



***NGO STAKEHOLDER RECOMMENDATIONS
ON THE COMMUNICATION
'TOWARDS A THEMATIC STRATEGY ON THE
URBAN ENVIRONMENT' COM2004(60)***

BY

THE EUROPEAN ENVIRONMENTAL BUREAU (EEB)

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PREFACE

The 6th Community Environment Action Programme

The 6th Community Action Programme was adopted on 22 July 2002 and sets objectives and priorities for the decade to come. One of the priorities identified is the Urban Environment. The European Commission is committed to developing a Thematic Strategy on the Urban Environment, which will be aimed at '**promoting an integrated horizontal approach across Community policies and improving the quality of the urban environment**'¹.

According to article 4 of the Programme Thematic Strategies should include 'an identification of the proposals that are required to reach the objectives set out in the programme and the procedures foreseen for their adoption' (Article 4.1). They should be developed and implemented in close co-operation with relevant parties (Article 4.3).

NEXT STEPS

The European Commission will develop the strategy according to the following steps:

1. **7 April 2004** – Meeting of the EU Expert Group on the Urban Environment, a multi-stakeholder platform bringing together actors with an interest in urban policy (local authorities, NGOs, business sector and academics). The meeting will debate Communication COM(2004)60: 'Towards a Thematic Strategy on the Urban Environment', adopted by the Commission on 11 January 2004. It will discuss the Commission's ideas on the four priority themes for the Thematic Strategy as well as give guidance to the aims and function of the expert working groups which will be set up in 2004.
2. **Throughout 2004** – Meetings of expert working groups on environmental management plans, sustainable urban transport plans, urban environment research and training needs, development of a methodology to assess the sustainability of buildings and urban environment data needs.
3. **12 July 2004** – Second meeting of the EU Expert Group on the Urban Environment
4. **25 October 2004** – Third meeting of the EU Expert Group on the Urban Environment
5. **July 2005** – A proposal for a Council and European Parliament Decision on a Thematic Strategy on the Urban Environment will be presented to the Council and the European Parliament.

THE CONSULTATION PROCESS

In order to ensure the proper participation of all relevant stakeholders, the European Commission has asked several representative organisations to organise a stakeholder consultation among their respective memberships. In this framework, the European Environmental Bureau (EEB) has taken on co-ordination responsibility for the NGOs' consultative process. This means that the EEB will continue to facilitate and co-ordinate the consultation of NGOs.

ACKNOWLEDGEMENT

This paper has been prepared by the EEB with input from a range of NGO stakeholders. The last NGO stakeholder meeting was an EEB workshop in Brussels on 24-25 October, 2003². The workshop discussed the main NGO recommendations on the four priority themes, environmental management plans, sustainable urban transport plans, sustainable urban design and sustainable urban construction and the situation in Accession Countries. Input was later collected through e-mail exchanges with members of the EEB working group on the urban environment. The stakeholders are drawn from various social and environmental NGOs in Europe - the current EU members 'EU15' and Accession Countries - active in the urban environment sub-themes. They incorporate men and women from different levels and professional backgrounds.

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¹ Decision No 166/2002/EC of the European Parliament and of the Council of 22 July 2002 laying down the Sixth Environment Action Programme – Official Journal of the European Communities L 242 – page 12, Article 7(h)

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the participants of the last stakeholder meeting in October.

We would like to thank all these individuals for their time and effort towards this consultative process.

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INTRODUCTION

OVERALL AIM OF THIS DOCUMENT

The overall aim of this document is to comment on the Communication COM(2004)60: 'Towards a Thematic Strategy on the Urban Environment', highlighting the main points we welcome and the main points we criticise as well as giving recommendations for the improvement of the strategy.

On 11 January 2004 the Commission adopted Communication COM(2004)60: 'Towards a Thematic Strategy on the Urban Environment'. This document sets out the Commission's ideas for the Thematic Strategy on the Urban Environment, which will be presented in July 2005.

For 2004 an ongoing, intensive stakeholder consultation is planned. We welcome the chance to comment in this consultation process and intend to contribute actively to the further development of the strategy.

We very much welcome this communication, and hail its proposal for binding requirements at EU level as a step in the right direction. Improving the urban environment is an important policy goal, which will enhance the quality of life and the health of many EU citizens.

Tackling urban issues illustrates the complex environmental problems that exist today. The local level clearly demonstrates how the different sectoral policies are interlinked and that treating environmental problems separately without an overall plan does not necessarily yield positive results.

The communication is a comprehensive document, which clearly outlines the Commission's ideas for the four priority themes as well as addressing the integration of urban environment policies with other community policies. However, we stress the need to strengthen the Strategy's proposals to ensure that the overall aim of the strategy to secure a healthy living environment for Europe's urban citizens is achieved. The text is an NGO contribution how to strengthen the Thematic Strategy.

PRIORITY RECOMMENDATIONS

INTRODUCE BINDING REQUIREMENTS FOR MANAGEMENT AND TRANSPORT PLANS

We strongly support the proposals for binding EU requirements for cities to adopt an urban environment management plan and a sustainable urban transport plan. We think it is essential that requirements to this effect are binding in order to have a positive input on the urban environment. As the Commission clearly states, the overall objective of the Thematic Strategy on the Urban Environment is to 'improve the environmental performance and quality of urban areas and to secure a healthy living environment of for Europe's urban citizens' (COM(2004)60, p. 4). We think it will only be possible to achieve this with binding requirements for cities.

We think the Thematic Strategy should facilitate the change from talking about best practice to delivering it across the European Union (*NGO Consultation Report 2003, p. 6*). Mandatory requirements are needed to reorient urban development priorities. Without legally binding requirements on environmental management and transport plans this strategy is not likely to ensure that best practices are really diffused to mainstream towns. Without binding obligations it is not at all obvious where the political commitment would come from and why local authorities as well as Member States would have a direct interest in taking more action on the urban environment.

Particularly in Accession Countries it is usually very difficult to give high priority to environmental issues because there are plenty of other very serious problems to solve. An EU-level obligation for management and transport plans is the only way to get the necessary political support.

Right now, all initiatives to improve the urban environment are voluntary. We think that this does not yield sufficient results and that the situation does not improve fast enough to respond to global environmental challenges such as climate change or to protect people's health.

Introduce binding requirements

Introduce binding requirements for management and transport plans in the Thematic Strategy.

LOWER THE THRESHOLD TO INCLUDE MORE CITIES

The threshold for cities included in the strategy should be lowered to 50,000 inhabitants (similar to the threshold in the URBAN Audit Schemes). This would include more of the smaller cities in countries such as The Netherlands, Denmark, Ireland etc. These cities have the administrative capacity to adopt and implement environment management and sustainable transport plans. Including them would create the opportunity to tackle problems like urban sprawl through an integrated approach before it spreads out significantly in these cities.

Include more cities

The threshold for cities included in the strategy should be lowered to 50000 inhabitants (similar to the threshold in the URBAN Audit Schemes).

OBLIGATORY TARGETS FOR MANAGEMENT AND TRANSPORT PLANS

To effectively tackle the existing environmental and health-related problems, city management and transport plans should contain obligatory minimum targets, to be the same for all cities.

Although cities are different, there have already been numerous initiatives on a voluntary basis which have not yet been effective. Cities' ecological footprints urgently need to be reduced – not least in regard to fulfilling international commitments, for example in the field of climate change – and voluntary approaches do not appear to deliver. If delivery is left at the

aspirational level, there is therefore serious danger that nothing will happen. Moving from best practice to action therefore requires binding targets.

Targets should be developed to reduce the link between economic growth and passenger transport demand, the need for increased share in public transport and the need to bring about a significant decoupling of transport and GDP growth, which are mentioned as objectives for the strategy in the 6th Environmental Action programme.³

The strategy states that environmental management plans would 'help place the largest 500 European cities on a more comparable footing with respect to their environmental initiatives and obligations' thus making economic competition between them less of a barrier to promoting a high quality and healthy urban environment (*COM(2004)60 p. 11*). However, this is only true if at least a minimum amount of the actual environmental objectives are shared by all cities.

Introduce obligatory targets

To effectively tackle the existing environmental and health-related problems, the city's management and transport plans should contain obligatory minimum targets.

MISSING LINK TO EXISTING LEGISLATION

The Communication regards environmental management plans, environment management systems and sustainable urban transport plans as tools to better implement existing EU and national environmental legislation contributing to better enforcement (*COM(2004)60, p. 11*). However, the Commission does not clarify how the link between environmental management plans and existing EU and national legislation should be made in practice. We think it is important to 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 legislation) applying to the city concerned. It should further 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 local information about the state of the environment on these issues to the public (for example, on local air quality). The link between existing environmental obligations applying to cities should be made very strong. This is important, because often citizens do not know about existing environmental obligations (despite good public information clauses), because the link between the EU level, the national level and the city is not made.

Make strong link to existing legislation

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 legislation) applying to the city concerned. The plans should further clarify how far the city is from reaching these obligations and what steps are needed to reach them. The city

³ Decision No 166/2002/EC of the European Parliament and of the Council of 22 July 2002 laying down the Sixth Environment Action Programme – Official Journal of the European Communities L 242 – page 12, Article 7(h)

should also be required to provide public information about the state of the environment, and all issues with EU or national obligations (for example, on local air quality).

COMMON INDICATORS

The Communication recognises the important role of indicators (*COM(2004)60, p. 36*). The Thematic Strategy on the Urban Environment offers the opportunity to gather comparable data for the most important European cities. Therefore we strongly support the proposal to identify a set of indicators that can be used at European level to guide the collection of data (*COM(2004)60, p. 37*). However, these indicators should be obligatory. If each city defines its own set of indicators, this will not help to generate comparable data. Comparable data however, is a precondition for transferring best practice between similar cities.

In addition to that, we believe that adequate monitoring and evaluation of the implementation of the strategy is essential to ensure its results. Some common indicators should therefore be obligatory for all cities implementing sustainable management and transport plans. These core set of indicators could then be complemented by additional indicators set locally.

Introduce common indicators

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

ENSURE STRICT MONITORING

We think it is essential that the proposed management and transport plans have a concrete positive impact on the quality of life in cities and effectively contribute to reducing the ecological footprint of cities. To ensure that the plans deliver, it is essential that strict monitoring is guaranteed. This is not reflected strongly enough in the Communication.

Introduce strict monitoring provisions

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.

MISSING TIMETABLES

Throughout the whole document, the Communication is very clear about the actions proposed for the forthcoming Thematic Strategy. Unfortunately, however, it is not clear about when the proposed actions should be implemented or which timespan the proposed management and transport plans should cover. We think the implementation for the binding requirements on management and transport should be required in the short term (3-5 years). We also think it is useful to define a uniform timespan for the proposed environmental management and transport plans at EU level. Otherwise the strategy would result in 500 or more different plans, with different objectives and different indicators covering different periods of time. This would not be an efficient strategy and will certainly make comparison between different cities difficult.

Define entry into force and time frame for plans

Define when the plans should enter into force and what time period they should cover.

PUBLIC PARTICIPATION

We welcome the fact that the Commission recognises and addresses the important role of public participation stating that 'Public participation in decision making is recognised as a prerequisite for achieving sustainability' (COM(2004)60, p. 40). We support the Commission's intention to ensure that plans to be drawn up by municipalities would include appropriate provisions for public participation (COM(2004)60, p. 40). This is essential, particularly in Accession Countries 'where democratic, open and transparent consultation traditions are not well established and frequently those stakeholders outside of national and municipal administrative structures are more in tune with sustainability issues' (NGO Post Stakeholder Report, p. 7).

Mainstreaming of urban sustainability can only take place if the new planning instruments are discussed, formulated, developed, implemented, monitored and/or reformulated in an open and transparent participatory process. Public participation in planning processes is essential to ensure that insights, needs, desires and aspirations of those affected by decisions (community stakeholders) are taken into account.

Currently, sustainable alternative proposals have a hard time finding their way into the existing planning and decision-making system. The Strategy on the Urban Environment should therefore be more concrete about how public participation would be included in the management and transport plans.

Ensure public participation

Define the mechanisms by which an open and transparent participatory planning and decision-making process can be operationalised in the context of the environmental management and sustainable transport plans.

MISSING LINK TO EU FUNDING

The Communication mentions the role of different Community funding programmes throughout the document. However, we do not find the necessary link between the implementation of the proposed environmental management plans and/or environmental management systems and EU funding. As we mentioned before (NGO Post Stakeholder Report 2003, p. 7), we think the strategy could be made a lot more effective by linking EU funding requirements for financing urban projects in the implementation of proposed environmental management plans and/or environmental management system. The implementation of such a system should be a precondition for on-going EU infrastructure funding and one of the most important criteria for getting support from EU structural funds. To receive funds, national and regional urban environment strategies, linking to national sustainable development plans, could also be a precondition. This would significantly enhance the impact of the strategy, particularly in Accession Countries.

Link implementation to EU funding

Make the implementation of environmental management plans and an environmental management system a precondition for EU funding on urban issues.

SUSTAINABLE URBAN MANAGEMENT

POINTS WE WELCOME

The environmental management plan will be one of the most important elements of the Thematic Strategy on the Urban Environment. We strongly support the proposal for a binding EU requirement for cities to adopt an urban environment management plan (*see Priority Recommendations*). We think it is essential that requirements to this effect are binding in order to have a positive effect on the urban environment.

Additionally to that we support the requirement for cities to introduce an environmental management system such as EMAS or ISO 14001. We think these are important tools to accompany the environmental management plan (*NGO Stakeholder Consultation Report 2003, p. 7*).

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, introduce a shared set of obligatory targets, 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

POINTS WE CRITICISE

Clarify link to LA21

One of the objectives for the Strategy in the Urban Environment is the promotion of Local Agenda 21 (LA21).⁴ From this Communication however, it is not obvious what the relationship should be between the urban environmental management plan and LA 21. It is not clear if the plan should be part of a LA21 strategy, if it should be equivalent to LA21 strategies or indeed replace them. As LA21 covers more issues than just the urban environment, the relationship between these two instruments needs to be further clarified.

FURTHER RECOMMENDATIONS

Link with city budgeting: it is important to 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. As long as this link is not made, one of the obstacles preventing best practice is that money is not always spent according to the priorities in planning documents (*see also NGO Consultation Report 2003, p. 13*).

Include electoral timetable: in order to ensure the long-term planning as intended by these plans (*COM(2004)60, p. 10*), it would be useful for each comprehensive plan to include information on the electoral timetable in the respective city. This information could be divided into three levels: 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.

⁴ Decision No 166/2002/EC of the European Parliament and of the Council of 22 July 2002 laying down the Sixth Environment Action Programme – Official Journal of the European Communities L 242 – page 12, Article 7(h).

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, as NGOs can act as watchdogs reminding local administrations of their previous commitments.

SUSTAINABLE URBAN TRANSPORT

POINTS WE WELCOME

We strongly support the proposal for a binding EU requirement for cities to adopt a sustainable urban transport plan (*see Priority Recommendations*). We think it is essential that requirements to this effect are binding in order to have a positive input on the urban environment.

The importance of the transport sector is reflected in the 6th Environmental Action Programme: four of the six objectives for the Thematic Strategy on the Urban Environment are related to transport.⁵ The sustainable urban transport plan needs to be part of and be compatible with the environmental management plan.

Introduce binding requirements: Introduce binding requirements for sustainable urban transport plans in the Thematic Strategy. Lower the threshold to 50,000 citizens in order to include more cities, introduce a shared set of obligatory targets, 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.

POINTS WE CRITICIZE

In the context of transport, this Communication gives a lot of attention to promoting alternative fuels and more efficient or cleaner vehicles. It is important to point out that a concept for a sustainable urban transport strategy should first and foremost prevent transport demand, then shift demand to walking, cycling and public transport, and finally consider alternative fuels and car technology. These three elements should be prioritised in this order, both in the Thematic Strategy and in the sustainable transport plans of the individual cities.

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.

In addition to that, we would like to stress that when TENs projects interface with urban areas, they can be at odds with the probable objectives of environment or sustainable transport management plans. As the TENs support the development of airports and ports it is worth noting that both airports and ports have direct negative impacts on local air quality and airports also cause a lot of noise, which is a serious concern for many urban neighbourhoods.

⁵ Decision No 166/2002/EC of the European Parliament and of the Council of 22 July 2002 laying down the Sixth Environment Action Programme – Official Journal of the European Communities L 242 – page 12, Article 7(h).

Air pollution and noise caused by ports and airports significantly reduce the quality of life for many urban dwellers. This is not acknowledged in this chapter.

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

FURTHER RECOMMENDATIONS

1. Prevention of transport demand

Focus more on sprawl: urban sprawl is correctly identified as source of more traffic (*COM(2004)60 P. 14*). The Communication should elaborate more on suggestions for how to counteract urban sprawl, particularly how to prevent sprawl for cities where it does not exist yet (smaller cities and cities in Accession Countries).

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

Prioritise in the right order: an urban transport system should prioritise walking, cycling and motorised modes (public transport and car transport), in that order. This should be reflected in the Strategy and in the sustainable transport plans to be set up by the cities.

Secure accessibility for pedestrians and cyclists: the Communication recognises that accessibility is an important social concern by stating that public transport can provide access for disadvantaged citizens (*COM(2004)60 P. 12-14*). Unfortunately the typical transport plan in practice eliminates the options of walking and cycling in poorer areas.

Transport planning should ensure the options of walking and cycling in the city. This is much more environmentally-friendly and cost-efficient than just providing public transport. 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, potentially, covers much a far greater area than can public transport. It is more competitive than private cars, and at a lower cost.

Transport planning should allow bicycles to be carried in trains, buses, trams and underground, and provide good and safe bicycle parking at terminals. This should be reflected in the Strategy and in the sustainable transport plans to be set up by the cities.

Mention parking charging: the chapter refers to measures for internalising the external costs of transport such as taxation, road user charging and license fees (*COM(2004)60 P. 18*). Parking charges can probably also be considered as a sort of road user charging. It should therefore be mentioned explicitly in the Thematic Strategy as this is already used as a policy instrument in numerous European cities.

3. Promotion of cleaner and safer vehicles

Focus on existing fleet: the currently discussed EURO 5 / EURO 6 emission standards for new passenger cars and duty vehicles will probably become mandatory from 2010 onwards. However, they will only apply to new vehicles. But all too often, positive effects have needed very high levels of subsidy and the benefits have been 'drowned out' by traffic growth. It is

therefore important that in general there be a stronger focus on policy measures to tackle emissions from existing vehicles.

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 for diesel vehicles should be promoted. Diesel cars with the right filters to fulfill EURO IV demands could be subject to tax breaks, similarly to a scheme recently proposed in Germany. Tax incentives should also be given to retrofit existing cars. The strategy should mention diesel filters as a way to reduce particle emissions.

Involve public authorities in car sharing schemes: public procurement could provide a market demand for clean vehicles. But the budget situation limits the possibility for any additional investments for new vehicles. The involvement of public authorities in car sharing schemes would be less costly. This should be mentioned in the Thematic Strategy.

Alternative fuels: Alternative fuels could have a positive impact on local air quality. However these fuels are not without problems. Hydrogen will not be ready to be implemented in the near future, and its production is not energy-efficient and it will only be a sustainable alternative fuel if it is produced from renewable sources. Furthermore, there are a number of environmental problems connected to the production of biofuels.⁶ The strategy should mention the difficulties associated with cleaner fuels that benefit local air quality and reduce greenhouse gas emissions. It should ensure that sustainable urban transport plans focus on prevention of transport demand and transport shift away from the private car.

SUSTAINABLE URBAN CONSTRUCTION

POINTS WE WELCOME

We welcome the proposal to elaborate a common methodology for evaluating the sustainability of buildings and construction, including life-cycle costing. We also welcome that the Commission intends to develop a methodology in collaboration with all relevant stakeholders, as we think it is important that NGOs are involved in elaborating this methodology. This methodology should at least assess the fields of energy saving, water saving, location in the city (e.g. city centre or suburbs, on greenfields or brownfields) building materials used and indoor air quality.

Involve NGOs: Involve NGOs in the development of a building performance methodology.

⁶ EEB position paper on biofuels: biofuels not as green as they sound:
<http://www.eeb.org/publication/EEB-POSITION-PAPER-ON-BIOFUELS-FINAL-21-May.pdf>.

POINTS WE CRITICISE

With respect to the proposed environmental label for construction materials, the Commission states that a corresponding EU label will be proposed in the framework of the EU Eco-label and/or a harmonised EPD (*COM(2004)60 P. 24*). We think it would be helpful to clarify how exactly the Commission intends to develop this label and how NGOs could impact on that.

Clarify construction label development: Clarify how construction label will be developed and how NGOs can be involved.

FURTHER RECOMMENDATIONS

Promote tenant participation on energy efficiency: we agree with the Commission that individual decisions and behaviours have a strong influence on the success of any local plan or framework for action (*COM(2004)60 P. 40*). This is particularly true in the field of energy efficiency. We therefore recommend the introduction of a programme to increase tenants' and users' participation in the energy efficiency management of houses. The training of tenants is a crucial issue for sustainability and their active participation important for the success of energy efficiency measures.

Upgrade the energy efficiency in Candidate and Accession Countries: EU funding should be provided to upgrade the energy efficiency of these existing high-rise buildings, which sometimes make up to 70-90 % of the existing houses in Accession Country cities. Otherwise the bad quality of the buildings will encourage many urban dwellers to seek new housing opportunities on cheap land 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 reachable by some 30% of the market. This is important to achieve a label with an appropriate level of excellence.

In the sector of construction materials, the top level could use the criteria of 'natureplus' for example (label for ecological building products). NGOs working on sustainable construction in Europe could be asked to contribute to defining the 'bio-ecological' level of excellence for these schemes.

Build 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. Since 2003 Germany, for example, has had a subsidy for insulation materials made of agricultural resources (hemp and flax). This could be extended to other renewable resources (wood and waste paper). 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

POINTS WE WELCOME

The Communication recognises urban sprawl as one of the key problems (*COM(2004)60, p. 18*) and analyses very well the problem of urban sprawl in the chapter on sustainable urban design (*COM(2004)60, p. 25-27*).

POINTS WE CRITICISE

We think the strategy should focus more clearly on the prevention of urban sprawl - especially in cities in the ten Accession Countries (*see chapter Sustainable Construction*). Uncontrolled urban sprawl has serious impacts on green spaces close to cities and makes an effective and environmental positive public transport system impossible. It also increases social problems as it becomes more difficult to get to shopping areas, schools, public authorities, other institutions and workplaces.

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.

FURTHER RECOMMENDATIONS

Member states to restrict greenfield use: Greenfield and brownfield use are interlinked. 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. Firm limitations on greenfield use will automatically lead to more brownfield 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: the Commission proposes to develop guidelines on the location and density of new developments that could have positive influence on daily practice (*COM(2004)60 p. 30*). These guidelines should be based on examples of best practices such as the regulations that exist in Denmark. In Denmark shopping centres outside city centres are effectively forbidden and offices of public interest and labour intensive companies etc. need to be build within 1–2 kilometres from train stations and other public transport centres. These facilities may not be permitted in places where they can only be reached by private cars.

Management plans should include green areas: environmental management plans should allow for a network of connected green areas, which are important for recreational, health and ecological reasons. Such areas can be part of an ecological infrastructure of the city and

combine parks, 'green corridors' for wildlife, sports, gardening, water, waste water and organic waste management as well ways for as pedestrians and cycle lanes. They should be located so that they can be used daily by residents, school children, nursing home patients and residents of old-age homes. This can contribute to cities being attractive places to live in and thus work to prevent urban sprawl.

Stress positive effects of gardens: recent research shows that horticultural activities work are one of the most efficient activities to prevent heart diseases and stomach cancer as well as keeping elderly people more healthy and self-reliant. It has also shown positive effects for people with mental diseases. The same effects are observed for other daily nature-based activities such as walking in green areas or fishing. These facts should be highlighted in the Strategy on the Urban Environment as well as related to the EU work on Environment and Health.

FUNDING

POINTS WE WELCOME

We support the use of mainstream funds for sustainable urban development in the post-2006 Cohesion Policy. In this context it is particularly important to focus on Accession Country cities. It will be very important to improve the energy efficiency of existing high-rise buildings (*see chapter Sustainable Urban Construction*) and other measures that help to reduce and prevent urban sprawl.

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.

POINTS WE CRITICISE

Even though the Communication stresses the importance of an integrated approach throughout the whole document, it does not analyse which current EU policies, and particularly funding initiatives, have had negative impacts on the urban environment. While it is important to reiterate that existing guidelines on the use of structural funds should be closely followed (*COM(2004)60 p. 18*), a more consistent mainstreaming of the Strategy's goals into the EU funding mechanisms is needed as well as monitoring if the project is meeting its environmental targets.

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 pillars of sustainable development.

FURTHER RECOMMENDATIONS:

Continue prioritising brownfields over greenfields: 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*).