1) **A brief analysis of the Framework Paper**

“A National Urban Policy (NUP) harnesses the dynamics of urbanization and integrates it into the overall process of a country’s development – it does not replace local urban policies, but compliments them to create an overall, cross-cutting vision of an urban landscape.”

**Key transformations**: cross-governmental institutional architecture, effective devolution (fiscal, policy-making, and service provision), appropriate capacity development; increased coherence of national and local policies related to urban development, empowering local authorities, empowering communities, improving investments in cities by improving business environment, fostering co-operation and collaboration across jurisdictions by overcoming metropolitan fragmentation and discouraging “race-to-the-bottom” competitions, improved quality of life and well-being.

**Key priorities**: structuring the urban systems (from large to medium to small cities), facilitating urban policies and governance at a metropolitan scale, strengthening urban, peri-urban and rural interactions, addressing urban poverty, segregation and inequality (such as informal settlements, land reform and housing), recognizing rural areas and the urban-rural continuum, considering safety and security in cities, strengthen active participation, accountability and transparency, ensure environmental sustainability, adequate financing of the NUP process, relevant legal and regulatory frameworks.

2) **Identify messages or proposals that are problematic for us: a brief comment or propose an alternative wording.**

Even if the paper stress the need for better coordination between different levels of government, call for the clarification of different stakeholders and alert against a top-down approach (“balancing top-down and bottom-up approaches to NUP development”), the role of sub-national governments as a sphere of government are not clearly addressed and defined. Sub-national governments could be perceived as merely implementing partners (“sub-national governments have the responsibilities/powers/resources to make the policy actionable”), but their role as decision making partners in NUPs definition and strategies, it is not clear developed.

Instead, the paper stress the need of national leadership for coordination across levels of governments, but the leading role of sub-national governments to promote a “bottom-up approach” to balance top-down strategies are not clearly recognized.

3) **Are there critical points or questions that are absent in the Framework Paper? Which ones?**

NUPs is one of the pillars of urban governance. The process for the development of adequate NUPs is as important or even more than the outcomes. It should be as seen as a process to build a “multilevel partnership approach” between different levels/spheres of government, based on the *principles of subsidiarity and recognition of local-self-governments.*
The document should make a stronger call for more balanced urban systems based on adequate financing mechanisms to reduce urban and territorial gaps and avoid letting any territory behind (i.e. transfers or equalization funds). The “differentiated territorial approach” - mentioned as part of the recommended actions- should encourage a closer collaboration and complementarities between metropolitan areas and intermediary (or secondary) cities and promote inter-municipal cooperation between intermediary cities to create a more inclusive and polycentric system of cities.

The proposed list of targets should include indicators on effective decentralization and on adequate financing for NUPs, and particularly sub-national governments for investments (i.e. ratio between national revenues and expenditures on local revenues and expenditures, disaggregated by regions and cities).

Comments from Committee on Culture:
- Very poor understanding of the key role of culture (heritage, creativity, diversity) as a key dimension of sustainable cities.
- There is the need to include a “culture” chapter in “National Urban Policies”. Cities need national guidelines / platforms / learning hubs / good practices also in the domain of cultural policies