

## EU urban agenda – response

The **Convention of Scottish Local Authorities (COSLA)** is the representative voice of the Scottish Local Authorities both nationally and internationally and it has long been advocating strong, consistent EU Territorial Cohesion policy in which local communities are given the means to prosper and where the partnership principle, whereby Local Authorities are fully involved in the design and implementation of the programmes, is fully applied.

- 1. What are the main rationales for an EU urban agenda?  
Where can EU action bring most added value?  
What elements of urban development would benefit from a more concerted approach between different sectors and levels of governance?**

We welcome that urban issues have more prominence in EU policies for the new 2014-2020 period.

COSLA also notes that even if programmes are being implemented for this period the Commission, Member States and stakeholders are thinking in the future shape of EU urban policies.

While we are also pleased to see the prominence of Urban Agenda, we see this as one of the strands of a more comprehensive Territorial Development and indeed Local Development policy that looks into the impact of urban policies in the immediate surrounding rural areas. Whilst statistics and maps show a clear boundary, the reality is that these areas often work well together and therefore policy must be careful not to create divides which are detrimental to both areas.

Looking at a policy intervention on the merits that is in an urban area is a false premise. For instance transport is a thematic policy which applies to urban and rural. Rather than defining policy of what kind of place it is the focus should be looking first on what is the problem we are trying to address be that on an urban, rural or rural-urban area.

- 2. Should an EU urban agenda focus on a limited number of urban challenges?  
Or, should an EU urban agenda provide a general framework to focus attention on the urban dimension of EU policies across the board, strengthening coordination between sectoral policies, city, national and EU actors?**

We believe that an urban policy is not (and cannot be) just about large cities. For instance ALL Scottish Councils (average population 100,000) are much larger than many cities in Europe, some of them are so large that they cover several towns and small cities. So we need to look at the urban problems wherever they are rather than whether a Local Authority is formally designated as a city or not. Equally defining urban areas just by population can be misleading, in Scotland we have rural Local Authorities that have far more population than urban local authorities, hence the definition of urban requires looking at density, urban pattern and economic and social behaviour.

An EU urban policy should look at the interaction of functional areas as well as urban rural relationships. We see **urban policy as one of the pillars of a much larger EU Local Development policy**. It should look at urban issues at city level, neighbourhood level (where levels of deprivation concentrate) but also at the complex set of relationships with neighbouring urban areas as well as rural areas.

For that reason COSLA has had a prominent role in helping develop the new Community Led Local Development vision covering all regional and Rural Policies and to the recent RURBAN vision developed by OECD which aims to find better ways for rural and urban areas to work together. Thus a new EU urban policy should complement those other policy work streams rather than being seen as a stand-alone issue.

**3. Is the European model of urban development as expressed in "Cities of Tomorrow" a sufficient basis to take the work on the EU urban agenda further?**

In terms of best practices in Scotland all Local Authorities, we have by law, Community Planning Partnerships (CPPs) that are made up by Local Authorities, other public bodies operating in the area and voluntary and private stakeholders. This is not a simple consultation mechanism. It takes collective decisions that are binding in all its members. We would be keen that such approach is set up also at European Level. Clearly all Commission DGs need to have a more structured linkage on urban (or local) issues than the more ad hoc approach as at present, the new structure of teams of Commissioners could be used to progress this coordination with a lead Commissioner for urban/Local issues that could coordinate the rest.

We also believe that the Scottish model of Single Outcome Agreements jointly set up between the Government and each Local Authority could be replicated at European level: there is the need also in Europe to look less at inputs or outputs and much more clearly on outcomes.

This Scottish approach is more ambitious than the new focus on results of the new EU funds and we are happy to work with the Commission to see how the Scottish experience could be used to improve the quality of EU programmes, which only recently have moved from being input-based to output-based.

We are concerned that in the Commission proposal does not mention the international agreements on urban development namely the future UN HABITAT III sustainable development goals in urban areas and the new ISO Standard TC/268 on Sustainable Development in urban communities. Both will definitely frame any future EU policy in urban areas and we are seriously concerned that these new global policies are being developed out of sync with this new EU urban agenda.

**4. How can urban stakeholders better contribute to the policy development and implementation processes at EU level?  
Do cities need to be more involved in policymaking at regional, national and EU level? How?**

The EU should not have legislative powers on urban issues, and certainly not transport, planning and social policy which are local powers and should remain so.

This would run against the principle of subsidiarity. We have seen as early as this year an attempt by the Commission to confer to itself powers on urban mobility. It was only due to the concerted action of local authority bodies such as COSLA and national governments that this was ruled out in the end. However this was more a tactical retreat than an admission that the EU Treaties (as COSLA argued at the recent Balance of Competence review) do not confer the EU explicit powers on urban policy – though it does indirectly via internal market, environment (noise, air quality, waste, building standards).

Thus the EU should to its best to optimise and streamline its very diverse policies and support tools areas to improve the conditions of its communities and provide the services they need.

Finally there needs to be a better collaboration between the intergovernmental work on urban issues and that of the Commission, building on the Code of Conduct on Partnership. But for that to work we believe that a more ambitious involvement of Local representatives than at the moment: we have the Committee of the Regions, the Council of European Municipalities and Regions (CEMR) and other networks and there are consultations going on but frequently these interactions

do not add up; we should think how to make the dialogue between the different players more effective

**5. What are the best ways to support a stronger urban and territorial knowledge base and exchange of experience?  
What specific elements of the knowledge base need to be strengthened in order to better support policymaking?**

Furthermore, there are other areas of EU policy not related to funding such as State Aid, Procurement, Environmental Legislation that are not necessarily helpful for Local Authorities including urban areas.

Perhaps the solution would be to have better **Territorial Impact Assessment** that local stakeholders can help the Commission anticipate what the local problems of EU legislation are, and which again COSLA is helping to scope. Indeed TIAs (such as being developed by CoR) could also be a good tool for achieving Better Regulation, as we are precisely arguing in the ongoing public consultation.

In addition to the need of a more integrated approach, better impact assessment and a more strategic dialogue with local and regional representatives we believe there are more work to do in having better data at European level.

At the moment the European statistics are for the most part from the NUTS II level. This in many countries such as Scotland or the UK do not reflect real places and real communities. They are just statistical areas defined for the EU. This results in many Eurostat statistics not reflecting a true picture of what happens in our local areas.

In Scotland we have additional indicators such as the Scottish Index of Multiple Deprivation that provide a very detailed picture of what is the social make up not of our cities but it goes down to neighbourhood level.

If then EU is to have better urban policies it needs accurate data of what happens on the ground. Equally we need to move from measuring well-being than by looking at GDP alone. In Scotland we use other indicators to measure quality of life and the EU could take inspiration of our and other examples.

We all know that this is a sensitive issue as EU funds continue to use GDP as the main criteria to allocate monies. However we are years away before the negotiations next round of EU funds – this is a great opportunity to do so.

**6. What should be the roles of the local, regional, national and EU levels in the definition, development and implementation of an EU urban agenda?**

We also expect from the Commission a consolidation of instruments supporting cities or urban areas. At the moment there is on one hand a “bidding war” between different parts the Commission to propose urban projects or policy solutions. This can be understandable to a certain extent but makes difficult for individual Councils to understand what the EU can do to help cities develop.

Many EU initiatives have risen in the last years, supporting actions of cities and accompanying them in their efforts towards sustainable and integrated urban development: *the Leipzig Charter, Reference Framework for Sustainable Cities, Covenant of Mayors, URBACT programme, the Territorial Agenda 2020, the RURBAN initiative, sustainable urban development under ERDF, sustainable urban development objectives in the 7th Environment Action Programme, etc.*

These multitudes of initiatives are sometimes overlapping and difficult to understand; therefore we agree that a more coherent EU approach would be useful. A consolidation would thus be welcome: if practitioners find it difficult to follow all this, let alone the general public.

Secondly we expect the EU to make things easier for cities to work together. Sometimes EU rules such as procurement or state aid do not help cities and urban areas to work together to deliver jointly new services or innovative approaches to policy. While nobody doubts that EU rules should exist to prevent unfair business practices and barriers to the EU internal market these EU rules act often as a disincentive for local areas to cooperate locally and develop innovative approaches.

Finally there is a need for a better coordination of the policy developments currently ongoing in the Council of Ministers under the original impulse of the Netherlands, the Lithuanian and now the Italian Presidency. Our exchanges to date at intergovernmental level show that we happen to be discussing the same issues but on entirely different premises so there is a risk that both discussions, at EU and at intergovernmental level end up talking across purposes.

Finally on the issue of empowerment of local and regional authorities and cities themselves, the new EU programmes were supposed to drive a much stronger local, and indeed urban dimension. However problems of design of the policies (i.e. the audit and reporting barriers that still remain across the ESF), intergovernmental issues (policy communities organised vertically rather than across policies, Commission DGs and ministries) certainly diminish the scope for these local or urban integrated development EU funded instruments to be used, as clearly shown in the two recent surveys on the Partnership Principle and the use of Integrated Territorial Investments in the new 2014-2020 period carried out by CEMR.

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