce transport costs and facilitate job creation.

5.1 Air quality and noise pollution

- Create policies for densification in central areas to **diminish travel distance and increase walking and bicycle use**
- **Promote non-motorized transportation**
- Provide **better conditions for public transportation**

5.3 Waste management

- To recognize unsustainable models of production and consumption and create policy to incentivize **more responsible use of resources**
- Strengthen community based initiatives for waste management

5.7 Protection of ecosystems and biodiversity

- To value and recover the continuity of ecosystems and green biological corridors
- To **value gardens and informal edge spaces** as part of the ecosystem network

2 – SOCIO-CULTURAL URBAN FRAMEWORK

Key priorities for socio-cultural urban frameworks

- **Rights, duties and services for refugees**
- **Services for all**
- **Livable, secure, inclusive urban environment**
- **Diversity of solutions for housing**
- **Good governance**

Finland supports the following policy priorities stated in the Policy Paper:

- An agreement for some **rights and duties for refugees** and migrants in cities in order to look for ways of living together.
- That an inclusive city is one that delivers **services to all** its residents, regardless of nationality or immigration status.
- Create **livable, secure and inclusive** urban environment **for all social groups** in cities, including poor and vulnerable.
- Achieve social cohesion and inclusiveness by emphasizing **diversity of solutions** to most urban problems from **housing** to employment.
- Develop **Spatial planning practices** that give priorities to **inclusion**.
- Enable **good governance** for assuring acceptable balances between **different social and population groups**.

3 – NATIONAL URBAN POLICY

Key priorities for national urban policies

- **Metropolitan policies, cities as functional units**
- **Urban, peri-urban and rural interaction**
- **Management of ecosystem services**
- **Territorial and differentiated approach**

Finland supports the following policy priorities stated in the Policy Paper:

- **Facilitating urban policies and governance at a metropolitan scale.** 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.
- **Strengthening urban, peri-urban and rural interactions** to enhance and structure the **environmental, social, economic and public policy connections** and therefore promote functional linkages between urban, peri-urban and rural.
- **Recognizing rural areas and the urban-rural continuum:** Rural areas must be recognized within functional urban areas (FUA), however the importance of linkages to rural go beyond the FUA. Policies need to address this, especially with respect to development of infrastructure and **management of eco-system services** (land and water, in particular).
- **Promoting a territorial and differentiated approach** by considering key urban and territorial principles, such as those in the International Guidelines for Urban and Territorial Planning.

4 – URBAN GOVERNANCE, CAPACITY AND INSTITUTIONAL DEVELOPMENT

Key priorities for urban governance, capacity and institutional development

- **Urban-rural collaboration**
- **Metropolitan governance**
- **Empowering disadvantaged groups**

Finland supports the following policy priorities stated in the Policy Paper:

- Enhanced **urban-rural collaboration** is a vital challenge for metropolitan governance.
- The **reduction of territorial inequality** (e.g. between metropolitan areas and intermediary cities), taking into account urban-rural linkages.
- **Metropolitan governance**: It is important to **adjust decision-making to system boundaries**.
- Current participation practices do not guarantee fairness and equality. Participation has to foster or **create a mechanism through which the poor and other disadvantaged groups are empowered** and must prevent manipulation by local elites and/or vested interests.

5 – MUNICIPAL FINANCE AND LOCAL FISCAL SYSTEMS

Key priorities for municipal finance and local fiscal systems

- **Balance in municipal mandates and funding**
- **New mechanisms to support climate change mitigation**
- **Metropolitan financing**

Finland supports the following policy priorities stated in the Policy Paper:

- **Narrowing the disconnect** between the devolution of **expenditures and municipal resourcing**, in other words, minimizing unfunded mandates or providing municipal governments with funding avenues to meet such mandates.
- Establishing new mechanisms that support climate change mitigation that provides **revenue for cities that succeed in reducing GHG emissions**.
- Metropolitan financing: Take meaningful steps to promoting processes and institutions which can **plan, finance and administer strategic infrastructure networks that cross municipal jurisdictions** in metropolitan areas.

6 - URBAN SPATIAL STRATEGIES

Key priorities for urban spatial strategies

- **Decrease the rate of urban sprawl**
- **Compact, connected urban form**
- **Green public spaces**
- **Integrated planning (land use, housing, transport)**
- **Institutional frameworks for urban-rural linkages**
- **Participation in public space planning**

Finland suggests the following recommendations related to spatial development:

- **Decrease the rate of urban sprawl**
- Promote **compact and connected urban form where applicable**, while respecting the cultural heritage and **ensuring sufficient green spaces**
- Promote **integrated planning** which includes land use, housing and transport
- Develop **diverse urban and rural areas** and ensure public participation in all

Finland supports the following policy priorities/actions stated in the Policy Paper:

- Reflect **urban-rural linkages in institutional frameworks** that promote sustainable and efficient spatial planning and management.

- Emphasize awareness that the **provision of green public spaces** is an important responsibility of **public authorities**.
- Make the provision of **green and public spaces a priority** of urban spatial strategies and settlement planning, with particular regard to location, design and quality aspects.
- Promote the creation of **compact cities with networks of green and public spaces** in order to raise the accessibility to green and public spaces for all and to enhance the provision of ecosystem services.
- Promote **green and public space planning** and devote a commensurate amount of **budget resources** to the implementation and maintenance of green and public spaces.
- Consider **green and public spaces a major priority of planning**.
- Develop **guidelines and a set of criteria** regarding green and public spaces planning.
- Promote and conduct **citywide inventories of green areas** and publicly owned land, and identify areas that can be reserved for creating new green and public spaces.
- Promote **equal citywide access to high quality green and public spaces**. Public-space oriented planning and design should include establishing a sound proportion between citywide and neighbourhood/local level public spaces.
- Ensure **walkable access to green and public spaces** in all neighbourhoods; and make sure that green and public space design offers **easy use and access** to children, elderly people and people with disabilities.
- Foster **participation in public space planning** and design. Professionals, city administrators and interested citizens alike should be trained in the most effective techniques to use effective participation as a key driver of green and public space development.

7 – URBAN ECONOMIC DEVELOPMENT STRATEGIES

Key priorities for urban economic development strategies

- **Recycling and reuse in product lifecycles**
- **Environmental responsibility and resilience**
- **Mixed land use, affordable transport systems**
- **Public transport and non-motorised transport**
- **Housing affordability**
- **Low-carbon economy**
- **Infrastructure development plans and provision (government, private, local communities)**
- **Pro-business stance and tailored support**
- **governance structures, monitoring and evaluation mechanisms**
- **Sustainable production and consumption patterns**

Finland suggests the following recommendation related to urban economic development strategies:

- Enhance recycling and re-use in product lifecycles by promoting **ecodesign** and using a **cradle-to-cradle approach** to bring benefits to the economy and the environment.

Finland supports the following policy priorities/actions stated in the Policy Paper:

- Due concern for equity and social justice, and sustainability, including **environmental responsibility and resilience**.
- Subject to environmental and congestion concerns, regulation should accommodate **high density development** and **mixed land uses**. An efficient and **affordable transport system and non-motorised transport** modes are essential for the mitigation of potential adverse effect of high density on livability, and a reduction in a city's carbon footprint.

- The housing policy framework should target **housing affordability, mixed income, mixed uses, and proximity to the public transport network.**
- The provision of infrastructure within the city is necessary to its efficient functioning. Transport infrastructure in particular is essential to achieving the benefits of connectivity and avoiding the costs of congestion. The demands of urban density and climate change mitigation place a **priority on public transport [and walking/ non-motorised transport such as cycling]**. Particular attention needs to be given to the **transport needs of the working poor.**
- Review of building and land-use regulation with a view to encouraging **density, connectedness and the transition towards a low-carbon economy** and society.
- Formulation of medium and long term **infrastructure development plans.** Balance the efforts to meet the infrastructural needs of both businesses and households.
- To actively explore **tripartite partnerships** between the government, the private sector and local communities of the poor in **infrastructure provision.**
- Adoption of a **pro-business stance** and capacity building of local officials. 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.
- Clearer **demarcation of boundary of competencies** between central, state, metropolitan and local governments
- Adoption of **governance structures and procedures that give different stakeholders** (including the private sector, universities, the trade unions, the informal sector, etc.) real voice and **influence in decision making**
- Strengthening of the **monitoring and evaluation mechanisms of government programmes;** enhancing transparency through measures such as e government.
- Some of the Agenda 2030 goals have direct relationship with Sustainable Urban Economic Development, including: Goal 12. Ensure **sustainable consumption and production** patterns, Goal 13. Take urgent action to **combat climate change** and its impacts.

8 – URBAN ECOLOGY AND RESILIENCE

Key priorities for urban ecology and resilience

- **Carbon- and resource-neutral society**
- **Primary and food production**
- **Ecosystem services and green spaces**
- **Air quality**
- **Urban ecology and resilience**
- **Systemic planning (housing, transport, energy, green systems)**
- **Integrated environmental, climate and disaster risk management**
- **Resilience of cities and rural areas**
- **Low carbon building codes**
- **Capacity building and education on urban ecology and resilience**
- **Good urban form; accessibility, zones based on walking, cycling, public transport**
- **Low-carbon planning and renewable energies**
- **Open, public, green space**
- **Tenure systems that include the poor and women**
- **Nature-based solutions and circular economy**

Finland suggests the following recommendations related to Urban Ecology and Resilience:

- promote a systemic change towards a **carbon-neutral and resource-neutral society**
- ensure **primary production and food production** when rural areas are merged with large population centres
- promote **biodiversity, ecosystem service delivery and green spaces**
- address indoor and outdoor **air quality**
- develop **resilience action plans**
- acknowledge the link between **migration** and climate change, disasters, and security

We note a key challenge stated in the policy paper: the **lack of financial resources to dedicate to urban ecology and resilience** because they are seen as non-essential. In the policy papers on municipal finance and urban economy, priorities related to financial resources for urban ecology and resilience should be included in a more comprehensive manner.

We also note, with appreciation, a key challenge in the policy paper with regard to planning: the need for **systemic planning which simultaneously integrates housing, transport, energy and green systems.**

Finland supports the following policy priorities/actions stated in the Policy Paper:

- **Environmental, climate, and disaster risk management should be integrated**, with broad participation by stakeholders enabling **transformative change** to occur at the individual, corporate, neighbourhood, community and local government levels.
- Policies for **resilience of cities** should be refined specifically to the place; they should relate closely to sustainable development and **appropriate use of resources**; incorporate integration of environmental, climate, disaster risk management, economic, and social objectives; consider the wider **system and connectivity to rural areas**; and be supported by a comprehensive and tailored “how to” menu of recommendations.
- **Urban form** should take shape **in collaboration with residents** and other stakeholders to make it resilient and locally relevant.
- Update and enforce relevant policies as context changes, such as appropriate **building codes** that reflect both affordability and safety, and that are **low-carbon and climate resilient**.
- Incorporate **principles of resilience into policymaking**: diversity, redundancy, modularity, feedback sensitivity, capacity for adaptation, environmental responsiveness and integration.
- **Include spatial designers** at earlier stages in the **policy process**.
- **Build capacity, knowledge and instruments** for individuals, communities and organizations to manage urban ecosystems for reduction of resilience to shocks and stresses.
- Increase **education about urban ecology and resilience** at all age levels, from primary school through universities and continuing education.
- Develop **community funds** to support investments in resilience.
- Invest in the **capacity of marginalised groups**.
- Good urban form should consider **accessibility and zones based on walking, cycling, public transport**, and transport of goods and services in resource and energy-efficient ways.
- Increase **low-carbon urban planning**. Make use of **renewable energies** appropriate to the specific context. Promote use of energy-efficient and safe buildings through planning.
- Set targets for achieving and maintaining a **specific amount and geographic distribution of open space and public space**.
- Address **urban-rural linkages** and explicitly consider these relationships in building and reinforcing **resilience**.
- Encourage **tenure systems** that do not exclude **the poor and women** from owning and controlling land, including farmland.

- **Investments** should be made in **sustainable and efficient infrastructure** that can meet growing demands for services such as energy, water, and food, while ensuring environmental sustainability and climate resilience.
- Formulate **clear targets (e.g. on energy, mobility, density)** to set the direction for current and future action.
- Design **open space** that integrates daily amenities and **provides co-benefits for resilience**.
- Utilize locally relevant **tools for valuing ecosystems services** to inform planning.
- Catalyze **behaviour changes** that enable a healthier urban ecology and enhanced resilience.

Finland supports the idea of creating enabling frameworks as stated in the Policy Paper:

- At the same time, mechanisms that encourage **active civil society and private sector engagement** in decision-making about **urban ecological and resilience concerns** can help to ensure that interventions achieve their goals...Examples of this type of mechanism include national forums bringing together different cities and researchers like Finland’s Hinku process, national sustainable development commissions, and expert panels which **connect the latest research and innovation to policymaking**.

Finland supports the idea of planning and design interventions stated in the Policy Paper:

- Consider nature-based solutions and **circular economy** to ensure green growth and sustainable development.
- Ensure interventions contribute to all dimensions of sustainable development, including **social wellbeing, livelihoods, and ecological boundaries**.

9 – URBAN SERVICES AND TECHNOLOGY

Key priorities for urban services and technology

- **Basic services for all**
- **Increase eco-mobility (walking, cycling and public transport)**
- **Down-scale individual car-based transport**
- **Develop smart mobility**
- **Integrated land use and transport planning**
- **Green spaces in dense urban settlements**
- **Connectivity beyond administrative boundaries**
- **Local waste prevention concepts**
- **Healthy living conditions**
- **Building-related energy efficiency and decentralized energy production**

Finland suggests the following recommendations related to urban services:

- Promote the principle of **basic services for all**
- **Decrease private car use**, increase walking, cycling and public transport
- **Decrease travel demand** through compact, mixed use urban form and digitization
- Leadership needs to be taken by the **public sector** in order to achieve ambitious results in **sustainable transport**
- **Smart mobility** in human settlements
- Promote **integrated land use and transport planning**

Finland supports the following key transformations/actions to achieve the policy priorities stated in the Policy Paper:

- **Basic urban services are the prerequisite** for any improvements in personal, social and economic opportunities for urban users and socio-economic development at all levels.
- **Fossil fuelled and individual car-based transport needs to be regarded as a complementary means of transport** and drastically downscaled in favour of eco-mobility (non-fossil fuel based public transport, cycling, walking).
- Public Spaces, green infrastructures and urban ecology. High-rise and **dense urban settlement** structures need to go **hand in hand with the quality of green spaces**. Green infrastructures should be interlinked and provide space for a various urban ecology.
- **Urban mobility** should support overall sustainability objectives through the delivery of resource-efficient, space-efficient, people-oriented, clean and safe mobility.
- **Connectivity** should provide for **inter-city and urban-rural linkages**; it should be provided at the level of metropolitan and urban areas, **beyond the administrative boundaries** of cities, through adequate collaboration between relevant entities.'
- Interlink **urban development planning with transport planning** and energy efficiency policies
- Establish mechanisms of **"circular economy"**.
- Develop **local waste prevention concepts** that take into account the specific urban metabolism and focus on the most urgent waste streams with the highest cost saving potentials.
- Reduce the hazardousness of waste streams and recycling rates by **better product design**.
- Improve **healthy living conditions** in urban areas (**air, water, soil, safety**) through transfer of peer experiences, local expertise and awareness;
- Add to any new building developments an **increased quality of public and green spaces** and interlink the system of green spaces to a green infrastructure;
- Combine **building-related energy efficiency improvement** (heating systems, insulation), **decentralized energy production** (solar, wind, geothermal, process or waste heat from industry, commerce and households) and efficiency through **cogeneration** (district heating networks).
- Set **renewable energy**, in conjunction with co-generation and a complementary proportion of conventional energy as long as unavoidable as the future of electricity and heat supply.
- **Coordinate mobility and land use planning policies**; in particular, promote compact urban development, which reduces the need for travel but not the accessibility.
- **Prioritize sustainable modes of transport**, by supporting public transport and non motorised transport, and manage the demand for private motorised transport (Sustainable Urban Mobility Plans).

10 – HOUSING POLICIES

Key priorities for housing policies

- **Affordable housing for all**
- **Social mix in housing**
- **Housing needs of special needs groups (the elderly, ethnic minorities)**
- **Balance of housing tenure types**
- **Green infrastructure, energy efficient housing**
- **Gender equality in inheritance rights**

Finland suggests the following recommendations related to housing policies:

- Ensure adequate **affordable housing** for low-income households
- Promote a **social mix** in housing areas

- Promote the well-being, housing conditions, services and accessibility of a growing **elderly population**.
- Address **housing needs of special groups** including, for example, eligibility rules in social rental housing to accommodate **ethnic minority groups**.

Finland supports the following key recommendations/transformations/actions to achieve the policy priorities stated in the Policy Paper:

- **Housing tenure types other than freehold ownership** should be encouraged, reflecting the various needs and preferences of different groups, including leaseholds, condominiums, cooperatives, shared leaseholds and various forms of rental housing.
- All countries should have a **national housing policy** that promotes adequate housing for all
- Promote a **balance of housing tenure solutions** that include both home ownership and rental
- Expand and improve the **supply chain of social housing stock**, including social rental, and other housing subsidy programs.
- Support **green infrastructure** including the development of energy-efficient housing and technologies.
- Ensure **gender equality** especially in **land inheritance rights**.
- **Recognize irregular settlements** in formal regulatory frameworks.
- Support urban **residential densification policies**.
- Promote integration of **housing** within **disaster response**.
- Address **housing needs of special needs groups**—the homeless, senior citizens, migrants, women, minority groups, and persons with disabilities—and prohibit housing discrimination.

Finland stresses the importance of the following linkages between housing policy and other key areas of the New Urban Agenda, as stated in the Policy Paper:

- The **linkages between housing and social cohesion are critical** for responding to the housing needs of low-income residents, integrating refugees, and ensuring safety.
- **Expanding housing options** in city centers can **limit urban sprawl**.
- Efforts to encourage **medium and high-density housing will reduce transportation costs** and air pollution.