



Rat der Gemeinden und Regionen Europas
Council of European Municipalities and Regions
Europæiske kommuners og regioners råd
Συμβούλιο των Ευρωπαϊκών Δημών και Περιφερειών
Consejo de municipios y regiones de Europa
Consiglio dei comuni e delle regioni d'Europa
Raad der Europese gemeenten en regio's
Conselho dos municípios e regioes da Europa

CONSEIL DES COMMUNES ET REGIONS D'EUROPE
Section européenne de IULA

4~~March~~ May 2004

CEMR RESPONSE TO THE COMMUNICATION « TOWARDS A THEMATIC STRATEGY ON THE URBAN ENVIRONMENT »

CEMR's position in brief:

- CEMR welcomes the Commission's initiative to put urban environment problems higher on the European agenda and believes that the EU can play an important role in promoting sustainable urban development.
- CEMR welcomes the recognition that urban areas require specific action, and that there is a need to give greater emphasis to the environment dimension of integrated urban management.
- CEMR underlines that across the EU different policies and plans focusing on sustainable urban development and improvement of the urban environment are already in place at national, regional and local levels. In particular, cities in a number of member states are already required by law to draw up plans and strategies – such as management plans, LA 21, mobility plans - to tackle urban environment problems.
- We therefore urge the Commission, in preparing the thematic strategy, to identify and evaluate the policies and plans already in place at the local level within the Member States, and as a result to determine, in cooperation with local authorities, the action and policies needed at EU level to address the gaps in the existing plans and policies.
- Prior to this study, CEMR is not persuaded that imposing binding requirements at EU level for local authorities to adopt specific sectoral plans relating to environmental management and urban transport, would be appropriate. These requirements could cut across current measures and risk creating extra administrative and financial strain rather than providing added value.
- In any event, we believe that the Commission should develop a broad and coherent policy framework for sustainable urban development, including innovative policy-making approaches such as the Open Method of Coordination – with jointly agreed targets and an effective peer review process - , a policy toolkit for local authorities and extensive opportunities for exchanging good practice.
- CEMR believes that, to achieve major progress in environmental planning and management, cities need to work together and learn from each other in practical ways. We furthermore believe that better coherence and coordination between policies at the local, regional, national and European levels is essential.

- CEMR would urge the Commission to strive to achieve greater policy coherence across all DGs and ensure that its policies do not adversely affect the urban environment.
- CEMR supports the Commission proposal to build upon the results of EU's urban research and providing a framework for active dissemination and exchange of experience.
- CEMR supports the idea of establishing training programmes for experts and politicians and offers to play an important role in developing and implementing these programmes.

I. Introduction

1. Poor quality of life in urban areas today – due to for example congestion, noise and poor air quality - is the result of policies that have throughout most of the 20th century not taken sufficient account of environmental concerns. Principally to blame are policies, which, in the 50s and 60s in particular, over-promoted the use of the car and modelled urban planning around this. These developments sparked a spiral of events that have led to the situations of urban sprawl and gridlock, which most urban areas are currently experiencing.
2. Whilst awareness amongst local politicians and citizens of the current problems, their causes and the need to address these so as to improve quality of life in urban areas, has increased, the measures that are needed to radically change the current negative trends are generally unpopular and therefore require considerable political will as well as investment in terms of resources and time to carry out.
3. CEMR therefore welcomes the attention that the Commission is giving to urban environment problems with the development of a thematic strategy in this area. We agree that “there are clear opportunities at the European level to develop, share and facilitate the implementation of appropriate solutions” and that “much can be achieved by a more integrated and focused approach using existing instruments and initiatives, and through enhanced cooperation and coordination at all levels of government.”¹
4. We agree with the Commission that an integrated and coherent approach to taking account of environmental concerns locally is vital to achieve a high quality and healthy urban environment. Such an integrated strategy alone will however not be sufficient to reach this objective. Indeed this will generally require reviewing the actual make-up of the city (introducing access restrictions in parts of the city, extending the public transport system, rearranging public spaces, renovating buildings, etc.). Such measures however require considerable financial investments and support from citizens, businesses and interest groups.
5. Nevertheless, local governments have taken considerable steps towards reaching urban sustainability over the past 10 years. Over 2000 local authorities have signed the Aalborg charter and implemented LA21 and many more have adopted similar processes. The strong presence of local government at the WSSD in Johannesburg also shows its commitment to sustainable development locally. Cities are also increasingly adopting innovative approaches to tackling mobility and pollution problems, as CEMR's recent Public Transport Award demonstrated.
6. The Aalborg+10 conference 9-11 June 2004, which is co-organised by CEMR, offers an excellent opportunity to review 10 years of local sustainability action, and to set new targets for urban sustainability. The Aalborg Commitments will call upon local governments to set clear qualitative and quantitative targets to implement the urban sustainability principles of the Aalborg Charter. These Commitments are designed as a flexible tool for action at the

¹ COM(2004)60, page 4

local level taking account of local circumstances and can work as a tool for evaluating the impacts of the local sustainability processes both at local and European levels and therefore contribute to the monitoring of the implementation of the Thematic Strategy on Urban Environment.

II. Sustainable urban management

7. The proposals for mandatory requirements on local authorities to develop environmental management plans and systems have led to intense discussions within CEMR. While fully understanding the Commission's rationale behind such proposals, our members have pointed out that legal obligations to this effect are already in place in a number of member states. Many of our members are not persuaded that new obligations at EU level would provide added value. However before reaching a final position on this question, we would suggest that a study is undertaken to identify and evaluate the different strategies and plans being implemented at the local level in the member states, in particular under statutory requirements, so as to have an understanding of where the gaps lie and where appropriate EU action could provide added value.
8. In any event CEMR would support a broad policy framework, which helps local authorities to develop a more integrated approach to tackling urban environment problems, while ensuring that they are free to decide for themselves the methodology and measures that are most appropriate to achieve the agreed strategies and objectives.
9. We furthermore agree that a more integrated vision for the urban environment, as proposed by the Commission, would be desirable. Such an integrated approach should also take account of the social and the cultural dimensions of urban areas as well as the important role of public services in the organisation of the urban space.

III. Sustainable Urban Transport

10. As quite rightly pointed out in the Communication, urban transport constitutes one of the major challenges to achieving a good quality of life and a healthy environment in urban areas. While EU legislation has significantly contributed to reducing the emission levels in cars, the number of cars on the streets has not ceased to increase and trends for the next years do not seem to indicate any positive changes. This situation is the result of a combination of measures and circumstances, and in particular important infrastructure developments that have promoted car-use combined with the continued appeal for cars as opposed to other modes of transport among citizen.
11. The issue of urban transport is one of CEMR's priorities. In this context CEMR has launched a number of initiatives aimed at exchanging experience on tools and innovative solutions to tackle these problems. Particularly relevant is the European Public Transport Award, which aims at rewarding those cities that have made considerable efforts to reverse current trends and exchanging good practice. A number of interesting and innovative initiatives emerged from the last edition of the award in 2003. These can be downloaded from the following webpage: http://www.ccre.org/bases/T_599_15_3520.pdf .
12. Drawing up a sustainable and integrated urban transport plan can play a vital role in identifying the best solution to achieving sustainable mobility, identifying the investment resources required and the means of securing them from public and private sources. We therefore agree with the recommendations of the Working Group on Sustainable Urban Transport set up under the EU expert group on the urban environment, that the EU should support the development of these plans at the local level. CEMR however questions the

requirement to adopt a freestanding urban transport plan. We fully accept the desirability of having integrated transport plans, but we are concerned that these are likely place an extra burden on cities – many of which voluntarily or because of a legal obligation already have similar plans – without providing the necessary added-value. Again, we suggest that the Commission undertake a study on the plans and systems already in place before developing action at EU level.

13. We note the Commission's statement that 'during the 1990s, a sample of European cities using controlled competition, succeeded in increasing the use of public transport by an average of 1.7% per year (compared with reductions of 0.2% per year in cities without competition).' We are not persuaded that there is a direct relationship between the extension of competition and increasing use of public transport. Increasing the use of public transport in our experience depends on a whole range of different factors. We believe research is needed to identify the factors that across different countries and contexts have led to increases or decreases in the use of public transport.

IV. Urban indicators and reporting

14. CEMR would like to maintain an active role in the attempt of establishing common indicators to monitor the Thematic Strategy on Urban Environment. Through the development of the Aalborg Commitments and the participation in the project "TISSUE" CEMR is already actively contributing to the plans of the European Commission. We would, however, like to emphasise the necessity of establishing flexible monitoring tools, which can be adjusted to local situations.
15. If a European framework were considered, we would urge the European Commission to limit the bureaucratic tasks to a minimum and try to combine the reporting needs with other local government obligations.

V. Recommendations

16. CEMR recognises the need to give greater emphasis to the environmental dimension of integrated urban management. Local authorities have already taken significant steps to tackle urban environment problems, but a lot more remains to be done. We therefore believe that the European Union can play an important role as a catalyst in this process.
17. We however believe that it is essential that the Commission undertake an in-depth evaluation of the many tools and policies already being implemented and tested at the local level before taking any legislative action at EU level. Such a stocktaking exercise is fundamental to ensure that the thematic strategy will add value to current policies at the local level and will not risk jeopardizing successful processes already in place or placing additional financial and administrative strains upon cities.
18. In parallel, CEMR urges the Commission to develop a policy framework to help cities better integrate environmental concerns in local policy-making so as to promote healthier and cleaner urban areas. This framework should build on policies and initiatives already being carried out at the local level so as to provide a toolkit for cities to implement successful measures and it should offer extensive opportunities for exchanging good practice. We would urge the Commission to consider developing the Open Method of Coordination in the field of urban sustainability, which would include the agreement of common targets and an effective peer review process, while leaving cities free to decide on the best means of achieving the agreed targets.

19. We urge the Commission to undertake an extended impact assessment for any binding measure that it proposes in this field.
20. We urge the Commission to continue its efforts to ensure that EU policy itself (across all DGs) is coherent and takes account of environmental concerns. We believe that a considerable number of EU policies do not take sufficient account of environmental concerns and therefore go against the EU's objective to achieve sustainable development. Internal Market policy, for instance, is still guided by strictly economic ambitions.
21. We strongly support the Commission proposal to build upon the results of the EU's urban research and demonstration activities and provide a framework for actively disseminating these to all cities and towns. Also the Structural Funds should be funnelled towards more sustainable projects.
22. CEMR also supports the idea of establishing training programmes for civil servants and politicians to build capacities in dealing with the urban environmental problems in an integrated manner. CEMR would also like to play an important role in developing and implementing these programmes.
23. Finally CEMR very much welcomes the Commission's proposed actions to help local authorities implement EU Environmental legislation, through the development of guidelines and recommendations. We would be happy to contribute to the development of such tools.