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TARGETED ANALYSIS //

URDICO

Urban Dimension of Cohesion Policy
and other EU programmes

Annex 4.8 – Warsaw Metropolis, City of Warsaw and Warsaw
Metropolitan Area // January 2026



This Targeted Analysis is conducted within the framework of the ESPON 2030 Cooperation Programme, partly financed by the European Regional Development Fund.

The ESPON EGTC is the Single Beneficiary of the ESPON 2030 Cooperation Programme. The Single Operation within the programme is implemented by the ESPON EGTC and co-financed by the European Regional Development Fund, the EU Member States and the Partner States, Iceland, Liechtenstein, Norway and Switzerland.

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Acknowledgements

The authors would like to thank all interviewees and participants of the Urban Laboratories for sharing their views, expertise, time, and effort

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ISBN: 978-2-919839-42-1

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Published in February 2026

Layout and graphic design by BGRAPHIC, Denmark.

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The information contained herein is subject to change and does not commit the ESPON EGTC and the countries participating in the ESPON 2030 Cooperation Programme.

The final version of the report will be published as soon as approved.

Table of contents

Abbreviations	8
1 Summary	9
2 Introduction	10
3 National Overview on Cohesion Policy	13
4 Urban structure and governance of Cohesion Policy	17
4.1 Spatial boundaries and administrative configuration	19
4.2 Governance of Cohesion Policy in Warsaw Metropolis	22
4.3 Warsaw Metropolis's involvement in Cohesion Policy.....	24
4.3.1 2014-2020 programming period	24
4.3.2 2021-2027 programming period	26
4.3.3 Main differences	28
4.4 Networking and lobbying activity.....	29
5 Administrative capacity and Institutional innovations	33
5.1 Administrative capacity and management gaps	34
5.2 Multilevel governance	35
5.3 Financial constraints and technical complexity.....	36
5.4 Innovations and good practices	37
5.5 Added value of negative experiences.....	43
6 Cohesion Policy contributions to city long-term agendas	45
6.1 Main development instruments.....	48
6.2 Localisation of Cohesion Policy	54
6.3 Key investment areas	57
7 Funding schemes and synergies	60
7.1 Funding schemes	60
7.1.1 Nationally or regionally distributed EU funds	60
7.1.2 Other relevant EU funds and programmes	61
7.1.3 Other funding alternatives.....	61
7.2 Funding coordination mechanism	62
8 Recovery and Resilience Plan	63
8.1 The Governance of Recovery and Resilience Plan	63
8.2 Coherence with Recovery and Resilience Plan	65
8.3 Recovery and Resilience Fund.....	67
9 Challenges and policy recommendations	69
9.1 Urban structure and governance of Cohesion	69
9.1.1 Challenges	69
9.1.2 Policy recommendations	70
9.1.2.1 Local level	70
9.1.2.2 National and regional level.....	70
9.1.2.3 European level.....	71
9.2 Administrative capacity and Institutional innovations	71
9.2.1 Challenges	71
9.2.2 Policy recommendations	71
9.2.2.1 Local level	71
9.2.2.2 National and regional level.....	72
9.2.2.3 European level.....	72
9.3 Cohesion Policy contributions to city long-term agendas.....	73

9.3.1	Challenges	73
9.3.2	Policy recommendations	73
9.3.2.1	Local level	73
9.3.2.2	National and regional level.....	74
9.3.2.3	European level.....	74
9.4	Funding schemes and synergies	75
9.4.1	Challenges	75
9.4.2	Policy recommendations	76
9.4.2.1	Local level	76
9.4.2.2	National and regional level.....	76
9.4.2.3	European level.....	77
10	Conclusion	79
	References.....	80

List of maps, figures and tables

List of maps

Map 4.1 Spatial boundaries of Warsaw Metropolis.....	21
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List of figures

Figure 3.1 EU Funds Implementation schemes in Poland	13
Figure 4.1 Institutional architecture of public administration in Poland	18
Figure 4.2 Networking mapping of Warsaw Metropolis.....	32

List of tables

Table 4.1 Spatial boundary of Warsaw Metropolis case study	19
Table 4.2 Administrative configuration and responsibilities in Warsaw Metropolis	21
Table 4.3 Governance of Cohesion Policy in Warsaw Metropolis	23
Table 4.4 Warsaw Metropolis engagement in delivering cohesion policy 2014-2020	25
Table 4.5 Warsaw Metropolis engagement in delivering Cohesion Policy 2021-2027.....	27
Table 4.6 Networking and lobbying activity of Warsaw Metropolis	31
Table 5.1 Main innovations implemented at local level.....	41
Table 5.2 Added value of negative experiences in Warsaw metropolis	44
Table 6.1 Main instruments at national, regional and local level.....	51
Table 6.2 Coherence with the Cohesion Thematic Objectives 2014-2020	55
Table 6.3 Coherence with the Cohesion Policy Objectives 2021-2027.....	56
Table 6.4 Key Investment Areas 2014-2020 and 2021-2027.....	58
Table 8.1 The Governance of Recovery and Resilience Plan in Poland	64
Table 8.2 Coherence with the Recovery and Resilience Plan.....	67

List of boxes

GOOD PRACTICE 1 Centre for Coordination and Quality in Cohesion Policy – the European Funds & Development Policy Department of the City of Warsaw	39
GOOD PRACTICE 2 Study Visits and Metropolitan Workshops Organised by the Warsaw Metropolis Association	40
GOOD PRACTICE 3 The Metropolitan Council – an advisory body of the Warsaw Metropolis	41

Abbreviations

APC – Association of Polish Cities (Związek Miast Polskich)
 BGK / NDBP – National Development Bank of Poland (Bank Gospodarstwa Krajowego)
 CF – Cohesion Fund
 CND / KRK – Concept of National Development (Koncepcja Rozwoju Kraju)
 CPR – Common Provisions Regulation
 CRW / RWS – Capital Region of Warsaw (Region Warszawski Stołeczny)
 CTH / CPK – Central Transport Hub (Centralny Port Komunikacyjny)
 EC – European Commission
 EGTC – European Grouping of Territorial Cooperation
 EMA – European Metropolitan Authorities
 ERDF – European Regional Development Fund
 ESF – European Social Fund
 ESF+ – European Social Fund+
 EU – European Union
 FUA – Functional Urban Area
 IB / IP – Intermediate Body (Instytucja Pośrednicząca)
 ITI / ZIT – Integrated Territorial Investments (Zintegrowane Inwestycje Terytorialne)
 JTF – Just Transition Fund
 KPO / RRP – National Recovery and Resilience Plan (Krajowy Plan Odbudowy)
 MA / IZ – Managing Authority (Instytucja Zarządzająca)
 MDS – Municipal Development Strategy
 MFiPR – Ministry of Funds and Regional Policy (Ministerstwo Funduszy i Polityki Regionalnej)
 MIMs – Minimal Interoperability Mechanisms
 MTNDS / ŚSRK – Medium-Term National Development Strategy (Średniookresowa Strategia Rozwoju Kraju)
 NSDC / KPZK – National Spatial Development Concept (Koncepcja Przestrzennego Zagospodarowania Kraju)
 NSRD / KSRR – National Strategy for Regional Development (Krajowa Strategia Rozwoju Regionalnego)
 NUP / KPM – National Urban Policy (Krajowa Polityka Miejska)
 NUTS – Nomenclature of Territorial Units for Statistics
 OASC – Open and Agile Smart Cities
 OP / PO – Operational Programme (Program Operacyjny)
 PIT – Personal Income Tax
 PPSE – Programme for Preventing Social Exclusion
 PPP – Public-Private Partnership
 PR / RP – Regional Programme (Program Regionalny)
 ROP / RPO – Regional Operational Programme (Regionalny Program Operacyjny)
 RRF – Recovery and Resilience Facility
 SECAP – Sustainable Energy and Climate Action Plan
 SEAP – Sustainable Energy Action Plan
 SUMP – Sustainable Urban Mobility Plan
 TO – Thematic Objective (2014–2020)
 PO (2021–2027) – Policy Objective (Cel Polityki)
 UMP – Union of Polish Metropolises (Unia Metropolii Polskich)
 WFA / WOF – Warsaw Functional Area (Warszawski Obszar Funkcjonalny)
 WM / MW – Warsaw Metropolis (Metropolia Warszawska)
 WMA / OMW – Warsaw Metropolitan Area (Obszar Metropolitalny Warszawy)
 WMAssoc. – Warsaw Metropolis Association (Stowarzyszenie Metropolia Warszawa)

1 Summary

This case study, prepared within the ESPON URDICO project, examines how Cohesion Policy is implemented in the Warsaw Metropolis, comprising the City of Warsaw and its surrounding municipalities. It analyses institutional arrangements, administrative capacity, multi-level governance, and territorial coordination across the national, regional, metropolitan and local levels. Drawing on strategic documents, financial data and interviews with key stakeholders, the report identifies how Cohesion Policy contributes to long-term development priorities, where systemic barriers persist, and which innovations improve governance and project delivery. The study highlights the evolution of strategic planning and cooperation frameworks in the metropolitan area, including ITI instrument, sectoral coordination mechanisms and emerging mission-oriented approaches.

The analysis identifies several interlinked challenges shaping how Cohesion Policy operates in the Warsaw Metropolis. First, multi-level governance remains fragmented: national authorities retain control over programming and regulatory decisions (“gatekeepers”), while regional-local coordination is often transactional rather than strategic. The absence of a metropolitan governance tier and the voluntary nature of inter-municipal cooperation limit coherence in key policy domains, including land-use planning, transport, climate policy, and public services. Second, the alignment between operational programmes and metropolitan needs is imperfect; thematic concentration rules restrict the scope of investments, and strategic urban priorities do not always match available OP windows. Third, administrative and regulatory complexity generates operational burdens: excessive bureaucracy, evolving eligibility rules, and limited flexibility hinder project delivery. Smaller municipalities face capacity gaps. Fourth, financial constraints and co-financing requirements remain significant. Reduced co-financing rates in 2021–2027 and rising investment costs create pressure on municipal budgets.

The report proposes actions across governance levels to strengthen the urban dimension of Cohesion Policy. At the local and metropolitan levels, recommendations include reinforcing inter-municipal cooperation platforms and institutionalising metropolitan-scale planning tools, especially in mobility, climate adaptation and spatial development. At the regional level, stronger strategic leadership from the Managing Authority is needed, with clearer frameworks for metropolitan-relevant investments, greater predictability in programming, and more consistent use of monitoring and consultation mechanisms. At the national level, reforms should reduce regulatory over-complexity, streamline procedures, and increase flexibility for urban and metropolitan priorities. National strategies should better recognise the functional role of large metropolitan areas and strengthen incentives for integrated territorial approaches. At the EU level, recommendations include improving the urban dimension within Cohesion Policy regulations, ensuring more stable and strategic involvement of metropolitan actors in programming, and fostering synergies with direct-management programmes. Increased flexibility in thematic concentration and more consistent support for metropolitan governance reforms would further enhance policy effectiveness.

Overall, the Warsaw Metropolis case underscores the need for a more coherent and territorially sensitive framework that supports coordinated metropolitan development while enabling municipalities to innovate, collaborate and deliver high-impact investments aligned with their long-term strategies.

2 Introduction

This report was prepared as part of the ESPON URDICO research project, which aimed to analyse the implementation of Cohesion Policy in urban areas of the European Union, with particular attention to the mechanisms of multi-level governance, territorial coordination, and the institutional capacity of actors involved in delivering Cohesion Policy. The Warsaw case study seeks to illustrate the specific features of policy implementation in Poland's largest city and its surrounding metropolitan area, as well as to identify both good practices and existing systemic barriers.

As the capital of Poland and a metropolitan leader Warsaw represents a particularly compelling case for analysing the institutional conditions for delivering integrated territorial investments, infrastructure projects, and urban initiatives. The study focuses on understanding decision-making mechanisms and the relationships between different levels of governance, from central government, through the regional level, to local authorities, as well as practices of cooperation within functional urban area (FUA).

The report is based on a set of qualitative and quantitative data, including the analysis of strategic documents, a review of Cohesion Policy instruments, and a series of in-depth interviews with representatives of key institutions from the local, regional and central governance levels. The analysis covers both the perspectives of managing authorities and local beneficiaries of EU projects.

The structure of the report follows the logic of case study analysis adopted by the ESPON URDICO project and guides the reader through successive stages of the study, from the institutional background to the identification of challenges and policy recommendations.

The opening chapter introduces the institutional and territorial context of Warsaw and its metropolitan area. The next part presents the framework for implementing Cohesion Policy in Poland. It then discusses the organisation of public administration in Poland and, in this context, the competences and responsibilities assigned to different levels of governance. Subsequent sections describe the delimitation of the case study area and the specific mechanisms of Cohesion Policy implementation in the Warsaw metropolis. The following chapters present the findings of the analysis of challenges related to multi-level governance and coordination across different administrative levels. Organisational barriers are identified, along with mismatches between operational programmes and metropolitan needs, as well as issues related to excessive bureaucracy and a lack of stable planning frameworks. The report then focuses on innovations implemented in Warsaw and the region, aimed at increasing institutional capacity, improving metropolitan cooperation, and enabling more effective use of EU funds. This includes practices related to transport integration, project management, inter-municipal cooperation mechanisms, and the development of support tools. Issues of fund accessibility and difficulties with project co-financing are also analysed. The final section presents a synthetic summary of challenges and policy recommendations at the local, regional, national, and EU levels.

* * *

The case study focuses on the city of Warsaw and its metropolitan area, collectively referred to as the Warsaw Metropolis. However, the definition of the metropolitan area has evolved over time. During the 2014–2020 programming period, the area of analysis was defined as the Warsaw Functional Area – WFA (WOF – Warszawski Obszar Funkcjonalny). This configuration was based on national-level strategic documents, namely the National Spatial Development Concept and the National Strategy for Regional Development 2010–2020. While the WFA was not formally designated as a metropolitan area in legal or statistical terms, it reflected a de facto metropolitan logic based on commuting flows, service accessibility, and actual as well as potential inter-municipal cooperation. The WFA encompassed 40 municipalities, including the city of

Warsaw. For this area, an Integrated Territorial Investments (ITI) Strategy was developed for the period 2014–2020+. The total area covered approximately 2,900 km², with a population of around 2.8 million.

A significant change occurred in the 2021–2027 period, because in 2018 the Capital Region of Warsaw – CRW (RWS - Region Warszawski Stołeczny) was introduced as a separate NUTS2 unit, following a revision of Poland's statistical territorial classification. The CRW encompassed the city of Warsaw, the municipalities included in the ITI area in 2014–2020, as well as 30 additional municipalities not previously part of the functional urban area. The CRW also includes 9 counties (as higher-level local government units). Thus this expanded territory is organised administratively into nine counties (powiaty) and became not only a new statistical unit but also the territorial frame of reference for the updated ITI strategy for 2021–2027.

The creation of the CRW was also reflected in the regional spatial development plan, which adjusted the boundaries of Warsaw's FUA to align with the new NUTS2. According to the Mazowieckie Voivodeship Development Strategy 2030+, the CRW has been designated a growth pole and a strategic intervention area. From that point onward, the CRW has been used to represent the Warsaw Metropolitan Area (WMA) in strategic planning documents. This area covers approximately 6,100 km² and has a population of about 3.2 million.

It is important to emphasize that the Warsaw Metropolitan Area is not a formalized administrative entity and lacks metropolitan governance structures. The establishment of a formal metropolitan authority in Poland requires national legislation. So far, only one such legal act has been adopted in 2017 establishing the Metropolitan Association of Upper Silesia and Zagłębie. Local governments from the CRW may refer to themselves as a "metropolis" in functional, strategic, or promotional terms. However, the absence of formal metropolitan status, such as that granted to the Upper Silesian metropolis, means that such entities do not receive dedicated financial support (e.g., the 5% PIT revenue share). Informal metropolitan areas operate under general laws on local government and associations. This is why the ITI mechanism has been particularly important for the development of the Warsaw Metropolis. The EU cohesion policy instrument of ITI has enabled a constructive dialogue among municipalities in the metropolitan area, resulting in a jointly developed ITI Strategy and coordinated implementation of projects significant to the area as a whole as well as to individual municipalities.

According to national regulations governing the implementation of EU-funded activities for the 2021–2027 programming period (Act of 2022), ITIs are implemented in functional urban areas designated as strategic intervention areas in regional development strategies. In the case of the Warsaw Metropolitan Area, ITI tasks are coordinated by the Warsaw Metropolis Association – WMAssoc. (Stowarzyszenie Metropolia Warszawa) based on its statute as an association of local government units, comprising 70 municipalities and 9 counties.

Warsaw is the core city of the Warsaw Metropolis. It concentrates national institutions, major businesses, international connections, and attracts a daily influx of commuters and migrants. Its surface area is 517.24 km², and its population has been steadily increasing since 2014, despite national trends of demographic aging and suburbanization, reaching 1,863,845 in 2024.

Warsaw operates under a specific law on the governance of the Capital City of Warsaw (Act of 2002), which distinguishes it from typical municipalities. It has the status of both a municipality and a county (*powiat*). The executive authority is vested in the Mayor (President of Warsaw, who is elected in a direct popular vote.), while the legislative body is the City Council. Warsaw is subdivided into 18 districts, which are not separate legal entities and do not have independent local government status. They operate on behalf of the city government within assigned areas of responsibility. Each district is managed by a District Board led by a Mayor, who is elected by the District Council. The District Council operates as the legislative body.

The Mayor and City Council of Warsaw exercise both political and financial oversight. While districts have a degree of operational autonomy, they do not have independent budgets. Funds are allocated by the City Council and districts' powers derive from city-level resolutions and regulations. The Mayor of Warsaw governs the entire city as its chief executive, represents it externally, signs contracts, implements the budget, supervises districts, and appoints or dismisses district mayors (at the request of the District Boards). Of particular relevance to the URDICO project, the Mayor is responsible for strategic and spatial planning, financial and investment management, and key public services including upper-secondary education, public transport, utilities, culture, and public safety.

As mentioned earlier, the Warsaw Metropolis lacks formal administrative or managerial institutionalization. Its development governance system can be described as complex, multi-level, and based on soft governance mechanisms without a single decision-making centre. Municipalities within the Warsaw Metropolitan Area retain full autonomy. Each local government unit has its own development strategy, planning authority, budget, and responsibilities for public services (education, local transport, social care, culture).

The Mazowieckie Voivodeship Government (Marshal and Marshal's Office) is responsible for preparing higher-level strategic documents, such as the Mazowieckie Voivodeship Development Strategy 2030+ and the Regional Spatial Development Plan. Through these instruments, the voivodeship fulfils its coordination mandate in regional socio-economic and spatial development.

Socio-economic actors, including NGOs, universities, business chambers, and companies, also play an important role in advancing regional and metropolitan development. They participate in consultations and project partnerships, including ITI-related initiatives. Their contributions are particularly significant in promoting social development, sustainable mobility, and educational advancement.

The central government provides the legal framework for the operations of local governments (municipalities, counties, and voivodeships), defines the rules for EU fund programming, and oversees selected areas of territorial development. This includes major national infrastructure projects (e.g., the Central Transport Hub – CTH / Centralny Port Komunikacyjny – CPK/, motorways and expressways, rail connections).

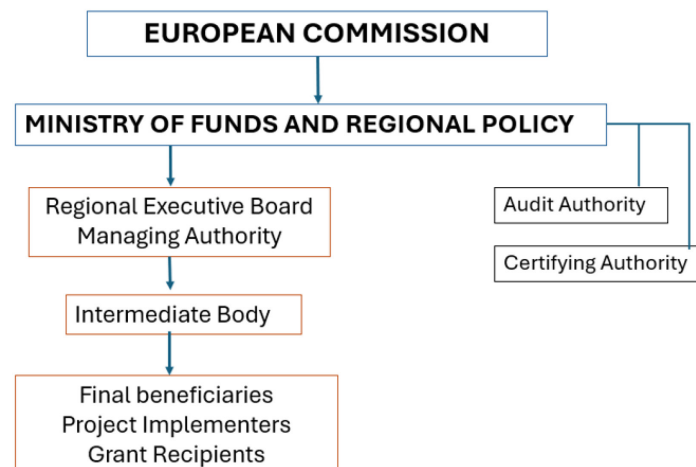
3 National Overview on Cohesion Policy

Poland has been a member state of the European Union since 2004, and cohesion policy constitutes a key instrument supporting the country's socio-economic development. Poland is a unitary state with a three-tier administrative structure: województwa (voivodeships, regions), powiaty (counties), and gminy (municipalities, constituting the basic level of local government). At the central level, public administration is carried out by the national government; at the regional level, both governmental and self-governmental administrations operate; while at the local level (municipalities and counties), administration is entirely devolved to local governments. Large cities and metropolitan areas play a particularly important role in this territorial system as growth poles. They concentrate significant population resources, infrastructure, and innovation potential, but they also face substantial challenges related to spatial, functional and social integration across their territories.

The European Union's cohesion policy aims to reduce development disparities between member states and regions, while promoting sustainable territorial development. In Poland, the implementation of cohesion policy is carried out through national and regional operational programmes, co-financed by the European Regional Development Fund (ERDF), the European Social Fund (ESF), the Cohesion Fund, and, in the 2021–2027 perspective, also by the European Social Fund Plus (ESF+) and the Just Transition Fund (JTF).

In both programming periods: 2014–2020 and 2021–2027, Poland adopted a decentralized model, in which both national and regional institutions play essential roles. At the national level, the Ministry of Funds and Regional Policy acts as the national coordinator for cohesion policy and serves as the managing authority for national operational programmes. These programmes include among others: Infrastructure and Environment (2014–2020 and 2021–2027), Eastern Poland (2014–2020) and its successor European Funds for Eastern Poland (2021–2027), Knowledge Education Development (2014–2020), replaced by European Funds for Social Development (2021–2027), and the Technical Assistance Programme. The Ministry is responsible for negotiations with the European Commission, programme coordination, monitoring and evaluation, as well as overseeing implementation systems.

Figure 3.1
EU Funds Implementation schemes in Poland



Source: authors' own elaboration

At the regional level, the key actors are the regional self-government authorities: Marszałek (the Marshal - Voivodeship Executive Board) and Sejmik Wojewódzki (the Voivodeship Regional Assembly). Each voivodeship self-government serves as the managing authority for its respective Regional Operational Programme (RPO 2014–2020) or Regional Programme (under the European Funds for Regional Development, 2021–2027). Voivodeship Marshals are responsible for preparing, implementing, and reporting on regional programmes.

Other line ministries and implementing agencies are also involved in programme delivery as intermediate bodies. These include, among others, the National Centre for Research and Development (NCBR) in the area of innovation and research, the Polish Agency for Enterprise Development (PARP) for SME support, and the General Directorate for National Roads and Motorways (GDDKiA) for the road infrastructure at the national level.

Cohesion policy in Poland is based on the principles of partnership and multi-level governance. In addition to central and regional authorities, local government units at the municipal and county levels also play a significant role. In the 2014–2020 period, a key territorial instrument was the ITI mechanism, which enabled the implementation of development projects within functional urban areas. In the 2021–2027 programming period, this model continues to be used to promote the sustainable development of functional areas.

Cohesion policy implementation in Poland takes place within a coherent yet complex institutional framework. A key feature of this system is decentralization: substantial competences have been delegated to regional self-governments, while national coordination rests with the Ministry of Funds and Regional Policy. The challenges associated with territorial governance, particularly in metropolitan areas, are partially addressed through instruments such as ITI. However, the lack of formalized metropolitan structures continues to limit the potential for spatial integration.

In both programming periods (2014–2020 and 2021–2027), there is clear prioritization of support for structurally weaker and economically lagging regions. In line with the EU's cohesion objectives, the vast majority of Polish regions qualified for the highest co-financing rate (85%), with only the CRW classified as more developed (receiving 50%). A prime example of territorially targeted support is the Eastern Poland Programme, which provided preferential funding for five voivodeships in the east of the country. In the 2021–2027 period, this approach has been reinforced and expanded under the European Funds for Eastern Poland, which also includes part of the Mazowieckie Voivodeship. This highlights a deliberate political and developmental choice to reinforce the convergence function of cohesion funding.

Both programming periods exhibit a pronounced emphasis on selected policy areas:

- **Transport and environmental infrastructure:** The bulk of EU funds were allocated to large-scale infrastructure projects through the Operational Programme Infrastructure and Environment (2014–2020) and its successor, the European Funds for Infrastructure, Climate and Environment (2021–2027). These include flagship investments such as motorways, railways, clean energy, waste and water systems, and health infrastructure - all politically visible and economically significant interventions.
- **Research, development, and innovation:** The Smart Growth Programme (2014–2020) and the European Funds for a Modern Economy (2021–2027) have become central vehicles for modernising the Polish economy and promoting high-tech sectors. They offer generous support for R&D, commercialization, business innovation, and science - industry collaboration, reflecting both developmental priorities and the political visibility of innovation as a strategic investment in competitiveness.

These choices signal a clear political commitment to long-term economic transformation, but also suggest a preference for high-impact sectors that can yield measurable results and political capital.

There is no explicit or formal mechanism in place that differentiates access to EU funds based on the political affiliation of local governments. The system is based on competitive calls, standardized project evaluation criteria, and institutional roles assigned to national and regional bodies. However, in practice, informal political influence may occur, especially through the formulation and interpretation of project selection criteria, strategic design of programmes and sectoral priorities, appointment of personnel within managing and implementing bodies and discretionary approval of large strategic projects or national-level initiatives.

Furthermore, the Ministry of Funds and Regional Policy, which plays a central role as the Managing Authority for all national programmes, gained greater coordinating authority in the 2021–2027 period. This increased centralization could potentially enhance the ability of the central government to shape policy directions and funding flows. The 2021–2027 period introduced a new implementation law (the so-called *ustawa wdrożeniowa*), which precisely defines the competences of managing, intermediary, and implementing institutions. Although presented as a technical reform, this legislative framework may also function as a political instrument strengthening central oversight and control through the designation and approval of intermediary bodies, the central authority's right to approve management and control systems, the power to issue binding guidelines, procedures, and criteria for project selection. This contributes to a shift in the balance of power within the multi-level governance system of Cohesion Policy, with a tendency toward stronger central steering, even if still formally based on the principle of partnership.

Thus the national regulation of Cohesion Policy reflects several politically significant patterns: a deliberate and consistent territorial focus on the most disadvantaged regions (especially the east), strategic prioritization of infrastructure and innovation sectors, and growing centralization of programme management, which creates opportunities for political influence.

While the principle of partnership and decentralization remains institutionally embedded, the increasing role of central government institutions suggests a more hierarchical and politically coordinated model of governance. In this context, instruments like the ITI remain important tools for fostering territorial cooperation and counterbalancing the lack of formal metropolitan governance in functional urban area of Warsaw and other big cities in Poland.

In both the 2014–2020 and 2021–2027 programming periods, a two-tier model for the implementation of Cohesion Policy has been applied. At the national level, operational programmes are managed by the Ministry of Funds and Regional Policy (e.g., Infrastructure and Environment, Smart Growth, Eastern Poland, Social Development, and Digital Development). At the regional level, there are 16 Regional Operational Programmes (RPOs), now referred to simply as regional programmes, managed by regional self-governments.

From a financial perspective, regional programmes constitute a significant share of the total EU funding allocation, and their importance has been growing systematically. Regional self-governments hold the authority to develop their own programmes, define investment priorities, announce calls for proposals, select projects, and carry out monitoring and evaluation activities. In the 2021–2027 period, the principle of decentralisation was maintained. However, the role of the central government has been strengthened in terms of legal frameworks, management systems, and unified guidelines, particularly following the adoption of a new implementation law in 2022.

Cities, and especially regional capital cities along with their functional urban areas, play an important role in the implementation of Cohesion Policy, although they do not formally act as managing authorities. Nevertheless, cities serve as leaders of the ITI. They are involved in planning, project selection, and overseeing the implementation of the ITI strategies. Cities are also active beneficiaries of both regional and national programmes. They implement projects in areas such as transport, education, urban regeneration, infrastructure, culture, and social policy. Furthermore, they develop their own local development strategies and exercise planning powers, which enhances their position in the overall implementation process.

Cities also participate in the preparation of regional programming documents and are consulted in the development of investment plans. In some cases, city leaders act as formal partners in dialogue with the regional programme managing authorities. Cities also have a formal role in national and regional programming and monitoring processes through their participation in Monitoring Committees. These committees, covering both national and regional programmes, are composed of representatives of central government, local and regional self-governments, social and economic partners, and non-governmental organisations. Large cities are represented in these committees, either directly or through the Association of Polish Cities (*Związek Miast Polskich*).

The urban dimension of Cohesion Policy has been, and continues to be, primarily implemented through the ITI mechanism, which constitutes the main instrument for delivering the objectives of sustainable urban development. In addition, interventions are carried out through thematic programmes or within the framework of territorial instruments dedicated to deprived urban areas, such as urban regeneration or support for energy transition.

The allocation of resources within the urban component of Cohesion Policy has been shaped by several political and strategic considerations. There has been a clear preference for regional capital cities and their functional urban areas, both in the 2014–2020 period and in the initial phase of 2021–2027. The main beneficiaries of the ITI remain large cities with metropolitan and regional functions. In the new programming period, a more differentiated approach has been adopted, which also includes medium-sized cities that are experiencing socio-economic decline. This shift is reflected in the regional development strategies of the voivodeships, which identify additional Strategic Intervention Areas (OSIs – Obszary Strategicznej Interwencji). An important factor influencing the allocation of resources has been the need to maintain political and territorial balance - the aim being to ensure a proportionate share of funding across all regions and to avoid excessive concentration of resources in the largest metropolitan areas. The allocation of ITI funds has been the subject of negotiations between regional self-governments and central coordinating institutions.

Significant changes occurred between the two programming periods in terms of how the urban dimension of Cohesion Policy is delivered. Due to EU regulations, the minimum allocation threshold for urban development increased from 5% to 8% of the ERDF, which in nominal terms represents a substantial increase in resources available for urban areas. The number of areas covered by ITI also expanded, now including medium-sized cities, enhancing inclusiveness and territorial balance in development.

It can therefore be concluded that the urban dimension of Cohesion Policy in Poland is implemented in a systemic manner. In the 2021–2027 period, this dimension was significantly strengthened: the allocation threshold was increased, the group of eligible beneficiaries was expanded, and urban interventions were more closely linked to regional strategic frameworks. At the same time, the institutional model has not undergone fundamental change and cities continue to act as implementation leaders but do not serve as managing authorities. Political decisions concerning resource allocation have been shaped by the logic of growth poles but also by the need to support more peripheral or disadvantaged cities through a place-based approach.

4 Urban structure and governance of Cohesion Policy

Poland is a unitary state with a three-tier administrative division, established by the 1999 reform. This structure comprises: 16 voivodeships (regions – NUTS 2 level), 380 counties (powiats), including 314 land counties and 66 cities with county rights, 2,479 municipalities (gminas), which are divided into three main types: urban municipalities (302), urban-rural municipalities (718), and rural municipalities (1,459)¹.

A municipality is the basic unit of local self-government in Poland. It is responsible for carrying out all public tasks of a local nature that have not been reserved for other authorities. This includes, among others, spatial planning, municipal services, social assistance, primary education, and healthcare. The municipal authorities are elected by direct vote and include: the municipal council as the legislative and oversight body, and the executive authority, which is either a village mayor / vogt (wójt), city mayor (burmistrz), or city president (prezydent miasta) if the city has more than 100 thousand inhabitants ². At the municipal level, so-called auxiliary units may be established. In cities, these include districts or neighbourhoods, while in rural areas, they take the form of sołectwo (village administrative units). Although these auxiliary units do not have legal personality, their role is to support the municipal government in carrying out local activities. Their function is primarily advisory and consultative, and the scope of their responsibilities is defined in the municipality's statute.

A county is an intermediate level of local self-government, situated between the municipality and the voivodeship. It is responsible for delivering public services that exceed the capacity of individual municipalities but do not yet require intervention at the voivodeship level. These responsibilities include, for example, the management of secondary schools, county hospitals, county roads, labour offices, and family support institutions. The authorities of the county include: the county council (legislative and oversight body, elected by universal suffrage) and the county executive board, led by the head of the county – county executive (starosta), who is elected by the council.

A voivodeship is a regional-level unit of public administration, characterized by a dual model of governance, combining government and self-government administration. The voivodeship self-government is responsible for regional development policy, including setting regional development directions, fostering economic growth, and developing social and technical infrastructure of regional importance. The self-government bodies of the voivodeship include: the voivodeship assembly (legislative and oversight body, elected by popular vote) and the voivodeship board (executive body), headed by the Marshal of the voivodeship, appointed by the assembly.

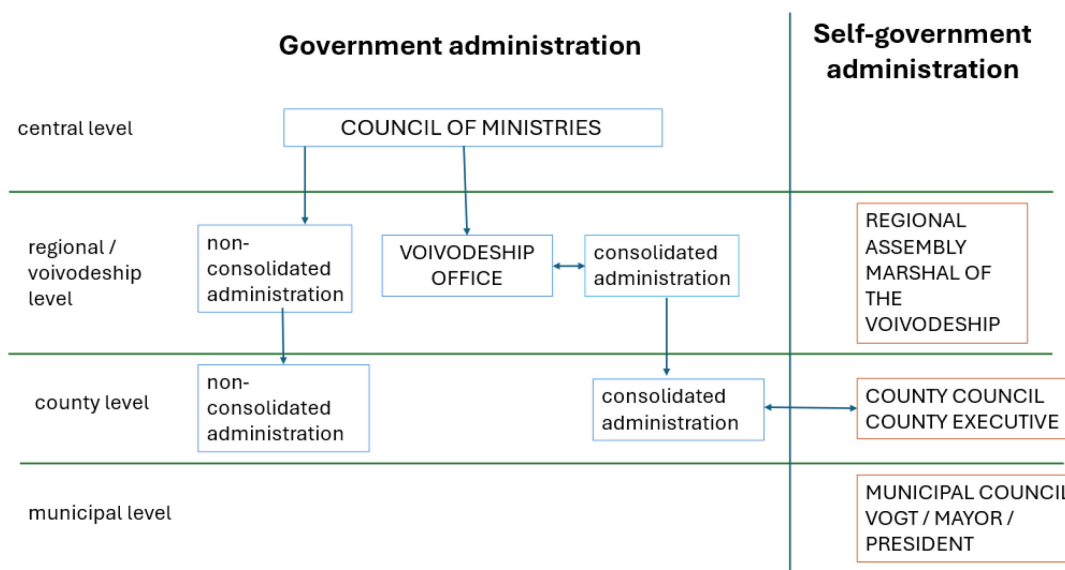
Government administration at the voivodeship level is represented by the voivode, who acts as the representative of the central government in the region. The voivode oversees consolidated government administration, which includes such services as the State Fire Service, the Veterinary Inspectorate, the Environmental Protection Inspectorate, and the Trade Inspectorate. The voivode also serves as a supervisory authority over local self-government units. In addition to the consolidated administration, the voivodeship is also home to various non-consolidated government bodies, such as customs, tax, military, and statistical administrations, which are directly subordinated to central ministries.

¹ Data from January 1st, 2025. The number of cities in Poland is higher than the number of urban municipalities. This results from the structure of the administrative system. An urban municipality is a municipality whose entire area is a city. An urban-rural municipality consists of a city and the surrounding villages. In such a case, the city is only part of the municipality, and the unit itself has the status of an urban-rural municipality. A rural municipality is composed exclusively of rural areas. As a result, the number of cities in Poland is 1020, but there are only 302 urban municipalities.

² Here is the case of Warsaw, which has over 100,000 inhabitants—Warsaw has a *prezydent* (city president), however we have adopted the convention of translating this position into English as the Mayor of Warsaw. It might be treated as a “general” solution, since a term “mayor” is used in case of all cities.

An important institution influencing the functioning of public administration and regional development management is the Joint Commission of the Government and Local Self-Government. This body serves as a forum for cooperation between central government and self-governments. Its operation is based on the principle of partnership and cooperation, which is one of the foundations of a democratic rule-of-law state. The Commission's tasks include agreeing on draft legislation, national strategies, government programs, and implementing regulations that affect self-governments. Every draft legal act concerning self-government should be reviewed by the Commission.

Figure 4.1
Institutional architecture of public administration in Poland



Source: authors' own elaboration

The system of territorial governance in Poland is based on the principle of cooperation between different levels of administration, while maintaining their autonomy. These relationships are both formal - regulated by legislation and oversight mechanisms - and functional, arising from the practical need for collaboration. Oversight of local governments is exercised by the central government, primarily through the voivode, who supervises the legality of local government resolutions and actions.

Polish law allows for the creation of supra-local structures that facilitate territorial cooperation and help coordinate actions between local governments. These structures include inter-municipal associations (związki gmin). However, cooperation between self-government units can also take different other forms like for example agreements. Functional urban areas are not administrative units and do not have legal personality. Nevertheless, they are recognized in strategic documents as an important level of development governance.

The relationship between self-governments and the central administration is shaped by the principle of decentralization within a unitary state. However, in recent years, political tensions have become evident - especially between some large cities and the central government. These tensions concern, among other issues, access to public funding, the direction of national reforms related to regional and urban development, and the management of sectoral policies.

4.1 Spatial boundaries and administrative configuration

The case study area corresponds to what is referred to in strategic documents as the Warsaw Metropolis. This territorial configuration is grounded in the NUTS2 statistical CRW, which was formally established in 2018 as a separate subregion within the Mazowieckie Voivodeship. The area covered by the case study is also area for the 2021–2027 ITI instrument implementation and the area covered by 2040 Metropolitan Development Strategy (Strategia Rozwoju Metropolii Warszawskiej do 2040 roku). The case study's spatial boundaries coincide with the administrative boundaries of the municipalities included in the partnership.

As it was mentioned in the introduction the Warsaw case study area has evolved significantly in terms of its spatial boundaries between the 2014 - 2020 and 2021 - 2027 programming periods. In the 2014 - 2020 period the area consisted of the City of Warsaw and 39 surrounding municipalities (area of 2,900 km², population 2.8 million). In the 2021 - 2027 period, the case study area was expanded to reflect the boundaries of the newly created NUTS2 CRW. The Warsaw Metropolis includes now the City of Warsaw, 69 municipalities, and 9 counties and covers around 6,100 km² and has a population of approximately 3.2 million. One municipality — Żyrardów, which used to be part of the Warsaw functional area — was not included in the NUTS 2 _ CRW.

The Warsaw Metropolis operates on the basis of a voluntary partnership of local government units. The core unit within the metropolitan structure is the municipality. According to the Act on Municipal Self-Government (1990), municipalities have full legal personality, budgetary autonomy, and competences in local development policy, the provision of public services, and spatial planning. All 70 municipalities and 9 counties constituting the Warsaw Metropolis are members of the Warsaw Metropolis Association.

The capital city of Warsaw plays a key role, due to its demographic weight, administrative importance, and leadership in metropolitan development. As the leading partner, Warsaw is the main actor in strategic planning at the level of the entire metropolitan area. Warsaw has a special governance structure defined by the Act on the Political System of the Capital City of Warsaw (2002). However, this act does not place Warsaw in a privileged position in its relations with other municipalities within the metropolitan territory.

The nine counties within the Warsaw metropolitan area participate in the development of strategic documents and are also responsible for inter-municipal services, including secondary education and county-level healthcare.

The Mazowieckie Regional Government performs a central role as the managing authority of the Regional Programme (European Funds for Mazovia 2021–2027). It is also responsible for preparing the Mazovian Regional Development Strategy 2030+ and the Regional Spatial Development Plan, and serves as a consultative body for the ITI Strategy.

The formal coordinator of metropolitan activities is the WMAssoc. The Association does not have authoritative powers. It operates based on its statute and the principle of voluntary cooperation. Thus the system of governance is based on partnership rather than hierarchical subordination, which aligns with the principles of polycentric and soft governance in non-institutionalized metropolitan areas.

Table 4.1
Spatial boundary of Warsaw Metropolis case study

2014-2020		2021-2027	
Level	LAU(s)	Level	LAU(s)
Warsaw	LAU 2	powiat grodziski powiat legionowski powiat miński powiat nowodworski powiat otwocki powiat piaseczyński powiat pruszkowski	LAU 1

2014-2020		2021-2027	
Level	LAU(s)	Level	LAU(s)
		powiat warszawski zachodni powiat wołomiński Warsaw	LAU 2
ITI - Błonie, Brwinów, Czosnów, Grodzisk Mazowiecki, Góra Kalwaria, Halinów, Izabelin, Jabłonna, Jaktorów, Józefów, Karczew, Kobyłka, Konstancin Jeziorna, Legionowo, Leszno, Lesznowola, Łomianki, Marki, Michałowice, Milanówek, Nadarzyn, Nieporęt, Nowy Dwór Mazowiecki, Otwock, Ożarów Mazowiecki, Piaseczno, Piastów, Podkova Leśna, Pruszków, Radzymiń, Raszyn, Sulejówek, Stare Babice, Wiązowna, Wieliszew, Wołomin, Ząbki, Zielonka, Żyrardów	LAU 2	ITI - Baranów, Grodzisk Mazowiecki, Jaktorów, Milanówek, Podkova Leśna, Żabia Wola, Jabłonna, Legionowo, Nieporęt, Serock, Wieliszew, Cegłów, Dębe Wielkie, Dobrze, Halinów, Jakubów, Kałuszyn, Latowicz, Mińsk Mazowiecki (miasto), Mińsk Mazowiecki (gmina wiejska), Mrozy, Siennica, Stanisławów, Sulejówek, Czosnów, Leoncin, Nasielsk, Nowy Dwór Mazowiecki, Pomiechówek, Zakroczym, Celestynów, Józefów, Karczew, Kołbiel, Osieck, Otwock, Sobienie-Jeziory, Wiązowna, Góra Kalwaria, Konstancin-Jeziorna, Lesznowola, Piaseczno, Prażmów, Tarczyn, Brwinów, Michałowice, Nadarzyn, Piastów, Pruszków, Raszyn, Błonie, Izabelin, Kampinos, Leszno, Łomianki, Ożarów Mazowiecki, Stare Babice, Dąbrówka, Jadów, Klembów, Kobyłka, Marki, Poświętne, Radzymiń, Strachówka, Tuszcz, Wołomin, Ząbki, Zielonka,	LAU 2

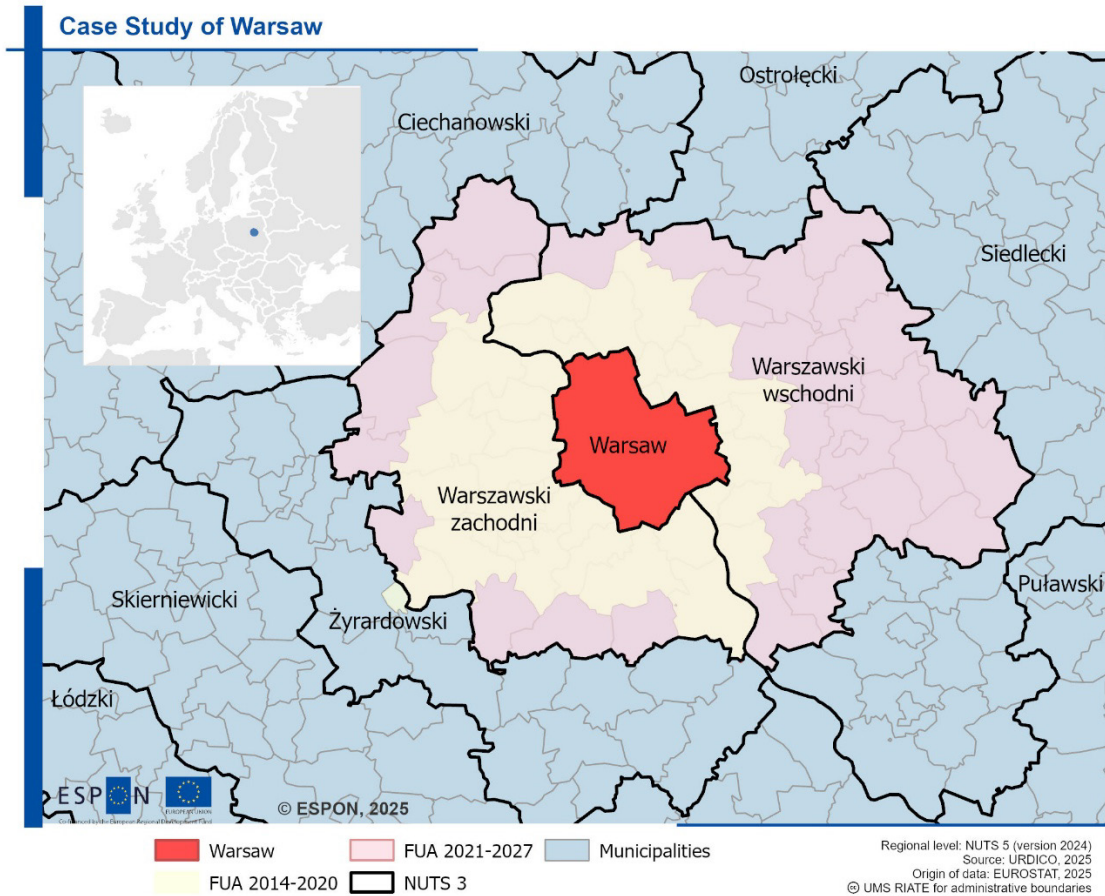
Source: author's own elaboration

Metropolitan governance in Poland has been a subject of ongoing debate for many years. At the heart of this discussion lie institutional and territorial challenges: the absence of a metropolitan law, the criteria for delimiting functional urban areas, cooperation between municipalities, and the capacity of institutions to collaborate within functional areas that transcend administrative boundaries. Over two decades of debate have failed to produce political consensus on the necessity of granting metropolises legal status as essential structures for the effective management of large cities and their functional areas. Legislative proposals have repeatedly failed to attract the attention of lawmakers.

Recognising the boundaries of the NUTS 2 region as those of Warsaw's Functional Area and treating them as identical to the metropolitan area's boundaries would put an end to the prolonged debate over the delimitation of Warsaw's Metropolitan Area. However, it is important to note that this area is also internally diverse. The municipalities within this area have varying degrees of functional ties to Warsaw. Their

economic conditions and quality of life also differ significantly. All of these factors pose a major challenge for governing the Warsaw Metropolis, especially if its development is to be sustainable and inclusive.

Map 4.1
Spatial boundaries of Warsaw Metropolis



Source: authors' own elaboration

Table 4.2
Administrative configuration and responsibilities in Warsaw Metropolis

Level	NUTS	Responsibility
Central		o responsible for programming EU Cohesion Policy funds, defines the structure of operational programmes, coordinates the overall implementation framework for territorial instruments, approving regional and ITI strategies and securing budget allocations
Regional	2 Regional Mazovian Region	acts as the Managing Authority for the Regional Operational Programme, responsible for adapting national priorities to regional needs, organizing funding calls, and evaluating project applications, consultative and coordinating role in the

Level	NUTS	Responsibility
Metropolitan area	2 Capital Region of Warsaw	development and approval of ITI strategies covering the metropolitan area Warsaw Metropolis Association - ITI implementing body, coordinates the preparation and implementation of the metropolitan ITI strategy and supports project selection in cooperation with local governments, serves as a platform for inter-municipal cooperation
Local	Poviats / counties from CRW – LAU 1	Involvement, cooperation and facilitation of development processes within CRW
Local	Warsaw LAU 2	Supporting Warsaw Metropolis Association, designing, applying for, and implementing specific projects, identifying local development needs, prepare investment proposals, and manage the execution of urban projects,
Local	Municipalities from ITI area LAU 2	designing, applying for, and implementing specific projects, identify local development needs, prepare investment proposals, and manage the execution of urban projects

Source: author's own elaboration

4.2 Governance of Cohesion Policy in Warsaw Metropolis

At the local level, within the structure of the City of Warsaw administration, the main unit responsible for implementing Cohesion Policy is the European Funds & Development Policy Department. This department coordinates the acquisition and implementation of European funds, including Cohesion Policy funds (ERDF, ESF+), under national, regional (ROP and RP), and territorial instruments such as Integrated Territorial Investments. It also carries out strategic activities related to urban development. Key departments involved in urban development programming and spatial planning also include the Department of Architecture and Spatial Planning, the Department of Strategy and Analysis, the Welfare and Social Projects Department, the Education Department, and the Department of Air Protection and Climate Policy.

The Department of Architecture and Spatial Planning is responsible for the preparation and implementation of planning documents that are strategically important for the entire city, as well as local spatial development plans that define detailed rules for land use and spatial development. The Department of Strategy and Analysis supports strategic planning and conducts spatial and socio-economic analyses. The Department of Air Protection and Climate Policy also play a role in shaping the city's spatial development, especially in the areas of infrastructure, mobility, and environment - areas often linked to projects co-financed by EU funds. All these departments operate strictly within the administrative boundaries of the City of Warsaw; outside the city limits, competences rest with county and municipal administrations. However, it is worth mentioning, that in case of spatial planning, the prepared supra-local development strategy will bring some changes, because it contains specific provisions in this regard. In certain domains like transport, environment, the labour market, and innovation, the involvement of the regional self-government is also important.

In the Warsaw Metropolis there is a clear chain of responsibility structured across four levels: national, regional, supra-local/metropolitan, and local. At the national level, the key role is played by the Ministry of Development Funds and Regional Policy, which is responsible for programming Cohesion Policy. It defines

the framework for the Partnership Agreement, sets priorities, and approves the structure of operational programmes and territorial instruments such as the ITI.

At the regional level, that is within the Mazovian Marshal's Office the Ministry delegates competencies related to the selection and monitoring of projects financed under the ROP and RP. The Marshal's Office is responsible for adapting national goals to regional conditions, organizing calls for proposals, evaluating ITI projects, and conducting consultations with the city and its metropolitan surroundings. The most crucial element for metropolitan cohesion is the metropolitan level, represented by the WMAssoc., which coordinates the preparation of the ITI strategy.

At the local level, Warsaw and the municipalities within the ITI area are responsible for preparing, submitting, and implementing projects. Their work should be structured, among others, through spatial planning. However, the practice of spatial planning at metropolitan level demonstrates that it remains poorly integrated. A recently prepared supra-local development strategy, which sets out a spatial development model for the metropolitan area, together with provisions and recommendations for municipalities, may change the situation. However, the misalignment of project call calendars, the time-consuming nature of planning procedures, and varying planning practices mean that development programming mechanisms do not always incorporate the spatial dimension of development.

Thus, on one hand, there is a well-defined set of actors with clear roles in shaping metropolitan development — from the Ministry of Development Funds and Regional Policy to local municipalities — which provides a solid formal foundation. On the other hand, the integration of spatial planning with territorial development management through Cohesion Policy instruments remains insufficient. Mechanisms linking strategic documents, investment plans, and financial tools are largely ad hoc rather than embedded in stable, integrated systems. To change this, both regulatory adjustments (such as coordination standards and periodic review mechanisms) and a cultural shift in institutional cooperation are necessary.

Table 4.3
Governance of Cohesion Policy in Warsaw Metropolis

Name of the actor	Level	Responsibility	
		Cohesion Policy	Spatial Planning
Ministry of Funds and Regional Policy	Central	x	
Mazovian Voivodeship Marshal's Office	Regional	x	x
Mazovian Office for Regional Planning	Regional		x
Warsaw Metropolis Association	Metropolitan	x	x
City of Warsaw – European Funds & Development Policy Department	Local	x	
City of Warsaw – Strategy & Analysis Department	Local	x	x
City of Warsaw – Architecture & Spatial Planning Department	Local		x
City of Warsaw – Infrastructure Department	Local	x	x
City of Warsaw – Air Protection and Climate Policy Department	Local	x	
City of Warsaw – Environmental Protection Department	Local	x	x

Name of the actor	Level	Responsibility	
		Cohesion Policy	Spatial Planning
City of Warsaw – Budgetary Planning Department	Local	x	
Municipalities within ITI area (other than Warsaw)	Local	x	x

Source: author's own elaboration

4.3 Warsaw Metropolis's involvement in Cohesion Policy

Between 2014 and 2020, Warsaw acted as an Intermediate Body (IB) for the ITI within the framework of the Regional Operational Programme of the Mazowieckie Voivodeship. According to an agreement with the Marshal's Office, Warsaw assumed IB responsibilities in the areas of preparing selection criteria, selecting projects, and implementing the ITI instrument in the WFA. Representatives of the City Hall participated in the meetings of the ROP Monitoring Committee. Warsaw also acted as a beneficiary, implementing its own projects as a municipality within national programmes (OP Infrastructure and Environment, OP Technical Assistance) as well as under the ROP of the Mazowieckie Voivodeship. It is important to note that the City of Warsaw maintained a clear functional separation between teams responsible for ITI programming and those acting as beneficiaries. Dedicated units coordinated ITI programming and metropolitan cooperation, while separate departments prepared and implemented Warsaw's own projects. The programming team was explicitly excluded from evaluating or assessing any project proposals submitted by the City of Warsaw to avoid conflicts of interest and ensure procedural neutrality.

In the 2021–2027 programming period, the situation evolved. The document entitled “Strategy for ITI of the Warsaw Metropolis 2021–2027+” formally designated the WMAssoc., in cooperation with the City of Warsaw, as the implementing body of the ITI instrument. This was confirmed through official resolutions of the WMAssoc. and was included in the administrative framework of the European Funds for Mazovia – EFM (Fundusze Europejskie dla Mazowsza – FEM). Warsaw and the WMAssoc. now serve as key intermediaries between the regional and local levels, responsible for the full functioning of the ITI mechanism. However, the core role of the City of Warsaw in the process has not changed significantly.

4.3.1 2014–2020 programming period

In the 2014–2020 programming period, Warsaw played a growing role in shaping and implementing the urban dimension of Cohesion Policy, especially through its participation in Integrated Territorial Investments (ITI) and as a beneficiary of several national and regional operational programmes. The programmes were as follows:

Regional Operational Programme of Mazovia (ROP WM 2014–2020)

- Instrument: Integrated Territorial Investments (ITI)
- Territorial Scope: The Warsaw Functional Area, including the City of Warsaw and 39 surrounding municipalities, representing approximately half of Mazovia's population.

Under a formal agreement signed in 2015 with the Mazovian Marshal's Department, Warsaw took on the role of IB for the implementation of the ITI. Through its IB role, Warsaw assumed a leadership position in coordinating cross-municipal investment planning and urban development, with projects covering transport, social infrastructure, and environmental improvements.

Operational Programme Infrastructure and Environment (OPIE) 2014–2020

- Instrument: Cohesion Fund (CF)

In complement to the ITI framework, the City of Warsaw also managed significant projects funded under Operational Programme Infrastructure and Environment. These included urban / metropolitan mobility projects (metro, trams, rail) which played a dominant role in this case.

Table 4.4
Warsaw Metropolis engagement in delivering cohesion policy 2014-2020

Document	Level	Phase			Role		
		Programming	Managing	Implementing	Managing Authority	Intermediate Body	Beneficiary
Regional OP of Mazovia	Regional	x		x		x	x
OP Infrastructure and Environment	National			x			x
OP Technical Assistance	National			x			x
OP Knowledge Education Development	National			x			x
ERDF – Urban Dimension	National Regional	x		x			x
Other regional/local instruments (e.g. local ESF projects)	Regional			x			x

Source: author's own elaboration

Urban Dimension of ERDF

In line with the EU requirement that at least 5% of ERDF be allocated to sustainable urban development, Warsaw channeled significant ERDF resources through the ITI strategy and aligned them with smart growth, environmental sustainability, and social inclusion objectives. The city also contributed to strategic discussions within the ROP framework to influence funding priorities and harmonize urban project typologies across the WFA. The ITI mechanism proved to be a critical tool for structuring EU investments around Warsaw's urban strategy and ensuring thematic coherence across projects.

National Urban Networks and EU-Level Initiatives

Warsaw participated in various European urban policy networks, including knowledge-sharing platforms and pilot schemes (e.g., on sustainable transport). However, the city did not initiate or implement any flagship projects under EU-level innovation initiatives such as Urban Innovative Actions during the 2014–2020 period. While Warsaw engaged in capacity-building and peer exchange, its presence in EU-led urban innovation instruments remained limited. Overall, between 2014 and 2020, Warsaw developed a more prominent role in urban cohesion programming. Its responsibilities under ITI significantly strengthened its

capacity to deliver integrated and territorially focused investments. Nonetheless, gaps in strategic influence at national and EU levels persisted.

4.3.2 2021-2027 programming period

With the launch of the new EU financial framework, the WMAssoc. was formally designated as the implementing structure for the ITI instrument within the newly defined CRW. While the City of Warsaw no longer holds the formal status of IB as in the previous period, it continues to play a critical role through the European Funds & Development Policy Department, which provides technical, administrative, and strategic support within the WMAssoc's. structure. City Hall experts and staff are directly involved in ITI implementation, ensuring institutional continuity and coherence. This shift toward a metropolitan governance model acknowledges the functional reality of Warsaw's functional area and reinforces legitimacy, equity, and coordination in allocating EU funds across municipalities.

Key strategic documents guiding the 2021–2027 period include: the Integrated Territorial Investment Strategy 2021–2027+, the Warsaw Metropolis Development Strategy 2040, and the Sustainable Urban Mobility Plan (SUMP) 2030+. These documents were developed through wide-ranging consultations with municipal stakeholders, residents, civil society organizations, and thematic experts. The SUMP underwent several phases of public consultation and revision, incorporating feedback from various interest groups and communities. Compared to 2014–2020, the planning process has become more participatory, thematically integrated, and responsive to cross-territorial development challenges. Furthermore, a Metropolitan Council – MC (Rada Metropolitalna) has been created, comprising representatives of local, regional, and central governments, researchers, experts, and NGOs, to provide strategic and consultative input on ITI implementation and broader metropolitan priorities. In addition, open consultations, stakeholder panels, and thematic working groups have been integrated into decision-making, institutionalizing civil society engagement in urban governance. These governance innovations enhance democratic legitimacy, reflect EU principles of multilevel governance, and strengthen institutional resilience across the metropolitan area.

Table 4.5
Warsaw Metropolis engagement in delivering Cohesion Policy 2021-2027

Document	Level	Phase			Role		
		Programming	Managing	Implementing	Managing Authority	Intermediate Body	Beneficiary
European Funds for Mazovia	Regional	x		x			x
ITI of the Warsaw Metropolis 2021-2027+	Regional	x		x			x
European Funds for Infrastructure, Climate and Environment	National			x			x
European Funds for Social Development	National			x			x
OP Technical Assistance	National			X			x
Participation in Monitoring Committees	National Regional	x					x
Direct Involvement in ITI Strategy & Implementation	Regional	x		x			x
EU-level Urban Platforms (e.g. Urban Initiative)	EU	x					x

Source: author's own elaboration

ITI investments during this period target a wide array of supra-local priorities, including mobility, energy efficiency, education, and administrative capacity building.

Remaining challenges include building administrative capacity across smaller municipalities, maintaining coordination across diverse actors, and ensuring fair access to ITI funding opportunities. In summary, in the 2021-2027 period, Warsaw has transformed its role in the urban dimension of Cohesion Policy from a city-centred coordinator to a metropolitan facilitator. Through the WMAssoc., it now leads a more inclusive, multilevel, and strategic approach to urban development in line with EU cohesion goals.

4.3.3 Main differences

In Poland's cohesion policy implementation system, Warsaw holds a unique position. On the one hand, it is the country's largest metropolitan centre, equipped with well-developed institutional structures and strong absorption capacity. On the other hand, it operates within a governance system that does not grant it sufficient agency or strategic tools. The experience of the two most recent EU programming periods reveals not so much an evolution of decentralisation as its superficiality - an operational shift rather than a structural transformation.

In the 2014–2020 period, Warsaw served as the lead entity for the ITI working in partnership with neighbouring municipalities. While it was formally responsible for strategy development and project coordination, many key programming and funding decisions were made at the regional or national level. The city functioned more as an intermediary than a strategic partner, with limited influence over the shape of interventions.

In the 2021–2027 programming period, responsibility for implementing ITI was transferred to the WMAssoc.. The city's experience from the previous cycle, as well as its extensive analytical and administrative capacity, is now being leveraged by the WMAssoc., which closely cooperates with the City of Warsaw's Department of European Funds and Regional Policy. However, Warsaw is still not treated as a strategic development partner at the national level, but rather as an efficient service provider also for the state. This approach limits the potential for synergy between local and central levels of governance and hampers the full use of cohesion policy across the functional urban area. In terms of programming, the ITI instrument operated in both periods, but its role has evolved. During 2014–2020, it functioned primarily as a technocratic tool for implementing predefined objectives. After 2021, ITI has increasingly been understood as a platform for territorial cooperation. Nevertheless, the absence of a dedicated national programme for metropolitan areas, and the inability to shape national programmes, continue to prevent the development of a coherent, long-term metropolitan policy. Although the ITI mechanism has become more flexible, it remains limited in terms of strategic impact.

In terms of funding, EU funds have played a dominant role in both periods, particularly in the area of transport infrastructure. However, in the current programming period, the gap in co-financing from the national budget has become increasingly evident. Projects are implemented mainly through municipal resources, which significantly burdens the Warsaw's budget. Growing regulatory constraints and diminishing central support are undermining Warsaw's investment capacity, even in the presence of available EU funds.

Thematic priorities have also shifted. In 2014–2020, the focus was on infrastructure investment, urban regeneration, and energy efficiency. In the current period, greater emphasis is placed on soft projects, innovation, green transformation, and public services. Cohesion policy is beginning to play not only a financial but also an integrative role, linking various sectors of urban policy. This requires local governments to adopt a new approach — moving from project implementation to the provision of integrated services. Warsaw is ready for this shift: it has the capacity, experience, and institutional structures, but it still lacks a stable system environment and an enabling institutional framework.

In a broader legislative context, changes between the two programming periods have been largely symbolic rather than structural. The new 2022 Act on the implementation of cohesion policy programmes introduced only minor modifications to the logic of centralisation. The national government still prepares the Partnership Agreement, defines national and regional programmes, and sets the rules for implementation. While voivodeship Marshals have slightly more decision-making power, true decentralisation has not taken place. As a result, despite the refinement of instruments, Warsaw — like other major cities — remains primarily an executor of centrally defined policies, with limited autonomy and heavy strain on its local budget. Strategic, city-focused instruments and a long-term metropolitan policy integrated into national development planning are still missing.

4.4 Networking and lobbying activity

The Capital City of Warsaw has long been actively engaged in both international and national urban cooperation networks, viewing participation in such platforms as a vital tool for exerting influence, acquiring knowledge, and representing the interests of its residents. As the largest city in Poland, Warsaw leverages its position to strengthen the urban agenda at multiple levels - from local to European.

At the European level, Warsaw is a full member of Eurocities, a prestigious network of over 200 cities. It participates in all thematic forums, ranging from mobility and environment to culture, economy, and the knowledge society. Membership in Eurocities allows Warsaw not only to exchange best practices with peer cities but also to shape EU urban policy by engaging in working groups, legislative consultations, and strategic conferences.

In addition, Warsaw is actively involved in several key thematic networks at both the European and global levels, addressing some of the most pressing challenges of contemporary cities - climate change, public health, and digital transformation. As a signatory of the Covenant of Mayors for Climate and Energy, the largest European initiative of cities and regions committed to climate action and sustainable energy, Warsaw has pledged to pursue ambitious climate-energy goals, including reducing CO₂ emissions and implementing adaptation strategies to mitigate the effects of climate change. In line with this commitment, the city has developed a Sustainable Energy and Climate Action Plan (SECAP). Participation in the Covenant provides Warsaw with access to practical tools, expert support, and peer learning opportunities, while also increasing its chances of securing EU funding for environmental and climate initiatives.

Warsaw is also actively engaged in the European Metropolitan Authorities (EMA), an initiative that brings together leaders of the largest metropolitan areas in Europe. EMA was established to strengthen the role of metropolitan regions in shaping EU policies and to promote inter-municipal cooperation in key areas such as sustainable transport, climate action, digital transformation, and territorial governance. In 2017, Warsaw hosted one of the network's most important conferences, during which the Warsaw Declaration was signed. It was a document calling for the recognition of metropolitan areas as key actors in the implementation of EU cohesion policy and climate goals.

The capital city, represented by both municipal authorities and the WMAssoc., participates in EMA's annual forums, engaging in dialogue with the European Commission and presenting joint positions on issues of importance to major cities and their surrounding areas. The WMAssoc. uses its involvement in EMA to amplify the voice of local governments forming the WFA. Participation in the network's activities enables more effective articulation of the shared needs of the metropolitan municipalities at the European level.

Another critical area of international engagement is Warsaw's membership in the WHO Healthy Cities Network - a World Health Organization initiative that brings together cities committed to improving public health and well-being as integral components of local policy. Warsaw has been part of the network for many years and is currently participating in the latest phase of the programme, which focuses on embedding health into all urban policies, addressing health inequalities, promoting environmental action, and fostering social inclusion. As part of this network, Warsaw is responsible for monitoring residents' health indicators, reporting on progress, and implementing concrete programmes, including health prevention, senior citizen support, services for people with disabilities, and the promotion of active mobility and green infrastructure. The city also benefits from knowledge exchange with other members enhancing the quality and integration of its health and social policies.

Warsaw is also a member of Open & Agile Smart Cities (OASC) - a global initiative of cities that supports open, scalable, and interoperable approaches to digital public services. As part of its OASC membership, Warsaw has committed to implementing the so-called Minimal Interoperability Mechanisms (MIMs), a set of standards designed to facilitate seamless data and system integration across cities and institutions. This commitment is reflected in the city's development of its open data portal (api.um.warszawa.pl) and its public APIs. The network also reinforces the city's commitment to transparency, operational efficiency, and intersectoral collaboration in the digital age.

Together, these three networks: Covenant of Mayors, WHO Healthy Cities, and OASC, form the foundation of Warsaw's modern and accountable approach to urban governance. Climate, health, and digital

transformation are not treated as separate policy sectors, but as interconnected dimensions of an integrated urban strategy. Through active participation in these networks, Warsaw shapes its responses to local challenges while learning from leading international practices.

Membership in such networks brings Warsaw far more than prestige. It serves as a practical instrument of development—facilitating access to EU funding, enabling the scaling of innovative solutions, and enhancing public trust in urban services. Within the WHO Healthy Cities Network, the city integrates health into planning, education, and social policies, fully embodying the “Health in All Policies” approach. Meanwhile, through the Covenant of Mayors, Warsaw anchors its local climate and energy policies in a broader European context, aligning with the continent’s transition goals.

On the national level Warsaw is engaged in activities of two key national networks: Association of Polish Cities – APC (Związek Miast Polskich – ZMP) and Union of Polish Metropolises – UPM (Unia Metropolii Polskich – UMP). The APC is the largest and oldest municipal association in Poland, representing over 70% of the country’s urban population. The APC works to strengthen local governance, support socio-economic development, and share modern governance solutions. Through its participation, Warsaw gains valuable legal and policy insights, shape legislative reforms, and access a broad network of peer cities. As a member, the capital city contributes to parliamentary consultations—including the Joint Government and Local Self-Government Commission and influences national-level decision-making affecting urban areas.

The UPM brings together the 12 largest cities in Poland. This network is dedicated to promoting metropolitan governance models and addressing the collective challenges of urban agglomerations. Warsaw’s involvement enables it to collaborate on shared policy approaches with other major cities, particularly in areas such as migration management, infrastructure planning, and urban-rural development coordination.

By participating in these organizations, Warsaw leverages a dual-strength model: through APC, the city strengthens its legislative influence, gains access to legal expertise, benchmarking tools, and engages actively in shaping national urban policy; through UPM, Warsaw secures a metropolitan perspective, collaborating on large-scale challenges and shared strategies with other Polish metropolises boosting its capacity to act not just as a major city, but as a central node within a broader functional region.

Warsaw is also an active member of the Polish Urban Network – PUN (Ogólnopolska Sieć Miast – OSM), co-developed with other municipalities and the APC. This network serves as a platform for mutual learning, knowledge exchange, and engagement in shaping national urban policy. Although Warsaw does not hold formal decision-making powers within national programmes, it acts as a trusted expert and advisor sharing experience in metropolitan governance, strategic planning, and digital service delivery. Through PUN, Warsaw takes part in thematic workshops, pilot projects, and collaborative initiatives, while also mentoring smaller cities in areas such as smart city development, participatory governance, and integrated strategic planning.

Parallel to Warsaw’s institutional activities, an increasingly significant role in representing the broader metropolitan interests is played by the WMAssoc., which as of 2024 is a member of METREX - a European network of metropolitan regions focused on spatial planning and territorial development. This membership allows the metropolitan area to take part in strategic dialogue at the European level, present joint positions, and contribute to shaping the future of metropolitan policy across Europe. At the national level, the WMAssoc. acts as the coordinator and advocate for the municipalities that make up the WFA. While the city of Warsaw and the WMAssoc. operate at different levels, their efforts are deeply complementary. The city serves as the metropolitan area’s voice in international structures—shaping European urban policy, promoting innovation, and applying global standards. The Association, in turn, strengthens the metropolitan region from within.

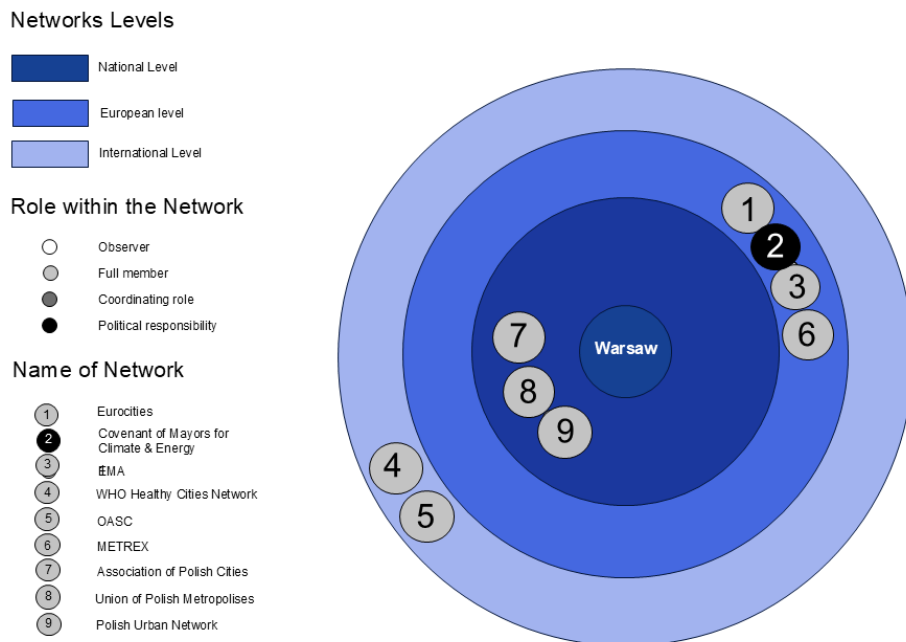
Table 4.6
Networking and lobbying activity of Warsaw Metropolis

Name of the network	Level	Topic	Role	Additional comment
EUROCITIES	European	Urban policy, environment, mobility	Full member, active participant	Warsaw participates in all thematic forums and advocacy campaigns; contributes to shaping EU urban policy and accessing funding tools (e.g. Green Deal).
Covenant of Mayors for Climate & Energy	European	Climate action and energy transition	Signatory	Warsaw committed to climate neutrality and implemented a Sustainable Energy and Climate Action Plan
European Metropolitan Authorities (EMA)	European	Metropolitan governance, urban policy	Participant	Warsaw and Warsaw Metropolis Association attend EMA forums and promote the metropolitan perspective in EU Cohesion Policy.
WHO Healthy Cities Network	International	Public health, social inclusion	Member	Warsaw participates in current programme phase; integrates health into urban policies and shares experience with other cities.
Open & Agile Smart Cities (OASC)	International	Digital governance, interoperability	Member	Engaged in smart city standards (MIMs); Warsaw develops open data services and uses FIWARE technologies.
METREX – Network of European Metropolitan Regions and Areas	European	Spatial planning, metropolitan strategy	Member via Warsaw Metropolis Association	Warsaw Metropolis Association joined METREX and is; involved in knowledge exchange and joint statements on EU urban and territorial policies.
Association of Polish Cities	National	Urban policy, legislative advocacy	Member	Warsaw uses UPC platform to influence national policy, co-develops legislative proposals, and participates in consultations and parliamentary reviews
Union of Polish Metropolises	National	Metropolitan development, governance	Member	Warsaw collaborates with 11 other large cities on joint strategies for spatial planning, infrastructure, and urban-rural relations

Name of the network	Level	Topic	Role	Additional comment
Polish Urban Network	National	Peer learning, integrated urban policy	Member / mentor	Warsaw shares expertise in metropolitan governance and smart city development; mentors smaller cities in planning and innovation practices

Source: author's own elaboration

Figure 4.2
Networking mapping of Warsaw Metropolis



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5 Administrative capacity and Institutional innovations

Despite the growing importance of functional urban areas and the dynamic development of Warsaw itself, metropolitan governance remains a process marked by tensions, limitations, and systemic barriers. There is a lack of stable legal, institutional, and financial frameworks that would enable effective cooperation between Warsaw and the surrounding municipalities. In many areas, provisional arrangements based on ad hoc agreements prevail, rather than durable mechanisms of joint decision-making and coordination. These problems stem not only from the absence of formal metropolitan structures but also from deeper political tensions, organizational shortcomings, and financial constraints.

The relationship between the core city and the municipalities of the metropolitan area is often characterized by a limited willingness to share power and resources, while a high degree of territorial and functional fragmentation hinders the development of coherent policies. Underlying these challenges is the clear influence of centralised decision-making at the national level, which restricts the actual capacity of large cities to shape development policy.

There are several fundamental barriers and limitations in the coordination and implementation of Cohesion Policy in Warsaw and its metropolitan area. One of the key issues is the fragmentation of institutional structures. The City of Warsaw itself is a complex administrative body, internally diverse in terms of administrative capacity. This creates a complex coordination environment for strategic planning. This complexity is further amplified at the metropolitan scale, where the city must interact with dozens of surrounding municipalities with diverse capacities and interests. As a result, cohesion and collective decision-making remain weak. The weakness of the decision-making system stems from the fact that Warsaw and its metropolitan area operate without any formal metropolitan structure and coordination relies solely on voluntary agreements. There is a lack of permanent mechanisms of integration between the city and its surrounding municipalities.

A second major issue remains the inefficiency of multi-level coordination. Although Warsaw functions as a strong administrative hub, the management of EU funds requires constant interaction with national institutions (e.g. ministries, the National Fund for Environmental Protection), regional bodies (such as the Mazovian Unit for EU Programmes), and newly introduced intermediaries like the National Development Bank of Poland – NDBP (Bank Gospodarstwa Krajowego – BGK). The resulting overlap of competences, inconsistent interpretations of rules, and lack of unified procedures create systemic confusion and delay.

This issue is closely linked to the lack of long-term planning frameworks for EU-funded interventions. Calls for proposals are often launched abruptly, with unclear evaluation criteria and short deadlines. Larger cities such as Warsaw are better positioned to benefit from this approach due to their greater administrative and technical capacity, whereas smaller municipalities may face difficulties in accessing similar opportunities. The absence of a multiannual calendar of calls undermines equal access and diminishes the strategic quality of submitted projects. The lack of strategic frameworks and long-term planning hinders not only the implementation of Warsaw's development policy but also the development of joint policies with surrounding municipalities, especially in the areas of transport, education, and waste management. Within the scope of the ITI, coordination is even more fragile due to unequal capacities of surrounding municipalities. Smaller municipalities often cannot participate effectively in funding schemes because of insufficient resources, limited staff, or the inability to pre-finance projects.

Additionally, the key strategic needs of the metropolis are not adequately reflected in regional calls or investment priorities. Feedback from Warsaw or the WMAssoc. is often gathered on an ad hoc basis and without formal mechanisms for negotiation or amendment. Instruments of intervention are poorly matched to the scale and specificity of Warsaw's needs. Infrastructure projects planned by the city frequently exceed the scope and scale of typical calls and are difficult to fund within current schemes.

Another barrier is the overregulation of EU procedures and formal complexity. It is clear that Cohesion Policy is burdened with excessive bureaucracy both from EU regulations and their overinterpretation at the national level. This hinders the flexible and timely implementation of projects. Application procedures are time-

consuming, inconsistent, and often unrealistic in terms of deadlines and documentation requirements. While EU funds are crucial for the development of the city and its metropolitan area, their use is limited by the sheer number of procedures, the need to coordinate actions with multiple levels of government, and the competitive nature of funding mechanisms. The problem is further aggravated by the lack of standardisation among implementing institutions (e.g., NDBP, National Fund for Environmental Protection), which creates legal and operational uncertainty. Divergent rules, formats, and interpretations of eligibility create confusion and risk for applicants.

The problem of procedural overregulation and formal complexity is compounded by the lack of multiannual investment planning frameworks at both regional and national levels for metropolitan areas. Instead, funding is distributed through short-term, project-based logics. This undermines the strategic nature of the ITI, which requires predictability, continuity, and governance memory. Each new programming period risks dismantling existing coordination structures due to changes in institutional roles or legal mandates.

One of the most operationally disruptive issues is the mismatch between local investment planning timelines and the scheduling of funding calls. Calls are often announced with little notice and are subject to mid-process changes in eligibility or evaluation criteria, making it difficult for municipalities to prepare high-quality, strategic projects. This unpredictability favours larger cities and penalises smaller actors who require stable timelines for public consultation and decision-making. In turn, assessment procedures, although formally transparent, are often seen as overly technocratic and detached from local realities, forcing applicants to focus on formal compliance rather than on the substantive quality or developmental impact of projects.

Additionally, there is structural instability in territorial instruments such as ITI. The tool is introduced for a single programming period and is not embedded in permanent legal or institutional frameworks. As a result, municipalities hesitate to commit to long-term projects whose funding and coordination structures may not exist in the next cycle. This short-termism contradicts the principle of sustainable development, which requires durable institutional and financial foundations for multiannual investments.

5.1 Administrative capacity and management gaps

In the case of Warsaw it is difficult to speak of significant institutional capacity gaps in the classical sense. The city has well-developed administrative structures, experienced personnel, and a high organizational culture. However, even with such strong institutional foundations, managing large investment projects, especially those funded by the EU, faces a number of systemic and operational challenges.

In particular, difficulties stemmed from the lack of flexibility in the project management system due, for instance, to complex and frequently changing guidelines on expenditure eligibility, public procurement procedures, and reporting requirements. Delays often occurred not because of failures on the part of the beneficiary but due to prolonged approval processes at the central level. These mechanisms, combined with insufficient coordination between managing authorities, introduced significant operational risks even in well-prepared projects.

The question of what conditions must be met to establish a well-functioning system for urban investments within the EU policy framework is complex and touches on deeper systemic dimensions. In Warsaw's case, the greatest constraints do not arise from limited management skills, but from the lack of proper recognition of large cities within the architecture of cohesion policy. Poland does not have a city-centered development policy. Warsaw, despite its scale, potential, and metropolitan importance, is not treated as a strategic partner of the state, but rather as an executive unit expected to efficiently implement centrally defined objectives.

There are no dedicated operational programs for metropolitan areas, nor are there mechanisms for contracting territorial development policies between the government and large cities. Furthermore, even within the existing ITI mechanism, which formally aims to support integrated development in functional urban areas, real decision-making power of local governments remains limited. It concerns both periods i.e. the 2014–2020 and the 2021–2027 period.

Another significant barrier is political tension between local governments of large cities and the central administration. The lack of trust and low levels of cooperation result in restricted access to information, difficulties in negotiating projects, and selective distribution of funds. Under such circumstances, it is difficult to speak of a shared urban policy based on partnership and co-decision. Despite its competence, experience, and expert capacity, Warsaw often remains merely an implementer of decisions made elsewhere, without real influence over the priorities of national operational programs or the content of the Partnership Agreement.

Organizational barriers are also present across the Warsaw Metropolitan Area. While the capital has a strong administrative base, many municipalities from metropolitan area struggle with staff shortages, limited experience in implementing joint projects, and weak planning capacity. There is a lack of shared standards, monitoring systems, integrated data platforms, and analytical tools that would enable joint investment planning. These deficits make it difficult to implement integrated projects that require coordination across administrative boundaries.

The experience of Warsaw and its metropolitan area suggests that, even with solid institutional preparation, the delivery of large EU projects can encounter broader systemic and procedural constraints. Developing an effective metropolitan investment policy would benefit from sustained collaboration across levels of government, with complementary national support and fit-for-purpose programming and financing tools to match local capacity.

5.2 Multilevel governance

Multi-level cooperation forms the formal foundation for the implementation of Cohesion Policy in Poland. This system is based on numerous consultative and coordination mechanisms, such as the Joint Commission of Government and Local Government or the Monitoring Committees of operational programmes. From a procedural and structural point of view, the system appears relatively complete and it functions, enables project implementation, and its effectiveness is reflected in the high absorption rate of EU funds.

However, the actual quality of this cooperation depends not only on the existence of institutions but also on trust, systemic stability, and a balanced distribution of power between partners. In this context, numerous tensions and limitations emerge, which are particularly strongly felt by Warsaw. Although formally included in the implementation system, Warsaw often functions more as an efficient executor of decisions made at the central level than as an equal partner co-deciding on development policy directions.

Under the current arrangements, the central government acts as the dominant gatekeeper through the Ministry of Funds and Regional Policy. This ministry decides on key parameters, such as the shape of the Partnership Agreement, allocation distribution, national programme structures, and eligibility criteria for projects. While the rhetoric of partnership and dialogue is present, the actual agency of local authorities, especially large cities, remains limited.

This is particularly visible in the city's relations with Managing Authorities. Cooperation with the Ministry of Funds is ambivalent. On the one hand, the city is involved in implementing national programmes, but on the other, it has repeatedly encountered resistance when trying to secure direct support for strategic projects for the city. The nature of these relations fluctuates between complementarity and tension, especially when Warsaw voices ambitions that exceed the standard role of a beneficiary. However, it must be also added, that cooperation with the Ministry resulted in a very significant increase in the allocation of funds for the Warsaw metropolis from structural funds in the period 2021-2027 compared to the original amount (thanks to the mechanism of transfers between categories of regions).

Co-operation with the Marshal's Office of the Mazowieckie Voivodeship (Managing Authority for the Regional Operational Programme) has varied by programming period. In 2014-2020, Warsaw acted as an Intermediate Body (IB/IP) within the ROP implementation system, which provided a formal role in selection and oversight. In 2021-2027, Warsaw no longer performs IB functions; collaboration remains broadly partnership-based, with Warsaw participating in the ITI strategy and project consultations. While thematic scopes are largely set at the regional level, there has been room for discussion on priorities most relevant to Warsaw. Final decisions, however, rest with the Managing Authority.

A crucial aspect of this landscape is the absence or marginalisation of certain actors within the system. Despite being the metropolitan leader, Warsaw lacks a formally recognised position in the Cohesion Policy structure because there are no dedicated programmes for metropolitan areas nor mechanisms for contracting territorial development policies with the government. The WMAssoc. seeks to fill this gap by representing the collective voice of municipalities within the functional urban area, but its position has yet to be technically and institutionally strengthened.

Regarding the alignment of the city's priorities with those of the Managing Authorities, the picture is mixed. Where Warsaw's needs aligned with EU or national strategies e.g., revitalisation, low-emission public transport, then support was available and relatively easy to obtain. Outcomes were less favourable for projects with a more metropolitan character or those not directly covered in national documents, such as metro expansion or integrated initiatives spanning multiple municipalities. This is because investments of this type fell outside the strategic priorities defined at national level and therefore did not receive dedicated funding channels. As a result, Warsaw often had to finance these projects largely from its own resources, which placed a disproportionate burden on the city's budget and limited its ability to pursue other development priorities.

Paradoxically, the more institutionally and technically mature the city is, the more visible the systemic limitations become. Formal multi-level governance does not translate into actual co-decision-making. Central gatekeepers retain the final say, while local partners, despite their professionalism and commitment, remain implementers of external strategies.

The greatest challenge for multi-level governance in Poland lies not merely in institutional design but in the prevailing management culture which is characterised by hierarchy, lack of trust, and limited dialogue. While formal cooperation mechanisms exist, they are often superficial just serving to meet consultation requirements rather than enabling real co-creation. There is a lack of openness to the arguments of local actors, particularly large cities that possess knowledge, resources, and experience but lack influence. Centralised decision-making is reinforced by bureaucratic inertia and a reluctance to share power. At the same time, no reliable, independent system exists to evaluate the quality of multi-level cooperation - there is a lack of data, analysis, and evaluations that could go beyond individual narratives and interests. Establishing such a framework with the participation of experts, local governments, and national institutions would help identify real tensions, highlight best practices, and build trust. Without it, any reform will remain superficial, and multi-level governance will continue to be an underutilised potential.

In conclusion multi-level cooperation in Poland benefits from strong institutional and administrative foundations but requires deeper grounding in the logic of genuine partnership. As a city of critical importance, Warsaw should have the ability to co-create the directions of Cohesion Policy rather than merely implement them. This would require not only strengthening mechanisms for metropolitan representation but also greater flexibility on the part of central institutions, legal stability, and the development of territorial contracting tools. Only then can true cooperation be achieved, where each level of governance plays a meaningful and equal role.

5.3 Financial constraints and technical complexity

The accessibility of EU funds for Warsaw and municipalities from its metropolitan area is a complex and ambiguous issue. On the one hand Warsaw has long been among the largest beneficiaries of Cohesion Policy in the country. Thanks to its administrative capacity, and experienced team, Warsaw has been able to effectively apply for funds, prepare high-quality projects, and implement them efficiently. Municipalities from the metropolitan area draw on EU funding under the ITI instrument and by applying directly to various programmes. On the other hand, however, this access is burdened by significant institutional, procedural, and political barriers that not only hinder the full use of EU funding potential but also limit the city's and its metropolitan area's strategic development planning capabilities.

Beyond the challenges faced by the City of Warsaw, the municipalities from the metropolitan area has also experienced significant financial constraints in the 2021–2027 programming period. Municipalities within the Warsaw Metropolitan Area, many of which have more limited administrative and fiscal capacity, have

been particularly affected by the reduction of the EU co-financing rate from 80% to 50% of eligible costs compared to the 2014–2020 period. This shift has substantially increased the required level of own-source funding, making it more difficult for smaller and less affluent municipalities to participate in metropolitan-scale projects or to implement investments that respond to their local needs. As a result, the disparity between municipalities with strong financial capacity and those with limited resources has deepened, challenging the coherence and inclusiveness of metropolitan cooperation.

The greatest difficulty in accessing EU funds is not the application process itself, but the institutional architecture in which programming and fund distribution take place. Warsaw's influence over the design of key financial instruments is indirect rather than determinative. The Partnership Agreement and national/regional operational programmes are prepared by central and regional administrations, but the city is consulted, particularly on the regional programme, and participates in monitoring committees established early in the process. These channels provide scope to shape priorities and implementation details. In practice, however, influence can be constrained, especially for large, strategic investments, and some city proposals are not taken on board, whether at regional or national level or by the European Commission. This is simply because the fact that EU regulatory frameworks and programming rules sometimes overlook the specific interests and development needs of cities and metropolitan areas, which reduces their ability to shape programmes proactively and results in funding instruments that are not fully aligned with metropolitan realities.

Co-financing requirements are among the most difficult barriers to the practical use of EU funds. While EU projects are co-financed from the EU budget, every investment requires a local contribution. For large infrastructure projects, this translates into hundreds of millions of zlotys that must be secured within the city's budget. Although Warsaw has relatively stable finances, rising operational costs, declining tax revenues, and legal constraints (e.g. the expenditure rule) make it increasingly difficult to provide the required co-financing.

In response, Warsaw has in recent years developed alternative and innovative financing methods for investment projects. First, the city makes active use of repayable instruments, such as loans from the NDBP and the European Investment Bank (EIB). Second, it is implementing a funding mix strategy combining EU, national, municipal, and repayable funds in a single project. This approach requires a high level of financial management culture and the ability to coordinate across multiple institutions but offers greater flexibility and resilience in the face of political or budgetary changes.

Another creative solution has been the development of an internal pipeline of ready-to-implement projects complete with documentation, financial analysis, and impact assessments. This allows the city to respond quickly to changing conditions and new funding calls while minimizing the risk of fund loss. In parallel, Warsaw operates a system of real-time public service quality evaluation and investment performance monitoring, which strengthens the social legitimacy of projects and makes them easier to promote politically.

Despite these efforts, Warsaw continues to call for systemic changes. First and foremost, the creation of a dedicated operational programme for large cities and metropolitan areas, which would account for their investment specificity and strategic role in national development. Second, increasing flexibility in co-financing rules, for example through the option to substitute own contributions with in-kind resources, tax incentives, or private sector participation. Third, reforming the logic of calls for proposals so that they better reflect the needs of strategic planning rather than only ad hoc project implementation.

5.4 Innovations and good practices

A number of innovative solutions have been introduced in Warsaw and the surrounding metropolitan area to enhance administrative capacity and improve coordination of Cohesion Policy. Most notably, there has been a strong focus on the development of internal project pipelines and implementation capacity. The City of Warsaw has developed a structured portfolio of ready-to-implement projects, allowing it to respond rapidly to unpredictable calls for proposals. This internal capacity - organizational, financial, and procedural - enables Warsaw to submit high-quality applications within very short timeframes. The foundation of this

innovative solution is the European Funds and Development Policy Department, with the ITI Team within it. This unit serves as an example of a highly specialized technical and expert body with strong competences and operational effectiveness.

An innovative and good practice example is the integration of transport systems across Warsaw and its metropolitan area. Local, regional, and suburban public transport has been integrated into a unified fare and organizational system. This includes a joint ticket valid for the Warsaw Transport Authority – WTA (Zakład Transportu Miejskiego – ZTM), Mazovia Railways – MR (Koleje Mazowieckie – KM) and Warsaw Commuter Railway – WCR (Warszawska Kolej Dojazdowa – WKD). The uniqueness of this model of inter-municipal cooperation in public transport lies not only in its scope but also in the fact that Warsaw has taken on the majority of operating costs, guided by social, environmental, and spatial benefits rather than a purely fiscal calculation. 75% of transport costs are covered by the city budget, and only 25% from ticket revenues. This financing structure allows for greater fare flexibility, development of services independent of current demand fluctuations, and long-term planning of infrastructure investments. This solution exemplifies political courage and a long-term vision for public service development.

Another innovation is the institutionalization of the metropolitan structure through assigning the ITI operator role to the WMAssoc. This is an example where a partnership structure, rather than a single local government unit, acts as the strategic coordinator of metropolitan actions. Warsaw remains a supporting partner, but transferring the leadership role fosters trust and shared responsibility. This solution represents an innovative model of "soft metropolitan governance", based on programmatic cooperation, mutual interest, and shared access to funding.

GOOD PRACTICE 1

Centre for Coordination and Quality in Cohesion Policy – the European Funds & Development Policy Department of the City of Warsaw

The Department's operations include numerous innovations. Among them, it has implemented a project assessment model based on criteria of strategic coherence, feasibility, measurability, and alignment with EU objectives. Every project undergoes a pre-selection quality check, which helps eliminate errors and increases the effectiveness of applications. The Department also serves as an advisory centre for the city's districts, which implement their own projects (e.g., in education, social inclusion, or the environment) – particularly those co-financed from the ESF as well as the ROP and RP for Mazovia. The Department provides not only technical assistance but also "translates EU documentation into the operational language of districts."

Importantly, the coordination model has evolved into a broader, functionally integrated system involving several specialised departments. The Welfare and Social Projects Department plays a key role in coordinating tasks related to social inclusion, community services, and ESF-related interventions, ensuring consistency of project pipelines developed by district-level social and welfare units. Similarly, the Education Department oversees and harmonises all projects in the field of education, including infrastructure, digitalisation, vocational training, and soft educational measures. Both departments ensure that sector-specific priorities are aligned with EU requirements, city-wide strategies, and metropolitan needs. Their involvement strengthens sectoral expertise and supports the preparation of high-quality applications, relieving districts from the need to interpret complex EU rules independently.

This is an institutional good practice that strengthens the implementation capacity of cohesion policy. It relates to the management of EU funds, coordination of strategic projects, and the institutional capacity of the local government for relational governance. The Department functions as a specialised competence centre that manages the entire life cycle of EU-funded projects in an integrated manner. The quality of operations is enhanced through the implementation of unified programming standards, performance indicators, and a project pre-selection system. Experience shows that the effectiveness of EU fund absorption and project quality depends not only on available funding but above all on the presence of a stable, professional unit that coordinates actions, provides support, and ensures alignment with the city's strategic goals and EU priorities. The success of this solution required strong political leadership, an effective leader with broad skillsets including negotiation skills, and a bold, creative approach to shaping organisational structures within city administration.

Source: author's own elaboration

New coordination and inter-municipal cooperation mechanisms have also been introduced. Warsaw has developed a network of flexible agreements with surrounding municipalities in areas such as transport, education, and waste management. Thanks to this, even in the absence of a formal metropolitan structure, it is possible to practically plan and implement public policies following the "soft metropolis" model. Notably, fare and organizational integration of city and regional transport stands out.

Warsaw has developed a comprehensive financial engineering approach that integrates multiple funding instruments to ensure stability and predictability in long-term development planning. Instead of relying on a single source of financing, the city systematically combines EU grants, repayable financial instruments, own-source revenues, and various national-level instruments when available. This diversified funding architecture enables Warsaw to maintain continuity in key policy areas regardless of fluctuations in specific funding streams or changes in national support schemes. By structuring its investment policy around multi-annual financial planning, blending funds, and carefully sequencing projects, the city has built a resilient model capable of supporting long-term strategic goals. This integrated and multi-fund approach constitutes an important institutional innovation, as it enhances financial flexibility, reduces exposure to external uncertainties, and strengthens the city's capacity to implement complex, multi-year development programmes.

GOOD PRACTICE 2

Study Visits and Metropolitan Workshops Organised by the Warsaw Metropolis Association

Since 2022, the Warsaw Metropolis Association has implemented a systematic cycle of study visits to member municipalities, combined with metropolitan workshops. The aim of this initiative is to strengthen cooperation, build trust, exchange knowledge, and identify common challenges and solutions that can be replicated in other parts of the metropolis. Although the initiative is informal in structure, it is carried out systematically. Meetings take place cyclically in different municipalities and involve mayors, municipal officials, representatives of the City of Warsaw, and external experts. Each host municipality presents its own good practices related to, for example, investment implementation, long-term social programmes, waste management solutions, mobility strategies, and more. A core element of the visit is a thematic workshop conducted by an external expert, focusing on topics of specific interest to the host municipality and others. The final part of each visit is a recommendation and summary session, during which participants jointly develop conclusions and explore how selected solutions can be adapted and implemented in their own local contexts.

This good practice targets: metropolitan cooperation, building social and institutional capital, and territorial integration. It is a low-cost, inclusive, and experience-based model, bringing together local leaders and experts in real-life, operational settings. Such a format is key to mutual understanding and trust-building among local governments. On-site meetings prove to be more effective than formal sessions in engaging participants and stimulating collaboration. Thanks to these study visits and metropolitan workshops coordination of projects within the ITI framework has become more effective, institutional capacities have been strengthened, and elements of relationship-based management have been introduced in the implementation of EU Cohesion Policy

Source: author's own elaboration

Warsaw conducts cyclical surveys on the quality of public services as perceived by residents. These are conducted on a reference sample and cover sectors such as transport, safety, and healthcare. This solution provides hard data for urban policy evaluation, strengthens the legitimacy of budget decisions, and allows monitoring of service perception trends over time.

Another innovative measure is the introduction of development programming standards for the City of Warsaw. This institutional tool is designed to increase the effectiveness, coherence, and transparency of the city's development activities. These standards were formulated in response to the need for systematizing and coordinating planning, programming, and policy implementation processes. They apply to both strategic and operational documents across all domains of city governance: from spatial policy to management of transport, education, environmental protection, and innovation. The standards include a set of formal, substantive, and procedural requirements that must be met by development programming documents. They define document structure, linkages between documents, and rules for their preparation. The standards ensure compatibility between documents, facilitating long-term and short-term planning and integration across policy areas. They contribute to more effective public spending by promoting measurable objectives and indicators. According to these standards, the City Development Strategy is the most important document, setting out the long-term vision and both strategic and operational goals. It is the guiding document, superior to sectoral policies and programs.

GOOD PRACTICE 3**The Metropolitan Council – an advisory body of the Warsaw Metropolis**

The Metropolitan Council was established in 2023 as an advisory body playing a key role in the development of the Integrated Territorial Investments Strategy 2021–2027+ and the Development Strategy for the Warsaw Metropolis up to 2040. The Council's role is multifaceted: it issues opinions on draft resolutions of the Management Board of the WMAssoc., on strategic documents, diagnoses, goals and proposed actions. It is engaged throughout all phases of the process – from the early development of documents to their adoption. It functions as an expert-partner forum supporting the substantive quality of documents. The outcomes of the Council's work include: improved quality of strategic documents, the development of social capital, and a procedural strengthening of intermunicipal partnership.

This good practice builds an aspirational model of institutional and societal partnership and strengthens the legitimacy of collective territorial policy. This practice relates to expert support in the preparation of metropolitan strategic documents. The Metropolitan Council is a body based on partnership among municipalities of the metropolis, experts, and civil society. Its work improves the quality of strategic documents and enhances public legitimacy of the adopted solutions. The Council's experience shows that combining expert knowledge with the experience of partners from various sectors improves planning processes and ensures alignment of the documents with EU policies. The experience of Warsaw demonstrates how to establish a durable mechanism that supports the creation of metropolitan development programmes – without the need for formal legal structures. Furthermore, the work of the Council has a positive impact on the EU Cohesion Policy, as it strengthens the principles of partnership and multi-level governance.

Source: author's own elaboration

Table 5.1
Main innovations implemented at local level

Name of innovation	Objective (barriers to overcome)	Innovative actions	Results	Additional comment
Internal EU Project Pipeline	Weak project readiness; delayed responses to calls	Creation of a structured portfolio of ready-to-launch projects and a permanent coordination unit (Department for EU Funds with ITI team)	Increased application success rate; faster mobilisation of funds	This anticipatory approach allows Warsaw to act quickly under tight EU timelines and adapt flexibly to emerging funding opportunities.
Integrated Metropolitan Transport Model	Fragmented transport governance; cost burdens	Full fare and operational integration across city, regional, and suburban networks; 75% of costs covered by Warsaw	Cohesive regional mobility; enhanced access and equity	A flagship example of long-term public investment vision and solidarity across municipalities, even in the absence of formal metropolitan governance.

Name of innovation	Objective (barriers to overcome)	Innovative actions	Results	Additional comment
ITI Leadership by Metropolitan Association	Limited metropolitan ownership; over-reliance on core city	Transfer of ITI coordination to Warsaw Metropolis Association, promoting shared governance and partnership	Increased legitimacy, trust, and joint responsibility	A soft governance solution enabling more balanced cooperation without institutional reform.
Inter-Municipal Cooperation Agreements	Legal gaps in metropolitan coordination	Use of flexible agreements in sectors like transport, education, and waste; policy delivery via “soft metropolis” framework	Expanded functional service provision; improved coordination	Supports joint action in the absence of a metropolitan law, based on mutual interest and administrative pragmatism.
Multi-source Funding Strategy	Decline in national funding; EU dependency	Combining EU grants, NDBP instruments, and national funding in key development areas like green transformation	Funding continuity; better financial resilience	Allows for more autonomous policy planning even when individual sources become volatile or politically restricted.
Public Services Perception Monitoring	Lack of feedback; policy misalignment	Regular city-wide resident surveys on public services (transport, safety, health)	Data-informed policy choices; improved spending legitimacy	A rare example of institutionalised perception monitoring at the local level, used to guide investment decisions and monitor public satisfaction over time.
Development Programming Standards	Fragmented planning; incoherent strategies	Introduction of formal standards for strategic and operational documents; cross-sector coordination and hierarchy of policy documents	Greater consistency; integration across departments	Anchors all sectoral strategies to the overarching City Development Strategy (e.g. Warszawa 2030) and strengthens horizontal coherence.
Metropolitan Study Visits and Workshops	Lack of trust and exchange among municipalities	Regular knowledge-sharing visits and workshops among municipalities, led by Warsaw Metropolis Association	Strengthened cooperation; replication of good practices	On-site, participatory meetings foster deeper engagement and have proven more effective than formal committee settings.

Name of innovation	Objective (barriers to overcome)	Innovative actions	Results	Additional comment
Metropolitan Council	Weak partnership legitimacy; fragmented planning process	Creation of an expert advisory body composed of local officials, civil society, and experts to support the preparation and review of key strategic documents	Improved quality of metropolitan strategies; stronger ownership and transparency	The Council operates without formal legal status, demonstrating how metropolitan governance can be strengthened through procedural innovation, expert engagement, and inclusive consultation — in full alignment with EU partnership principles.

Source: author's own elaboration

5.5 Added value of negative experiences

Warsaw's experience with managing EU cohesion funds and strategic urban development offers a powerful lesson on the limits of well-designed institutional frameworks when they are not sufficiently responsive to metropolitan realities. While the overall governance architecture of cohesion policy in Poland is functionally sound, built on clear allocation of competencies, aligned with democratic principles, and generally effective in producing tangible investment outcomes, its application in the case of Warsaw has revealed substantial weaknesses.

As Poland's capital and the functional core of the Warsaw Metropolitan Area, the city plays a critical national role, both administratively and economically. It provides public services for dozens of surrounding municipalities, acts as a major labour market hub for commuters from within and beyond the region, and generates the majority of GDP within the Warsaw Capital Region, which in turn accounts for nearly 20% of national GDP. Yet, despite these contributions and its extensive functional reach, Warsaw has struggled to secure a governance model or funding mechanisms adequate to the complexity and scale of its metropolitan responsibilities.

A particularly negative experience has been the exclusion of Warsaw from strategic programming processes at the national and regional levels. The city has long advocated for stronger involvement in the programming and allocation of EU funds, emphasizing the need to tailor investment strategies to the specific challenges of a capital city serving a broad metropolitan catchment. However, these calls have largely gone unheeded. Efforts to establish a formal metropolitan governance framework have failed, and regional fund programming has consistently lacked sensitivity to Warsaw's differentiated needs. Moreover, despite the extensive experience gained by the city and its neighbouring municipalities in implementing ITI, this knowledge has not been effectively incorporated into improvements in multi-level governance. This disconnect has created a gap between the conceptual foundations of cohesion policy and its operationalization in the Warsaw metropolitan context.

The key takeaway from this experience is that without a supportive institutional environment and genuine recognition of a city's functional role, even the most capable urban administration cannot fully realize its strategic objectives. For Warsaw, this has meant adopting a pragmatic and self-reliant approach. Rather than waiting for top-down reforms, the city has focused on building internal resilience and strengthening its own administrative capacity.

This shift has resulted in several good practices. Warsaw has professionalized its staff, standardized its development programming documents, and created a more cohesive internal policy framework. The city has also invested in institutional platforms to sustain inter-municipal cooperation. Notably, it actively supports the Warsaw Metropolis Association, which now plays a crucial role in coordinating efforts across the metropolitan area. This approach has yielded important political outcomes, most significantly, the unanimous support of all municipalities within the Warsaw Capital Region for a locally drafted proposal for a metropolitan law. This unprecedented alignment reflects the strength of relationships that have been cultivated and the emergence of a values-based coalition of municipalities committed to shared development goals. Warsaw's negative experience of institutional under-recognition has catalysed a process of internal consolidation, capacity-building, and bottom-up alliance formation.

Table 5.2
Added value of negative experiences in Warsaw metropolis

Name of the Initiative	Topic	Objective	What went wrong	What the city learnt
Proposal for a Metropolitan Law for Warsaw	Metropolitan governance	To establish a formal legal and institutional framework for managing the Warsaw metropolitan area through a dedicated metropolitan law	Despite strong support from all municipalities in the Warsaw Capital Region, the central government did not adopt the proposed legislation. The initiative stalled due to lack of political will at the national level and absence of a coherent national metropolitan policy	In the absence of national-level reform, cities must rely on local alliances and voluntary cooperation. Warsaw invested in building strong inter-municipal partnerships and used the process of preparing the draft law to consolidate a shared strategic vision across the metropolitan area
Advocacy for Greater Involvement in EU Fund Programming	Multi-level governance and EU funding	To secure a more prominent role for Warsaw in shaping national and regional EU operational programmes, better reflecting the city's functional needs and strategic priorities	Warsaw remained largely excluded from formal programming processes. Its proposals for dedicated urban components or direct participation mechanisms were not taken up by regional or national authorities. The result was limited alignment between available funding instruments and the city's long-term plans	Warsaw strengthened its internal strategic planning capacity and developed standardized investment portfolios to better position itself for available calls. It also reinforced its voice through national city networks and worked to influence programming indirectly through coalition-building and evidence-based advocacy
Integration of ITI Experience into Systemic Governance Reform	Urban development management and policy learning	To use the experience of implementing Integrated Territorial Investments (ITI) to inform improvements in urban governance and foster more effective multi-level coordination	Despite the successful implementation of ITI in Warsaw and surrounding municipalities, the lessons learned were not incorporated into national or regional governance reforms. The potential to build a more functional multi-level governance system was missed	Warsaw focused on capitalizing internally on the experience gained through ITI by professionalizing its administration, formalizing coordination tools, and enhancing cooperation with neighbouring municipalities. It learned to treat local capacity-building as a strategic response to systemic inertia

Source: author's own elaboration.

6 Cohesion Policy contributions to city long-term agendas

The case study covers Warsaw and its metropolitan area. As previously mentioned, during the 2014–2020 programming period, the metropolitan area consisted of 40 municipalities. In the 2021–2027 period, this number increased to 70 municipalities and 9 counties. Warsaw, as the core city of the Warsaw Metropolis, due to its size, development potential, and the functions it performs, naturally faces different challenges and has different needs than the municipalities in the metropolitan area. Therefore, the impact of Cohesion Policy on long-term agendas should be viewed from two perspectives: that of the core city of the metropolis and that of the metropolitan area.

Long-term agendas of Warsaw can be found in the two main strategic documents: the current *#Warszawa2030 Strategy* and the new document *"Programming Assumptions for the Development Strategy of Warsaw 2040+"*. Several key conclusions can be drawn regarding the city's long-term development objectives and the directions in which they are evolving.

Both documents share a consistent and enduring vision of Warsaw's development: a city of active residents, a friendly place to live, and an open metropolis that is part of the European network of cities. A common foundation of both strategies is a human-centred approach, where the resident is both the creator and user of the city. Warsaw is envisioned as inclusive and accessible, regardless of age, origin, or social status.

The *#Warszawa2030* strategy was built around three overarching goals: first, *Active Residents*, focused on civic engagement; second, *Friendly Place*, oriented toward improving living and working conditions; and third, *Open Metropolis*, aiming to position Warsaw as a hub for cooperation and innovation.

The new *2040+ Strategy* retains these fundamental priorities but expands and reorganizes them into five strategic goals. These include *Responsible Community*, emphasizing civic society, solidarity, and local identity; *Comfortable Locality*, promoting the 15-minute city model and access to services near one's residence; *Functional Space*, concerned with spatial order and high-quality infrastructure; and *Creative Environment*, highlighting a knowledge-based economy, innovation, and culture. A new and important addition is the goal of a *Resilient City*, which introduces a horizontal priority responding to new challenges that emerged after the COVID-19 pandemic, the refugee crisis linked to the war in Ukraine, and ongoing climate and geopolitical uncertainties. This goal encompasses the city's capacity to respond to social, environmental, and infrastructural crises, including energy, health, and social security.

The most significant evolution in the new strategy is the inclusion of resilience as a central theme, reflecting Warsaw's growing need to adapt to uncertainty and external shocks. Another notable change is the extension of the planning horizon from 2030 to 2040+ which enables deeper long-term planning, particularly in coordination with the city's new general spatial plan.

The *2040+ Strategy* introduces advanced spatial planning components not present in the earlier strategy, including a model of the city's functional-spatial structure, a hierarchy of settlement networks, a system of ecological linkages, and technical and social infrastructure frameworks. It also incorporates realistic financial projections and anticipates population growth to 1.91 million by 2040. The strategy assumes multi-source financing, combining EU funds, national resources, and municipal budgets.

While the *2040+ Strategy* is largely a continuation of *#Warszawa2030*, it clearly adapts the city's development model to a new social and political context. The core objectives remain relevant, but the increased emphasis on resilience, stronger focus on local service integration, and enhanced spatial-environmental alignment mark a shift toward a more flexible, green, safe, and integrated urban model. The strategy strengthens Warsaw's long-term development capacity, integrates spatial and social dimensions more fully, and better prepares the city to face future evolving challenges.

The long-term strategic vision for the Warsaw Functional Area is articulated in two successive documents: the ITI Strategy 2014–2020 and the ITI Strategy 2021–2027+. Together, they outline the evolving development agenda for the Warsaw metropolitan area and reflect the increasing maturity of inter-municipal cooperation.

The first strategy, implemented during the 2014–2020 programming period, was designed to address common development challenges across 39 municipalities forming the WOF at that time. Its central aim was to build the foundations for metropolitan coordination and to strengthen territorial cohesion through joint investments, particularly in areas such as low-emission transport, social inclusion, and education infrastructure. The strategy supported the development of a shared territorial identity and cooperation culture, even in the absence of a formal metropolitan governance structure.

The 2021–2027+ ZIT Strategy builds on this foundation and reflects a significantly expanded territorial coverage increasing the number of participating municipalities from 40 to 70 and 9 counties. The strategy is now framed within a broader strategic architecture composed of three interlinked documents: the ITI Strategy 2021–2027+ (implementation-oriented), the Sustainable Urban Mobility Plan for the Warsaw Metropolis 2030+ (SUMP), and the adopted Development Strategy for the Warsaw Metropolis to 2040. These documents form a comprehensive long-term policy framework addressing spatial, social, environmental, and mobility challenges in a coherent manner.

The strategic objectives of the ITI Strategy 2021–2027+ are organised around three main goals that translate the functional, people-centred and sustainable development model into concrete interventions.

Goal 1 – Improving the quality and accessibility of educational services – focuses on raising educational outcomes and equalising opportunities across the Warsaw metropolitan area, including support for schools with the weakest results, pupils with special educational needs and the modernisation of educational infrastructure. Goal 2 – Improving the quality of space – concentrates on sustainable mobility and environmental quality, in particular the development of low- and zero-emission public transport, active mobility infrastructure and energy-efficient, climate-resilient urban environments.

Goal 3 – Strengthening the capacity of the ITI Association – is aimed at building the administrative and coordination capabilities of the Warsaw Metropolis Association as the ITI body.

Together, these three goals are implemented through specific directions of action and a set of integrated projects.

What distinguishes the new strategy is its alignment with EU green and digital priorities and its emphasis on multi-level governance and partnership-based programming. The strategy was developed in collaboration with the Metropolitan Council, local governments, experts, and civic stakeholders — reinforcing the legitimacy and quality of the resulting priorities. Furthermore, the strategy introduces a stronger spatial and environmental dimension, supported by diagnostic studies and strategic planning tools such as functional analysis, territorial SWOT assessments, and sustainable mobility diagnostics. It is informed by the diagnosis of SUMP and anticipates synergies with other sectoral strategies. The 2021–2027+ agenda also reflects a pragmatic financial approach. It assumes multi-source funding, with EU Cohesion Policy as a primary engine, complemented by national funds and municipal contributions. It also promotes soft mechanisms of cooperation, such as inter-municipal agreements, technical assistance platforms, and advisory tools, to compensate for the lack of a formal metropolitan legal framework.

The newly adopted Development Strategy for the Warsaw Metropolis to 2040 is a supra-local strategy jointly prepared by the City of Warsaw and the municipalities of the Warsaw Metropolis, conceived as a kind of “agreement” between all local governments on shared directions of development for the entire metropolitan area.

It defines a common long-term vision for 2040, focused on strengthening metropolitan cooperation, improving spatial order, enhancing quality of life and environmental resilience, and boosting the area’s competitiveness in Europe. The Strategy sets out key thematic pillars (such as mobility, climate adaptation, green and blue infrastructure, public services, and economic development), links them with a functional-spatial model of the metropolis, and identifies areas of strategic intervention.

Implementation is framed through multi-level governance: the Warsaw Metropolis Association plays a coordinating role, while individual municipalities commit to align their local strategies and projects with the metropolitan vision. The document is also intended to support coherent use of Cohesion Policy instruments, national funds and local resources for jointly defined metropolitan priorities

In sum, the evolution of long-term development strategies for the WFA illustrates a shift from fragmented project-based cooperation to a more integrated and strategic metropolitan governance model. It balances

flexibility with coordination, local autonomy with shared investment planning, and offers a durable framework for territorial cohesion and resilience across the metropolitan area.

The results of the analysis of projects implemented in Warsaw and its functional area in the 2014–2020 and 2021–2027 programming periods allow for several conclusions to be drawn regarding how the urban dimension of the Cohesion Policy supports long-term urban agendas and localises EU priorities.

The projects implemented have closely reflected the strategic goals articulated in Warsaw's development strategies, notably *#Warszawa2030* and the *Strategy 2040+* which is under preparation. These strategies emphasise sustainable mobility, social inclusion, digital transformation, educational equity, and the transition to a low-emission economy. Cohesion Policy has functioned not merely as a financial mechanism but as a primary tool for implementing these long-term urban objectives. For instance, the extension of Metro Line II, a flagship investment exceeding €2 billion between 2014 and 2027, directly advances Warsaw's ambitions for sustainable mobility and emission reduction. Other initiatives, such as the development of digital public services and the modernisation of educational infrastructure, correspond to strategic objectives related to improving access to services and building inclusive, knowledge-based human capital.

Cohesion Policy has also effectively translated high-level European Union priorities into place-based interventions in both Warsaw and its functional area. Thematic Objectives such as TO4 (low-carbon economy), TO2 (information and communication technologies), TO10 (education), and TO9 (social inclusion) were concretely implemented through dozens of projects. ICT-related projects also remained prominent, Education and social cohesion were also operationalised through modernisation of schools, support for vocational training, and services for disadvantaged populations. In the 2021–2027 period, a notable shift toward climate resilience and decarbonised mobility can be observed.

The implementation of ITI and the leadership role of the WMAssoc. have also significantly strengthened institutional capacities. The urban dimension of Cohesion Policy has encouraged horizontal and vertical coordination across municipalities and fostered the development of shared strategic documents like the Sustainable Urban Mobility Plan (SUMP 2030+) and the Development Strategy for the Warsaw Metropolis to 2040. In parallel, the involvement of residents and stakeholders through thematic groups and consultations has reinforced public legitimacy and ownership. These processes have embedded European funding logic, planning cycles, and evaluation mechanisms into the local development ecosystem.

One of the defining features of urban investments in Warsaw and WFA is their multi-source financing model. Projects funding combined contributions from the EU sources, the municipal budgets, loans from the European Investment Bank, and national co-financing instruments, including support from the National Fund for Environmental Protection and Water Management. This blending of resources has enabled Warsaw and other municipalities to pursue more ambitious projects with longer lifespans and strategic relevance.

Between 2014 and 2020, Cohesion Policy provided the foundation for Warsaw to build robust infrastructural and social systems which proved essential during the COVID-19 pandemic. Investments in public service digitalisation, online education, and the development of e-administration enabled the continuity of city services during lockdown periods. A large number of projects in the field of ICT have been implemented, including electronic education platforms, spatial information systems, and e-health systems in public institutions. These initiatives significantly enhanced the resilience of municipal administrative systems to future shocks.

In the 2021–2027 programming period, Warsaw and the municipalities within the metropolitan area have focused their response on the climate crisis and energy transition. The dominant projects are those related to low-emission economy and sustainable mobility. These projects not only reduce emissions but also increase the city's resilience to climate impacts (e.g., by limiting dependence on private car transport). The complementary nature of funding—EU resources (ERDF, Cohesion Fund) supported by loans from the European Investment Bank, national funds, and local budgets has enabled the implementation of complex and capital-intensive projects.

Cohesion Policy has also played a crucial role in promoting social inclusion. Across both financial periods, dozens of projects were implemented to support education, vocational activation, and social integration, particularly in smaller municipalities of the Warsaw Functional Area, which would otherwise be unable to carry out such initiatives without EU support.

6.1 Main development instruments

Understanding the main development policy and planning instruments is essential for assessing how the urban dimension of Cohesion Policy is operationalised in Warsaw and its metropolitan area. These instruments, ranging from statutory national strategies to regional programmes and voluntary policy frameworks, form the backbone of the city's and region's ability to plan, finance, and implement investments in line with European, national, and local priorities.

In the Polish context, the architecture of development instruments is multilayered. At the national level, statutory documents such as the National Strategy for Regional Development 2030 and the Medium-Term National Development Strategy set out the overarching territorial and sectoral objectives, binding central and regional administrations in strategic programming. Long-term frameworks such as the Concept of National Development 2050 provide a vision for socio-economic transformation, while thematic policies like the National Urban Policy 2030 guide urban development.

At the regional level, instruments such as the Mazovia Development Strategy 2030 and the ROP (2014-2020) and RP (2021-2027) for Mazovia translate these strategic goals into territorially specific investment pipelines, allocating EU and national resources in ways that balance the growth of the region. These regional tools also serve as the primary frameworks for ITI.

At the metropolitan and local levels, strategic plans, such as the Warsaw Metropolis Development Strategy 2040, the ITI Strategy 2021-2027+, and the Warsaw 2030 strategy with its 2040+ programming assumptions, anchor these broader objectives in place-based priorities. They define investment needs, coordinate sectoral policies, and align projects with the funding and thematic priorities of the current EU programming period.

At the local level municipalities are also required to prepare a set of statutory strategic and spatial planning documents, complemented by sectoral programmes, some of which are mandatory while others are voluntary. The most important of these are the Municipal Development Strategy and the General Spatial Development Plan, which covers the entire municipal area. Other documents, prepared pursuant to provisions of sectoral legislation (e.g., the Environmental Protection Law, the Public Transport Act, the Act on Maintaining Cleanliness and Order in Municipalities), include the Municipal Environmental Protection Programme, the Low-Emission Economy Plan, Climate Action Plan, the Sustainable Public Transport Development Plan, and the Programme for Preventing Social Exclusion.

At present, there is no statutory requirement for metropolitan areas to adopt a dedicated metropolitan strategy, except where such a strategy is mandated under the ITI framework. Overall, local-level development instruments in Poland are predominantly statutory in nature and binding on municipal authorities, with implementation ensured through spatial planning, investment programming, and sectoral policy measures.

Together, these instruments answer critical questions about statutory versus voluntary commitments, binding versus guiding provisions, and the roles of actors from the national government to municipal administrations. They determine which objectives are prioritised, who is involved in shaping and delivering them, and how implementation is designed to ensure coherence between European objectives and local development realities.

National Strategy of Regional Development 2030 (Krajowa Strategia Rozwoju Regionalnego – KSRR 2030)

The strategy is statutory and adopted by the Council of Ministers. While it is not legally binding in the way that laws or regulations are, it is considered an obligatory reference document for all national and regional programming. It binds central and regional administrations in strategic and investment planning and is referenced in operational programmes.

The main objectives of the Strategy include, among others: balanced and sustainable regional development, reduction of inter- and intra-regional disparities, and strengthened territorial cohesion.

The strategy is implemented via sectoral programmes, regional strategies, and financial instruments (e.g., EU and national operational programmes). It is supported by contracts for regional development between the

state and voivodeships; monitored through indicators aligned with EU territorial cohesion goals and reinforced through strategic documents such as the Partnership Agreement and EU-funded OPs.

The Strategy integrates environmental and digital transitions into regional policy by promoting green and smart growth. Urban areas are seen as laboratories for sustainable innovation—whether in low-emission transport, circular economy, or digital public services. At the same time, the document acknowledges the risk of deepening territorial inequalities unless EU and national funds are explicitly targeted using functional and strategic indicators, rather than per capita GDP alone.

Crucially, the strategy embraces the principle of flexible subsidiarity—where central, regional, and local actors are expected to co-create development trajectories within a coordinated but adaptive planning system. This is particularly important in the context of Cohesion Policy, where operational programme design (both national and regional) must reflect the general principles of the Strategy but allow space for place-sensitive project design.

From an implementation perspective, the Strategy is not a financing programme in itself, but rather an umbrella strategy that guides and legitimizes the allocation and use of both EU and national development funds. The Warsaw case provides a telling example of both the utility and the limitations of the Strategy. On the one hand, the strategy's place-based logic supports Warsaw's role as a metropolitan driver of national growth and innovation. It justifies investment in metropolitan-scale infrastructure, including transit systems, innovation clusters, and social resilience frameworks. On the other hand, the implementation of the Strategy still relies heavily on centralized planning and fund distribution, limiting Warsaw's agency in defining its own strategic investment priorities. Moreover, although the Strategy calls for greater alignment between regional and metropolitan planning, institutional mechanisms for such alignment remain underdeveloped. For example, the Mazovian Voivodeship's regional development strategy and Warsaw's development strategy are not bound by formal coordination procedures, and the ITI governance framework remains predominantly soft and voluntary.

National Urban Policy 2030 (Krajowa Polityka Miejska 2030 – KPM 2030)

The National Urban Policy 2030 is a voluntary policy instrument. It is not legally binding, nor is it mandatory to develop. However, it is a strategic guidance document officially adopted by the Ministry of Funds and Regional Policy and recognized as a reference in national, regional, and municipal planning processes. It holds particular weight in the programming of EU Cohesion Policy instruments, including ITIs and regional operational programmes.

The National Urban Policy 2030 (NUP 2030) sets a strategic framework for the sustainable development of Polish cities and functional urban areas. Rather than defining a fixed set of “city types”, the document identifies a series of key thematic challenges that require coordinated intervention: sustainable and integrated urban mobility; spatial planning and the reduction of chaotic suburbanisation; climate change adaptation and environmental quality; energy efficiency and low-emission development; digital transformation; housing availability; social inclusion and community development; and strengthening the investment and governance capacity of cities. The overarching objective of NUP 2030 is to enhance the ability of urban areas—especially functional urban areas such as the Warsaw Metropolis—to generate sustainable growth, create high-quality living conditions, and build resilience to demographic, environmental and economic pressures. The policy also emphasises the need for differentiated territorial approaches, recognising that metropolitan areas, medium-sized cities and shrinking towns face distinct development trajectories and therefore require tailored policy responses.

The main objectives are to strengthen the strategic capacity and resilience of cities, promote sustainable urban development aligned with EU priorities (green, digital, inclusive), support multi-level governance and coordination between national, regional, and local actors, encourage innovation, civic engagement, and evidence-based urban policy and promote functional integration at the metropolitan level

NUP 2030 is a continuation and update of the earlier NUP 2023, but it reflects significant changes in the policy environment, notably the European Green Deal, the New Leipzig Charter, and the lessons drawn from the COVID-19 pandemic. A core conceptual shift in NUP 2030 is the emphasis on urban resilience as a cross-cutting priority. Cities are not merely engines of growth, but also vulnerable systems exposed to multiple pressures — demographic, environmental, financial, and political. This understanding leads to a redefinition

of the role of national urban policy: not as a top-down investment tool, but as an enabling framework for local governments to act more strategically and collaboratively.

Cities are not formally obliged to follow the recommendations of NUP 2030, and the document itself lacks a dedicated budget or implementation mechanism. As such, its success depends largely on voluntary alignment, administrative culture, and the availability of supportive funding instruments. Another limitation is that while the policy supports multi-level governance in principle, institutional coordination mechanisms remain underdeveloped. There is no formal requirement for regional governments to incorporate NUP 2030 into their strategies, nor for national sectoral ministries to align their investment logic with its goals. In this sense, it is more of a “platform for dialogue” than a policy enforcement tool.

Medium-Term National Development Strategy (Średniookresowa Strategia Rozwoju Kraju 2020)

This Strategy is a statutory instrument, mandatory and binding for central, regional, and local administrations in aligning development actions. Its main objectives are to promote a dynamic, inclusive economy driven by innovation and knowledge, ensure social and territorial cohesion, addressing disparities, and to build an effective, lean, and development-oriented state.

Structured around the principle of twinned development—economic dynamism alongside cohesion—it integrates economic growth with social inclusion and state modernization. Territorial coherence holds a prominent place within the Strategy. It explicitly addresses the need for targeted intervention in functional urban areas to transform them into sustainable hubs that complement national growth rather than exacerbate disparities.

Concept of National Development 2050 (Koncepcja Rozwoju Kraju 2050 – KRK 2050)

This concept is a statutory document required by amendment to the Development Policy Act (Ustawa o zasadach prowadzenia polityki rozwoju) It serves as a long-term vision document with advisory (rather than binding) status. The main objectives are to identify future global and national trends and challenges through to 2050, to propose strategic development scenarios and possible policy pathways, and to guide mid-term strategies in socio-economic, territorial, and environmental domains.

As in the case of the previously discussed documents, the leading role in preparing the strategy is played by the Ministry of Funds and Regional Policy. The strategy is not implemented through direct measures, but as a high-level vision steering the development of medium-term and sectoral strategies. As a strategic planning platform, it seeks to integrate various national agendas—urban, environmental, economic, demographic—into a coherent framework anticipating future shocks and uncertainties. Unlike operational strategies, this Strategy does not allocate budgets or prescribe interventions; instead, it establishes a long-term vision calibrated around key global megatrends such as climate change, demographic transformation, and digital disruption—factors that will undeniably shape urban futures.

Mazovia Development Strategy 2030 (Strategia Rozwoju Województwa Mazowieckiego 2030)

The Mazovia Development Strategy 2030 is a statutory regional strategic document. It is mandatory for all voivodeships to adopt such strategies and binding for regional authorities, especially in programming regional operational programmes, spatial development plans, and coordinating with lower-level (subregional and local) planning.

The main objectives are to strengthen territorial cohesion and competitiveness of the region, to promote green, digital, and inclusive transformation, to enhance innovation and human capital, to develop sustainable transport, climate resilience, and urban-rural linkages, and to support polycentric development, with emphasis on functional urban areas.

The Strategy is implemented through operationalisation in the ROP. The Mazovia Development Strategy 2030 is the cornerstone of regional policy-making in the Mazowieckie Voivodeship. The strategy reflects an evolved understanding of regional governance, where strategic priorities are grounded in territorial specificity, functional interactions, and multi-level cooperation. A fundamental ambition of the Strategy is to balance territorial asymmetries within the voivodeship, which comprises both the metropolitan giant of Warsaw and its dynamic metropolitan area, as well as peripheral subregions with lower development indicators.

From the perspective of Warsaw and its metropolitan area, the strategy provides both opportunities and tensions. On one hand, it explicitly promotes Warsaw's role as a national and regional hub. On the other hand, it seeks to rebalance regional development, which can sometimes translate into prioritising support for weaker subregions. This tension is visible in the allocation logic of the RPO, which distinguishes between Warsaw (excluded from parts of the ERDF) and the rest of the voivodeship.

European Funds for Mazovia 2021–2027 (FEM – Fundusze Europejskie dla Mazowsza 2021–2027)

Operational programmes for regions are statutory instrument under EU and national law. They are mandatory for each voivodeship and binding for the regional Managing Authority and for project beneficiaries. Their main objectives are to support EU Cohesion Policy goals through thematic concentration, address regional needs in areas such as innovation, energy transition, mobility, social services, education, health, and sustainable urban development, and to promote territorial cohesion, green and digital transformation, and inclusive growth.

RP is prepared by regional self-government in cooperation with various partners from the region, negotiated and consulted with the Ministry of Funds and Regional Policy and eventually approved by the European Commission. Regional programmes are implemented through priorities and specific objectives, defined in line with EU regulations (ERDF, ESF+). delivered via calls for proposals, strategic projects and ITI mechanisms.

Table 6.1
Main instruments at national, regional and local level

Instrument	Level	Type (1)	Type (2)	Type (3)	Main Goals	Actors Involved
NSRD	National	Strategy	Statutory mandator y	Binding for public authorities	Balanced and sustainable regional development, territorial cohesion	MFIPR – central level, regional self-government, local government, social partners
MTNDS	National	Strategy	Statutory mandator y	Binding for public authorities	Promotion of dynamic, inclusive economy driven by innovation and knowledge	MFIPR – central level, regional self-government, local government, social partners
NUP	National	Policy	Statutory	Non-binding	To strengthen the strategic capacity and resilience of cities, promote sustainable urban development aligned with EU priorities	MFIPR – central level, regional self-government, local government, social partners
CND	National	Concept	Statutory	Non-binding	Identification of future global	MFIPR – central level,

Instrument	Level	Type (1)	Type (2)	Type (3)	Main Goals	Actors Involved
					and national trends and challenges, guidelines for mid-term strategies in socio-economic, territorial, and environmental domains	regional self-government, local government, social partners
MRDS	Regional	Strategy	Statutory mandatory	Binding for public authorities	To strengthen territorial cohesion and competitiveness of the region,	Regional self-government, local authorities, social partners
RPO / RP	Regional	Programme	Mandatory	Binding for public authorities	Facilitation of development plans and projects implementation	Regional self-government, local governments , MFiPR
MDS	Local	Strategy	Statutory mandatory	Binding for public authorities	To set a long-term vision and priorities for the municipality's development, guide investment and spatial planning decisions, coordinate sectoral policies	Local self-governments , social partners
MEPP	Local	Programme	Statutory mandatory	Binding for public authorities	Set objectives and measures for environmental protection and sustainable resource use	Local self-governments , social partners
SUMP / SPTDP	Local/ Supra-local / Metropolitan	Plan	Statutory mandatory	Binding for public authorities	To create an integrated, long-term strategy for improving urban transport and mobility, promoting sustainable and low-emission modes	Local self-governments , social partners

Instrument	Level	Type (1)	Type (2)	Type (3)	Main Goals	Actors Involved
PPSE	Local	Programme	Mandatory	Binding for public authorities	to identify and address the causes of social marginalisation, support vulnerable groups, improve access to social services	Local self-governments, social partners
ITI	Metropolitan	Strategy	Mandatory for EU funds under ITI	Binding for signatory municipalities	to coordinate development actions across a functional urban area, integrate projects from multiple municipalities, address metropolitan-scale challenge	Local self-governments, social partners
Other metropolitan strategies or action plans	Metropolitan	Strategies / action plans	Voluntary	Voluntary unless linked to funding or cooperation agreements	addressing specific problems relevant to individual municipalities and to the FUA	Local self-governments, social partners

Source: author's own elaboration.

Main instruments at the local level

The Municipal Development Strategy is the city's primary strategic anchor. Its objectives provide the "demand side" for EU and national instruments, while offering selection criteria for municipal projects submitted to regional and national programmes. In practical terms, the strategy has framed successive calls and flagship investments like metro extensions, tram lines, e-services, climate and energy initiatives—co-financed through the regional programme and the ITI framework.

The General Spatial Development Plan (plan ogólny) now being prepared for the entire municipality will become the binding spatial mechanism that turns strategic goals into land-use rules, and will steer local plans toward compact, transit-oriented, climate-resilient growth. Its legal and technical design (as a city-wide spatial data set) makes it a direct lever for Cohesion Policy priorities on sustainable urban development, ensuring that EU-funded infrastructure (mobility hubs, green–blue systems, social facilities) is embedded in a coherent spatial framework.

The Municipal Environmental Protection Programme (MEPP) provides the statutory, indicator-rich backbone for projects in air quality, noise, water/wastewater, biodiversity and green–blue infrastructure. The city's current programme (2025–2030) details targets and measures that convert EU environmental acquis

and Cohesion priorities into municipal actions e.g., heat-source modernisation, stormwater retention, green corridors, making it a natural pipeline for ERDF and Cohesion Fund operations.

In climate and energy, Warsaw's trajectory has moved from an adopted SEAP (2011) and a Low-Emission Economy Plan toward an integrated SECAP approach, complemented by the Urban Climate Adaptation Strategy to 2030 (with a 2050 outlook). Together these documents steer mitigation (energy efficiency, RES on public assets, clean fleets) and adaptation (heat-island management, flood safety, nature-based solutions), tightly matching Cohesion Policy's PO2 ("Greener Europe") and SUD principles. They also standardise the city's evidence base (emissions, risk maps), allowing Warsaw to structure mature, fundable projects.

The Sustainable Public Transport Development Plan (SPTDP / "Plan transportowy") is the binding mobility plan for Warsaw as the transport organiser; it underpins network extensions, service standards and fleet modernisation that the city has repeatedly co-financed with EU funds. At the metropolitan scale, the SUMP for the Warsaw Metropolis 2030+ now provides an integrated, FUA-wide mobility framework—active travel, interchange nodes, demand management, decarbonised fleets—so that city and suburban projects selected under the regional programme and ITI share the same accessibility and climate logic. This pairing of a statutory city plan (SPTDP) with a voluntary but programme-oriented metropolitan SUMP is a core localisation mechanism for PO2/PO3 and the urban dimension of ERDF and Cohesion Fund.

On the social side, Warsaw's Strategy for Solving Social Problems / Programme for Preventing Social Exclusion (to 2030) translates ESF+/ERDF inclusion priorities into local programmes (activation, services, accessibility, community infrastructure). It deliberately interlocks with #Warsaw2030 and with FUA-level cooperation, supplying a steady pipeline of inclusion and skills projects for EU calls under the regional programme and ITI.

Finally, the Integrated Territorial Investments (ITI) Strategy 2021–2027+ for the Warsaw Metropolis is the city/FUA's most explicit tool for Cohesion Policy localisation. The ITI Strategy aligns municipal pipelines across the functional area around shared priorities: clean mobility, climate and energy, education/skills, quality public spaces, backed by a ring-fenced EU allocation under the regional programme. It hard-wires strategic coherence across municipalities and ensures that Warsaw's long-term agenda is delivered through integrated, cross-boundary projects rather than isolated schemes.

In aggregate, these local instruments form a chain from strategy to funding. The strategy (#Warsaw2030, moving to 2040) defines goals aligned with EU POs. The general plan (spatial development plan), which includes the functional-spatial structure model set out in the development strategy, translates them into binding spatial rules (compactness, TOD, green-blue systems). Sectoral programmes (MEPP, SPTDP/SUMP, social inclusion) provide the evidence, targets and project lists that fit EU selection criteria. And the ITI Strategy connects Warsaw with its neighbours, turning place-based priorities into integrated, co-financed investment packages. This is precisely how the urban dimension of Cohesion Policy is embedded in Warsaw's long-term agenda and scaled to the metropolitan level.

6.2 Localisation of Cohesion Policy

An examination of the main development policy and planning instruments at national, regional, local, and metropolitan levels shows that, overall, they are highly coherent with the priorities and principles of the Cohesion Policy for both the 2014–2020 and 2021–2027 programming periods, particularly in relation to the Sustainable Urban Development (SUD) agenda. This coherence is most explicit where documents are directly linked to the programming and implementation of EU funds, such as Regional Operational Programmes and ITI strategies, but it also extends to statutory strategies, sectoral programmes, and binding planning documents.

At the national level, the Medium-Term National Development Strategy and the National Strategy for Regional Development 2030 serve as the main bridges between EU strategic frameworks and domestic policy. Both embed the thematic objectives and policy objectives of the Cohesion Policy into their strategic priorities,

covering innovation, climate and environment, sustainable mobility, social inclusion, and place-based development.

At the regional level, the Mazovia Regional Development Strategy is a statutory document that ensures the translation of national and EU priorities into regional contexts, including explicit provisions for functional urban areas. Its role is reinforced by the ROP, which is directly negotiated with and approved by the European Commission. The ROP's architecture mirrors EU objectives, with dedicated SUD allocations, selection criteria embedding horizontal principles such as climate action and equality, and a performance framework linked to EU monitoring requirements.

At the local level, the Municipal Development Strategy is the key statutory instrument aligning municipal goals with EU priorities. Recent strategies increasingly integrate green transition measures, sustainable mobility, social inclusion, and digitalisation, often structured around funding opportunities in the ROP and ITI. Binding new spatial planning instruments (introduced in 2023) such as the general spatial development plans will play a decisive role in implementing the spatial dimension of EU priorities, from compact urban form to transit-oriented development and green-blue infrastructure.

At the metropolitan scale, the ITI Strategy for the Warsaw Functional Area remains the key localisation instrument of Cohesion Policy. Its alignment with EU objectives is embedded in its design; however, because the available allocation for the Warsaw area was relatively modest compared to other Polish metropolitan regions, the strategy had to concentrate on a narrow set of thematic priorities where joint intervention was both feasible and financially viable. As a result, the ITI Strategy operationalises only selected dimensions of metropolitan development.

Table 6.2
Coherece with the Cohesion Thematic Objectives 2014-2020

Tool	Cohesion Thematic Objectives 2014-2020										
	TO1	TO2	TO3	TO4	TO5	TO6	TO7	TO8	TO9	TO10	TO11
NSRD	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
MTNDS	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
NUP	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Partially
CND	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Partially
MRDS	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
RPO / RP	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
MDS	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Partially
MEPP	No	Yes	No	Yes	Yes	Yes	No	No	No	No	No
SUMP / SPTDP	No	Yes	No	Yes	Yes	No	yes	No	No	No	No
PPSE	No	No	No	No	No	No	No	Yes	Yes	Yes	No
ITI	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Partially

Source: author's own elaboration.

The analysis of the selected instruments demonstrates a generally high degree of coherence with the 2014–2020 Cohesion Policy thematic objectives. National and regional strategies, as well as operational programmes, systematically address all or nearly all of the TOs, reflecting their role as the main vehicles for translating EU policy priorities into domestic and regional frameworks. The strongest and most consistent alignment is observed for TO4–TO7 (low-carbon transition, climate adaptation, environmental protection, and sustainable transport), TO8–TO10 (employment, social inclusion, and education), and TO1–TO3 (innovation, ICT, and SME competitiveness).

At the local level, statutory development strategies and sectoral programmes align particularly well with environmental, mobility, and inclusion objectives (TO2, TO4–TO7, TO9), though their coverage of innovation, SME competitiveness, and governance (TO1, TO3, TO11) is often partial. Spatial planning instruments, while critical for implementing climate resilience, sustainable mobility, and place-based development, show more limited direct links to employment, education, and innovation objectives, as these are outside their primary remit.

The ITI Strategy for the Warsaw Functional Urban Area exhibits high coherence across nearly all thematic objectives, as it integrates multi-sectoral projects from transport to inclusion within a unified EU funding framework. However, due to the relatively modest allocation available for the Warsaw metropolitan area, the Strategy was forced to focus on a thematically narrow set of priorities, primarily education, sustainable mobility, and climate-related measures, rather than the full spectrum of metropolitan needs. The transition to the PO framework reinforced this alignment, though with shifted thematic boundaries.

If any inconsistencies arise regarding programmes or planned projects and policy objectives they relate less to strategic mismatch and more to implementation levers: (i) non-binding strategies that require translation into binding spatial/sectoral instruments, (ii) uneven plan coverage and legacy provisions, (iii) cross boundary financing and revenue sharing not embedded outside ITI, and (iv) capacity/co financing constraints that shape the scale and pace of delivery.

Table 6.3
Coherence with the Cohesion Policy Objectives 2021-2027

Tool	Cohesion Policy Objectives 2021-2027				
	PO 1	PO 2	PO 3	PO 4	PO 5
NSRD	Yes	Yes	Yes	Yes	Yes
MTNDS	Yes	Yes	Yes	Yes	Yes
NUP	Yes	Yes	Yes	Yes	Yes
CND	Partially	Yes	Partially	Partially	Yes
MRDS	Yes	Yes	Yes	Yes	Yes
RP	Yes	Yes	Yes	Yes	Yes
MDS	Yes	Yes	Yes	Yes	Yes
MEPP	No	Yes	Partially*	Partially*	Partially*
SUMP / SPTDP	Partially	Yes**	Yes	Partially***	Partially
PPSE	No	Partially****	Partially****	Yes	Partially
ITI	Yes	Yes	Yes	Yes	Yes

* Co-benefits via health, access, and environmental justice measures.

** Greener mobility (fleet decarbonisation, active travel, demand management).

*** Accessibility and affordability measures with social co benefits.

*** Environmental/transport elements only where linked to inclusion (e.g., clean air, access to jobs/services).
Source: author's own elaboration.

6.3 Key investment areas

Local development plans in Warsaw and its FUA provide the operational layer through which European Union Cohesion Policy priorities are translated into concrete territorial investments. These plans, including statutory municipal development strategies, binding spatial plans, and mandatory sectoral programmes, directly influence the selection, design, and sequencing of projects financed under both the 2014–2020 and 2021–2027 programming periods. A review of their scope and thematic focus reveals a consistent pattern of alignment with the EU's evolving Policy Objectives (POs) and, previously, Thematic Objectives (TOs), with certain thematic clusters emerging as the dominant areas of local investment.

Five thematic clusters consistently dominate local investments, with thematic continuity across both programming periods but changing policy framing. *Innovation, digitalisation, and SME support (PO1 / TO1–TO3)*

Although local development plans are not primarily instruments of research and innovation policy, many municipal strategies explicitly integrate objectives related to smart city solutions, digital transformation of public services, and support for local entrepreneurship. In Warsaw, strategic priorities include expanding e-government platforms and deploying digital mobility management systems. These initiatives directly contribute to the Cohesion Policy's "Smarter Europe" agenda.

Green transition, climate resilience, and environmental protection (PO2 / TO4–TO6)

Environmental priorities form one of the most mature and operationalised areas in local strategies. Municipal Environmental Protection Programmes define concrete targets for air quality, noise reduction, water and wastewater systems, biodiversity, green-blue infrastructure and waste management. Investments include renewable energy installations in public buildings, nature-based solutions, retention systems, riverbank restoration and circular economy initiatives. These interventions sit firmly within PO2.

Sustainable mobility (PO2 for urban mobility, TO4–TO6)

Most urban mobility investments in Warsaw and the FUA — including zero-emission bus fleets, tramway modernisation, active mobility networks, local interchange hubs, pedestrian infrastructure and low-emission zones — fall under PO2 rather than PO3. This reflects EU programme architecture: sustainable mobility of an urban or environmental nature is funded primarily through the green transition objective. Local SUMP's reinforce this alignment by specifying low-carbon and active mobility pathways.

Road and rail infrastructure (PO3 / TO7)

PO3 and TO7 generally apply to major rail and road investments, including metropolitan railways, regional rail links, and selected strategic road corridors. This separation between "urban mobility under PO2" and "rail/road under PO3" represents a structural design choice at EU level, which often constrains metropolitan areas seeking integrated mobility packages across funding lines.

Social inclusion, quality of life, and access to services (PO4 / TO8–TO10)

Programmes for Preventing Social Exclusion form a key component of local policy frameworks, targeting vulnerable populations including the elderly, persons with disabilities, long-term unemployed, and low-income households. Investments include creating community and cultural centres, improving accessibility of public buildings and transport, and expanding the availability of childcare and eldercare services. Education and training initiatives, often embedded in municipal strategies, focus on lifelong learning, vocational skills, and digital literacy. These actions reflect the "Social Europe" objective of the Cohesion Policy, aiming to reduce inequalities and improve opportunities across the metropolitan area.

Place-based development and integrated urban interventions

Place-based development is primarily pursued through integrated territorial instruments implemented under the regional programme *European Funds for Mazovia 2021–2027*. The Integrated Territorial Investments framework provides a mechanism for coordinating selected interventions across municipalities, focusing on

functional linkages rather than on comprehensive inner-city regeneration as a standalone policy objective. Typical interventions include improvements in sustainable mobility, accessibility of public services, environmental infrastructure, education and social facilities, as well as measures supporting institutional cooperation within the functional urban area. While urban regeneration and spatial transformation remain important elements of Warsaw’s broader development agenda, flagship inner-city redevelopment programmes such as the New City Centre (Nowe Centrum Warszawy) rely on different financing arrangements, including municipal resources and other European or national instruments. As a result, the role of ITI in the Warsaw context is best understood as a tool for integrated territorial coordination and functional-area development, rather than as a primary vehicle for large-scale urban regeneration projects in the city core.

Mechanisms supporting coherence and investment focus

The alignment between local investment areas and Cohesion Policy objectives is not accidental; it is reinforced by several structural and procedural mechanisms. Firstly, statutory requirements for municipal development strategies and sectoral programmes ensure that certain thematic areas—environment, mobility, inclusion—are systematically addressed. Secondly, EU enabling conditions and ex-ante requirements, such as the obligation to have a Sustainable Urban Mobility Plan for transport investments, directly shape local priorities. Thirdly, the ITI framework in the Warsaw FUA creates a joint investment pipeline across municipalities, making it easier to channel funding into projects that meet both local needs and EU priorities. Finally, the integration of environmental and social impact assessments into planning processes aligns project design with EU horizontal principles on climate action, equality, and public participation.

Continuity and evolution from 2014–2020 to 2021–2027

While the thematic focus of local investments has remained broadly consistent across the two programming periods, there is a noticeable shift towards stronger integration of climate, digital, and resilience objectives in 2021–2027. In the earlier period, environmental protection and sustainable mobility were already prominent, but they are now framed within a more comprehensive green transition agenda that includes circular economy measures, nature-based solutions, and climate adaptation strategies. Similarly, digitalisation of public services and mobility management, once a secondary theme, has moved closer to the core of local strategies under PO1. Social inclusion remains a constant, but with a greater emphasis on accessibility, and skills for the green and digital economy.

Table 6.4
Key Investment Areas 2014-2020 and 2021-2027

Investment area	Key investment areas: 2014-2020 and 2021-2027		
	2014–2020 TOs addressed	2021–2027 POs addressed	Examples
Innovation, digitalisation, SME support	TO1: R&D & innovation; TO2: ICT; TO3: SME competitiveness	PO1: A smarter Europe	Digital city platforms, innovation districts, SME hubs, smart mobility systems
Green transition, climate resilience, environment	TO4: Low-carbon; TO5: Climate adaptation; TO6: Environment/resource efficiency	PO2: A greener Europe	Air quality plans, renewable energy in public buildings, stormwater retention, green-blue corridors
Sustainable mobility	TO4-TO6: Sustainable transport & network infrastructure	PO2: A more connected Europe;	Cycling networks, pedestrian zones, zero-emission buses, local interchanges; co-benefits for PO3 where linked to rail, metro expansion, intermodal hubs

Investment area	Key investment areas: 2014-2020 and 2021-2027		
	2014-2020 TOs addressed	2021-2027 POs addressed	Examples
Road and rail infrastructure (metropolitan/regional scale)	TO7: Sustainable transport & network infrastructure	PO3: A more connected Europe	Railway modernisation; metropolitan rail extensions; regional rail links; selected strategic roads
Social inclusion, quality of life, services	TO8: Employment; TO9: Social inclusion; TO10: Education & lifelong learning	PO4: A more social Europe	Social housing renovation, care services, vocational training, accessibility improvements
Place-based regeneration and integrated territorial development	Cross-cutting TOs, esp. TO9 (inclusion) and TO6-7 (urban environment, mobility)	PO5: Europe closer to citizens <i>Note: ITI Warsaw is financed under other POs (PO2-PO4)</i>	Urban regeneration programmes, revitalisation of degraded districts

Source: author's own elaboration.

The mapping of key investment areas confirms that the main local investment areas in Warsaw and its functional urban area are consistently aligned with Cohesion Policy objectives across programming periods. In 2014-2020, priorities were structured around thematic objectives that emphasised innovation, low-carbon transition, sustainable transport, and social inclusion. These themes remain central in 2021-2027 but are reframed within a more integrated policy architecture that clusters them into five broad objectives.

Across both programming periods, environmental protection and mobility remain important investment areas, but the 2021-2027 framework positions them within a broader "green and connected transition". The climate neutrality agenda strengthens the integration of nature-based solutions, circularity and adaptation measures. Digitalisation, once a secondary theme, is now embedded across multiple sectors, responding to PO1 and increasing the role of smart city solutions.

At the same time, it is important to acknowledge the structural limits of cohesion policy funding in addressing the full spectrum of metropolitan investment needs. Certain strategically significant areas - particularly large-scale road infrastructure and complex, capital-intensive urban revitalisation projects - are only partially eligible or entirely excluded from cohesion policy support due to funding constraints, eligibility rules and the scale of required investments. In the Warsaw context, such projects are therefore implemented through complementary financing arrangements, combining municipal resources, national instruments and European financial tools outside the cohesion policy framework. This results in a differentiated policy mix, in which cohesion policy plays a catalytic and selective role rather than serving as a comprehensive source of funding for all major urban and infrastructure investments.

7 Funding schemes and synergies

7.1 Funding schemes

The total number of projects implemented across the Warsaw Metropolis in the two programming periods, 2014–2020 and 2021–2027, amounts to 449. Of these, 287 projects (including those funded from RRF) were carried out in the City of Warsaw, while 162 were implemented within the metropolitan area under the ITI mechanism. In the 2014–2020 programming period 322 projects were implemented across the Warsaw Metropolis, including 206 undertaken in Warsaw itself and 116 carried out in the wider metropolitan area through the ITI framework. In the 2021–2027 period, a total of 84 projects were implemented within the metropolitan area, of which 38 took place in Warsaw and 46 in the surrounding municipalities.⁵

Warsaw has primarily used EU shared-management funds (ERDF, CF, ESF+/ESF), complemented, on a smaller scale, by direct-management programmes (notably LIFE) and other EU/European instruments (e.g., EIB/EBRD lending alongside EU grants). Shared-management streams remain dominant in both periods, with the city's flagship investments funded mainly via the Cohesion Fund/ERDF under national and regional programmes. Direct-management grants have been more selective and project-specific (e.g., climate adaptation), while additional envelopes such as REACT-EU or CEF have influenced the wider metropolitan transport system even when the city was not the formal beneficiary.

7.1.1 Nationally or regionally distributed EU funds

Nationally or regionally distributed EU funds - primarily the European Regional Development Fund (ERDF), the Cohesion Fund (CF) and the European Social Fund / ESF+ - constitute the backbone of EU financing for both the City of Warsaw and the wider Warsaw Metropolitan Area across the two programming periods analysed.

In the 2014–2020 programming period, shared management instruments overwhelmingly dominated the funding landscape. They financed the vast majority of projects implemented in the City of Warsaw and all projects implemented within the metropolitan area under the ITI mechanism. In numerical terms, shared management funds accounted for more than nine out of ten projects implemented in Warsaw during this period, confirming their central role as the primary delivery channel for urban and metropolitan investments.

In the 2021–2027 programming period, shared-management funds remain the dominant source of EU financing, although their relative weight has declined. The number of projects financed through ERDF, CF and ESF+ is lower than in the previous period, reflecting a reduced overall project pipeline. Nevertheless, shared-management funds continue to account for the majority of projects implemented in Warsaw and remain the exclusive source of EU funding for projects implemented in the metropolitan area outside the core city.

By value, the city benefits most from the Infrastructure and Environment Operational Programme (2014–2020, POIiŚ) and European Funds for Infrastructure, Climate and Environment (FEnIKS, 2021–2027) chiefly through Cohesion Fund and ERDF support for metro expansion and rolling stock, supplemented by the

⁵ The analysis draws on data available as of September 2025. The dataset covers key projects implemented in Warsaw by entities subordinate to the city authorities, as well as projects carried out within the metropolitan area in which the City of Warsaw was directly involved. The database does not include: a) information on projects implemented within the City of Warsaw by other entities applying independently for EU funding; b) information on projects implemented in municipalities of the Warsaw metropolitan area that may apply for EU funds outside the ITI framework.

Regional Programme for Mazovia (Regional Operational Programme (2014-2020, RPO; 2021-2027, European Funds for Mazovia, FEEM) for city-scale projects and ITI packages.

Institutionally, access is strong thanks to a specialised European Funds & Development Policy Department and an established metropolitan ITI mechanism; bottlenecks relate mainly to co-financing burdens and heavy procedures at national and regional “gatekeeper” levels, which can slow or narrow calls despite the city’s readiness. Information gathered underlines limited national co-funding for high-capex public transport (e.g., metro), increasing pressure on the municipal budget.

7.1.2 Other relevant EU funds and programmes

Although direct-management EU programmes represent a modest share of Warsaw’s total EU portfolio, the city has become a national leader in international, mission-driven projects that shape policy and practice beyond individual grants. Warsaw’s engagement with EU direct-management instruments is centred on its participation in the EU Mission “100 Climate-Neutral and Smart Cities by 2030”. The city’s Climate City Contract and Action Plan have been endorsed by the European Commission (Mission Label), providing a strategic and governance framework that positions Warsaw as a national leader in urban decarbonisation. Within this Mission ecosystem, Warsaw contributes to NEEST – NetZero Emission and Environmentally Sustainable Territories, a Horizon 2020 project.

Warsaw is also a partner in Commit2Green (C2G), a Horizon Europe project advancing the objectives of the EU Mission for Climate Adaptation. C2G supports eight European pilot cities in testing participatory approaches to nature-based solutions, urban greening and microclimate improvements, helping reduce heat and flood risks while strengthening community co-ownership of green infrastructure—an area aligned with Warsaw’s adaptation priorities.

In addition, the city participates as a transfer partner in the European Urban Initiative (EUI) SOFT Academy project, which facilitates the circulation of innovative urban practices across Europe. Warsaw’s role in SOFT Academy reinforces its position as a metropolitan learning hub and accelerates the uptake of tested solutions within its own administration and across the Warsaw Metropolitan Area.

Financially, direct-management programmes (Horizon 2020/Europe, EUI) remain small relative to shared-management flows, which dominate Warsaw’s EU funding profile—particularly ERDF, CF and ESF+ for infrastructure, transport and social investments. A third, separate channel emerged in 2021–2027 through Next Generation EU under Poland’s National Recovery and Resilience Plan (KPO), which provides substantial support for energy efficiency in educational facilities and the expansion of childcare infrastructure. While outside cohesion policy, these interventions complement mainstream investments and support key transformation goals.

Overall, the picture is consistent across programming periods: Warsaw uses direct-management programmes selectively and strategically, primarily as instruments for experimentation, pilot deployment, organisational learning and international collaboration, while anchoring major capital investments in shared-management operational programmes. In this configuration, direct-management programmes are not ancillary; they provide Warsaw with access to cutting-edge policy innovation, help de-risk systemic transitions through Mission-led pilots and strengthen the city’s capacity to scale successful solutions through cohesion policy instruments.

7.1.3 Other funding alternatives

Just Transition Fund (JTF) targets carbon-intensive regions in transition. Mazowieckie Voivodeship and Warsaw itself are not in the group of the JTF regions. The city and its metropolitan area do not draw on JTF envelopes. Their climate transition relies instead on CF/ERDF, LIFE pilots, and financial instruments (EIB/EBRD loans aligned with EU policy), rather than JTF-style territorial plans.

During the period of 2021–2022 REACT-EU topped up ERDF/ESF to support pandemic recovery. In Mazovia these resources were channelled through existing OPs, financing health, SME and digital projects. For Warsaw, this worked as an incremental boost within shared-management structures rather than a standalone programme—useful to protect pipelines but not transformative relative to metro-scale CF investments.

Connecting Europe Facility (CEF) is directly managed and primarily funds TEN-T transport and energy. In the Warsaw functional area, CEF has financed major rail upgrades (e.g., cross-city line and E65/E75 corridors) with national infrastructure managers (PKP PLK) as beneficiaries. While the City of Warsaw is not typically the grant holder, these projects materially benefit the metropolitan transport system (capacity, reliability, intermodality) and thus complement city investments in metro and hubs. CEF therefore represents an indirect yet significant EU contribution to Warsaw’s mobility ecosystem.

Beyond grants, Warsaw systematically uses loan instruments from EIB/EBRD (and national BGK) to close co-financing gaps and to sequence projects over multiple EU calls, part of a long-standing “funding mix” strategy described in the report. This mixing of grants and loans increases resilience to procedural delays and fiscal shocks and enables pipeline-based delivery (documentation ready to “catch” calls). The WMAssoc. support municipalities from the WFA to extend their capacity to access EU funds at the metro scale.

Comparing programming periods 2014–2020 and 2021–2027 one may say that in the first period “other” alternatives mostly meant EIB/EBRD/BGK loans aligned with CF/ERDF projects and, exceptionally, LIFE pilots. In 2021–2027, the menu widens (EUI-IA; greener CEF priorities) but the city’s stance remains pragmatic: large assets via Cohesion, supplemented by targeted direct schemes and blended finance. Where national co-funding is weak, reliance on EU grants plus municipal/loan co-financing persists.

7.2 Funding coordination mechanism

Warsaw has developed a robust internal coordination model centred on the European Funds & Development Policy Department, recognised in the case study as GOOD PRACTICE 1. The department curates the city’s EU project pipeline, aligns calls with sectoral priorities (transport, environment, social), supports services in application and implementation procedures, and monitors delivery reducing fragmentation and shortening time-to-grant. At the metropolitan scale, WMAssoc. as an ITI intermediate body, provides advisory and standardisation support to partner municipalities, extending Warsaw’s coordination capacity across the FUA.

Key coordination tools include: (i) a project pipeline with ready documentation to respond to calls; (ii) blended-finance playbooks combining EU grants with loans (EIB/EBRD/BGK) to meet co-financing needs; (iii) procedural templates and training for metro-level beneficiaries; and (iv) systematic service-quality and investment effectiveness surveys that inform prioritisation and justify allocations. Together, these instruments allow Warsaw to sequence large investments over multiple OPs and calls, maintaining momentum despite multi-year funding cycles.

Despite strong local capacity, two external frictions recur. First, national and regional “gatekeepers”, who design programmes, calls and procedures, can constrain timing, eligibility and scale, forcing the city to adapt to windows it does not control. Second, co-financing burdens are structurally high for capital-intensive mobility projects; interview evidence highlights the lack of stable national co-funding for the metro, shifting costs to the municipal budget even when EU grants are available. These constraints reduce flexibility and can narrow the scope of otherwise mature projects.

Between periods 2014–2020 and 2021–2027 coordination matured rather than changed radically. In 2014–2020, the city honed its pipeline blending approach while building ITI governance. In 2021–2027, the policy architecture (PO1–PO5) and greener and digital priorities demanded deeper cross-sector alignment; Warsaw’s department scaled its integrative role, while the re-normalisation of EU funding flows in 2024 (the unfreezing of RRF funds by the new government after the 2023 elections) improved predictability. Yet the fundamentals persist: Cohesion Policy remains the anchor, with direct programmes used surgically; national and regional procedures still shape access costs and pace; and large projects continue to rely on a mix of EU grants and loans to close the financing gap.

8 Recovery and Resilience Plan

Poland's National Recovery and Resilience Plan - NRRP, (Krajowy Plan Odbudowy i Zwiększania Odporności - KPO) is the national implementation of the EU's Recovery and Resilience Facility (RRF). The envelope for Poland amounts to roughly EUR 59.8 billion (about EUR 25.27 billion in grants and EUR 34.54 billion in loans), with a strong orientation toward climate and digital objectives. Poland submitted its plan to the European Commission in May 2021; the Council of the EU approved it on 17 June 2022. The plan has since undergone several revisions, including on 8 December 2023, 16 July 2024, and 20 June 2025, and now comprises 57 investments and 54 reforms organised into seven components (including an added REPowerEU chapter). All investments must be completed by 31 August 2026.

8.1 The Governance of Recovery and Resilience Plan

Nationally, the Ministry of Funds and Regional Policy (MFiPR) acts as the overall coordinating institution for the NRRP. It manages the interface with the European Commission, ensures coherence across ministries, and oversees monitoring and reporting. The EU and Poland concluded "Operational Arrangements" in 2023–2025 that set out precise responsibilities on the national side, identifying which ministries are responsible for which reforms and investments, and detailing the evidence and verification methods required to demonstrate the completion of milestones and quantitative targets before any payment can be made.

A multi-stakeholder Monitoring Committee for the NRRP complements this architecture. It brings together central government, local governments (including cities), social and economic partners, and civil-society organisations. Chaired by the minister responsible for funds and regional policy, the committee reviews progress, discusses changes (including the integration of the REPowerEU chapter), identifies implementation risks, and issues opinions on key operational documents. For cities, committee membership provides a formal channel to articulate urban priorities and implementation concerns.

Implementation is carried out by "ministries responsible for reforms and investments" (line ministries), often supported by specialised implementing agencies. In transport, the Ministry of Infrastructure relies on the Centre for EU Transport Projects (CUPT) as a delivery arm: CUPT runs calls, signs contracts, monitors progress, provides beneficiary training, and handles financial reporting, including for intermodal transport and zero-emission bus schemes. In climate and energy, the National Fund for Environmental Protection and Water Management (NFOŚiGW) supports the Ministry of Climate and Environment by operating programmes for municipalities and firms (e.g., school retrofits, hydrogen, public transport decarbonisation, energy storage). For enterprise support and skills measures, the Polish Agency for Enterprise Development (PARP) implements instruments targeted at SMEs (including digitalisation and hospitality sector recovery). Finally, the state development bank BGK (Bank Gospodarstwa Krajowego) manages a suite of loan windows under the NRRP, including urban green transition, building energy efficiency, and energy networks -related instruments, designed to finance large municipal and corporate investments and to complement grant-based measures.

The payment calendar illustrates the "pay-for-performance" logic. Poland submitted its first payment request in December 2023; on 15 April 2024 the Commission disbursed EUR 6.3 billion upon confirmation that 37 milestones and one target had been achieved. In autumn 2024 the Commission positively assessed a combined second and third payment request (around EUR 9.4 billion), with disbursement at the end of that year. This sequencing emphasises that national authorities must reach agreed milestones and targets before each tranche is paid, while the Commission verifies both legal reforms and measurable investment outputs.

Cities play two roles in this governance set-up. First, at the systemic level, urban representatives sit on the Monitoring Committee, ensuring an institutional voice in oversight and in any plan revisions. Second, at the operational level, many NRRP instruments explicitly target local governments, which apply through calls managed by ministries, NFOŚiGW, CUPT, or BGK. These cover, among others, building decarbonisation and energy efficiency, green and zero-emission urban mobility, urban greening, digitalisation of public services

and education, and early childhood infrastructure. Demand from municipalities has been very strong; for example, BGK's city-focused loan windows for green transition attracted several hundred municipal applications whose combined value exceeded PLN 3 billion.

For Warsaw, the NRRP has presented both opportunities and constraints. The city has successfully tapped the loan strand (via BGK) for green transition and e-mobility packages, with approved grant-plus-loan support totalling several hundred million PLN. Constraints included eligibility rules, most notably, the impossibility to finance projects retroactively where contracts pre-dated 1 February 2020, as well as the practical legacy of national prefinancing via PFR earlier in the cycle. Local governments also pointed to the need for more consistent documentation standards and more predictable call calendars to reduce organisational risk and the "race" dynamics that time-compressed calls can create.

In short, the NRRP's governance blends central coordination (MFiPR), sectoral delivery (line ministries and their agencies), specialised intermediaries (CUPT, NFOŚiGW, PARP, BGK), and formalised oversight. At EU level, the Commission and the Council structure the process, with disbursements strictly conditional on reforms and results by mid-2026. In practice, cities are pivotal beneficiaries - both through their representation in governance and, crucially, through their capacity to activate multiple funding channels aligned with NRRP priorities: climate action, digital transformation, resilient public services, and green mobility.

Table 8.1
The Governance of Recovery and Resilience Plan in Poland

Name of the actor	Level	Responsibility
Ministry of Funds and Regional Policy	National	Overall coordination of the NRRP; monitoring and reporting; interface with the European Commission; chairs the Monitoring Committee
NRRP Monitoring Committee	Multi-level	Partners' oversight: reviews progress, discusses modifications, flags risks, and issues opinions on operational documents
Line ministries responsible for reforms and investments	National	Design and implement reforms and investments; run calls; select and contract projects; deliver milestones and targets
Centre for EU Transport Projects (CUPT)	National agency	Delivery arm for the Ministry of Infrastructure: manages calls (e.g., intermodal, tram/bus decarbonisation), contracts and monitoring, training, and financial reporting
National Fund for Environmental Protection and Water Management (NFOŚiGW)	National agency	Delivery arm for the Ministry of Climate and Environment: programmes for municipalities and firms (e.g., school retrofits, hydrogen public transport, energy storage)
Polish Agency for Enterprise Development (PARP)	National agency	Implements instruments for enterprises (e.g., SME digitalisation, hospitality sector recovery, competence development)
Bank Gospodarstwa Krajowego (BGK)	National	Operates NRRP loan windows (e.g., urban green transition, building efficiency, energy networks/offshore); finances large municipal and corporate investments
Self-governments	Local, regional	Beneficiaries and project promoters; implement investments aligned with NRRP priorities

Source: author's own elaboration

8.2 Coherence with Recovery and Resilience Plan

Poland's Recovery and Resilience Plan (NRRP/KPO) is structured into seven components⁴: (1) Resilience and competitiveness of the economy; (2) Green energy and reducing energy consumption; (3) Digital transformation; (4) Efficiency, accessibility and quality of the healthcare system; (5) Green, intelligent mobility; (6) Improving the quality of institutions and the conditions for implementing the NRRP; and (7) REPowerEU (the energy-security/acceleration chapter added in the 2023–2025 revisions). The current plan comprises 57 investments and 54 reforms, all to be completed by 31 August 2026.

The city's main development instruments (Section 6.1) create a direct “bridge” to these NRRP components. At the top of the cascade, the Municipal Development Strategy (#Warsaw2030, moving toward 2040+) defines the long-term urban priorities that map naturally to Component 1 (resilience/competitiveness) and Component 6 (institutional quality/implementation), while providing the selection logic for energy, mobility and inclusion projects financed under KPO schemes. The General Spatial Development Plan—the binding city-wide land-use mechanism now being prepared—translates those priorities into spatial rules that favour compact, transit-oriented and climate-resilient growth, creating the enabling conditions for mobility (Component 5), energy efficiency and renewable energy source (RES) (Component 2), and digital public services (Component 3).

On the environmental and climate side, Warsaw's Municipal Environmental Protection Programme (MEPP 2025–2030) and the SECAP + Urban Climate Adaptation Strategy form a coherent pipeline for measures that KPO explicitly funds: building decarbonisation, heat-source modernisation, local RES, stormwater retention, green-blue infrastructure and risk-reduction. Those instruments line up first with Component 2 (Green energy and lower energy intensity) and with acceleration items such as rooftop PV, storage and grid-relief also with REPowerEU (Component 7). Their indicator-rich structure (inventories, targets, risk maps) also raises the maturity of proposals toward KPO calls, where verifiable outputs and quick delivery matter due to the 2026 deadline.

Mobility instruments show perhaps the strongest single-component fit. The Sustainable Public Transport Development Plan (SPTDP/“Plan transportowy”) and the Metropolitan SUMP 2030+ provide the statutory and metropolitan frameworks for decarbonising public transport fleets, reshaping interchange nodes, scaling active travel and demand management - all core to Component 5 (Green, intelligent mobility). They also contain enabling digital layers (ITS, ticketing, data) relevant for Component 3. Because these plans run at both municipal and FUA scales, they allow Warsaw and neighbouring communes to “package” KPO interventions (e.g., zero-emission buses/trams, depot modernisation, last-mile interchanges) into integrated projects, which is how KPO delivers scale in a short window.

On the social side, the Programme for Preventing Social Exclusion / Strategy for Solving Social Problems connects to Component 1 (resilience/competitiveness) through labour-market activation, service access and skills, while digital inclusion and e-services sit under Component 3. Although education is not a standalone “mission” in Poland's component naming, KPO includes measures for digital schools, Early Childhood

⁴ The Polish NRRP uses the term “component,” not “mission.”

Education and Care (ECEC), and upskilling; the city’s social and education programmes therefore remain coherent “delivery vehicles” where calls are open to municipalities.

Crucially, the ITI Strategy 2021–2027+ for the Warsaw Metropolitan Area functions as a place-based coordination framework rather than as an implementation tool for national programmes. It supports the alignment of municipal investment priorities across the functional area, particularly in domains such as clean mobility, climate and energy transition, education and skills, and the quality of public spaces – areas that are broadly consistent with several thematic components of national and European recovery agendas. However, this alignment operates primarily at the level of strategic orientation and territorial coherence. The ITI Strategy does not play a direct role in the programming, selection or implementation of projects under the national Recovery and Resilience Plan (RRP). Instead, its contribution lies in fostering metropolitan coordination, shared planning routines and cross-municipal governance capacities, which may indirectly enhance the coherence of investments financed through different instruments. In this sense, the ITI Strategy complements national recovery efforts by strengthening functional-area governance, rather than by acting as an operational channel for RRP-funded projects.

The strongest complementarities are visible where KPO loans (e.g., BGK windows for green transformation) can blend with grant-type measures and the city’s CAPEX planning, enabling fast scale-up of mature projects already prioritised in local instruments. In mobility and energy, the match is especially tight because the city’s plans were designed around decarbonisation and service quality long before KPO calls opened; this “readiness” allowed Warsaw to credibly activate KPO instruments without reinventing project logic. Conversely, two tensions must be managed: (i) timing risk – KPO’s hard 2026 deadline demands shovel-ready projects and disciplined procurement, which cities achieve only if the instrument pipeline (MEPP/SECAP/SPTDP) had already pre-engineered solutions; and (ii) eligibility constraints—for example, the inability to finance contracts signed before 1 February 2020 and restrictions on certain asset types, which the city has handled by prioritising projects that meet KPO’s “new-spend” and result-verification logic.

Digital and institutional coherence cuts horizontally across all tools. The Minimal Interoperability Mechanisms and the city’s e-service drive sit under Component 3, but they also underpin Component 6 by codifying templates, QA routines and portfolio management practices for EU-funded projects. In practice, Warsaw’s European Funds & Development Policy Department serves as a coordination hub (“Centre for Coordination and Quality”) ensuring that local instruments are translated into bankable, auditable projects—exactly the type of institutional capacity KPO incentivises.

The 2023–2025 revisions raise the salience of Component 7 (REPowerEU), sharpening the focus on supply-side energy security and the rapid deployment of renewables, storage and demand-side efficiency. Here, MEPP and SECAP give the city ready-made project lists (e.g., PV + storage on public assets, deep retrofits, district-energy modernisation) and allow for metropolitan coordination via the SUMP where transport-

energy interactions (charging, depots, smart grids) are concerned. This is precisely where coherent local instruments translate into “fast-track” KPO delivery.

Table 8.2
Coherence with the Recovery and Resilience Plan

Tool	Recovery and Resilience Plan Missions ⁵						
	Mission 1	Mission 2	Mission 3	Mission 4	Mission 5	Mission 6	Mission 7
Municipal Development Strategy	Xx	x	x	o	x	xx	o
General Spatial Development Plan	X	xx	x	o	xx	x	o
MEPP 2025–2030	X	xx	o	o	o	o	xx
SECAP + Adaptation Strategy	X	xx	o	o	x	o	xx
SPTDP / SUMP	X	x	x	o	xx	x	x
PPSE - social Inclusion	Xx	o	x	o	o	x	o
ITI Strategy 2021–2027+	X	x	x	o	xx	xx	x

Coherence: xx strong/direct; x moderate/indirect; o marginal/none

Source: author’s own elaboration.

8.3 Recovery and Resilience Fund

Warsaw has activated both the loan and grant strands of Poland’s National Recovery and Resilience Plan (Krajowy Plan Odbudowy - KPO), using them to accelerate green investment and essential public-service upgrades. On the loan side, in November 2024 the city concluded two BGK loan agreements under Investment B3.4.1 “Investments for a comprehensive green transformation of cities” for a total of PLN 406 million. This framework financing covers a package of low-carbon urban projects, among them energy-efficient street lighting, greener and more climate-resilient public spaces around central squares, and improvements for pedestrians and cyclists. Because the facility aggregates multiple sub-projects, it gives the city a practical way to deliver numerous smaller interventions at scale, within the tight RRF timetable. Additionally, in September 2025, loan agreements worth more than PLN 2 billion were signed to finance investments in trams and urban rail.

On the grant side, in August 2025 Warsaw signed with NFOŚiGW (the National Fund for Environmental Protection and Water Management) two projects - Scopes 1 and 2 - worth about PLN 153 million in grants (total project value PLN 192 million). These will thermo-modernise 25 schools and preschools across 14

⁵ The Polish NRRP uses the term “component,” not “mission.” For consistency with the template, the term “mission” is retained in the table.

districts, under Component B1.1.3 “Thermo-modernisation of educational institutions.” The dispersion across districts ensures visible, near-term energy savings and comfort gains in the education estate while meeting the RRF’s quick-delivery logic.

In health, three municipal providers were selected for grants under D1.1.1 “Improving resilience of the health system” (Ministry of Health): Szpital Bielański (SPZOZ) — PLN 50.08m, Szpital Czerniakowski sp. z o.o. — PLN 56.71m, and Szpital Praski sp. z o.o. — PLN 59.999m. These are city-founded/city-owned entities, so the funding directly strengthens Warsaw’s local health capacity and resilience.

Not every application succeeded. Under E1.2.1 (CUPT’s urban rail rolling-stock window), Tramwaje Warszawskie submitted a proposal that did not receive funding (the project was not ranked for award under the competition’s criteria). This result aligns with early critiques from large cities about limited eligibility in some transport windows, especially for urban rail, within the Polish NRRP design.

Beyond the city budget, the RRF also finances national rail projects that materially benefit the Warsaw metropolitan area. For example, PKP PLK’s upgrades between Kraków and Warsaw and works in the Warsaw agglomeration (nearly PLN 220m). These improve capacity, reliability and passenger experience across the functional region. Since the beneficiary is PLK S.A., not the City of Warsaw, these amounts are not counted in the city’s own tally below, but they do raise the metropolitan system’s overall performance and complement city investments.

Taking Warsaw and city-owned entities together, the Recovery and Resilience Facility (RRF) mobilised approximately PLN 726 million in support, combining grants and loans. This includes around PLN 320 million in grants, primarily allocated to education retrofitting and health system resilience, and approximately PLN 406 million in loans supporting large-scale public investment.

In 2025, the City of Warsaw’s total budget amounts to approximately PLN 29.5 billion, including around PLN 3.1 billion in capital expenditure. Against this backdrop, total RRF resources correspond to roughly 2.5% of the city’s overall budget and about 23% of its annual capital expenditure. Grants alone account for just over 1% of the total city budget and around 10% of annual capital expenditure. These figures underline the complementary role of RRF funding in Warsaw’s public investment model, in which EU resources reinforce, but do not replace, municipal financing capacity.

While shared-management EU funds (ERDF/CF via FEM/FEnIKS/ITI) remain the dominant external source for large urban infrastructure, the RRF has become a meaningful additional pillar—especially for fast, distributed green projects (education retrofits) and multi-site urban greening/efficiency (via BGK – NDBP loans). Second, the loan component is material in size and purpose-built to help cities sequence many smaller interventions under a single financing umbrella—valuable when the calendar to 31 August 2026 is tight and call windows are centrally timed.

Compared with 2014–2020 (when RRF did not exist), the 2021–2027 landscape adds centrally managed instruments that Warsaw can activate alongside Cohesion Policy. The city’s experience - six wins and one miss - illustrates a pragmatic approach: target RRF grants where maturity and eligibility are strongest (schools, municipal hospitals) and use the BGK loan framework to scale city-wide, climate-aligned upgrades; accept that certain transport windows (e.g., urban rail rolling stock) may be less accessible under RRF’s specific rules.

9 Challenges and policy recommendations

9.1 Urban structure and governance of Cohesion

9.1.1 Challenges

Over the past decade, metropolitan areas have faced intensifying pressures stemming from fragmented governance and insufficient coordination mechanisms across their functional urban areas. Rapid urbanization has not been accompanied by parallel improvements in joint spatial planning and investment alignment. As a result, urban development is increasingly uneven and spatially incoherent. The lack of formalized, legally supported platforms for coordinated decision-making impedes efforts to implement long-term strategies across administrative boundaries. This institutional fragmentation generates planning conflicts and missed opportunities to leverage economies of scale. Without mechanisms to collectively address mobility, housing, or environmental challenges, the entire functional urban area risks suboptimal outcomes and rising social inequalities.

The absence of metropolitan-scale spatial planning mechanisms results in spatial chaos, functional conflicts, urban sprawl, rising costs of public service provision, and the significant difficulties in transport and environmental investments planning. The most pressing challenges related to both sustainable development policy and the governance of the metropolitan area stem from the lack of a coherent and overarching spatial policy framework. The 2023 spatial planning reform does not resolve this issue, as it remains confined to the local level. As a consequence, strategic decisions become virtually impossible to implement in an integrated and coordinated manner. In this context, it appears that greater importance should be assigned to spatial planning at the metropolitan and regional levels. Its effectiveness, however, largely depends on the coordination of actions undertaken, when metropolitan governance structure does not exist, jointly by regional and municipal authorities to guide land use and spatial development.

The Warsaw metropolitan area is composed of municipalities that differ significantly in size, levels of socio-economic development, wealth, investment needs, and growth potential. Some municipalities that participated in the implementation of Integrated Territorial Investments during the 2014–2020 programming period have gained valuable experience in inter-municipal cooperation. Their institutional and organizational capacities have been strengthened in the process. In contrast, municipalities newly included in the metropolitan area due to the establishment of the new NUTS 2 unit lack such experience. Their functional ties with Warsaw are weaker. In order to define common interests and build commitment to inter-municipal collaboration, it is necessary to identify specific intervention areas that can deliver tangible improvements for these municipalities. Moreover, the significant disparities in the financial situation of municipalities mean that they differ in their ability to invest and allocate own-source funding for co-financing metropolitan projects. As a result, their participation in such projects remains challenging, particularly when these initiatives fail to directly address their specific needs.

Integrated Territorial Investments have made it possible to lay the foundation for cooperation between Warsaw and the municipalities within its functional urban area. Through ITI, long-standing distrust and reluctance among municipalities to collaborate were gradually overcome. Mechanisms for inter-municipal communication were established, informal relationships were forged that facilitated coordination, and joint investments were successfully implemented. However, ITI remains a project-based instrument, limited to the programming cycle of EU cohesion funds. Once that cycle ends, not only the institutional structures, but also the relationships and cooperation networks built over time may begin to dissolve. This lack of continuity risks eroding the institutional capacity that has been developed and makes it significantly more difficult to pursue long-term strategic planning and implement cohesive development policies over an extended timeframe.

9.1.2 Policy recommendations

9.1.2.1 Local level

It is recommended that local development policies take into account supra-local conditions as well as the provisions of overarching strategies, such as the Warsaw Metropolis Development Strategy 2040. The sectoral strategies developed by the municipalities should reflect shared functional challenges and enable alignment with metropolitan-scale projects. They ought to be designed with the principle of complementarity in mind, ensuring coherence with regional and national strategic documents, while preserving the autonomy of local policymaking.

There is a continued need to strengthen the institutional capacity for inter-municipal cooperation. Investment should be made in developing the competencies of civil servants responsible for development policy and in establishing durable, professional structures that support cooperation between municipalities. All municipalities should be equipped with tools and procedures that allow them to quickly respond to metropolitan initiatives and engage effectively in joint partnership processes.

It is also recommended that local spatial development plans should be adapted to the needs of the wider functional urban area. Spatial development directions should be coordinated across the metropolitan territory, particularly with respect to the designation of investment areas, public transportation corridors, green spaces, and housing zones. Establishing common planning frameworks and consultation mechanisms—such as allowing neighbouring municipalities to review and comment on draft local plans—is strongly encouraged.

9.1.2.2 National and regional level

Metropolitan areas need a clearer legal and procedural framework to govern inter-municipal cooperation. Warsaw needs a metropolitan act (Metropolitan Governance Act) which, by taking into account its specific characteristics as a metropolis and its past experience, codifies flexible but efficient cooperation with municipalities from metropolitan area. This framework should enable the alignment of investment priorities, spatial plans, and service delivery strategies without dismantling local autonomy.

The national government should develop a dedicated operational programme (or a specific component within a broader programme) aimed at supporting metropolitan investments and development strategies. This programme should finance projects in the core city of metropolis and supra-local projects that are jointly implemented by multiple municipalities and have functional significance.

Existing tools such as ITI should be leveraged more strategically to bundle investments and encourage coordinated action. The regional and central administration should actively promote ITI not merely as a funding tool, but as a governance platform for long-term, cross-jurisdictional collaboration in areas like transport, land use, and green infrastructure.

Better metropolitan-regional coordination must be achieved by enhancing the effectiveness of existing consultation structures. This requires formalizing routine, structured dialogue between regional managing authorities and municipalities. Regional governments shall intensify the use of existing technical networks to foster inter-institutional learning, scenario planning, and programme co-design. Aligning spatial and investment planning through joint sessions and data-sharing protocols will help reconcile regional and metropolitan strategies and ensure functional coherence.

Enhancing the flexibility and responsiveness of the Regional Programme / European Funds for Mazovia is required to meet the needs of metropolitan municipalities. It is recommended to develop financial mechanisms that reflect the diverse capacities of municipalities within the metropolitan area. This could include dedicated calls for less-resourced local governments, partnership components that promote inter-municipal collaboration, and advisory components that support project preparation. Funding allocations should be tailored to the specific needs and challenges. Funding eligibility criteria and project selection processes should be adapted to prioritize initiatives with proven metropolitan-scale benefits and alignment with functional urban logic, rather than solely administrative borders.

9.1.2.3 European level

The European Commission should further strengthen the urban dimension of Cohesion Policy by reinforcing the strategic role of ITI in metropolitan governance. Future funding regulations should require a proportionate “core planning package” for ITI areas, limited to a few concise elements like for example jointly agreed metropolitan priorities, a short sequenced investment pipeline, and a shared monitoring dashboard with a small set of common indicators. Evidence of functional coordination between municipalities should follow a ‘comply-or-explain’ approach.

It is recommended to ensure, already at the EU level, the formalised and early participation of city authorities in the programming of European funds by establishing mandatory governance mechanisms that grant cities a structured role in decision-making related to the co-financing, prioritisation and implementation of place-based instruments, including Integrated Territorial Investments (ITI). It is recommended to introduce dedicated mechanisms for the direct financing of cities and metropolitan areas. The European Commission should launch dedicated financial instruments that allow cities and metropolitan areas to apply for funding directly, bypassing national administrative structures, particularly in strategic areas such as climate action, innovation, and green mobility. Additionally, the creation of thematic urban missions within the framework of Cohesion Policy should be considered as a complementary approach.

EU funding should also reward those local and regional governments that engage in structured metropolitan cooperation and develop integrated investment pipelines. Promoting peer learning across metropolitan areas, and providing additional technical assistance to support spatial coordination and cross-jurisdictional management, will enhance the long-term institutional resilience of cities across the EU.

9.2 Administrative capacity and Institutional innovations

9.2.1 Challenges

Urban governments continue to struggle with structural barriers that limit their ability to effectively plan and deliver EU-funded initiatives. At the regional level, excessive procedural rigidity remains a serious obstacle. Programmes are often conceived within narrowly defined institutional silos, making them ill-suited to address the multidimensional nature of urban challenges. Administrative procedures and decision-making cycles are over formalized, and poorly adapted to the realities of project delivery in dynamic metropolitan contexts. As a result, cities face unnecessary delays, legal uncertainties, and misalignment between funding cycles and investment readiness.

Another critical barrier is the limited financial autonomy of cities. While responsibilities have grown significantly, local governments remain highly dependent on intergovernmental transfers and have insufficient control over revenue streams. This financial dependency weakens their ability to plan multiannual investment strategies or respond flexibly to emerging needs. Without stronger strategic and administrative capacity, cities risk becoming passive implementers of fragmented programmes rather than proactive leaders of transformation.

9.2.2 Policy recommendations

9.2.2.1 Local level

The recommendations under 9.2.2.1 should be mapped to both the local and the supra-local/metropolitan levels. To mitigate limited financial autonomy, cities should prioritise both revenue-generating and cost-saving projects aligned with EU priorities e.g., sustainable mobility, energy efficiency, and the circular economy, so that new income and operational savings jointly strengthen local budgets. These projects can reduce fiscal pressure in the long term while also making cities and municipalities more resilient and environmentally responsible. EU cohesion policy instruments should be integrated into broader strategic planning frameworks (e.g. local development strategies, urban resilience plans) to avoid fragmentation and reinforce coherence.

Urban / municipal administrations must take full advantage of available support instruments to increase their strategic capacity and administrative efficiency. Cities and municipalities should strengthen their

internal project preparation systems by improving cross-departmental coordination, standardizing procedures, and investing in skills development for integrated policy delivery. Technical assistance funding should be actively used to run diagnostics of internal bottlenecks, streamline workflows, and build multidisciplinary teams capable of managing complex investments. A well-prepared and stable team of experts becomes the backbone of local administrative capacity. In the case of the Warsaw Metropolis, it is essential to significantly strengthen the staffing of the Warsaw Metropolis Association.

9.2.2.2 National and regional level

Managing authorities at the national and regional levels should support capacity-building by adapting existing systems and procedures to better fit the needs of municipalities. This means simplifying application and reporting requirements, reducing time lags in project approvals, and expanding the use of pilot fast-track mechanisms for integrated, place-based projects. These changes can be implemented through updates to internal guidelines and investment selection protocols.

It is recommended to adopt the principle of “proportionality of bureaucracy” — smaller projects should not be subject to the same documentation requirements as large-scale infrastructure investments. Calls for proposals, evaluation processes, and contract signing schedules should be designed in close consultation with beneficiaries to reflect their organizational capacities and investment readiness.

Regional programmes should adopt more inclusive governance practices, such as thematic advisory groups involving city experts, targeted technical workshops, and co-evaluation of project pipelines. These mechanisms would help cities align better with programme objectives while giving them greater ownership of the design and implementation process. Regional coordination platforms, even informal ones, can provide meaningful spaces for knowledge exchange and alignment of expectations.

Not all local governments have the resources to independently prepare project proposals. The regional authority should consider establishing a dedicated institutional support fund to finance, among other things, the preparation of documentation, feasibility studies, expert analyses, and the hiring of additional staff to manage EU funds within local governments. This fund could take the form of either grants or in-kind support services, with the overarching goal of reducing disparities in capacity among municipalities.

9.2.2.3 European level

The European Commission can play a catalytic role in strengthening local administrative capacity by promoting peer learning, supporting technical assistance, and encouraging adaptive governance. Specific funding streams, including the Technical Assistance for Cohesion Policy and URBACT-type initiatives should be expanded and more explicitly targeted to support cities in managing complexity. Importantly, flexibility mechanisms such as the N+3 rule should be retained or adapted for large-scale, high-impact urban projects that require multi-year procurement and delivery processes.

It is also recommended to introduce a mechanism of flexible programming frameworks for large cities. Major urban centres should be granted the opportunity to develop their own cohesion policy implementation plans in the form of “urban programming frameworks” approved by the European Commission. Such a document could include a long-term investment plan, the ability to flexibly reallocate funds across actions, and streamlined decision-making procedures. This would serve as a powerful tool to enhance the agency and accountability of cities in delivering cohesion policy objectives.

It would be appropriate to promote the use of experimental and pilot-based approaches in managing urban and metropolitan development. The European Commission should establish a dedicated component within cohesion policy to support the testing of new models for territorial governance. Institutional innovation should be recognized as a fully eligible activity for EU funding, allowing cities to explore and scale new solutions to complex development challenges.

Moreover, the Commission should provide clearer guidance to Member States on how to reduce administrative burden without compromising control. Encouraging multiannual programming, outcome-based management, and simplified cost options (SCOs) will allow cities to focus more on results than paperwork. These reforms will help ensure that cities are not only fund recipients, but key institutional partners capable of shaping and sustaining systemic change.

9.3 Cohesion Policy contributions to city long-term agendas

9.3.1 Challenges

Although Cohesion Policy has played an essential role in financing urban development, there remains a persistent gap between short-term project funding and long-term strategic urban agendas. For cities like Warsaw, this disconnect is particularly visible in the fragmented nature of EU-funded interventions, which are often shaped more by programme availability than by urban priorities. As a result, investments sometimes bypass the city's core strategies, leading to inconsistencies in spatial development, infrastructure rollout, and service provision.

National frameworks still tend to treat cities as mere implementers of projects rather than strategic actors in co-designing development trajectories. This hierarchical model limits the ability of urban authorities to influence national development programmes and undermines the potential for strategic alignment. Consequently, the transformative potential of EU funding is reduced, and investments risk becoming isolated and unsustainable once EU support ends.

Another key challenge is the difficulty of maintaining coherence between multiple funding sources, especially across ITI, regional programmes, and direct EU instruments, and aligning these with comprehensive urban development strategies. Without effective coordination and political ownership, cities may struggle to leverage Cohesion Policy as a consistent driver of their long-term vision.

One of the key challenges to effective long-term planning in cities is the uncertainty surrounding the thematic areas eligible for EU funding. Cities often develop local development strategies, investment plans, and sectoral programmes without having full clarity on which types of interventions will be supported in a given programming period. As a result, priority projects may ultimately fall outside the scope of eligible funding in operational programmes.

In practice, programming drives planning rather than the other way around - a dynamic that risks hollowing out strategic planning and turning strategies into mere tickets to funding. Another major issue is the misalignment between planning and programming calendars: the timeframes for preparing urban strategies and planning documents often do not coincide with the schedule of calls for proposals or the rollout of financial instruments. Consequently, local governments may be forced to hastily adapt projects to the technical requirements of funding calls, without the time to align them meaningfully with the city's long-term vision. For this reason, it is essential that information on future priorities and intervention areas within EU funds be made available well in advance. This would allow cities to design interventions that are not only coherent with their own goals but also fundable, while enabling them to update programmatic documents, build partnerships, and prepare necessary project documentation. Transparency and predictability on the part of managing authorities are fundamental preconditions for leveraging EU funding in support of long-term urban agendas.

9.3.2 Policy recommendations

9.3.2.1 Local level

The recommendations under 9.3.2.1 should be mapped to both the local and the supra-local/metropolitan levels. Cities and municipalities should consistently develop their own long-term development strategies such as local development strategies, sectoral policies and comprehensive investment plans, and clearly articulate their strategic priorities within them. It is essential that these documents serve not as mere formalities, but as practical tools for coordinating all development activities, including those funded by EU resources. For this reason, every application for EU funding should be assessed in terms of its alignment with the city's overarching development agenda. It is also recommended that cities establish local project review mechanisms to ensure that EU-funded investments remain consistent with the city's long-term vision and do not undermine strategic policy coherence.

Cities and municipalities should reinforce their internal governance systems to better integrate Cohesion Policy investments into strategic urban agendas. This requires stronger alignment between project development teams, planning departments, and political leadership. Investment pipelines emerging from EU programmes should be reviewed in light of long-term goals defined in strategies such as municipalities development strategies, spatial development plans or climate roadmaps.

Rather than reacting to the logic of funding calls, cities and municipalities should proactively position themselves as strategy-driven actors. Tools like ITI should not be seen merely as funding envelopes but as instruments to implement local and supra-local / metropolitan priorities. To this end, local administrations should strengthen strategic monitoring units and foster internal learning processes, allowing staff to better align EU opportunities with local policy goals and co-create roadmaps for integrated project portfolios.

9.3.2.2 National and regional level

National ministries and regional authorities must recognize cities and municipalities as co-creators of operational programmes, not just recipients of funds. This can be achieved by opening structured dialogue spaces where urban authorities contribute to the programming and updating of national and regional operational programmes. Participation should go beyond formal consultations, allowing cities to shape thematic priorities, territorial targeting, and investment logics.

To foster better alignment, managing authorities should design co-programming tools such as urban strategic compacts or long-term investment frameworks, which would connect programme cycles with municipal strategies. Within the ITI instrument, the role of urban strategies should be strengthened through explicit ex ante alignment procedures and regular strategic reviews co-led by regional and urban actors. These steps would help ensure that Cohesion Policy contributes to structural, rather than fragmented, urban transformation.

It is recommended to strengthen the alignment between regional funding instruments and urban development strategies. Regional self-governments, as managing authorities, should actively collaborate with cities to ensure that interventions at the regional level genuinely support municipal priorities. This should involve both an assessment of project alignment with local strategies and the flexible adaptation of funding call conditions to the specificities of urban planning frameworks. Regional institutions should also develop integrated investment plans for functional urban areas, ensuring that local priorities are embedded within the broader framework of regional policy. This would enhance coherence, reduce fragmentation, and support long-term urban transformation efforts through coordinated regional support.

The national government should move away from treating cities solely as beneficiaries and implementers of centrally designed policies, and instead begin to recognize them as strategic partners in territorial development planning. It is recommended that a formal mechanism be established to enable systematic consultation between central authorities and major cities, including their functional urban areas, particularly in relation to cohesion policy, infrastructure, climate action, and housing. Cities should be given the opportunity to contribute their plans and strategic priorities to the design of national operational programmes and the definition of their funding priorities. One possible solution would be the creation of cross-sectoral “urban panels” at the national level, composed of representatives from key ministries and urban authorities. These panels would serve both advisory and coordination functions, ensuring that national development policies and programmes are shaped with the realities, needs, and long-term visions of large urban areas in mind.

9.3.2.3 European level

At the EU level, a stronger emphasis is needed on the urban strategic function in Cohesion Policy. While the 2021–2027 framework includes a mandatory urban dimension, more must be done to ensure that this goes beyond project aggregation and supports coherent, long-term trajectories. The European Commission should encourage Member States to adopt models where urban strategies guide investment logic and act as binding frameworks for EU-funded interventions.

At the EU level, it is essential to clearly affirm that long-term urban strategies constitute key reference documents for the allocation of EU funding. The European Commission should require Member States to demonstrate how their national and regional operational programmes support the implementation of local

urban strategies. This could take the form of mandatory alignment matrices annexed to each operational programme, explicitly mapping how EU-funded interventions contribute to the priorities and objectives defined in cities' strategic planning documents. Such a requirement would reinforce the role of urban agendas in shaping investment decisions and promote greater coherence between EU policy goals and local development trajectories.

Ensure that Cohesion Fund financing is maintained at least at the level of previous programming periods and decoupled from regional categorisation based on relative wealth, as long-term effectiveness of cohesion policy interventions depends on the predictability and stability of funding. Moving away from income-based regional classification would support sustained investment planning and enable Cohesion Fund resources to address structural, long-term challenges across all eligible territories, rather than limiting support to short-term convergence metrics.

The EU should also promote the development of integrated urban transition portfolios, combining climate, digital, housing, and social cohesion objectives into comprehensive urban investment agendas. These can be supported by improved coordination between different funds (e.g., CF, ERDF, ESF+) and facilitated through technical assistance, peer learning, and dedicated urban platforms. By strengthening the strategic positioning of cities in the multiannual financial framework, the EU can maximize the long-term impact of Cohesion Policy on sustainable and inclusive urban development.

The European Commission should support the development of monitoring tools that assess the impact of Cohesion Policy on the implementation of local strategies not only in terms of quantitative, output-based indicators, but also with regard to institutional and governance dimensions. These could include indicators measuring the durability of partnerships, the alignment of funded projects with local strategic plans, and the degree of cross-sectoral integration. By capturing both tangible results and qualitative governance outcomes, such tools would provide a more comprehensive understanding of how EU funding contributes to long-term urban development.

9.4 Funding schemes and synergies

9.4.1 Challenges

Accessing and managing EU funds remains a complex and resource-intensive process for local governments, particularly in metropolitan areas. One of the most persistent structural issues is the overwhelming reliance on GDP per capita as the primary criterion for fund allocation. While useful as a macroeconomic indicator, it fails to capture the full scope of territorial disparities within urban areas including deep social exclusion, housing unaffordability, and environmental vulnerability. As a result, well-developed cities may appear statistically prosperous while still facing acute investment needs in specific districts or sectors, which are then inadequately addressed by funding formulas.

Another barrier is the limited direct access to EU funds for cities. Although they are essential actors in achieving European objectives such as the green transition or digitalisation, municipalities are often sidelined during national-level programming and negotiation processes. Consequently, local priorities are filtered through regional or national interpretations, weakening subsidiarity and diluting the local ownership of interventions. Cities have fewer opportunities to shape the terms of implementation or design investment portfolios that correspond to their functional challenges.

Moreover, cities face tightening financial and procedural constraints. In 2021–2027, the shift from the N+3 to N+2 rule shortens the time available to implement large, complex projects. Combined with misaligned calls for proposals and rigid co-financing requirements, this increases the risk of decommitment and weakens cities' capacity to plan and deliver long-term investments.

EU funds, particularly the Cohesion Fund, have played a strategic role in the development of Warsaw's infrastructure. Thanks to this support, the city has implemented key infrastructure projects, including the second metro line, the modernization of the tram network, the expansion of the water and sewage systems, and initiatives in the field of electromobility. The Cohesion Fund accounts for approximately 80% of all funding secured by the city since Poland's accession to the European Union (this refers to the period before the launch of the RRF). However, the current level of EU structural funding does not offset the costs associated

with maintaining and further developing infrastructure that, in practice, serves functions well beyond the local scale.

9.4.2 Policy recommendations

9.4.2.1 Local level

Cities and municipalities should build internal capacities to strategically navigate the EU funding ecosystem and to better coordinate across multiple programmes and instruments. This involves developing institutional routines to match local priorities with relevant funding streams, as well as enhancing the planning and delivery of large, multi-sectoral projects. Establishing dedicated units or working groups for cross-departmental coordination — within existing administrative structures — can help prevent fragmentation and support synergy across funding sources.

Moreover, cities and municipalities should improve their readiness for EU investment by preparing multi-annual project pipelines that are aligned with both EU priorities and local development strategies. This forward planning would enable faster responses to funding calls and reduce reliance on reactive project generation. Technical assistance funds should be used to support project development, legal and financial advisory, and staff training in fund management and procurement.

Local authorities should consistently advocate for the inclusion of cities in the programming processes of Cohesion Policy at both national and regional levels. This should involve presenting their own proposals for urban components, specific types of projects, and management mechanisms. The collective voice of cities should be strengthened through active engagement in networks such as the Association of Polish Cities and the Union of Polish Metropolises, ensuring urban priorities are reflected in policy design.

Cities and municipalities should also develop their own tools for assessing the impact of EU-funded projects, with particular attention to local social, spatial, and environmental inequalities. Even when a city as a whole displays a high GDP per capita, certain districts may still face acute development needs. Therefore, it is essential to create detailed local investment needs maps that can inform the design of projects aligned with the actual conditions on the ground. These tools will allow for a more equitable and targeted use of EU funds, ensuring they support inclusive and sustainable urban development.

9.4.2.2 National and regional level

Managing authorities of regional programmes should adopt a more nuanced approach when assessing investment needs within metropolitan areas. Rather than treating the city as a homogenous and statistically affluent territory, internal disparities such as disadvantaged neighbourhoods, peripheral zones, and post-industrial areas should be explicitly recognized and addressed through dedicated funding streams.

It is also recommended to introduce dedicated support pathways for metropolitan projects with supra-local functions. For infrastructure projects that serve a broader catchment than a single municipality higher co-financing rates and extended implementation periods should be applied. Regional managing authorities should establish specialized intervention lines for such projects and allow for greater procedural flexibility in assessing their feasibility. This would enable more strategic and coordinated investments that reflect the functional realities of metropolitan areas.

Cohesion policy funds at the regional level should be allocated with reference to the diverse needs of municipalities and taking into account functional linkages. Such an allocation logic would allow for a better alignment of intervention instruments with the development needs of specific territorial configurations at the sub-regional scale. At the same time, regional self-government authorities should also support the development of the NUTS 2 area – the Warsaw Capital Region – with their own resources. The current development policy relies entirely on EU funds, which, however, are unavailable for many important types of projects in the Warsaw Capital Region. A possible solution would be to finance some investments in the WCR from the regional budget, using the resources for project that, in the Mazowieckie Regional Region, can be financed from EU funds.

Additionally, the national government should work to harmonize the rules governing different funding sources including National Recovery Plan (KPO). Procedures should be standardized and based on proven

experiences and good practices in the use of EU funds. This includes developing common templates, simplified reporting mechanisms, and uniform evaluation criteria that reduce administrative burdens for beneficiaries. Drawing on successful models, such as integrated project pipelines, modular application systems, or pre-qualification procedures, can improve efficiency and predictability across programmes. Standardization should also foster consistency between funding instruments, enabling smoother combination of resources and greater accessibility for local governments, especially those with limited administrative capacity.

In parallel, consideration should be given to establishing a dedicated instrument for the direct financing of long-term urban plans, potentially in the form of “mission-based funding” or “urban transformation compacts.” Through this instrument, cities would be able to submit integrated investment packages aligned with their strategic development goals over a 7–10 year horizon. This approach would address one of the most persistent shortcomings of the current system: the fragmentation caused by short-term, project-by-project funding calls. By enabling longer-term, bundled financing anchored in local strategies, the EU and national governments could empower cities to deliver more coherent, transformative, and sustainable development trajectories.

National and regional authorities should modernize funding frameworks by adopting multi-dimensional allocation criteria that better reflect territorial realities. In addition to GDP, indicators such as housing stress, infrastructure pressure, environmental exposure, and social vulnerability should be integrated into programme design. These refined metrics would allow better targeting of urban investments and help address intra-metropolitan inequalities.

Co-financing requirements must also be reviewed to reflect the actual fiscal capacity of urban governments. Tailored co-financing rates should be introduced, especially for cities with constrained budgets but high strategic relevance. National authorities should also ensure that calls for proposals are better aligned with local planning cycles and that eligibility conditions support the bundling of complementary projects under shared thematic umbrellas.

The ministry responsible for EU funds and regional development should systematically support cities in applying directly to European programmes such as Horizon Europe, LIFE, CEF, URBACT, and instruments offered by the European Investment Bank. This support should include the establishment of a national advisory centre dedicated to assisting municipalities with direct EU funding applications. Such a centre would offer technical guidance, facilitate administrative procedures, and provide project development support. Additionally, a system of incentives or performance-based rewards should be introduced for local governments that successfully secure and implement projects through these direct instruments, encouraging broader participation and building institutional capacity across municipalities.

As a negotiating partner with the European Commission, the national government should advocate for the reintroduction of the N+3 rule particularly for complex infrastructure projects in large urban areas. Under current conditions, shortened implementation periods significantly hinder the planning and execution of transformative investments. The time constraints force cities to scale back or delay projects, undermining their strategic potential. Ensuring extended and predictable timelines would improve project quality, reduce the risk of fund decommitment, and enhance the overall effectiveness of EU support in urban infrastructure development. Stable and predictable implementation frameworks particularly for infrastructure with regional or metropolitan impact are essential for cities to plan effectively, build multi-annual investment pipelines, and fully leverage the strategic opportunities offered by EU funding.

9.4.2.3 European level

At the European level, policy frameworks must move decisively towards equity-based allocation models that recognise the complexity of urban challenges. The European Commission should encourage Member States to use functional urban data and localised territorial diagnostics during programme planning and fund distribution. Tools like urban deprivation indices, vulnerability maps, or housing pressure indicators can serve as the basis for more just and strategic fund allocation.

Recognizing the complexity of metropolitan challenges, the European Commission should consider modifying the system of fund allocation to better reflect intra-urban disparities and the functional importance of investments. In the case of large cities, a territorially differentiated approach should be applied

— for example, through the creation of dedicated “transformational packages” for selected areas, whether within cities or across metropolitan regions.

In order to reflect the internal diversity of more developed regions and the scale of structural challenges faced by metropolitan areas, co-financing rates under cohesion policy should be adjusted to allow higher EU contributions also in wealthier regions. In the case of the Warsaw metropolitan area, this implies at least retaining the co-financing rate applied in the 2021–2027 period (50%), rather than further reducing EU participation. Such an approach would strengthen the effectiveness of place-based interventions and prevent statistical regional prosperity from undermining the delivery of long-term, high-cost urban investments.

In order to strengthen the urban dimension of cohesion policy and enhance the effectiveness of place-based interventions, a minimum earmarking of 10% of Structural Funds at national level should be introduced for urban development instruments, providing cities with a predictable and dedicated allocation for integrated territorial strategies.

The EU should more actively promote the integration of funding sources and offer harmonized rules for combining resources from different programmes. There is a need for streamlined procedures and common application platforms that would reduce administrative costs and enable cities to build integrated investment packages more effectively.

To address access limitations, the EU should expand direct-access mechanisms for cities, including dedicated urban calls with simplified procedures. Initiatives like the Urban Initiative, LIFE, and Horizon Europe missions should be better integrated into the broader cohesion framework and promoted as complementary tools for systemic urban innovation.

Finally, the EU should revisit implementation rules to ensure that procedural flexibility is maintained. The N+3 rule or its functional equivalents should be retained for large-scale, transformative projects with complex procurement phases. Flexibility in expenditure deadlines and reporting should be a cornerstone of urban project delivery, not an exception.

10 Conclusion

The Warsaw Metropolis evidence base points to a simple truth: to deliver EU-wide transitions credibly and efficiently, Cohesion Policy must operate at the right scale (including metropolitan), with the right partners (cities as co-designers), and with rules that match the size and timing of the challenges it asks cities to solve.

If one lesson stands out from Warsaw's experience, it is this: cities are not just recipients of Cohesion Policy; they are where European ambitions either come to life or fade into paperwork. When a metro line opens, when public space cools a heat-stricken district, when buses go electric - Europe becomes tangible. Treating cities as co-creators across programming, delivery and evaluation is therefore not a courtesy; it is a precondition for impact.

Over the last two periods, Warsaw Metropolis learned to turn EU frameworks into a disciplined delivery system. Inside City Hall, a dedicated team of professionals curates a pipeline of "shovel-ready" projects, pre-screens concepts for quality, standardises documentation and follows projects through to certification. At the metropolitan level, the ITI architecture has given Warsaw and its neighbouring municipalities a shared language for priorities - public transport, climate and energy, digital services - and the practical tools to move from strategy to bankable portfolios. This institutional "software" proved as important as any physical investment, because it reduced the friction that otherwise accumulates when multiple managing authorities, national agencies and local units collide.

And yet, the case also reveals the limits of a system designed around small, fragmented projects and short calendars. Metropolitan assets are complex and capital-intensive. They need time, phasing and predictable calls. Where rules tighten sharply, where eligibility interpretations diverge, or where national co-funding for nationally relevant urban assets is missing, even strong city pipelines stall. The costs are not abstract: each delay pushes contracts into inflationary environments, chips away at scope, and erodes public confidence that Europe can deliver at scale.

A practical path forward emerges from this evidence. Keep the strength of shared management, but refit it to metropolitan reality. That means restoring timelines that match complexity, allowing phasing across periods for projects with long design and procurement cycles, and giving ITI a stable, structural role rather than a time-limited "basket." It means multi-annual call calendars and unified interpretations so that local administrations can plan, hire and sequence tenders without gambling on shifting goalposts. And it means recognising that GDP per head alone cannot steer allocations in places where climate risk, accessibility gaps and intra-metropolitan inequalities drive needs just as much as income does.

Here is also an uncomfortable message which concerns national co-funding. In Warsaw, assets with clear national spillovers - above all the metro - still lean too heavily on the municipal balance sheet. This is unusual by European standards and ultimately self-defeating: without predictable state co-financing, cities defer or slice projects, raising lifecycle costs and undermining decarbonisation and productivity goals that are national in scope. Future frameworks should encourage, and where appropriate condition, stable national backing for capital-city infrastructure that serves the broader economy, labour market and climate transition.

These lessons suggest a simple narrative for Cohesion Policy after 2027. Keep the anchor: shared management that finances the backbone of Europe's urban transition. But tune the instrument to the scale of the task. Build Cohesion around metropolitan governance that is continuous, resourced and accountable. Publish call calendars and align interpretations so portfolio planning is a craft, not a gamble. Restore time horizons that fit complex assets and allow phasing across periods to prevent fragmentation. Use multidimensional needs - not GDP alone - to direct effort where climate risk, access and inequality say it is most urgent. And treat administrative capacity as core infrastructure.

If Europe wants citizens to feel the Union in the places they live then empower the places that deliver those changes. Make cities co-designers, not afterthoughts. Finance the big kit through Cohesion, complement it with targeted direct programmes and smart loans, and insist on the metropolitan cooperation that turns individual projects into functioning systems.

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Interviews & interactive session

Interview 1 – Secretary of the Capital City of Warsaw, 23 April 2025

Interview 2 - Plenipotentiary of the Mayor of Warsaw for City Development Strategy, 15 May 2025

Interview 3 - Deputy Director, Department for European Funds and Development Strategy (programming issues), 22 May 2025

Interview 4 – Deputy Director, Department for European Funds and Development Strategy (ITI framework - cooperation), 26 May 2025

Interview 5 – Subject-matter expert, MA, regional level, Department of Regional Development and European Funds, 27 May 2025

Interview 6 – President of the Warsaw Metropolis Association, 28 May 2025

Interview 7 – Director of the Office of the Warsaw Metropolis Association, 15 July 2025

Interview 8 - Subject-matter expert, Ministry of Funds and Regional Policy, 16 July 2025

Urban Laboratory: with additional participation of an advisor from the Ministry of Funds and Regional Policy and an academic expert responsible for the preparation of the Development Strategy for the Warsaw Metropolis, 30 June 2025

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The ESPON EGTC is the Single Beneficiary of the ESPON 2030 Cooperation Programme. The Single Operation within the programme is implemented by the ESPON EGTC and co-financed by the European Regional Development Fund, the EU Member States and the Partner States, Iceland, Liechtenstein, Norway, and Switzerland.

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