

Working Group Europe
of the German Association
for Housing, Urban & Spatial Development
(Deutscher Verband für Wohnungswesen, Städtebau und Raumordnung e.V.)

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Response to the communication from the Commission
The urban dimension of EU policies - key features of an EU urban agenda COM (2014)
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The German Association is a non-governmental organisation that serves as a discussion platform for representatives of federal, state and municipal governments as well as representatives of the housing sector, banks and other business organisations for the purpose of discussing matters pertaining to the sphere of activities of the Association and drafting joint statements. These statements do not replace the statements of the respective governments and organisations, but integrate various views and emphasise commonalities.

At its meeting on 18 September 2014, the Working Group Europe deliberated in detail on the communication from the Commission on the "urban agenda" and issued the following statement on the issues raised in the communication:

Q 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?

1. Considerations on an EU "urban agenda" should be informed and guided by the following:
 - The EU has no jurisdiction over urban development.
 - At the same time, though, individual sectoral policies of the EU do have substantial impacts on the development of the cities of its Member States.
 - The cities are the drivers of growth, innovation, education and integration, but they also are melting pots for social problems within the EU.
2. From this follows that the fundamental documents of the EU - such as the follow-up of the EU 2020 Strategy - and the measures under the EU's sectoral policies must take into account, early on and while they are being developed, the respective consequences for the cities and the interactions with other policy areas.
3. This is best achieved by way of a guiding principle, an "urban agenda". Such an informal document should inform the EU and its sectoral policies about the impact of their ideas on urban spaces, social objectives and problems as well as political approaches

(e.g., integrated approach) in order to take these and the respective contexts into consideration right from the beginning. This corresponds to an urban impact assessment, based on a given guiding principle.

4. An "urban agenda" with legally binding elements or an announcement of subsequent legal acts, however, is to be dismissed. Also the attempt, to obligingly coordinate the sectoral EU policies regarding an urban dimension by means of an "urban agenda" would be doomed to fail, referring to Germany's experiences with a federal spatial planning programme in the 1980s.
5. Ideally, the Member States would also provide an informal "urban agenda" for their own sectoral policies. This, however, requires that the "urban agenda" is prepared in close coordination with the Member States.
6. An EU "urban agenda" in that sense must not focus just on major cities, especially not those that are growing and emerging. Instead, it must also consider small and medium-sized cities, as well as metropolitan areas and urban-rural interrelations. Overall, such an agenda must be open to the diversity of the urban landscape in the Member States and reflect the polycentric approach of European cities. It should be linked substantially with the Territorial Agenda of the EU.
7. Particularly EU measures that affect and change cities the most, can achieve the greatest added value by taking into account an "urban agenda". This is true, for example, of energy efficiency, transport and environmental policies, the Digital Agenda as well as EU procurement law..
8. Urban development requires, in particular, a spatially integrative perspective as well as integrated planning that connects and balances sector-based planning, as already described in the Leipzig Charter. That charter has shown that the instrument of integrated urban development can help to overcome sectoral thinking and actions, organise comprehensive public participation and balance the various interests.

Q 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?

1. The alternatives broached in these questions are not mutually exclusive. An EU "urban agenda" should contain a general part in line with the second question, and a special part that illustrates it on the basis of a limited number of urban challenges and EU policies. Under no circumstances should the integrated approach of the Leipzig Charter, with its open thematic spectrum, be narrowed to only a few subject areas. The second approach of the Leipzig Charter is also important, as it points to the socio-geographic

impact of other political approaches . Special attention must be paid in an overall urban context to deprived urban neighbourhoods and population groups. This is not only the responsibility of urban and social politics, but of all polities.

2. The keywords "coordination, integration and bundling" describe the key objectives of an "urban agenda" appropriately. However, the expectations in this context should not be set too high. Relevant is a mutual understanding: the sectoral policies must recognise an urban dimension of their instruments, and cities must recognise the necessary sectoral measures. Both taken together will achieve the intended added value of EU policies. Beside an "urban agenda", such a process of understanding needs a dialogue between those in charge of sectoral policies and the national actors responsible for urban development. This does not require new bodies and procedures; specifically-themed events with alternating participation of professional stakeholders are usually more efficient.

Q 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?

It is appropriate to note here that the work on an "urban agenda" does not have to start at zero. Instead, it should build upon the large number of existing documents - particularly those that emerged from cooperation between Member States. In this context, the process should be based on the Leipzig Charter and the other documents of Member State cooperation. Concentrating merely on one document would raise the impression that a new expert discussion should be avoided. However, since an "urban agenda" as an informal instrument can be only as effective as it is technically persuasive in convincing the widest possible spectrum of actors, its substance should be coordinated and harmonised as widely as possible - including the sectoral policies.

Q 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 idea that the cities, through their national associations, the Council of European Municipalities and Regions (CEMR) and other organisations, and in the comprehensive understanding of recommendation no. 5 for Q 1, should be involved more closely in policy making at regional, national and EU levels is strongly supported. Being the "fourth column" of state organisation (EU, national, regional, municipal), they are often not accorded the necessary importance in decision processes. But this cannot be changed fundamentally by an informal "urban agenda". Even the creation of a new body does not guarantee a remedy, as the large number of existing bodies dealing with urban development demonstrates. A positive example to be highlighted in this context is the Urban Intergroup of the European Parliament, which discusses different EU poli

cies from an urban perspective and includes urban representatives. What is really needed is an improved "early warning system" for planned new EU policy approaches, or those that are to be modified, so as to allow for a broad debate on their impact on cities. It is then the task of cities and their organisations to participate in such a debate. To do so, cities and/or their organisations in the Member States and at the EU level must provide more administrative force for EU matters.

Q 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?

1. The knowledge base on the situation of German cities is insufficient. This is particularly true of data on specific city districts. From this point of view, the impression that the availability of knowledge and data is not a problem is wrong. Only too often, information required for a specific political decision cannot be supplied in limited time frames.
2. This is why a dialogue between decision makers and knowledge carriers is needed ahead of political initiatives. Such a dialogue must clarify the data required as well as the form, the time and the costs with which it can be provided.
3. An "urban agenda", as an informal instrument of an urban impact assessment of fundamental and sectoral EU policies should be evaluated scientifically in terms of its impact in order to be able to monitor and develop further this political approach in the medium term.

Q 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?

1. The acceptance and effect of an informal "urban agenda" depends on the consensus on the contents among decision makers, to whom it is addressed. This requires a broad harmonisation process not only in urban development and territorial cohesion, but also with sectoral policies. This takes time, continuity as well as sufficient human and financial resources.
2. After an enlargement of the EU, the option of working out an agenda solely through cooperation among Member States and with the involvement of the COM will likely be off the table. Since, however, the "urban agenda", as it is understood, is to address EU relevant policies first and foremost, there are no concerns about the COM taking charge and conducting its own broad participatory process with Member States, Länder, regions and municipalities.
3. To establish the proper significance of the "urban agenda" also in the Member States in terms of national sectoral policies, it is recommended that the Member States, too,

conduct appropriate harmonisation processes and share the results with the COM process.

4. During participatory processes, it is important that the objective of an "urban agenda" as an informal instrument for integrating the urban dimension into the EU's general and sectoral policies is communicated right from the beginning without being changed in the course of the process. The decision-makers of sectoral policies must be convinced of the added value of instruments, planning and measures geared to the "urban agenda".