



**COUNCIL OF EUROPEAN MUNICIPALITIES AND REGIONS
CONSEIL DES COMMUNES ET REGIONS D'EUROPE**

CEMR Response to the Consultation on the European Commission's draft Community strategic guidelines on cohesion

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RESPONSE TO THE CONSULTATION ON THE EUROPEAN COMMISSION'S DRAFT COMMUNITY STRATEGIC GUIDELINES ON COHESION

Introduction

1. The Council of European Municipalities and Regions reaffirms its strong support for an ambitious, pan-European cohesion and regional policy for the period 2007-2013, and for the proposed architecture for the future as set out by the European Commission in July 2004.
2. Concerning the draft Community Strategic Guidelines on Cohesion, we welcome the flexibility inherent in the 'framework' approach of the guidelines and the recognition that the best mix of priorities and actions will be drawn up respecting subsidiarity, according to the needs of each region.
3. We emphasise the need to safeguard a high level of flexibility to enable decision-making about themes and geographies to be taken locally, as close to affected communities as possible.
4. We note, however, that the guidelines are not always clear on the relationship between thematic targeting and spatial targeting. It is not apparent, whether all actions are equally applicable to all types of regions or if some should be tailored towards 'convergence' or 'competitiveness and employment' regions only.

Improving governance

5. Whilst the conclusions of the 2005 Spring Council highlighted the strategic importance of the local dimension to Europe's growth and competitiveness, the Guidelines do not take sufficient account of the important role of the local level in reaching the Lisbon objectives. Local government, for instance, is absent from both the second and third priority, although the importance of local employment initiatives are widely recognised as are local strategies for improving knowledge and growth.
6. The Guidelines should recommend that Member States foresee a wide involvement of local actors in all phases of the new programming period. Municipalities can contribute to promoting economic growth and innovation of territories, encouraging entrepreneurship and social inclusion, enhancing local economies and environmental sustainability. It is important to explicitly recognise the unique role of local authorities as the democratically accountable tier of government closest to the communities that the programmes are intended to assist – they are particularly well placed to support not only the implementation of the funds but also the formulation of guiding policies.
7. As regards the assessment of the NSRF, we would welcome more detail on the actual criteria and process the Commission will use to agree national strategies. A key criterion should be ensuring local and regional partners are able to prioritise and deliver the full range of EU-supported actions. The NSRFs should be strategic, non-prescriptive,

high level documents to respect the principle of local self-governance and subsidiarity.

8. We also call for transparency and close involvement of local government in the criteria and process Member States will use to define regions eligible for the competitiveness and employment objective.

Promoting an integrated approach to territorial cohesion

9. We welcome the Guideline's section on territorial cohesion and its general recommendations with regard to the urban and the rural dimension.
10. However, we note with regret that the territorial dimension – both urban and rural – is not integrated sufficiently across all sections of the document, most notably in the three priorities of “attractiveness”, “knowledge and innovation” and “more jobs”.
11. With regard to urban development, we see a need to encourage Member States to develop national and regional plans for urban development that follow the integrated and cross-sectoral approach developed under URBAN and we recommend the delegation of resources and management to the local level. Cities, towns and municipalities should be explicitly recognised as key actors in delivering the structural funds.
12. We welcome the emphasis in section 5.1 on the need to develop links between the economically strongest cities and the smaller towns in the rest of the region. It is important to ensure that urban policy benefits urban areas of different sizes and functionalities, depending on the specific situation in each Member State and region. Cooperation between city and surrounding region as well as the pooling of various towns in a larger region should be encouraged in addition to targeting specific disadvantaged urban areas.
13. With regard to the diversification of rural areas, we share the Commission's concern that complementarity between rural actions funded under the EAFRD and those funded under the ERDF/ESF is needed. We emphasise the need for the NSRFs to show clearly how coordination between the two regimes will be ensured.
14. We particularly welcome the emphasis on rural area development poles and economic clusters in small and medium-sized towns.
15. Finally, we highlight the importance to enable decisions on “urban/rural” programmes to be made locally according to polycentric models to ensure that decisions are based on need rather than arbitrary geographical definitions. Many disadvantaged communities fall out of the urban/rural designation, being neither remote rural nor large cities and yet clearly in need of support.

European territorial cooperation

16. We emphasise the need for a fully funded cooperation objective, available to all regions and covering the three dimensions to cooperation (cross-border, transnational and interregional). Territorial cooperation plays a key role in ensuring that the benefits drawn from

best practice in one part of the EU are shared and built upon in other regions and local authorities. It promotes stronger integration of the EU territory and fosters balanced and sustainable development.

17. We strongly believe that interregional cooperation should continue to be given a prominent role within the spectrum of territorial cooperation initiatives, including measures previously supported under URBACT and INTERREG IIC.
18. We continue to reject the arbitrary 150km maximum maritime distance for areas to qualify under the cross-border element of the cooperation objective.
19. In terms of thematic priorities, we would encourage more emphasis on demographic issues such as depopulation of remote areas and increasing congestion in urban areas in the context of territorial cooperation.
20. Transnational cooperation, finally, should be focused beyond economic growth to the wider social inclusion and sustainable development agenda to take forward the European Spatial Development Perspective. Culture, sport, tourism and heritage should be included as means of improving economic, social and environmental development.

The need for a balanced approach to the three pillars of Lisbon

21. In principal we support the Guidelines approach to competitiveness and innovation but note that a certain imbalance exists in terms of the three pillars of the Lisbon strategy.
22. Therefore, we believe that more weight should be given to the sustainable development pillar of the Lisbon strategy, as a key enabler of territorial cohesion.
23. Greater emphasis is also needed on social inclusion and the potential of the social economy and community development to support delivery of social cohesion, employment and sustainability.

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