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Comments on the Habitat III issue papers 2.0

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IHS appreciates the invitation provided to civil society and academia to submit written comments on the issue papers (IPs) whose final versions were published on the conference website on May 31st, 2015.

As the institute of urban management of Erasmus University Rotterdam, IHS has developed into a leading international knowledge centre with over 55 years of experience in applied knowledge for urban management and development. Operating on a global scale, IHS offers post graduate education, training, advisory services and applied research. IHS was actively involved in the preparation and execution of Habitat II, Istanbul in the capacity of a core educational institution with an international focus including the urban issues of developing countries.

IHS is a member of the GAP - Academic and Research Constituent Group, an associate partner to the World Urban Campaign and a member of numerous national, regional and international knowledge networks.

We would like to stress the importance of the co-production, dissemination and application of urban knowledge to efficiently achieve the aims as formulated e.g. in the draft of the SDG 11: "Make Cities and Human Settlements inclusive, safe, resilient and sustainable".

We provide within this document some general as well as IP specific comments and suggestions for your kind consideration. We structured the general comments as (1) required clarifications, (2) selection and separation of issue papers and (3) stakeholders, actions and capacities. We structured the IP specific comments as (a) critical points and (b) suggestions for improvement. These however can only be indications of what should be reviewed and what improved. We understand that there will be future opportunities to improve the issue papers during the upcoming processes.

1. General comments

1.1 Required clarifications

- Throughout different issue papers or even the same issue paper **the terminology** is not consistently used (e.g. equity / equality, safety/ security, human rights/ rights)
    - A Definition of terms needs to be made consistent and should be provided in a glossary as part of the set of issue papers.
    - Such a glossary should also indicate the scope and connotation of the terms (e.g. in the IP 11 "Public space" the issue paper states that "public space includes streets" but then continues writing about "public space and streets")
    - General semantic review of all issues papers needed to ensure the careful and concise use of the terminology.
- The global promotion of **specific concepts**, such as the "compact city" that is considered as "the only" environmentally sustainable, or ideal form of city, is highly problematic for an international agenda.
    - IPs should not prescribe specific urban forms or morphologies. These should be developed and decided at national and local levels. We should remember the damage done to our cities by the promotion of spatial principles, e. g. through the Charter of Athens
- Some **general statements** lack evidence to be valid on the global level.
    - Issue papers should incorporate the flexibility to be applicable to different country and city contexts
- Supporting **evidence** should be specific enough to be identifiable
    - References provided such as (Holland) or (London) are not very useful- they need to relate to specific documentation
    - In general, references are too much focused on UN – they should be much wider
- The issue papers are not value-free, the use of **judgemental wording** such as "good cities" or "better path" indicate a certain perspective on how these should be like. This is understandable from the perspective of the authors.
    - Provide an overview issue paper that makes the basic values explicit and clarifies the perspective of the authors.

- There is a shift **from a previous developmental agenda** (as the Habitat Agenda from 1996 was mainly addressing the developing world) to an international one, however this has led to a more Western-city thinking approach and hence an unbalanced perspective on urban development.

    - The differences between high, middle and low income countries should be clearly acknowledged and highlighted

    - All IPs should also recognize the differences not only between countries, but also regional diversities, cultural values and societal requirements.

1.2 Selection and separation of the IPs

- The IPs were selected and delivered before providing a **clearer statement of goals and mission of H III**. This makes the exercise of formulating an overarching aim increasingly difficult as the IPs point now in all possible directions, but at the same time do not cover all aspects of urban life and hence of a future urban agenda and, more importantly, do not clarify how these issues are interacting with each other.

    - The formulation of an overarching aim should base on current discourses of what we want from a city (or of the city we need) e. g. the urban SDG, but such an aim needs to be operationalized into processes (not broken down into sectors). An integrated issue paper that links to policy and provides a framework for the issue papers and highlights their connections could be a useful approach.

- Most importantly, however, is that neglecting the **links between the issues** does not only contradict the aim of an integrative (urban) development, but moreover results in fragmented solutions that cannot ensure the expected impact. Most of the issues cannot realistically and efficiently be solved in isolation, but only in conjunction with other issues (e. g. informal settlements and urban land, migration and urban-rural linkages etc.).

    - Indicate, in each IP, its interconnections with all other issues. "Urban and Spatial Planning and Design" (IP 8) is a good example for this approach. In this way the issue papers will be more structured and easy to understand, less repetitive and clearly related. Figure 1 below is a graphical representation of the linkages between the 22 issue papers.

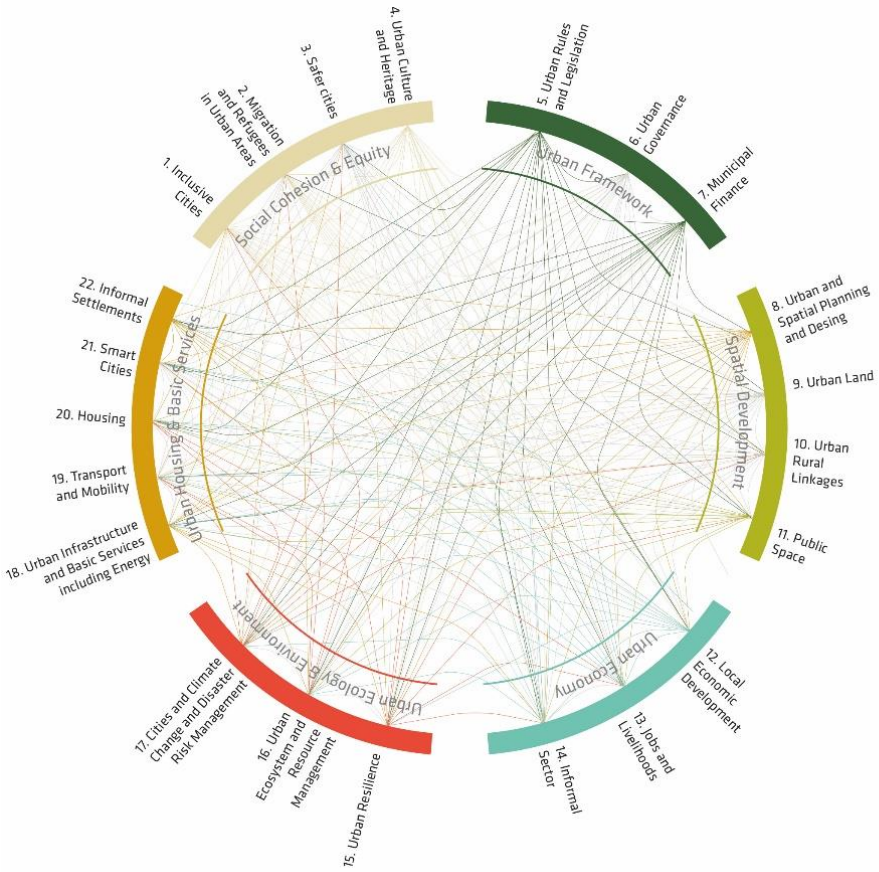


Figure 1: Linkages between issue papers

- The **selection of issues** seems arbitrary and – as any selection – runs the risk to leave important aspects out. For instance an IP on urban capacities is missing.

    - There needs to be more focus on the ways and actions for achieving identified aims. This includes to provide more evidence of the forces of urbanization and current urban development; being clear about the global diversity of "the urban" and also about the essential demands of urban societies and cultures.

- The **sectoral approach** also contributes to a certain tendency to promote rather static and statutory planning approaches. The assumption prevails throughout most of the IPs that urban planning and design can solve most challenges, including safety and migration processes. Furthermore the sectoral approach favours the creation of silos and hampers further integration.

    - Such assumptions need to be critically reviewed and evidence should be gathered where and how cities solved challenges through statutory planning.

1.3 Actions, stakeholders and capacities

- The chapter **"key drivers of** actions**"** is interpreted differently by the various IP authors, sometimes including institutions and stakeholders, sometimes referring to policies or even actions.
  - Provide a clear definition of the meaning of key drivers of actions to the authors

- Many IPs lack a clear **description of stakeholders' roles and responsibilities**. It remains widely unclear who is responsible for the planning or implementation of the required processes.
  - Introduce a chapter to define and highlight the role of different stakeholders would be helpful, maybe with pre-defined sets of actors including civil society, public and private sector.

- The stakeholders **identified are entrusted with actions** they might not be able to accomplish easily, and also without a reference to the plenitude of different levels and constituencies (regional, from city to city, within the different levels of government or civil society etc.)
  - Discuss the capacities needed to address the indicated challenges.

- The **self-organizational capacities** of citizens together with the dynamisms of urban development that go beyond pragmatically planned approaches are not recognized as also positive factors. Instead, they are rather treated as threats that need to be better controlled.
  - Discuss what kind of processes can help urban development and how dynamism can be positively influenced and facilitated, rather than controlled. Moreover, experimenting, learning and adaptive management should be highlighted as important elements of urban decision making to deal with urban dynamism and multiple uncertainties.

1.4 Concluding general comments

Eventually, capacity development (CD) is core for actors, actions and the integration of the different issues. The involvement of the different stakeholders also ensures the plurality of concepts and perspectives which is needed to holistically understand and address current urban challenges. CD needs to address all stakeholders that actively participate in urban development.

Knowledge based institutes have an important role and responsibility for the better integration of the different disciplines and issues within urban development. Often Universities still promote sectorial approaches and divide disciplines into opposing school of thoughts. Silo-thinking is the result of the promotion of specialization and specialists. It will however not help us to address the complexity of urban development and create the cities we want. A link should be established between the IPs and relevant stakeholders understanding their specific requirements and capacities. Moreover a systematic approach should facilitate efficient interaction and cooperation among the different stakeholders. This would help to align the role of knowledge based institutes to more integrative and inclusive urban development worldwide.

Area 1: Social Cohesion and Equity - Liveable Cities

1. Inclusive Cities

Critical points

1. A definition of 'inclusive' or 'inclusive cities' is lacking. Throughout the issue paper, it becomes clear that 'inclusive' is 'equal access for all groups to [all sorts of amenities, resources, processes]. This should be clear from the beginning.

2. In many places, the issue paper lacks concrete and concise numbers and statistics. It is for example not clear how big 'big inequalities' (1) are, what is 'huge' (footnote 1), what are 'serious variances'. We suggest to leave the interpretation of the numbers to the reader and to provide the numbers.

3. Related to that, the issue paper should be reflective onto its own values. The authors clearly value – for example – a 'better path' (1). We suggest to replace this by 'more inclusive path'.

4. Throughout the issue paper, stick to 'inclusive cities', and do not shift to 'harmonious and inclusive society' (2) or 'social cohesion' (4). This is confusing for the reader.

5. The part titled 'the issue' (2) is not substantiated by 'evidence' – as it says it is. The bulleted points are not 'evidence' as they are not substantiated by facts and references. At the moment, these can only be interpreted as 'observations' or 'wishful thinking'. This is a main flaw in the issue paper. In summary: as long as these claims are not clearly argued for, these are untenable.

6. The relationship between 'greater cultural diversity' and 'reducing associated discrimination' (2) is not fully described. The other side of the coin is that, cultural diversity can also lead to affirmation of bias/prejudices as studies show.

7. The bullet-point *'Local governments are …'* is not substantiated. It simply assumes that local governments are working for the benefit of the excluded and marginalized, which is not the case as the issue paper further down argues.

8. We find it striking that almost exclusively references are made to UN reports. I think the issue paper would gain in authority if scientific resources are taken into account as well.

9. Cities are seen as major actors in this issue paper. However, a 'city' in itself cannot be an actor, but 'urban actors' can. Examples of such actors are: the local government, urban private sector, third sector etc. This should be better defined.

10. 'Social innovation' is widely and divergently defined. Provide a definition here.

11. What are 'generative urban spaces' (6)

12. Under 'accountability': 'enhancing access to information' would do better as a part of 'participation' (5). Enhanced access to information can lead to practices of social innovation in itself.

Suggestions for improvement

1. The issue paper is not addressing civil society or the market sector as an actor in inclusive urbanization. The political power of public authorities is limited and integration with civil society and the market sector in inclusive cities is necessary. How can 'inclusive cities' be reached through an integrated approach? Are there any 'best practices'?

2. More examples. This will enhance many 'empty' arguments as made right now in the issue paper.

3. The structure of the issue paper is good: it aims to provide the facts 'the issue' first and then move to a future outlook. However, as is noted under (5), these 'facts' need to be substantiated with evidence or at least references.

4. The definition of 'inclusive cities' should be open for cultural and contextualized meaning. That would truly be 'inclusive'.

A positive note: the notes made on the migrant 'narrative' (5) are eye-opening, plus the attention in general for 'migrants' is positively evaluated.

2. Migration and refugees in urban areas

Critical points

1. The IP on Migration nearly exclusively refers to forced or "illegal" migration (displaced persons, refugees) while the same issue paper indicates that this is only a fourth part of the total of migrants.

2. No reference is made to national migration patterns, to circular or rural-urban migration, to the growing city-to-city migration and its economic implications. Also the important numbers of legal intra-national migration that have strongly impacted on most cities worldwide are not addressed here.

3. Migrants add to the work force of cities, but also impact on the urban development, e. g. in terms of housing and land markets. Growth due to migration is the main factor for rapid urban growth. At a natural growth (through birth in the city) of e. g. 2% and an immigration growth

of another 3%, a city will triple in size within less than 24 years. This is the growth pattern of megacities in the last 30 years.

4. The issue paper states that *"Municipalities are largely not involved in migration policy processes"* – which is not correct in many aspects: e. g. European cities are the ones expected to manage the new arrivals, deal with migrant populations, are the main responsible for the social integration for the existing groups and have often dedicated departments for doing so.

Suggestions for improvement

1. The well-meant recommendation *"Including migration and displacement issues in urban planning and development will help make cities capable of responding to the physical, social and economic challenges"* lacks an indication of how this can be implemented and how urban planning can address migration better.

2. The immediate requirements to address migration (such as housing and work policies that support integration and are flanked with other programmes for inclusion, e. g. in education) are less part of urban physical planning but of policy making.

3. Safer Cities

Critical points

1. "Safe" is not a synonym for "secure". However, the issue paper elaborates much more on issues related to insecurity (violence, crime) rather than safety (ensuring the ability to lead a life protected from harm - including traffic accidents, earthquakes, floods etc.).

2. Inappropriate planning in many cases has significantly contributed to unsafe and unsecured cities. It has caused segregation, fragmentation and, as consequence, deterioration and unsafe areas. These - and other causes of unsafety - are not described in the IP.

Suggestions for improvement

1. *"The majority of the world's poorest people live in cities affected by high crime and violence"* is a misleading statement (building a correlation between the degree of poverty to the extent of crime) and presumably not verifiable. Moreover, poverty is relative so the superlative "poorest" should be avoided.

2. Urban planning or ICT solutions as insurance for more secure cities should be critically questioned: planning approaches can often lead to segregation and fragmentation and not everyone uses social media.

3. The issue paper needs to recognize that functional and sustainable neighbourhoods, as the best warranty for safe and secure places, depend much more on social interactions and opportunities provided to all neighbours than on urban design or policies.

4. Urban Culture and Heritage

Critical points

1. Culture and heritage are often used interchangeably - this is often confusing. Including culture in territorial planning does not necessarily mean the same as including heritage in territorial planning. Integrated conservation, means that cultural heritage (both tangible and intangible) are mainstreamed in strategic planning.

2. The previous comment is also relevant in the sense that in many countries the focus remains on protection and preservation and leaves little room for the more dynamic understanding of heritage as an asset rather than a victim that needs protection.

Suggestions for improvement

1. Heritage as an asset could be more elaborately unpacked in terms of its contributions to economic development (job creation, property value increases, tourism gains, etc) which is all there in the discussion on the creative economy/class. The latter puts little attention to the sphere of lifestyles which an important element of the creative class.

2. The important shift in thinking that sees heritage no longer as a 'victim' but rather as an 'asset' should be more stressed; cultural heritage as a driver for economic (e.g. increased property values), social (e.g. increased citizen participation), ecological (e.g. pedestrian/non-motorized districts) development.

Area 2: Urban Frameworks

5. Urban Rules and Legislation

Critical points

1. It is felt that often remarks are placed rather arbitrarily under specific headings. Also the headings used are vague: what is for instance 'knowledge and operations'? In addition, why would the observation that legal frameworks more often exclude than include vulnerable groups (point 6) fit under this heading? The issue paper would benefit from a logical build-up of argumentation, the use of clearer headings and a more logical categorization of points under these headings. Some form of conclusion, with a future outlook would help in that respect.

2. Some sentences are unclear. For example: point 1 under the heading 'key drivers'. Another example: point 4, same heading: here 2 arguments are given in one point. Suggestion: one bullet point = one argument.

3. The first section discusses main concepts. We feel that the concept of inclusiveness should have a place here and accountability might also be further elaborated. Both are key concepts.

6. Urban Governance

Critical points

1. The issue paper does not present concepts in an analytical way. It rather provides an ideal model of good urban governance promoted by development organisations. Therefore, it does not bring new insights supported by current debates on this topic.

2. There is no reflection on how the barriers to the implementation of the ideal model can be overcome. It is definitely important to state what the final objective should be, but it is also of fundamental importance to shed light on the trajectory (or trajectories) to reach the objectives, and how the inevitable hurdles can be dealt with.

Suggestions for improvement

1. There is no recognition that “good urban governance” may mean different things in different contexts. What we are witnessing is the emergence of different models of good governance, sometimes depending on the particular political context within which they are developed. This should be acknowledged and accepted, if not supported, in order to be able to learn from diversity. By way of illustration, in Asia the Singapore experience is widely considered as the

model to follow though this diverges on some very relevant dimensions from the ideal model put forward by UN-Habitat.

7. Municipal Finance

Critical points

1. The issue paper focuses mainly on the role of governments in financing urban development. However, innovative financing mechanisms increasingly look at other actors beyond the government - the private sector and public-private partnerships are mentioned, but also crowdfunding, incremental financing, sharing and getting access to international grant opportunities are among the possibilities.

2. Moreover, for expanding endogenous resources, it is paramount that citizens understand and support the local tax systems. Citizens and civil society also have an important role to play in auditing government spending and holding governments accountable.

3. The issue paper describes issues of weak capacity and points out the need to develop individual as well as institutional capacity. This also relates to the employment conditions, since in many countries, especially at local level, government employment conditions cannot compete against those of the private sector. This results in a brain drain of the most skilled employees and hence a loss of institutional capacity.

4. Beyond capacity, also the (political) willingness to be transparent in public spending is critical. Since political mandates are mostly limited in time, this poses limitations on long term visions and planning. Furthermore, balancing capital and long-term spending, including operation and maintenance costs, often is not an easy exercise.

5. Optimizing municipal finance means not only looking at how to increase revenues, but also to reduce needless spending.

Suggestions for improvement

1. In order to create a sustainable tax base, budgets and policies need to be understandable and transparent. Participatory budgeting can contribute to citizens' engagement and willingness to pay, as well as linking taxes to spending. Additionally, open, clear and regular communication about taxation and spending is key.

2. Privatizing services that the government does not have the financial means to implement can be a viable strategy. However, as the government represents the rights of all its citizens, it should ensure that all its services, including the privatized ones, are inclusive, pro-poor and gender sensitive.

Area 3: Spatial Development

8. Urban and Spatial Planning and Design

Critical points

1. The issue paper presents issues critically, providing clear definitions and using consistent terminology, making it a comprehensive document.

2. The "compact city" and "urban sprawl" concepts are objectively analysed in relation to the connectivity and mobility. As it is mentioned in the issue paper, the compact city has "generally produced more sustainable urban patterns and forms" due to connectivity. Most of the other IPs explicitly present the compact city as "the only" environmentally sustainable, or ideal form of city without any further elaboration or critique (also see "General comments" section).

3. However, there is a confusion created regarding streets (and also public space). Although the relation of streets with connectivity and its many advantages is clear, the quantitative approach of measuring connectivity with the percentage of land allocated to streets, especially when previously in the same issue paper we read "street connectivity refers to the density of connections and nodes", raises questions.

4. It has to be recognised that "layout and quality" are mentioned directly after the quantitative examples (page 4). However, this is "layout and quality of public space" and not of streets. IP11 on Public Space is focusing more on this issue, however not providing a clear definition and relation between streets and public space, as well. The distinction between (or relation of) streets, connectivity, public space, compact city/urban sprawl requires more focused analysis.

Suggestions for improvement

1. The issue paper is well-structured, clearly relating the topic of Urban and Spatial Planning and Design to most of the other IPs and their thematic areas. Specific mentions and relations to the other IPs could support this structure and introduce a cross-cutting, interactive and integrative approach (that could also be followed by the other IPs and make them more comprehensive)

2. The issue of health should be elaborated and presented in relation to the qualities of urban space. Currently it adds to the debate regarding the compact city as it is assumed that only *"compact and connected urban form [...] has facilitated accessible, low carbon, human centred environments and can influence a community's health in the long term"* (page 4).

3. The relationship between statutory urban spatial planning and development planning such as City Development Strategies should be addressed as this often gives confusion and problems in practise.

4. The role of ethics and the roles professional associations of planners should be highlighted as values such as "inclusivity" or "equity" require strong support in practise in the context of light government and strong private sector.

9. Urban Land

Critical points

1. In the concept of land governance, local governments as an actor should be explicitly included because of their land use planning and taxation responsibilities.

2. As mentioned, the continuum of land rights is not a single line – therefore the representation on a single line is contradictive. A web would be a better representation, or a path with different bifurcations, as there is not a single route but many paths with different outcomes. There should not be one single outcome of the process, e.g. group tenure (leasehold and customary) can also be the targeted land tenure option.

3. In the concept of land value sharing, it should be added that the values should accrue to the public also to finance land uses that are left out of the market (e.g. land for the poor, social housing) or encroached upon (environmentally significant areas).

4. In the case of evictions (concept of security of tenure), there is a difference in whether the land is used directly or held as an asset. For example, in the case of expropriation by the government, the landlord will be compensated, but not the tenants, whereas it is affecting the latter more.

5. The definition of security of tenure as "an agreement or understanding between an individual or group…" eliminates expropriation which will always be needed for the provision of collectively required land uses (public purpose). Expropriation needs to be backed by fair compensation. The idea is that you have the right to an equivalent situation if your possession is required for public purpose. Tenure security refers to the security of the rights not of the specific piece of land.

6. A key issue raised in Vancouver is that the value of land, especially the increments pertaining from public action should be captured for the benefit of society. This is still valid and the basis of the "value sharing" concept.

7. Caution is needed regarding the statement that social tenures - informal and overlapping rights have "caused enormous problems", because it is stigmatizing group/social tenures. There are a lot of slums located on private land where landlords hold land titles (e.g. in Latin America).

8. Point 3 on page 3 is not focusing on urban land. Women's rights to urban land should be the centre of this item.

9. Regarding the 4.5 billion unregistered parcels: this includes 40% of unregistered land in the UK. Therefore unregistered parcels cannot be correlated to slums. This can also be seen from the ratio of people living in slums to unregistered parcels: even with only 1 person per parcel, this would only amount to 25%.

10. The figures mentioned for the urbanization drivers do not seem very reliable. Moreover, the three categories of rural to urban migration, natural population increase and reclassification of land into urban land clearly have overlaps.

11. For securing access to land, also the elderly should be considered specifically (bullet 1 page 4).

12. In issue summary 1 on page 4, the "known and agreed legal procedure" should not be individually agreed but democratically agreed – that is, not a contract but a law.

13. Bullet number 5 on page 5, rather than talking about the opportunities of "land and property tax systems", land based financing of cities should be used, since land and property tax is only one of the instruments.

14. It should be emphasized that the "balance" mentioned in bullet number 8 (page 5) means recognizing the value added by the city (through public investment and land use planning decisions) to individual land and that at present, it is kept mostly by individual owners.

15. Land-based financing should be added as a solution under the first key driver for action.

16. In the second key driver for action, it is suggested to add inclusionary and not exclusionary land use planning. This phrasing is critical to support various initiatives that are trying to implement inclusionary housing in many countries.

Suggestions for improvement

1. Not much is said about serviced land, which is more critical than security of tenure. Security does not bring services (water, sanitation, schools, etc.). "Land value sharing may strengthen supply chains and increase productivity" (page 5), particularly of much needed urban services, infrastructure and social housing.

2. When talking about the land rights of people, public needs should not be forgotten. They should have higher priority than individual needs. The FPIC approach (bullet 5, page 6) is useful for relocation or land sharing forms, but not for expropriation for the public good.

3. As suggested in the IP, rents (prices, value) of land should be brought down and not increased. Revenues raised should be used not only for critical infrastructure and services (bullet 8 on page 6), but also for critical land affordable options and for protection of environmentally sensitive land. More options to access well-located, serviced land should be created so that future generations do not end up in slums and conflicts are reduced. This includes rendering land hoarding and land speculation less attractive. Preventive supply (or rather "release" – as it is not necessarily done by the government) of eco-sensitive land options could be considered. Measures to prevent informal development and sprawl are important, since only preventive action will mitigate the growth of slums. Upgrading and securing tenure in slums should be undertaken with caution as it will attract the formation of more slums.

10. Urban-rural linkages

Critical points

1. The issue paper identifies key issues, such as the need of a synergetic co-operation between urban and rural areas in order to reach common goals. However, it focuses too much on the topic of food and food waste, not exploring other issues, such as exchange and flow of technology and information.

2. The statement *" [...] despite rural areas being a source of unprecedented migration, they are also peaceful and harmonious areas to live in [...]"* (page 7) is a broad and general assumption.

Suggestions for improvement

1. The issue paper should provide clear guidelines and strategies, perhaps including examples, as well as descriptions of stakeholders and their responsibilities.

2. Avoid broad assumptions and generalisations.

3. This issue paper could be linked to issues addressed in the other issue papers, such as Public Space and Urban Land, exploring the connections between them.

11. Public Space

Critical points

1. Currently the lack of structure is making it look vague. Different concepts seem to add-on with little penetration. For example, most "Main Concepts" introduced on page 1 are not discussed in issue paper thoroughly, such as urban commons, placemaking, walkability.

2. Pages 1,2,3: The "public space" definition in Main Concepts indicates that public space includes "streets, open spaces and public facilities". However later on (pages 2 and 3) we read "the character of a city is defined by its streets and public spaces", "focusing on streets and public spaces as a business case..", page 4 "green open spaces"

3. Very technical orientation towards design approaches. The IP8 for "Urban and Spatial Planning and Design" addresses this topic already in depth. Moreover, design should not be considered as the main approach when discussing public space.

4. A quantitative approach dominates – i.e. the focus on securing a determined proportion of space to be public - although quality is many times highlighted, but not developed further in the content of the issue paper.

5. "Private space" as one opposite to public space is not mentioned at all. Privatization is indicated to describe some indistinct threat, but the cause and impact on the underlying processes not scrutinized.

6. At the same time "open, equal and inclusive access" is rather idealistically conceptualized, without a reference to the need of exclusiveness in public space (e. g. children, women, other groups that wish to be sometimes by themselves etc.)

7. Page 2: The statement "Public space generates equality" is a broad assumption and should be better described, taking into consideration an integrated approach towards equality provision.

8. The issue paper should indicate awareness of the differences in the global spectrum, and allow for more subjectivity for the definition of "good places". The "new paradigm for public spaces" (page 6) is made up of quantitative, design and economic development, investment oriented factors. Social issues are missing, except from "access" and "employment" which are mentioned.

Suggestions for improvement

1. The issue paper needs to be structured along clearer lines, setting priorities and providing clearer arguments for its concepts.

2. In addition to the comment above, "equality" and "equity", both mentioned throughout the issue paper, should be considered as two different concepts and defined ("equality" is presented as a Main Concept while "equity" is not).

3. Page 4: the issue paper indicates that "context matters". For that reason it should not conclude by analysing public space only in physical terms and measuring open space versus built space patterns. Instead, local context and urban space in general should be regarded also in terms of their social, cultural and economic aspects namely in the goal/target section. Eventually, quantitative targets for public space and street allocation are context dependent, and should be cultural and regional sensitive, not prescribed.

4. Determining statements such as "a good city should..." (page 5) should be revised.

5. In the "key drivers for action" section, examples for cross-cutting approaches could be made. Public space has important links to issues regarding urban land as well as urban-rural linkages, these could be much stronger connected with the respective IP 11.

Area 4: Urban Economy

12. Local Economic Development

Critical points

1. The issue paper discusses the local economic development and city competitiveness by giving attention to agglomeration economies of the cities. However, agglomeration economies can result to negative spill-overs for the community and the city. Additional to that newer studies in the field of agglomeration economies, strongly debate the much celebrated positive effects of agglomeration economies.

2. In the issue paper we miss any linkages between rural and urban areas. Evolutionary economic geography research has been introduced lately. We recommend literature on the "Borrow sized" concept.

3. More attention has to be given on the attraction of FDI and what is the position of the cities in the global network that will lead to LEC.

Suggestions for improvement

1. Cities need to be categorized into small, medium and large. Depending of the size of the city different strategies need to apply in order to capitalize untapped potentials. The issue paper generalizes the LED.

2. The same holds for sectors. Cities need to identify their comparative advantage based on different sectors.

13. Jobs and Livelihoods

Critical points

1. The issue paper presents some very important and critical issues, such as the "need to generate not just more jobs, but decent jobs"; and the "necessity to promote gender equality and women's empowerment through effective mainstreaming in policy (...)".

2. The issue paper also mentions the problems related to lack of good planning regarding jobs creation, poor working conditions that have an impact in the economic growth, and lack of opportunities for youth and women.

Suggestions for improvement

1. The issue paper could explore better some other actors related to the topic such as legal rights.

14. Informal Sector

Critical points

1. The issue paper starts with the definition of the main concepts and key words. Afterwards the issue paper gives a background of the problematic and gives important facts about the informal economy. Finally it provides main issues and key drivers for actions.

2. It highlights the important role that informal economy plays in different countries, especially in developing economies and in transition. It makes a clear division between geographical regions and gives a broad view on how much (in %) the informal employment contributes to the economy in different regions. A few countries and cities are mentioned as an example.

3. It mentions briefly the role of women and youth in the informal economy and provides maps or figures explaining better the distribution of informal economy in the global south.

4. In the "Issue Summary" section, it addresses the serious labour situation in the informal economy like the insecure and hazardous working conditions.

5. The "key drivers for action" section proposes to tackle some issues by analysing the local context and adopting tailored responses. This could lead to good strategies and significant case studies for other countries with similar situations.

Suggestions for improvement

1. In the "Figures and key facts" section more explanation about the role of women and youth could be added.

2. Child labour is not mentioned and it is an important issue in Asia and Latin America for example. It could be also added that due to informal child labour, children cannot attend to a regular school and therefore this situation limits poor children to obtain knowledge and skills to improve their quality of life in the future.

3. In the "Issue Summary" section, it mentions in a very general way the push and pull factors of informal economy, however issues like corruption, political instability, drug trade and prostitution are not mentioned.

4. As well it is missing an analysis of economic sectors, for example, which economic sectors attract more informal economy (e.g. tourism, manufacturing, agriculture, mining or (domestic) services, etc.).

5. In the "Prioritizing key spatial solutions" an Integrated Urban Planning approach should be also added next to the "planning for social inclusion" which aims to the transition from the informal to the formal economy.

6. In the "Building partnerships", they mention partnerships among local authorities, informal workers and informal enterprises representatives. It could be interesting to analyse the actions of NGOs to address informal economy as well.

7. In the "Drawing on good practices", again child labour has to be addressed to avoid the continuous chain of unskilled social capital. More attention should be given to the capacity building of informal workers and government officials like training, advice, facilitation and technical assistance to help in the transition of informal to formal economy.

8. Positive effects on formalizing informal economies also need to be addressed like access to micro-credits, pro-poor sustainable growth and economic development, and increase of urban competitiveness and attractiveness for future investments.

Area 5: Urban Ecology and Environment

15. Urban Resilience

Critical Points and Suggestions for Improvement

1. Apart from the issue of poverty and informal settlements that exacerbate the vulnerability of poor populations, the issue of raising income inequalities should be also emphasized as a factor that hinders resilience of certain urban societal groups. There is growing evidence showing that socio-economic disparities often lead to vulnerability and risk inequalities.

2. The economic case of investing today on disaster prevention and risk reduction than bearing the emergency and reconstruction costs in the future should be further emphasized. Further work on this area is needed. Evidence based decision support and research should guide decision making towards the allocation of investments for resilient proofing of current and new infrastructure, and mainstreaming resilience in existing plans, policies and institutions and agents operations.

3. Page 7. It is not only that there are a number of tools, methodologies and frameworks available to help cities evaluate their vulnerability and 'test' their resilience. There is an extremely large amount of them, often proposing overlapping approaches and not really advancing knowledge. In the name of resilience many development agencies justify budget expenditures in lower-income countries, with gains in terms of advancing their agendas, developing new frameworks (often slightly rebranded) and publishing outcomes through a variety of outlets. Resilience also becomes the badge of honor that enables local organizations that receive funds to claim they are doing the right thing but the way this is done and for whom is always contested. The report and the organizations putting it forward should be self-reflexive on this point and seek to collaborate rather than compete "at the sound of new frameworks".

4. Page 8. Should 'compact city' be the only desired urban form? Particularly in the context of resilience public green open spaces in cities are considered essential for minimizing multiple vulnerabilities such as flood risk, heat island effect, air pollution, etc. Therefore urban design should consider multiple factors and aim at balancing potential trade -offs and maximizing synergies.

5. Page 8. Measuring resilience is as hard as measuring sustainability and at the moment there are no studies that can be considered analytically sound. Indeed some researchers have begun to question whether it can even be measured at all. The report should mention these issues and acknowledge a series of good principles published by the IDS around building

quantitative measurements of resilience. Link: http://vulnerabilityandpoverty.blogspot.nl/2013/10/can-we-actually-measure-resilience.html). Of course quantitative measuring of resilience alone is not rich enough, and should be coupled with more qualitative analyses.

16. Urban Ecosystem and Resource Management

Critical Points and Suggestions for Improvement

1. The presentation of the different sections can be further simplified/structured as there are overlaps in the content, such as for example, on the goods and services provided by ecosystems in and around cities.

2. The links between ecosystem services, urban planning (including land use/spatial planning), resource efficiency, and ecosystem-based management can be further explained or clearly outlined.

3. The existing challenges, such as difficulties in ecosystem services valuation as well effective translation of these ecosystem benefits to multiple actors, can be acknowledged. Ecosystem services as public goods/common pool resources can be underlined.

4. The inclusion of multiple stakeholders on ecosystems services management is should be emphasized as an important and necessary process of creating ownership of the approach along with the fact that would allow a clear understanding of the distribution of ecosystem services benefits and costs (also at different spatial and governance levels).

5. The issue paper can include governance arrangements for ecosystem services, operational implementation and/or degree of uptake of ecosystem service approaches in developed and developing countries, and available methods/tools/instruments on top of anecdotal examples.

6. Issues of innovative finance mechanisms related to ecosystems services management are missing and therefore should be considered. For instance payments for ecosystem services and land value capture are known innovative finance instruments that relate to ecosystems services benefits.

7. The interlinkages between urban, peri-urban and rural areas with regard to certain ecosystems services provisions should be further emphasized. For example rural-urban agriculture and forestry should be addressed in a more systemic way than purely from an urban perspective.

8. In the section of "sustainable resource efficient cities and preserving ecosystem-based management of cities" the concept of circular economy should be presented and emphasized

as one of the main approaches of contributing to the development of more resource efficient cities.

9. The role of evidence based and informed decision making in urban ecosystems management should be also emphasized and the role of knowledge based Institutes should be acknowledged. The gap between urban practitioners, policy makers and researchers should be bridged and other multi-stakeholders partnerships should be promoted.

17. Cities and Climate Change and Disaster Risk Management

Critical Points and Suggestions for Improvement

1. Climate impacts will be faced differently from cities in high, middle and low income countries. This differentiation and distribution of vulnerability and risk across cities with different income levels should be highlighted. In addition, depending on the local context and local needs cities should prioritize issues related to climate change. Climate change mitigation for instance should not be the first priority for a low income city that lacks basic services and infrastructure while having minimum contribution to global GHG emissions.

2. The different objectives, challenges, processes of climate mitigation and adaptation (and DRR) should be better explained and structured in the IP. The drivers of their differences should be also explained. For instance climate mitigation refers to global and long term benefits through the reduction of GHG emissions, whereas climate adaptation refers to direct local and short to midterm benefits.

3. Furthermore potential trade - offs and synergies between mitigation and adaptation (and DRR) should be also addressed in the IP. It is important to understand these interrelationships in order to maximize their synergies and minimize their conflicts.

4. The economic case of investing in climate mitigation and climate proof/resilient infrastructure should be underlined. Understanding of the distribution of costs and benefits of climate mitigation and adaptation is essential in order to have informed decision making.

5. The issue of finance and different sources of climate finance should be further emphasized along with the need of new innovative and efficient financial mechanisms (e.g. green bonds).

6. Page 4. What "new data" consists of remains vague and should be made specific. Who holds the new data? Is it traditional knowledge held by indigenous communities? Is it localized citizen generated content?

7. Page 4. There is a recognition that “a gap remains” in translating knowledge gathered through risk assessments, emission inventories, into practice and informing local, regional and

national policies. The only strategy suggested to overcome this gap is better access to data, information and service products, while it is important question the whole system of knowledge production for climate change in order to understand why certain knowledge is included and other is excluded. For example, the socio-political context and decisions often engender vulnerability but this is often neglected as "knowledge for climate". Different ways of seeing, cultures and worldviews that go beyond scientific knowledge, are also neglected. What types of other approach to an epistemology of climate change can be thought of? Is the consideration of transdisciplinarity enough considering our increasingly diverse cities and neighbourhoods?

8. Page 5. Vulnerability is not only influenced by socio-economic variables but also crucially by political-economic and planning decisions made by local governments and ruling elites.

9. Page 6. The policy section should recognize that still in many countries national strategies for climate change adaptation fail to generate clear mandates at lower tiers of government leaving action up to those local government units where most vulnerabilities are identified.

10. Page 9. It's not clear what "implementing risk reduction and climate action as a continuous process" refers to. reduction of risk can contribute to climate adaptation but effectively proving this depends on longitudinal studies comparing impacts before and after similar magnitude events disaster events and on consistent monitoring and evaluation procedures in time for which many governments do not set aside financing.

11. Page 10. "In cities there is an inter-connected economic and resilience/climate benefit from infrastructures". This "infrastructural" approach is very narrow and serves well those development agencies out there that are seeking business and leverage in urban development. This is not to dispute the fact that cities need well maintained and reliable infrastructure, the problem is the mode in which this is delivered (through big donor agencies partnering with dominant power elites often resulting in their reinforcement) and how it affects the citizens that it is supposed to serve (the ways in which new infrastructures and technologies enter the metabolism of a city and its citizens is often neglected). The suggestion here should be that the inter-connected economic and resilience/climate benefit from infrastructures can be realized and achieve distributional effects only if critical competing interests are taken into account during the planning process. Also what are the other aspects that we should seek to improve/finance and that can bring other types of benefits to a society?

12. Page 10. This focus on ICT as the panacea for solving information, data and knowledge management is overstated. The reality is very different, citizens and governments have access and use ICT in a non-homogenous way, therefore focusing on ICT also means to take into account who is left out and who is accounted for. Further because the actors who experience climate change are diverse (different incomes, different education levels, different cultures) and the type of data collected across sectors (e.g. health, planning, ecology) may require

different analysis skills and tools, the report should be more nuanced towards ICT and open to a diversity of ways of collecting, storing and sharing information and data about climate adaptation and risk, including more analogue and traditional ways for which there may not be a digitized counterpart).

Area 6: Urban Housing and Basic Services

18. Urban Infrastructure and Basic Services including energy

Critical points

1. The issue paper puts an emphasis on climate change as an issue for sustainable development. However, in the changing paradigm of sustainable urban infrastructure planning local conditions has been recognized as a more critical issue. The issue paper does not adequately reflect diversity, challenges and influence of local conditions in planning and providing basic infrastructure.

2. The section key drivers of action primarily focus on holistic approach, new business models and more participatory planning. It misses out the role and importance of innovations in technology and design.

3. The role of scientific research in decision support tools in infrastructure planning is also not discussed in the issue paper.

Suggestions for improvement

1. In the issues section, the issue paper should elaborate more on the diversity in local needs for basic infrastructure. It should also reflect upon the impacts of infrastructure development on different and non-user groups in the local area.

2. A section on decision making tools in infrastructure planning shall be included as one of the key drivers.

19. Transport and Mobility

Critical Points

1. The issue paper is well structured providing first an overview of the main issue regarding transportation and mobility, with data and examples, and then focusing on key drivers for actions.

2. The issue paper mentions the importance of transportation and mobility planning for all, including the poor, the elderly, the young, people with disabilities, women and children. However, it does not explore accessibility and safety issues involving these groups.

Suggestions for improvement

1. More focus on safety issues considering not only traffic safety but also personal safety and security especially related to the groups in vulnerable conditions, such as women, people with disabilities, elderly.

2. The paper should have stronger linkages to other issue papers such as housing, jobs and livelihoods, urban land.

20. Housing

Critical Points

1. The issue paper emphasizes the need of a stronger nexus between housing and urban planning practices, connecting housing to issues such as accessibility and livelihood in cities. However, it lacks further development about strategies to integrate all these issues.

2. Some statements are too general and might not be the case in some countries. Page 4 *"Government interference in the housing sector has been minimal and many have almost withdrawn from housing provision, land supply, procurement, servicing and even regulation."*

Suggestions for improvement

1. The issue paper should discuss more about the roles of all stakeholders in the housing context and how to strengthen capacity of local governments and finance institutions. Important aspects should be better elucidated such as affordability in different local contexts (developing and developed countries), segregation and informal housing.

21. Smart Cities

Critical points

1. The paper recognizes that the rate of urbanization in the near future will keep on increasing rapidly. The assumptions are based on acceptable forecasts, however making it the only base for the way forward reduces the scope for thinking about alternative sets of possible solutions for managing urbanization. These include reducing immigration of people from rural areas to cities by strengthening regional mobility, developing satellite towns, and improving quality of life in rural areas.

2. The paper strongly focus on the role of ICT in service delivery but it completely misses out risks involved in ICT based city governance. This is a very critical issue, even in most advanced

countries computing errors in smart infrastructure are commonly seen. Countries in transition should be made aware about smart cities from the perspective of the risks involved.

Suggestions for improvement

1. It is really important to include a section on risks involved in ICT based service delivery and city governance. It can be incorporated in the section 'Smart Cities: A viable option for the future'.

2. The paper should not focus uni-directionally on smart cities as a way forward to sustainable development. It should rather present smart cities approach as an alternative with its own limitations and shortcomings.

22. Informal Settlements

Critical points

1. Whilst informality in terms of categories of income, employment generation, mode of settlement development, or land servicing are unregulated by the state or informal regulatory structures, it is acknowledged that informal social institutions and networks play a critical role in organization and support, particularly in informal settlements. They help alleviate vulnerability and other undesirable challenges associated with informality. For instance, informal social networks, norms, and structures play an important role in holding economies and communities together despite daunting economic, political, and environmental challenges. In some countries, especially in Sub-Saharan Africa, social institutions and regulatory networks have been regulating spatial structure in informal settlements and facilitating land markets; they also provide security of tenure. The roles being played by social regulators have made a difference in many cases, making informal settlements not only attractive to the poor, but also to the affluent.

2. For most informal settlements, location is crucial, as access to employment often depends on it. The persistence of informal settlements even in places with sufficient, but not well located land available indicates that for informal settlers, employment often takes priority over basic services. Inversely, the proximity of cheap labour force contributes to the competitiveness of the economy. The further away workers live from employment opportunities, the higher their financial and social costs for commuting. For an inclusive approach, it is imperative that there is sufficient provision of well-located areas for the poor. As upgrading often pushes the poor out, it is important to protect these areas through policy.

Suggestions for improvement

1. The central issue regarding informality—especially informal settlements—is how to enable the informal land development sector to perform better, that is, to improve the quality of living and working environments created by informal sector actors. Firstly, this implies accepting

informality as a mode of urbanisation, and secondly, supporting and working with those parcelling and constructing buildings in informal settlements rather than working against them.

2. Voices from the informal settlements need to be heard, not only during the process of upgrading, but in policy and decision making in general.