



**European Committee
of the Regions**

ENVE-VI/043

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OPINION

Towards sustainable neighbourhoods and small communities – Environment policy below municipal level

THE EUROPEAN COMMITTEE OF THE REGIONS

- aims to make sure that the needs of all types of communities are taken into account in EU environmental policies; underlines that this opinion focuses on sub-municipal communities such as neighbourhoods as part of an urban municipality or villages as part of a rural municipality; asserts that important environmental specificities can be found both at and below the municipal level;
- stresses, in particular, the need to take into account specific territorial situations, which encounter particular environmental challenges. On account of their remoteness, these areas sometimes possess unique natural features that give them disproportionate ecological importance: small islands, sparsely or underpopulated areas, mountain or lake areas;
- acknowledges the varied contexts within which small communities find themselves, ranging from urban to rural areas, from densely to sparsely populated areas, and from wealthy to deprived areas;
- maintains that the sustainable communities concept should be aimed at regenerating poor or vulnerable areas by combining social and environmental objectives;
- strongly believes that the EU should consider the specific needs and contributions of small and sub-municipal communities in the formulation and implementation of its environmental policies; considers that the successful implementation of many EU and national environmental policies depends on their ownership by, and the contribution of, sub-municipal communities;
- proposes to identify mechanisms for taking sub-municipal issues into account in the formulation of CoR opinions and for bringing them to the attention of the EU institutions and bodies;
- commits to a dialogue with the European Commission, including in the framework of the Technical Platform for Cooperation on the Environment, to ensure that small communities below the municipal level are adequately taken into consideration in the implementation of specific EU environmental policies. This could build on existing efforts by DG ENV and other DGs to provide guidance documents and tools focused on small communities and neighbourhoods;
- emphasises the importance of enabling sub-municipal actors to access EU funding programmes.

Rapporteur

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Opinion of the European Committee of the Regions – Towards sustainable neighbourhoods and small communities – Environment policy below municipal level

I. POLICY RECOMMENDATIONS

THE EUROPEAN COMMITTEE OF THE REGIONS

A. Understanding sustainable neighbourhoods and small communities

1. appreciates the integrative nature of the UN Sustainable Development Goals (SDGs), and in particular Goal 11 "Sustainable Cities and Communities" that calls for "inclusive, safe, resilient and sustainable" human settlements;
2. wishes to highlight the key role of democratic and inclusive multi-level governance in partnership between all levels, including where appropriate also the levels below the municipal one where different models and entities exist with more or less formalised structures, competencies and resources; involving them in multi-level governance could be very helpful for the development and effective implementation of policies and for the legitimacy of the democratic system itself; notes that this is particularly true for policies in areas which respond to serious concerns of citizens and where both the challenges and the policy responses deeply affect citizens lives, such as environmental matters and climate change;
3. recalls the numerous existing efforts aimed at promoting sustainable communities, which call for societal transformation to address new forms of social, economic and environmental inequalities. These include the EU Urban Agenda and its partnerships, the Leipzig Charter on Sustainable European Cities, the Aalborg Charter and Commitments, the Basque Declaration, the New Urban Agenda, and many more;
4. in keeping with Priority 1 of the CoR for 2015-2020 "Creating jobs and sustainable growth in cities and regions to provide a better quality of life for citizens", calls to promote the concept of sustainable communities that involves all areas in those communities, and that also ensures that less wealthy areas can get the necessary opportunities to develop sustainable solutions;
5. maintains that the sustainable communities concept should be aimed at regenerating poor or vulnerable areas by combining social and environmental objectives, in line with the CoR opinion on "The Seventh Environment Action Programme and the sustainable city";
6. refers to the CoR opinion "Towards an 8th Environmental Action programme", aiming to make sure that the needs of all typologies of communities are taken into account in EU environmental policies;
7. considers that the successful implementation of many EU and national environmental policies depends on their ownership by, and contribution of, sub-municipal communities;
8. asserts that important environmental specificities can be found both at and below the municipal level. Environmental challenges can have specific effects in different sub-municipal units;

underlines that it is therefore important to develop holistic approaches at each level that take due account of more localised/differentiated situations which may require specific responses and input;

9. recognises that responsibility for sub-municipal communities, and for their involvement, rests with the levels of governance in the Member States that are responsible for the sub-municipal level. The competent local and regional authorities have an important responsibility for their whole territory, which needs to be taken seriously; calls on them to actively involve and support sub-municipal levels in the implementation of environment policy and to empower local inhabitants to make their communities more sustainable;
10. recognises the diversity of terminology employed in relation to these types of communities, amongst others hamlets, neighbourhoods, districts, wards, sectors, villages, parishes, boroughs. These terms may refer to administrative units, or to communities without an administrative role. This opinion therefore uses in equivalent fashion the expressions "below the municipal level" and "sub-municipal";
11. acknowledges the varied contexts within which small communities find themselves, ranging from urban to rural areas, from densely to sparsely populated areas, and from wealthy to deprived areas;
12. stresses, in particular, the need to take into account specific territorial situations, which encounter particular environmental challenges. On account of their remoteness, these areas sometimes possess unique natural features that give them disproportionate ecological importance:
 - a. small islands may face physical separation from the rest of the municipalities of which they are part, which hinders access to services and decision-making processes, generates high dependency on external inputs and weak administrative autonomy. Cooperation with the Interregional group on Insular Regions of the CoR, as well as with other networks such as Clean Energy for EU Islands, the European Small Islands Federation, the European Small Islands Network and with activities connected with the newly established Mediterranean Insularity concept should be promoted and expanded;
 - b. sparsely populated and underpopulated areas are often at a significant distance from the rest of the municipality. Cooperation with existing networks such as the Northern Sparsely Populated Areas network, the Southern Sparsely Populated Areas network and Euromontana should be promoted and expanded;
 - c. sub-municipal communities in areas with specific geographic profiles, such as mountain or lake areas;
13. recognises the importance of small municipalities but underlines that this opinion focuses on small communities below the municipal level that face different challenges. Sub-municipal communities might not have (i) elected representatives to monitor the environmental impact of projects in order to ensure compliance with EU environmental legislation; (ii) public spaces to

discuss involvement in EU projects or activities, or how to implement an EU policy at local level; and (iii) budgets to cover even minimal costs or technical expertise to provide know-how on how to access EU funding;

14. highlights the diversity of institutional forms existing at the sub-municipal level, including but not limited to official public bodies, other forms of participation organised by or in cooperation with public authorities, and local committees and activist groups;
15. stresses that the sub-municipal level, precisely because of the many varieties of organisational forms across the member states' territories and the often less formalised organisation, offers great potential in terms of participatory and democratic experimentation to develop new forms of involvement and communication (such as neighbourhood communities, village committees, participatory laboratories and fora); recalls that in particular environmental and climate change activities have enormous mobilisation potential for citizens in this sense;
16. recognises the role of voluntary grassroots organisations of citizens in small communities in local associations and committees aimed at working on a single environmental issue or more in general to promote sustainable actions. While these groups can bring together resources, skills, energy, and motivation, local and regional authorities can play a key role in empowering them through technical and financial support, as well as regular consultations;

B. Pathways to strengthen environmental policy below the municipal level

Across domains of application

Low emission development

17. points out that sub-municipal communities are typically those most immediately affected by environmental issues such as air quality or noise, having little control over decisions linked to transport and mobility, and notes that these issues are unequally distributed over territories. It is crucial for environmental monitoring mechanisms to disaggregate data below the municipal level, in order to allow for targeted measures and solutions;
18. supports the development of a coherent guidance framework below the municipal level and specifically islands, in relation to the mitigation of climate change, facilitating their transition to renewable clean energy. Inspiration could be drawn from the streamlining of the Pact of Islands into the Covenant of Mayors for Climate & Energy, and could involve existing initiatives, such as the Clean energy for EU islands initiative and the Climate Active Neighbourhoods Interreg project;

Nature-based development

19. encourages the involvement of small communities (in particular insular, mountain or rural ones) in the management of natural areas, which frequently do not follow municipal boundaries. Such involvement could increase local ownership of environmental policy choices and reduce

conflicts around questions such as land use. Participation could further increase awareness of the socio-economic benefits of protected natural areas, whether Natura 2000 areas or other;

20. promotes the role of communities below the municipal level in the implementation of Nature-Based Solutions, including green corridors or belts, urban trees, as well as peri-urban nature areas. These efforts should provide equitable access to nature, and its benefits in terms of human health, climate mitigation and adaptation, and broader resilience to human or natural hazards;

Circular development

21. calls for tailored technical support by the competent levels of governance for small communities to implement sustainable wastewater management and waste management practices and to also address marine and coastal pollution via zero-waste strategies, and calls for the promotion of existing initiatives such as for example the OECD project supporting cities and regions on the circular economy;
22. encourages the development of measures to support socially-innovative practices at the sub-municipal level, ranging from loan groups that share objects and tools locally, to repair groups that allow members to repair items that would otherwise be discarded;

Resilient development

23. promotes the spread of microclimate interventions to adapt to climate change, particularly in densely built-up urban neighbourhoods. These can include low-cost solutions, as well as more complex neighbourhood-level ones, such as the disconnection of buildings from sewers for improved storm water management. Interventions of this sort have the potential to increase resilience in sub-municipal areas sensitive to natural hazards by alleviating stress on critical infrastructure;
24. encourages members of the CoR to foster regenerative food systems, which generate ecological, economic and social benefits at and beyond the sub-municipal level (e.g. local school or community gardens, community-supported agriculture or innovative farming methods);
25. highlights sustainable tourism as an opportunity for growth in small communities, as outlined in the "Sparsely populated and under-populated areas" briefing of the European Parliament Research Service and the past opinions of the CoR on tourism¹ and cultural heritage²;

Equitable and people-centred development

26. urges the EU to recognise the role of the multiple and innovative forms of participatory democracy in promoting sustainable communities, in particular at the sub-municipal level. This potential could be further strengthened by explicitly taking the democratic innovation

¹ NAT-VI/009 ([OJ C 185, 9.6.2017, p. 15](#))

² SEDEC/VI-035 ([OJ C 361, 5.10.2018, p. 31](#))

element into account in relevant pieces of EU environmental policies or as an element of EU project support;

27. points to the successful and long-standing Local Agenda 21 (LA21) efforts, as a starting-point for the inclusion of the sub-municipal level in environmental policy. Over the past decades, LA21 initiatives have supported local authorities in the implementation of strategies and actions for local sustainability, through the sharing of methods, tools and best practices;

Across policy processes

Recognition

28. strongly believes that the EU should consider the specific needs and contributions of small and sub-municipal communities in the formulation and implementation of its environmental policies;
29. proposes to identify mechanisms for taking sub-municipal issues into account in the formulation of CoR opinions and in bringing them to the attention of the EU institutions and bodies, as well as developing closer cooperation with the appropriate organisations and networks dealing with or representing sub-municipal structures at EU level;
30. encourages the members of the CoR to interact individually with sub-municipal communities in their own territories and to bring their experiences for discussion at the CoR and integrate them into their work, in particular in CoR opinions, peer-to-peer exchanges and potentially the Technical Platform for Cooperation on the Environment (DG Environment and the European Committee of the Regions);
31. aims to make explicit reference to communities below the municipal level in the CoR priorities for the post-2020 period;
32. recalls the Union's overall commitment to the promotion of social, economic and environmental cohesion, notably with the aim to reduce disparities between the levels of development of the various regions (both islands and mainland), in accordance with Article 174 of the Treaty on the Functioning of the European Union and stresses the important role of sub-municipal levels of governance in this respect;
33. proposes to assess the possibility of extending the Division of Powers portal, by adding, where relevant, an additional section for each Member State concerned, covering entities below the local level, starting from an analysis of their roles in environment and climate change policy;
34. calls on the European Commission to assess the possibility of establishing a Sustainable Neighbourhood Award, in order to encourage local communities to get involved in managing their own areas and of organising a single or recurrent event to promote interaction with small communities, such as an annual "European Day of Sustainable Villages and Neighbourhoods";

Awareness-raising

35. offers to promote broader recognition of the importance of the sub-municipal level in local environmental policy among the other EU institutions and bodies. This could include advocating for the inclusion of the sub-municipal level in future policy documents and in revisions of existing strategies from EU institutions and bodies;
36. advocates raising awareness of the sub-municipal level via EU research and innovation projects (Horizon 2020 and Horizon Europe) as well as by cooperating with the European Environment Agency (EEA) and EU research services;
37. commits to a dialogue with the European Commission, including in the framework of the Technical Platform for Cooperation on the Environment, to ensure that small communities below the municipal level are adequately taken into consideration in the implementation of specific EU environmental policies. This could build on existing efforts from DG ENV and other DGs to provide guidance documents and tools focused on small communities and neighbourhoods;

Communication and dissemination

38. agrees to assess the possibility of making material pertaining to EU networks and activities of particular interest for small communities available on the CoR website, by providing information on networks, programmes and events, as well as collecting relevant contributions;
39. commits to assessing ways to promote recognition of environmental achievements at the level of small communities, highlighting best practices and encouraging replication of sustainable solutions. This includes exploring integration with existing recognition systems and EU level awards, in line with practices from the European Green Capital and European Green Leaf Awards, the Natura 2000 Awards, the Transformative Action Award, and the European Week for Waste Reduction Awards;
40. underlines the importance of including the topic of environmental implementation in communities below the municipal level in the annual theme or programme of recurring EU level events on the environment such as Green Week, the European Week for Waste Reduction, or the European Week of Regions and Cities;
41. supports the adapted use of ICT to better connect sub-municipal communities both amongst themselves and with their respective local governments in order to foster democratic participation and decision-making;

Funding

42. emphasises the importance of enabling sub-municipal actors to access EU funding programmes. Some already target the neighbourhood level, such as the URBACT programme, which fosters European exchange and learning for sustainable urban development. In this regard calls for

appropriate training for the staff of the sub-municipal level communities in order to achieve effective use of EU funding;

43. considers community-led local development (CLLD) and LEADER Action Groups as specific tools to better mobilise and involve the sub-municipal level in pursuing long-term development and achieving the Europe 2020 Strategy goals;
44. encourages the European Commission to assess the best way to ensure that small communities can contribute to, and benefit from, EU-funded projects promoting sustainability below the municipal level. This could be achieved through: (i) the inclusion of specific references to small communities in guidance documents and handbooks; (ii) the preparation and publication of calls for interest and/or work programmes specifically targeting communities below the municipal level; and (iii) the simplification and the streamlining of financial and eligibility rules to encourage and facilitate their participation (e.g. re-granting) in order to promote the overall harmonious development of the EU (Article 174 TFEU).

Brussels, 12 February 2020

The President
of the European Committee of the Regions

Apostolos Tzitzikostas

The Secretary-General
of the European Committee of the Regions

Petr Blížkovský

II. PROCEDURE

Title	Towards sustainable neighbourhoods and small communities - Environment policy below municipal level
Reference(s)	-
Legal basis	Own-initiative
Procedural basis	Rule 41(b)(ii)
Date of Council/EP referral/Date of Commission letter	-
Date of Bureau/President's decision	25 June 2019
Commission responsible	ENVE
Rapporteur	Gaetano ARMAO (IT/EPP)
Analysis	3 October 2019
Discussed in commission	19 September 2019
Date adopted by commission	21 November 2019
Result of the vote in commission (majority, unanimity)	Unanimity (1 abstention)
Date adopted in plenary	12 February 2020
Previous Committee opinions	-
Date of subsidiarity monitoring consultation	-