



Initial NGO recommendations on the Communication 'Towards a Thematic Strategy on the Urban Environment'

Priority Recommendations

Introduce binding requirements: introduce binding requirements for management and transport plans in the thematic strategy. Lower the threshold to 50,000 citizens in order to include more cities.

Introduce obligatory targets: to effectively tackle the existing environmental problems in cities' management and transport plans should contain obligatory minimum targets.

Make strong link to existing obligations: require environmental management plans and sustainable transport plans to explicitly list all environmental objectives and obligations from all pieces of environmental legislation (EU and national) applying to the city concerned. The plans should clarify how far the city is from reaching these obligations and what steps are needed to reach them. The city should also be required to provide public information about the state of the environment on all issues with EU or national obligations (for example about local air quality).

Introduce common indicators: introduce a core set of common indicators obligatory for all cities implementing sustainable management and transport plans.

Ensure strict monitoring: environmental management plans and sustainable transport plans should contain provisions that ensure strict monitoring of their implementation. Monitoring should happen on the basis of common indicators and with public participation.

Define entry into force and time frame of plans: define when the plans should enter into force and what time period they should cover.

Ensure public participation: define the mechanisms by which an open and transparent participatory planning and decision-making process can take place in the context of the environmental management and sustainable transport plans.

Link implementation to EU funding: make the implementation of an environmental management plan and an environmental management system a precondition for EU funding on urban issues.

Sustainable Urban Management

Introduce binding requirements: introduce binding requirements for environment management plans in the thematic strategy. Lower the threshold to 50,000 citizens in order to include more cities, define when the plans should enter into force, what time period they should cover and which key set of indicators they should use and ensure strict monitoring.

Clarify link to LA21: clarify the relationship between proposed environmental management plans and LA21.

Link with city budgeting: link the urban environment plan with city budgeting. This is necessary to make the plans deliver and to ensure that money is allocated to reach the policy objectives of the plan, otherwise money may not always be spent according to the priorities in planning documents.

Include electoral timetable: in order to ensure the long-term planning processes as intended by these plans, it could be useful for each comprehensive plan to include information on: a)

the city's long-term goals, b) what the present city council will do c) what the past one did, to ensure follow-up of activities.

Ensure NGO involvement: the continuous involvement and participation of NGOs in all stages of the environment management plan could also help to ensure that processes are long-lasting.

Sustainable Urban Transport

Introduce binding requirements: introduce binding requirements for sustainable urban transport plans in the thematic strategy. Lower the threshold to 50,000 citizens to include more cities, define when the plans should enter into force, what time period they should cover and which key set of indicators they should use and ensure strict monitoring.

Prioritise prevention: prioritise prevention of transport demand and demand shift to walking, cycling and public transport over alternative fuels and car technology, both in the strategy and in the sustainable urban transport plans.

Highlight policy conflicts: highlight possible or existing policy conflicts between TEN-sponsored airports and ports and city air quality and noise objectives.

1. Prevention of transport demand

Focus more on sprawl: elaborate more on suggestions for how to counteract urban sprawl, particularly how to prevent sprawl for cities where it does not yet exist (smaller cities and cities in Accession Countries).

2. Shift of transport demand to walking, cycling and public transport

Prioritise walking + cycling: prioritise walking, cycling and motorised modes (public transport and car transport) in that order, both in the Strategy and in the sustainable transport plans to be set up by the cities.

Secure accessibility for pedestrians and cyclists: ensure that transport planning secures the options of walking and cycling in the city. This should be reflected in the strategy and in the sustainable transport plans to be set up by the cities.

Guarantee interoperability: the combination of bicycles and public transport is much more efficient and covers more area than public transport itself. This should be reflected in the Strategy and in the sustainable transport plans to be set up by the cities.

Mention parking charging: parking charging can probably be considered a type of road user charging and should therefore be mentioned explicitly in the thematic strategy.

3. Promotion of cleaner and safer vehicles

Focus on existing fleet: the Strategy should propose measures on how to improve the emissions of the existing fleet i.e. by incentives for retrofitting, mandatory environmental inspections and emission control zones (access only for 'clean' vehicles). Currently the Community measures focus on new cars only. This should be reflected in the Strategy and in the sustainable transport plans to be set up by the cities.

Promote the right diesel filters: to tackle the serious health effects of particle emissions, particle filters reducing the number of particles emitted by diesel vehicles should be promoted. The strategy should mention diesel filters as a way to reduce particle emissions.

Involve public authorities in car sharing schemes: the Strategy should recommend that public authorities participate in car sharing schemes, which would be less costly than investing in clean public transport.

Alternative fuels: the Strategy should mention the difficulties associated with cleaner fuels that benefit local air quality and reduce greenhouse gas emissions. The Strategy should therefore ensure that sustainable urban transport plans focus on prevention of transport demand and transport shift away from the private car.

Sustainable Urban Construction

Involve NGOs in the development of a building performance methodology: this methodology should assess, at least, the fields of energy saving, water saving, location in the city (e.g. city centre or suburbs, on greenfield or brownfield sites) building materials used and indoor air quality.

Clarify construction label development: clarify how a construction label would be developed and how NGOs would be involved.

Promote tenants' participation on energy efficiency: introduce a programme to increase tenants' and users' participation in the energy efficiency management of houses. The active participation of tenants is important for the success of energy efficiency measures.

Upgrade the energy efficiency in Candidate and Accession Countries: use EU funding to upgrade the energy efficiency of existing high-rise buildings. Otherwise the people living in these buildings will seek new housing opportunities on the periphery of cities or beyond, thus encouraging urban sprawl and generating more traffic.

Differentiate construction label: a useful label for construction material should contain different levels. This makes it possible to create a top 'bio-ecological' level and another level which can be reached by some 30 % of the market. This is important to achieve a label with an appropriate level of excellence.

Create labels on the basis of existing schemes: an EU environmental labelling scheme for construction materials should be built on already existing schemes. It would be useful to compare the already existing labels in some European countries and regions, combine the best practices and integrate them into an EU-wide scheme.

Stress subsidies for sustainable construction manufacturers: to promote market penetration of sustainable construction materials, a taxation or subsidy scheme could be useful. The need for additional incentives in this area could be stressed in the Strategy.

Targeted awareness raising: a strategy for awareness-raising in the field of sustainable construction should be set up for three target groups: builders / owners, authorities on all levels (local, regional, national, European) and building professionals.

Sustainable Urban Design

Focus more on sprawl: the Strategy should focus more clearly on the prevention of urban sprawl, particularly in smaller and middle-sized cities and in Accession Countries.

Member states to restrict greenfield use: the Communication states 'Incentives ... discouraging greenfield development, need to be adopted' (*COM(2004)60 p. 30*). We think Member States should go further and not only 'discourage' but put firm disincentives on greenfield development i.e. by introducing fees for greenfield use.

Stress public participation in large-scale projects: the Strategy should stress the importance of public participation in public and private large-scale projects (*see also NGO Post Stakeholder Report, p. 7*).

Base guidelines on best practices: guidelines on the location and density of new developments should be based on examples of best practices. In Denmark, for example, shopping centres outside city centres are effectively forbidden and offices of public interest and labour-intensive companies etc need to be built within 1–2 kilometres from train stations and other public transport centres. These facilities are not permitted in sites which can only be reached by private cars.

Management plans should include green areas: environmental management plans should allow a network of connected green areas. They should be located in such a way that they can be used daily by residents, school children, nursing-home patients and residents of old-age homes. This can contribute to preventing urban sprawl.

Stress positive effects of gardens: highlight the positive health effects of garden work (preventing heart disease and stomach cancer, keeping vulnerable people more healthy and self-reliant) in the strategy as well as in the EU work on Environment and Health.

Funding

Promote use of mainstream funds: promote the use of mainstream funds for sustainable urban development in the post 2006 Cohesion Policy. The emphasis should be on sustainable urban transport and energy efficiency measures.

Integrate the Strategy's goals into EU funding mechanisms: the Thematic Strategy's overall goal of a high quality of life and a healthy living environment in urban areas should be reflected in the criteria for projects getting support from the EU regional funds and the European Investment Bank. Integration of these goals into EU funding mechanisms should from now on result in a consequent rejection of projects that do not take care of the environmental and social pillar of sustainable development.

Continue prioritising brownfield over greenfield sites: the Structural Funds Regulations and Guidelines for the period 2000-2006 prioritise brownfield over greenfield development. They should continue to do so in the next programming period.

Support special eligibility rules: in the context of sustainable construction the Commission mentioned establishing special eligibility rules and rates that provide incentives for sustainable development (*COM(2004)60, p. 22*). These standards could also apply to national and international financial institutions (*see also NGO Post Stakeholder Report, p. 6*).

Fund more best-practice projects: for specific projects promoting best practice in urban transport, construction, and design, monetary incentives should be provided to encourage voluntary sustainable practices particularly in Accession Countries.

Fund NGO participation: more EU funding should be made available to NGOs working with urban sustainability issues, particularly in Accession Countries to ensure adequate public participation in local planning processes (*see Priority Recommendations*).

<p>The European Environmental Bureau (EEB) is a federation of more than 140 environmental citizens' organisations based in all EU Member States and most Accession countries, as well as a few neighbouring countries. They range from local to national to European and international.</p>
