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TARGETED ANALYSIS //

URDICO

Urban Dimension of Cohesion Policy
and other EU Programmes

Annex 4.6 - Strasbourg Study Report // January 2026



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This document is a final report.

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The final version of the report will be published as soon as approved.

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Abbreviations

CP	Cohesion Policy
EC	European Commission
EMS	Eurométropole de Strasbourg
AFCCRE	French Association of the Council of European Municipalities and Regions
ANCT	National Agency for Territorial Cohesion
ARF	Association of French Regions
ATI	Integrated Territorial Approach
CCT	Cross-Border Cooperation Committee
CEMR	Council of European Municipalities and Regions
CGET	General Commissariat for Territorial Equality
CPER	State-Region Plan Contract
CRII	Coronavirus Response Investment Initiative
CRTE	Contract for the Recovery and Ecological Transition
DATAR	Interministerial Delegation for Territorial Planning and Regional Attractiveness
DGEFP	General Delegation for Employment and Vocational Training
DREETS	Regional Directorate for Economy, Employment, Labour, and Solidarity
EAFRD	European Agricultural Fund for Rural Development
EIT	European Institute of Innovation and Technology
EMFAF	European Maritime, Aquaculture and Fisheries Fund
EMFF	European Maritime and Fisheries Fund
EPCI	Inter-municipal Cooperation Body
ERDF	European Regional Development Fund
ESF	European Social Fund
ESIF	European Structural and Investment Funds
EU	European Union
EUR	Euro
ICLEI	Local Governments for Sustainability
INCOPAP	National Partnership Consultation Body for the Partnership Agreement
ITI	Integrated Territorial Investment
JTF	Just Transition Fund
MAPTAM	Law on the Modernisation of Territorial Public Action and Affirmation of Metropolises
MOT	Cross-Border Operational Agency
NOP	National Operational Programme
NPNRU	National Urban Renewal Programme
PCAET	Territorial Climate-Air-Energy Plan
PLH	Local Housing Program
PLU	Local Urban Plan
PLUH	Local Urban and Housing Plan
PLUI	Intercommunal Local Urban Plan
POS	Land Use Plan
PTRTE	Territorial Pact for Recovery and Ecological Transition
PUI	Integrated Urban Programme
QPV	Priority Urban Districts
RDP	Rural Development Programmes
REACT-EU	Recovery Assistance for Cohesion and the Territories of Europe
ROP	Regional Operational Programme
RRF	Recovery and Resilience Facility
RRP	Recovery and Resilience Plan
SCOT	Territorial Coherence Plan
SD	Master Plan
SDG	Sustainable Development Goal

SGAE	General Secretary for European Affairs
SME	Small or Medium-Sized Enterprise
SO	Strategic Objective
SRADDET	Regional Plan for Sustainable Development and the Equality of Territories
SRU	Law for Urban Solidarity and Renewal
SSE	Social and Solidarity Economy
TMR	Trinational Metropolitan Region of the Upper Rhine
TO	Thematic Objectives
UCLG	United Cities and Local Governments
ZUS	Sensitive Urban Zones

1 Summary

Strasbourg is the main metropolitan area in the East of France, it is the capital city of the *Grand Est* region and it is also one of the capital city of the European Union. Considering the income inequalities and high poverty rates in some parts of this prosperous conurbation, social and territorial cohesion is a major challenge. The area is governed by the *Eurométropole de Strasbourg* (EMS), a framework of metropolitan cooperation that was established in the late 1960s. EMS has large competencies regarding housing, spatial planning, economic development, transport, environment, culture, and so on. Metropolitan governance is remarkable, resulting in ambitious local policies regarding mobilities, biodiversity, health, or economic and social development.

Like other French *métropoles*, EMS is not included in the design of the EU Cohesion Policy at the national level. However, since 2002, EMS acts as an intermediary body with a full delegation for managing ERDF and ESF. This has long been a unique case in France – the Mulhouse conurbation, also located in the Grand Est region, has the same status for the 2021-2027 programming period. EMS has developed very strong technical capacity in managing an ITI over the last two programming periods. The priorities defined are closely aligned with the EMS's integrated urban strategy. The ITI subsidizes private projects led by SMEs or social and solidarity economy stakeholders. Such support ensures a strong presence of the EU priorities locally.

During the 2021-2027 period, the ITI amounts to 15.1 million euros funding and in only two years this sum has been totally assigned to projects. The support to local actors creates a leverage effect: every euro invested has 2 euros as counterpart. EMS also applies to direct EU programs (INTERREG, Horizon, Life, sectoral programs, etc.) to support especially its projects in energy, mobility and biodiversity. But the EU funding mobilized by Strasbourg through EU joint or direct funds is around 100 times less than the huge investments needed, which have been estimated to a total of 2 billion euros for the 2021-2026 period. Another critical issue is that EU programs do not trigger cooperation between EMS and other institutional, social, or economic partners beyond its administrative boundaries, except in cross-border projects. The added value of EU funding in Strasbourg is qualitative, not quantitative, and it is restricted to the urban core, with little connection to other parts of the metropolitan functional area. In a period when EMS must rethink territorial development, reduce greenhouse gas emissions, save resources like water and soil, and preserve biodiversity, it cannot count on EU Cohesion funds to help its strategy.

Considering the situation of Strasbourg and the challenges it meets, the following policy recommendations are made to EMS:

- In collaboration with other metropolitan and large urban areas at the national and European levels, claim a role in defining EU cohesion policy for the post-2027 programming period and in discussions on the Social Climate Fund.
- Regarding the future EU funded programmes developed by regional authorities, advocate for EMS to be able to freely select the thematic areas to be included in the ITI.
- While maintaining the ITI at the service of the EMS territory, mobilize European programs to conduct collaborative and integrated projects in the Strasbourg metropolitan region. Cooperation between EMS and other institutional, social or economic partners beyond its administrative limits can contribute to the ecological transition of the wider metropolitan territory.

2 Introduction

In France, Strasbourg is located at the border with Germany in the historic region of Alsace. It is the capital and largest city of the Grand Est region. It is also the official seat of the European Parliament.

In 2022, the city proper had 291,709 inhabitants (+4.45 % as compared to 2016) and the Eurométropole de Strasbourg (EMS) which gathers 33 municipalities had 517,386 inhabitants. More than half of the EMS population (56%) is concentrated in the city of Strasbourg. EMS is an intermunicipal form of metropolitan government which exists since the late 1960s. It has major competencies like spatial planning, economic development and innovation, housing, culture, transport, and so on. By delegation from the Grand Est region, EMS manages ESIF funds in the form of an ITI.

The Strasbourg functional urban area (called in French '*aire d'attraction des villes*')¹ covers 268 municipalities and it had a population of 864,993 in 2021, not counting the section across the border in Germany. This makes the functional urban area the eighth largest one in France and home to 13% of the Grand Est region's inhabitants. The cross-border Eurodistrict Strasbourg-Ortenau had a population of 1,010,514 inhabitants in 2020.

Alongside Brussels and Luxembourg, Strasbourg is one of the three main capitals of the European Union, as it is the seat of several European institutions, such as the European Parliament, the Council of Europe (with its European Court of Human Rights, its European Directorate for the Quality of Medicine, its European Audiovisual Observatory), the Eurocorps, as well as the European Ombudsman of the European Union. The city is also the seat of many non-European international institutions such as the Central Commission for Navigation on the Rhine and the International Institute of Human Rights. It is the second city in France in terms of international congress and symposia, after Paris.

Strasbourg's historic city centre, the *Grande Île* (Grand Island), was classified a World Heritage Site by UNESCO in 1988, the first time such an honour was placed on an entire city centre. Strasbourg is immersed in Franco-German culture and although violently disputed throughout history, it has been a cultural bridge between France and Germany for centuries.

The population of the EMS is ageing: the proportion of people between 60-74 years of age and 75 years or more old increased by 2% and 1% respectively between 2009 and 2020, while lower age ranges remain stable. They represented 14% and 8% respectively of the total population in 2020. The level of education has increased in the EMS in the last decade: between 2009 and 2020, while individuals who only received primary education decreased from 26% of total population in 2009 to 18% in 2020. Meanwhile those who obtained a tertiary education diploma increased from 31% to 41% in the same period. In 2021, 26% of the population (35 000 households) of the city of Strasbourg lived below the poverty line, i.e., less than EUR 1 063 per month for a single person, before social benefits (INSEE, 2025). EMS ranks 3rd among French groupings of municipalities in terms of income inequality, expressed by the inter-decile ratio in 2021.

Strasbourg is the leading metropolitan area in France for the share of travel by bicycle (15%) and for the number of kilometers of cycle paths. This is explained by the continuity of a policy in favor

¹ An '*aire d'attraction des villes*' (AAV) follows the same definition as the Functional Urban Area (FUA) used by Eurostat and the OECD. Thus the AAVs are thus strictly comparable to the FUAs.

of this mode, initiated in 1978 and never interrupted. More broadly, EMS implements an urban travel policy that moderates car traffic and carries out an ambitious ecological transition policy. According to Beyer and Lacoste (2017: 865), “the population's environmental awareness has been reinforced by a proactive policy over the past two decades. The urban area has thus acquired a remarkable transport system, and numerous eco-districts have been launched to meet housing needs in the center and contain the peri-urban halo”.

Thanks to its geographical location, the city is at the crossroads of a historically busy north-south axis and an east-west axis. The port of Strasbourg is the second largest on the Rhine after Duisburg in Germany, and the fourth largest river port in France after Nantes, Rouen and Bordeaux. As with any large city in France, the predominant sector of activity is the private tertiary sector (retail trade, transport, producer services...) with 72.3% of the workforce in 2022, followed by public administration, education and health services (13.9%). The building industry and manufacturing industries make up for only 8.7 and 4.6% respectively, but they still account for a significant number of jobs in some neighbouring towns.

The local economy may be considered as prosperous. According to Eurostat, between 2014 and 2021, the gross domestic product (GDP) of the Bas-Rhin NUTS3 region, which includes EMS, increased by 12%: from EUR 32,600 to EUR 36,500 per capita. This remains 3% below the national average in 2021 (EUR 36 670 per capita) but the national figures incorporate the performance of the Paris region, one of very few global city-regions on the European continent. Key contributors to the EMS's economic landscape in 2019 were the tertiary economy, constituting 19.2% of the GDP, along with the social and solidarity economy (13.8%), and the tourism sector (8.4%). Between 2013 and 2019, the number of jobs provided by firms and organizations located within the EMS increased from 245,804 to 257,052 (+4.6%). Due to the COVID-19 pandemic and its associated lockdowns, the local economy suffered in 2020 but since then it proved to be resilient. The total number of jobs offered in 2021 is 266,070, which means an increase of 3.5% as compared to 2019. Besides, between 2017 and 2022, the number of new companies created annually increased from around 4,500 in the early 2010s to over 7,00 since 2019. The figure for 2024 is even 8,920 (INSEE, 2025).

3 National Overview on Cohesion Policy

The vast majority of EU policies, including Cohesion Policy, function within the model of shared management between the EU and the Member States (Cotella et al., 2021). This means that the EU creates the strategic framework for the policies, which, however, are implemented according to the decisions of the national governments of the Member States. Therefore, it is important to explore this “gatekeeper role” of the national governments. In the case of France, we shall see that the regional governments also play a substantial role. Cities have to work within the national framework, while they also differ regarding their own policy agendas and competencies.

This section provides a national overview about the implementation of Cohesion Policy in France during two programming periods, 2014-2020 and 2021-2027. We address the following questions:

- How important is the EU Cohesion Policy in France and how are responsibilities split for delivering it, across the various territorial administrative levels?
- What kind of political considerations can be identified in the national regulation of Cohesion Policy (e.g. strong concentration on the most lagging behind areas, strong prioritization of some sectoral policies, etc.)?
- What is the form and share of decentralized planning and implementation of Cohesion Policy (e.g. regional operational programmes)? Is there any role given for cities in this process? Are there any institutional forms (e.g. monitoring committees...) through which cities can influence the national processes?
- How is the urban dimension of Cohesion Policy delivered in France? What political considerations determined the allocation of these resources between different levels of urban hierarchy? Were there any big changes between the 2014-2020 and 2021-2027 programming periods at the national level, or rather continuity?

3.1 How important is the EU Cohesion Policy in France and how are responsibilities split for delivering it, across the various territorial administrative levels?

In this section we shall see that the EU Cohesion Policy matters in the French context even though the nation contributes more to the financing of the European Cohesion Policy than it receives. Second, we shall see that the management of EU Cohesion funds has been partly devolved to regional authorities. Finally, we shall examine to what extent the voice of large cities authorities has been heard in the development of the Partnership Agreement of the two last programming periods.

3.1.1 The Importance of Cohesion Policy Funds in France for the 2014–2020 and 2021–2027 Periods

In connection with the Partnership Agreement approved by the European Commission in August 2014, France received more than €27.8 billion for the 2014–2020 programming period. **Although France contributes more to the financing of the European Cohesion Policy than it receives, it was allocated €15.5 billion under the European policy for economic, social, and territorial cohesion**, €588 million under the Common Fisheries Policy and Integrated Maritime Policy (EMFF), and €11.4 billion under the European Rural Development Policy (EAFRD). For the years 2021 and 2022, the EAFRD credits were supplemented by an additional €5.8 billion.

For the 2021–2027 period, the Partnership Agreement negotiated between the French authorities and the European Commission was formally adopted on 2 June 2022. France will receive a total of €30 billion from the EU, including €10 billion from the EAFRD for the 2023–2027 period. **€16.8 billion is allocated to France under the European policy for economic, social, and territorial cohesion.** This amount is broken down into €9.2 billion from the ERDF, €6.7 billion from the ESF, and €1 billion from the Just Transition Fund (JTF), in addition to €3.2 billion under the INTERREG programmes. Furthermore, France receives €588 million under the Common Fisheries Policy and the Integrated Maritime Policy (EMFAF). The ERDF, ESF, JTF, and EMFAF funds support 22 regional or national programmes and finance projects contributing to a smarter, greener, more connected, more social, and more citizen-focused Europe, while taking into account the specific development needs of the outermost regions.

From one programming period to the next, the number of operational programmes decreased in pursuit of greater efficiency, and because the number of regions was reduced from 26 to 18 following a reform of local government in 2015. During the 2014–2020 programming period, Cohesion Policy in France was implemented through 83 national (NOP) and regional (ROP) operational programmes:

- 6 National Operational Programmes (NOP): These are managed at the national level and cover the entire country. Each one focuses on a thematic area deemed particularly relevant for the country. They are linked to competences specific to the national level, not shared with the regions. The thematic areas targeted by the PONs for 2014–2020 included: youth employment, employment, social inclusion, rural development, fisheries, and technical assistance.
- 31 Regional Operational Programmes (ROP): 27 of these were managed by regional governments and covered by the European Regional Development Fund (ERDF) and the European Social Fund (ESF). Most were multi-fund programmes (ERDF-ESF), except for Alsace, which managed separate ESF and ERDF ROPs. Four additional ROPs were managed by State agencies in the outermost regions.
- 7 Interregional ERDF OPs, targeting mountainous areas and river basins.
- 27 Rural Development Programmes (RDPs): Each of France's 27 regions managed its own RDP under the EAFRD.
- 9 Cross-border cooperation programmes (ERDF).

For the 2021–2027 Programming Period, a decree dated 21 April 2022 set out the national eligibility rules for expenditure under EU cohesion and maritime/fisheries programmes. **As in the previous period, Regional Council were designated as managing authorities for programmes implementing the ERDF and part of the ESF+. They also manage part of the Just Transition Fund (JTF) and the EAFRD. Meanwhile, the State manages 65% of the ESF+ credits, and some departmental councils and metropolitan areas manage certain ESF+ measures.** Altogether, Cohesion Policy is implemented in France through 3 national operational programmes (NOP) and 19 regional programmes (ROP).

There are 19 ROPs in total—one for each of the 18 regions and one specifically for the overseas territory of Saint-Martin. Each ROP includes ERDF funding, which is managed exclusively by regional governments. It is combined with 35% of the ESF+, except in Mayotte and Saint-Martin, where the ROP is funded solely by the ERDF. In other ROPs, ESF+ supports mainly activities related to vocational training, job seekers, apprenticeships, youth orientation, and business creation.

In addition to the ROPs, three NOPs are in place. The “Employment, Inclusion, Youth, and Skills” NOP, managed by the State (Ministry of Labour, Full Employment, and Inclusion), oversees 65% of

the ESF+. It is implemented in each region by the Regional Directorates for Economy, Employment, Labour, and Solidarity (DREETS). The actions target employment and social inclusion. Part of the inclusion-related programmes are delegated to intermediate bodies, which may be subnational governments (departments, intercommunal bodies like the Eurométropole of Strasbourg), or local civil society organizations. Compared to the 2014–2020 period, the financial envelope has decreased by about 10%. Another ESF+ NOP is run by the State: the “European Support for Food Aid” programme, which succeeds the 2014–2020 Fund for European Aid to the Most Deprived (FEAD).

The Just Transition Fund (JTF), with a €1.03 billion envelope for France, is managed both nationally through a third NOP, and regionally. The funding is split: 70% goes to eligible regional councils for implementing economic measures, and 30% is allocated to the State for employment/skills-related measures. At the national level, the JTF is managed by the Ministry of Labour (as with the ESF+) and focuses on professional retraining, training, support for job seekers, and social inclusion. At the regional level, it is implemented in six eligible regions: Hauts-de-France, Provence-Alpes-Côte d’Azur, Auvergne-Rhône-Alpes, Grand Est, Normandy, and Pays de la Loire. Each region develops a Territorial Just Transition Plan (TJTP), drafted jointly by the regional council and the regional branch of the Ministry of Labour and Employment. Each TJTP is annexed to both the regional ERDF–ESF+–JTF programme and the national JTF NOP.

France also participates in Interreg programmes:

- 7 cross-border Interreg programmes with Belgium, Italy, Germany, Luxembourg, Spain, Andorra, and Switzerland.
- 7 transnational Interreg programmes: Alpine Space, Euro-MED, NEXT MED, North-West Europe, Atlantic Area, North Sea, and South-West Europe.
- 4 outermost Interreg programmes: Amazonia, Caribbean, Mozambique Channel, and Indian Ocean.
- 4 interregional Interreg programmes: ESPON 2030, Interreg Europe, Interact, and Urbact.

3.1.2 A Shared Responsibility Between the National and Regional Levels

In France, the management of European funds underwent significant changes during the 2014–2020 programming period. Recognizing that regions play a key role in spatial planning and economic development, the State partially transferred the management of European funds to them. While the State retains an equivalent level of responsibility to the regional councils for the portion of European funds it continues to manage, it also maintains political responsibility for ensuring the consistency and proper implementation of funds across the national territory.

More specifically, **the authority to manage European funds was transferred to the regions in 2014** under the law on the modernization of territorial public action and the affirmation of metropolitan areas, known as the MAPTAM law. This law did not mention metropolitan areas, even though they were one of its primary targets. This transfer marked a major change in the governance of EU Cohesion Policy in France, as the managing authority is the central link in fund programming. It is responsible for defining the funding strategy, financial steering of the programme, project selection, regional partnership coordination, evaluation and communication of the programme, and, where applicable, supervision of intermediate bodies. It bears full financial, legal, and political responsibility for its programmes.

However, decentralization in France remains partial, and regional autonomy in defining strategies for the use of European funds is still limited. Although the regions are managing authorities for almost all of the ERDF, they must still comply with European regulations, which define eligibility

criteria and mandate allocations to certain thematic priorities, and must align their actions with national priorities as set out in the Partnership Agreement. This is particularly the case for the urban dimension. For the ESF, 35% of the envelope is allocated to regions, mainly for interventions relating to vocational training, apprenticeships, and youth orientation. In parallel, a national operational programme was established for 65% of the ESF, half of which is dedicated to employment and the other half to social inclusion. Management of these programmes is often delegated to departments or voluntary intercommunal groupings for local integration plans through the economy (*Plans Locaux pour l'Insertion et l'Emploi*, or PLIE).

This shared management between regions and the State necessitated close dialogue between managing authorities at the regional level—namely between each regional council and the regional office of the Ministry of Labour, which is responsible for implementing the territorially-devolved part of the national ESF programme. This new architecture also presupposed strong institutional and political capacity at the regional level.

However, based on a Senate report on how European funds were spent (Senate, 2019), two major criticisms can be made regarding the governance of European funds implemented in France during the 2014–2020 period.

Firstly, the Managing Authority status was introduced without sufficient preparation. Although the status of managing authority had been requested by the regions for many years, it was introduced without much anticipation of its consequences. Managing European funds requires a rapid build-up of competencies within regional council departments, primarily through the recruitment and training of staff capable of developing the necessary expertise for preparing project dossiers. The Senate report notes that the transfer of this responsibility from the State to the regions “**complicated the already difficult mobilisation of European funds by local stakeholders. Even before the transfer, they faced recurring difficulties, such as deficient information systems, administrative burdens that could discourage project applicants, and long payment delays**” (Sénat, 2019: 107).

However, it should be noted that for the period 2007–2013, the Alsace region was the managing authority on an experimental basis. As the only French region in this situation, Alsace was able to prepare for the role that fell to all regional authorities for the period 2014–2020. As a result of this learning, we can mention the good consumption rates of European funds in Alsace, and particularly in Strasbourg.

Designating regions as managing authorities for the ERDF and part of the ESF meant that regional council staff had to **absorb and master all the EU regulations relating to those funds**. “For the 2014–2020 period, it is estimated that a managing department must understand and master over 4,300 pages of rules before being able to grant funding. This illustrates the material difficulty faced by regions in acquiring the necessary competencies in such a short timeframe.” (Senate, 2019: 112)

Overall, the 2014–2020 programming period in France was marked by stricter control and management requirements compared to the previous period. While both the State and the regions sought to secure the funds, the resulting regulatory burden caused problems for some beneficiaries—especially under the ESF.

Second, the Senate report raises the possibility that **the merger of regions**—which was carried out in 2015 following a very rapid decision by the French government, completely disconnected from the decentralisation of European funds—**may have made it more difficult for regional councils to learn and adapt to their new role as managing authorities**.

This status had been established by the **MAPTAM Law** in January 2014, at a time when there were no plans for enlarging regional boundaries at the national level. However, this argument should be

kept in perspective. In a hearing before the Senate, the **Director of Territorial Strategies at the General Commissariat for Territorial Equality (CGET)** stated: “Programming rates are not correlated with whether or not a region underwent a merger. The most effective regions are not necessarily those that were spared.” (Senate, 2019: 115). According to this State representative: “Programming performance is strongest, and the use of European funds most coherent, in regions that have experienced political stability and where European policy is not seen as foreign to regional development policy, but instead is actively leveraged by the executive as a major tool for regional development.”

For the **2021–2027** programming period, the division of responsibilities between the State and the regions has been maintained:

- **The entire ERDF** remains under regional management.
- **The ESF** continues to be split the same way, with **65% managed by the State and 35% by the regions**.
- **The Just Transition Fund (JTF)** is **jointly managed** by the State and the regions.

This **co-management of European Structural and Investment Funds (ESIF)** by the State and the regions is broadly accepted by both actors. The State in particular acknowledges the regions’ capacity to effectively manage cohesion funds, citing their closer geographical proximity to project sponsors and their ability to provide tailored support.

However, **the quality of dialogue between the State and regions does not eliminate a lingering issue: the limited role given to other levels of subnational government, such as departments and intermunicipal groupings**. Furthermore, **although criticism of administrative complexity has been persistent, it is not clear what concrete solutions have been implemented to address these issues in the current programming period**.

3.1.3 The Development of the Partnership Agreement: What Role for Local Authorities?

The drafting of the 2014–2020 Partnership Agreement was coordinated by the Interministerial Delegation for Territorial Planning and Regional Attractiveness (DATAR). Several ministries were involved, notably those that had managed European funds during the 2007–2013 period, as well as the General Secretariat for European Affairs, and regional councils through the Association of French Regions (ARF).

The partnership, as defined by Article 5 of Regulation (EU) No. 1303/2013, was broadly engaged in the preparation of the Partnership Agreement. Indeed, the French authorities chose to open the national consultation to the general public.

Two more focused bodies were created, structured into four stakeholder groups: the State, local authorities, social partners, and economic and civil society actors:

- The “National Partnership” brought together over 350 national organizations, each responsible for representing various regional networks;
- A more targeted debate forum was also established: the National Partnership Consultation Body for the Partnership Agreement (INCOPAP). INCOPAP convened more than 60 national-level organizations (“network heads”) that represented the broader national partnership and were consulted on successive versions of the agreement.

The national consultation took place in three phases, from December 2012 to July 2013. The first INCOPAP meeting marked the launch of Phase 1. During this meeting, members of the national partnership were invited to submit written contributions based on a consultation document. A

total of 96 written contributions were received. Based on these contributions, 17 seminars were organized in spring 2013, covering thematic, territorial, and methodological topics, and drawing more than 600 participants. These meetings showed strong engagement from subnational partners, particularly around territorial approaches². Within INCOPAP, *France urbaine* was one of the 15 members representing the local authorities group.

The national consultation concluded in July 2013 with a summary seminar attended by all members of the national partnership, as well as the European Commissioner for Regional Policy and French government ministers.



France urbaine, its aims and actions

France urbaine is an association of local authorities that embodies urban diversity and promotes alliances with neighbouring territories. France urbaine represents 2 000 municipalities of all sizes which are home to nearly 30 million French people. Minimum size of member cities is 100 000 inhabitants for cities and 250 000 for intercommunalities. Supported by elected officials from all political parties, the association currently has 107 members. These include France's major cities, metropolitan areas, urban communities and agglomerations. France urbaine provides a political and technical vision for its members and citizens by engaging in a permanent dialogue with all of society's stakeholders at the local, national, European and international levels. It helps to clarify public decision-making on key issues for urban areas and decentralisation.

The consultation process organized for the 2021–2027 programming period followed the same organizational structure as before. The development of national priorities was the result of a process that lasted just over two years. On one hand, it involved all managing authorities of European funds—the Regions for the ERDF, and both the State and the Regions for the ESF and EMFAF. On the other hand, a number of diagnostic assessments were carried out on the main intervention themes of the funds. The stated objective was for France to be able to respond effectively to the priorities of the European Cohesion Policy, by identifying the key issues that specifically affect the country, while also respecting the considerable diversity of its territories. All of this was discussed and refined in close exchange with INCOPAP members. According to the National Agency for Territorial Cohesion (ANCT), this consultation: “allowed for the integration of their social, environmental, and economic concerns into the document that France submitted to the European Commission” (ANCT, 2022) specifically, the final version of the Partnership Agreement, which was formally submitted on 17 December 2021. In fact, INCOPAP was convened to examine all four successive versions of the Partnership Agreement as negotiations with the European Commission progressed.

² From April to June 2013, the general public also had the opportunity to express their views through an online consultation. Around fifty contributions from citizens, associations, local authorities, etc. were received.

3.2 What is the form and share of decentralized planning and implementation of the Cohesion Policy?

To implement the EU Cohesion Policy funds, France has combined deconcentration and decentralization since the 2014–2020 period. For the majority of the ESF+, the principle of deconcentration applies. The regional directorates of the Ministry of Labour and Employment are responsible for managing these funds. At the same time, a decentralized management model exists, whereby funds are entrusted to regional governments for the ERDF and 35% of the ESF+. This architecture of shared responsibilities between deconcentrated State services and decentralized regional authorities has been maintained for the 2021–2027 programming period.

To strengthen institutional governance and administrative capacity for the management, programming, and coordination of actions related to Cohesion Policy funds, the National Agency for Territorial Cohesion (ANCT) acts as the coordination authority for Structural and Investment Funds in France.

At the national level, two bodies ensure the coordination of actions:

- A State–Regions Committee addresses matters related to the Partnership Agreement and issues common to the European Cohesion Policy funds. This committee provides coordination at the political level.
- The National Monitoring Committee, shared by the ESF+ and JTF national programmes, brings together national and regional partners involved in the implementation of these funds. It reviews the programmes from the standpoint of their implementation and the progress made in achieving their objectives. This committee is co-chaired by the General Delegation for Employment and Vocational Training (DGEFP) of the Ministry of Labour and by Régions de France.

In addition, in each region, the governance of the EU Cohesion Policy is ensured by a regional monitoring committee, co-chaired by the regional Prefect and the President of the Regional Council, in order to guarantee a multi-fund approach (ERDF, ESF+, and JTF). Since National Operational Programmes (NOPs) are managed through deconcentrated State services and Regional Operational Programmes (ROPs) are managed by the regions, the regional monitoring committee serves as both as a forum for sharing information on fund consumption, and as a space for consultation in preparing for future programming periods.

In the end, it can be said that since the 2014–2020 programming period, the design and implementation of EU Cohesion Policy in France has been partially decentralized, with the regions playing a central role. But **what is the place of other levels of public intervention, particularly authorities governing large cities?** Given that in France, subnational governments are fully autonomous from one another, urban authorities must earn their place in this governance system—and that place is not guaranteed.

Feedback from members of France urbaine regarding their ability to access European funding reveals several areas of concern with respect to designing sustainable urban development and cohesion policies that effectively involve municipalities and their groupings (such as metropolitan areas and urban communities). The key issues appear to be:

- **A lack of consultation and dialogue from regional authorities** during the development of the 2021–2027 ROPs. Part of the difficulty stems from the health crisis, which disrupted the organization of meetings by regional authorities during the COVID-19 period. However, the political context may sometimes feed rivalry between the regional government and the authorities governing the major urban agglomerations.

- **In certain regions**—such as Auvergne-Rhône-Alpes—**where the Integrated Territorial Investment (ITI) was not renewed for the 2021–2027 period by regional decision**, urban authorities affected may feel excluded from the governance of Cohesion Policy.
- **At times, some urban-area local authorities are excluded from certain ROP funding lines**, or face access only through constrained programme axes, limited by thematic envelopes.

It has been reported that in some cases, the regional authority, acting with a kind of "discretionary right", may exclude a project that is formally eligible simply because it does not align with its political vision. **Tensions appear to be strongest between regional governments and metropolitan areas, which are often the originators of the largest and most complex projects.** As a result, **the governance of European Cohesion Policy in France may appear to be more regional than multilevel, with some (not all) regional governments effectively assuming the role of "gatekeeper."**

Moreover, some urban authorities also face difficulties in their interactions with national authorities, who—let us recall—manage 65% of the ESF+. Once again, based on their experience, France urbaine members raise several important questions:

- Is there truly a recognition of the autonomy of local authorities acting as fund managers when the framework is imposed with no real room for maneuver in managing and implementing European funds?
- Why are adjustments proposed by urban territories rejected, even though these authorities have the best knowledge of local needs?
- In addition, the State is sometimes seen to over-secure its management procedures, invoking anti-fraud measures, but without providing additional technical assistance to support these increased administrative requirements.

3.3 What kind of political considerations can be identified in the national regulation of Cohesion Policy? And how is the urban dimension of Cohesion Policy delivered in France?

Table 3.1

Allocation of European Cohesion Funds in France by Strategic Objective (2021–2027 Programming Period)

Strategic Objective	ERDF Amount(million euros)	Share of ERDF Envelope (%)	ESF+ Amount(million euros)	Share of ESF+ Envelope (%)
SO 1 – A Smarter Europe	3,517	40.2%	–	0%
SO 2 – A Greener Europe	3,376	38.5%	–	0%
SO 3 – A More Connected Europe	251	2.9%	–	0%
SO 4 – A More Social Europe	548	6.2%	6,412	100.0%
SO 5 – Europe Closer to Citizens	1,065	12.2%	–	0%
Total	8,757	100.0%	6,412	100.0%

Source: author's own elaboration

The 2021–2027 programming of the European Structural and Investment Funds (ESIF) in France reveals a strong focus on Objective 4, which absorbs all ESF+ funding, followed by Objectives 1 and 2, which are supported by the ERDF. This reflects a strong concentration on sectoral policies, respectively dedicated to labor market access, competitiveness and innovation, and policies with a positive environmental impact. In this way, one can say that the three pillars of sustainable development are covered.

In this study, we will now focus our analysis on sustainable urban development. For the current period, sustainable urban development is included under Strategic Objective 5, but it is not limited to SO5.1, which is specifically dedicated to supporting development strategies in urban areas. In fact, programmes may support urban development through other strategic objectives as well, particularly via dedicated territorial tools such as Integrated Territorial Investments (ITIs).

Given this, we will address here two questions:

- Have there been significant changes at the national level between the 2014–2020 and 2021–2027 programming periods?
- For the 2021–2027 period, what political considerations have guided the allocation principles of European funds across different types of urban territories?

3.3.1 The 2014–2020 period: EU funds target mostly deprived urban districts

During the 2007–2013 programming period, the idea of the usefulness of an urban policy gained traction, supported at the European level by numerous actors, including Eurocities. For the 2014–2020 programming period, the urban dimension was maintained, and EU regulations preserved the level of funding previously allocated to the urban dimension during 2007–

2013, namely at least 5% of ERDF funds. Each Member State was responsible for defining the details of its action.

In its Partnership Agreement, approved on August 8, 2014 by the European Commission, France allocated 10% of ERDF–ESF funds to sustainable urban development, twice the expected amount. The territorial framework for urban development corresponded to the geography of deprivation, which informed the national urban policy. At the time, this geography of deprivation was being redefined based on new indicators. By emphasizing “territorial cohesion,” or even “territorial equality,” the Hollande government (2012–2017) sought to reinforce its commitment to disadvantaged neighborhoods, which had been stigmatized under President Nicolas Sarkozy (2007–2012) (Demazière and Sykes, 2021).

The government chose to align the duration of the upcoming city contracts (which link the state and local authorities) with the 2014–2020 EU funding period. In February 2013, François Lamy, Minister Delegate for Urban Affairs, and Alain Rousset, President of the Association of French Regions (ARF), signed a framework agreement aimed at mobilizing 10% of national ERDF and ESF funds for the future priority urban neighborhoods.

This agreement was signed just days before the Interministerial Committee on Cities (which would define the future priority neighborhoods and their contractual arrangements) and two months before the presentation of the MAPTAM law to the Council of Ministers, which would designate the regions as managing authorities for EU structural funds.

The national government noted that during the 2007–2013 programming period, only 2% of the ESF (i.e., €90 million) had benefited urban neighborhoods. Under the “Regional Competitiveness and Employment” ERDF objective, only 7% (€535 million) targeted neighborhoods under the national urban policy through 65 integrated urban projects (PUI). Furthermore, of the 26 regions, only 14 were involved in urban renewal agreements and 9 in CUCS (urban social cohesion contracts).

The agreement stated that “the Association of French Regions commits each regional president to participate in the 2014–2020 city contracts.” This commitment would vary in degree, as specified in Article 3, which stated: “The urban policy component of the regional operational programmes will represent at least 10% of the total ROP budget,” while clarifying that “the overall objective of 10% will be adjusted based on the importance of urbanization and socio-urban disparities observed in each region.” Thus, the 10% rate was not strictly applied to all regions.

In any case, all regions were to be managing authorities for structural funds dedicated to priority neighborhoods under urban policy, and their regional operational programmes had to include either a multi-fund urban axis (ERDF–ESF) or an Integrated Territorial Investment (ITI), as part of the “urban policy component for integrated urban development.” According to the agreement between the regions and the government, European funding would be “prioritized” towards inter-municipal groupings (EPCI) hosting priority neighborhoods, and “global grants may be delegated to EPCIs that request them,” the agreement specified.

These funds would be integrated into the financial commitments of future city contracts, alongside those specific to urban policy and mainstream policies. The regions could also intervene in addition to European and state funding, within their own areas of responsibility—such as economic development, transport, and youth training.

Three observations can be made. First, the funding targeted neighborhoods included in the new 2014–2024 National Urban Renewal Programme (NPNRU), but it was agreed that actions could be implemented at different territorial levels, with broader intervention perimeters.

Second, while urban action represented 10% of the national budget, the effort varied considerably from one region to another, ranging from 4% of the ROP in Centre-Val de Loire to 21% in Île-de-France. Third, French regional governments adopted different approaches to managing their urban component. Of the 27 French regions in 2014, 11 dedicated a component of their ROP to integrated urban development. This allowed for a conventional management of urban funds, following the same rules as the rest of the ROP. The ROP defined the types of actions eligible under the urban component, without the need to preselect eligible territories. On the other hand, 16 regions, including Alsace, opted to use the ITI mechanism. This allowed urban actions to be funded across all ROP axes, but the list of beneficiaries was limited: the managing authority selected its ITIs at the beginning of the period. Each ITI developed an integrated territorial strategy, which appeared to encourage spatially targeted action.

3.3.2 The 2021–2027 period: a wider territorial scope for EU funds

In its Partnership Agreement, approved on June 2, 2022 by the European Commission, France allocated 10% of ERDF–ESF funds to sustainable urban development—the same percentage as in the 2014–2020 period. This stability can be interpreted as a sign of continued commitment by French authorities. On the other hand, while French authorities had previously allocated double the amount of ESIF to urban development compared to the level mandated by the European Commission, the current figure is now closer to the European average (8%), though still slightly higher.

More importantly, **the territorial scope of urban policy has significantly widened in the French case.** In the section on Strategic Objective 5, the Partnership Agreement states that “urban areas concentrate challenges related to social inequalities and the impacts of climate change and must address multiple development issues” (République française, 2022: 17). Among the “fragile urban areas,” it mentions “for example, neighborhoods targeted by urban policy (QPV) in metropolitan areas” (République française, 2022: 17). The phrase “for example,” which we emphasize here, implies that other types of territories may (and should) also be considered “fragile.”

Further along, the same section notes that “small and medium-sized towns act as economic, cultural, and social hubs for their wider urban or rural catchment areas, but they sometimes face difficulties in terms of attractiveness, degraded housing, or commercial vitality, which negatively affects residents’ quality of life. Within the framework of a territorial project, ERDF support can help these areas pursue a path of sustainable development that enhances their attractiveness” (République française, 2022: 17–18).

This geographic expansion of the urban scope during the new programming period reflects the growing demand, since the 2010s, for national public intervention in non-metropolitan territories. In response to the demands of local officials outside metropolitan areas, and in reaction to a geography of discontent made visible by the “Yellow Vest” protests, new national urban revitalization policies have emerged in recent years (Demazière and Sykes, 2021). These initially targeted “medium-sized towns” (with the Action Cœur de Ville programme launched in 2018), then “small towns” (with the Petites Villes de Demain programme launched in 2020), and more recently “rural areas” with the Villages d’Avenir programme, launched in 2022. These initiatives coexist with the longstanding national “urban policy,” which still targets fragile neighborhoods in large urban areas but no longer holds a monopoly over the national narrative around support for vulnerable territories.

Ultimately, an analysis of the urban component of the 2021–2027 Regional Operational Programmes (ROPs) shows that **only one programme—that of the Île-de-France region—continues to exclusively target areas defined by national urban policy.** The Occitanie

ROP restricts some actions to priority neighborhoods under urban policy (ANCT, 2024). In other regions, the initial overlap, established in the 1990s, between areas receiving national attention (urban policy neighborhoods) and those selected by French authorities for EU funding, has faded. Today, such overlap appears to be an exception rather than a rule.

This dilution of the “fragile” or “challenged” urban concept also reflects, in the current period, **political rivalries** and disagreements between regional governments, which manage the ERDF, and the authorities governing major cities (“metropolises” or “urban communities”). Similar tensions between regions and metropolitan areas exist in other European countries (Cremaschi et al., 2015). In France, authorities in some regions sometimes believe that large urban areas have sufficient financial resources and technical expertise to manage without regional support, whereas peri-urban, rural, or medium-sized urban centers are seen as more vulnerable and in greater need of regional development policies.

A notable example of this tension is the case of the Auvergne–Rhône–Alpes region versus the metropolitan areas of Clermont-Ferrand, Grenoble, Lyon, and Saint-Étienne (Demazière, 2022). As previously noted, the Auvergne–Rhône–Alpes region eliminated the ITI tool, despite strong support from the metropolises. More generally, during the preparation of the 2021–2027 programming period, the French government did not—or perhaps chose not to—convince regional authorities to maintain the geographic framework of urban policy neighborhoods, which many actors, including some at the highest levels of the state, deemed too restrictive (Demazière and Sykes, 2021).

An illustration of the freedom granted to each region in defining its urban priorities appears in an ANCT document on the urban component of the 2021–2027 period. In response to the question “What is an urban area?” the ANCT, France’s national spatial planning agency, states: “The definition of urban areas targeted by each programme is left to the discretion of the managing authorities and adapted according to regional territorial needs and characteristics” (ANCT, 2024: 2).

This flexibility was announced in the 2021–2027 Partnership Agreement. It states: “Given the diversity of territories within French regions (urban, peri-urban, rural, mountain, coastal) and in line with the European objective of strengthening support for integrated territorial development—particularly through Strategic Objective 5—regional managing authorities plan to allocate part of their funding to support these territories. On average, regional managing authorities intend to allocate more than 12.7% of their ERDF credits to SO5, with significant variation between regions (from 0% to 25%).

(...) In most regions, territorial development support through SO5 will target both urban and non-urban areas. As for integrated urban development, the targeted areas vary from one region to another. While major cities remain the primary urban focus in most regions, others choose to target narrower areas (such as priority neighborhoods identified by urban policy and vulnerable city centers in PACA or Occitanie), or, conversely, to broaden the scope to include all municipalities with more than 2,000 inhabitants in response to issues related to the attractiveness of these secondary centers.” (République française, 2022 : 53–54).

3.3.3 A decreasing importance of Integrated Territorial Investments

Regarding the instruments used, it is interesting to examine how the use of Integrated Territorial Investments (ITI) has evolved between the 2014–2020 and 2021–2027 periods. According to the 2021–2027 Partnership Agreement, “only one-third of the regions plan to rely on integrated territorial investments or community-led local development (in Nouvelle-Aquitaine and Guyane only); the others will rely on pre-existing integrated territorial strategies or

ad hoc strategies such as territorial contracts, city contracts, recovery and energy transition contracts (*Contrats de Relance et de Transition Ecologique* – CRTE), Massif or River strategies, 'Action cœur de ville' or 'Petites villes de demain' programmes, etc. Coherence with the SRADDET [regional planning documents] will also be a selection criterion for actions in several regions” (République française, 2022: 53–54).

More recently, the ANCT (2024) has clarified the choices made by regional governments. It reports that eight regions have chosen to use ITIs: Brittany, Corsica, Grand Est, Hauts-de-France, Île-de-France, Pays de la Loire, Provence-Alpes-Côte d’Azur, and Réunion. During the previous 2014–2020 period, 13 regional programs had used the ITI tool. The reduction in the number of metropolitan regions (from 21 to 12 in 2015³) partly explains the decline in ITI use. However, it is worth noting that the metropolitan areas of Grenoble, Lyon, and Saint-Etienne—all of which had implemented an ITI during 2014–2020 (each with €8 million, fully used) and wanted to continue using the tool—faced opposition from the Auvergne-Rhône-Alpes Region.

Moreover, **the relative decrease in the financial amounts allocated to ITIs is significant.** For the 2021–2027 period, ITIs account for 42% of the “urban area” ERDF funds in France, meaning the other territorial tools used by other regions now make up the majority (58%). In the previous 2014–2020 period, programs using the ITI tool accounted for 70% of the ERDF “urban” envelope, while the others chose an integrated urban axis.

Regarding ITIs, only two ROPs (Pays de la Loire and Provence-Alpes-Côte d’Azur) allocate them exclusively to Objective 5.1. The six other regions using ITIs have selected multiple specific objectives, most often some specific objectives from Priority 2 “A Greener Europe.” Notably, the Grand Est regional program—which includes Strasbourg as a case study—offers the broadest eligibility: all ERDF specific objectives can be used by the selected ITIs.

This diversity raises an important question: **to what extent were urban territories benefiting from an ITI involved in selecting the specific objectives?** According to a benchmark conducted by France urbaine, covering 14 urban areas, the level of involvement varied widely. For instance, in Brittany, the metropolitan areas of Brest and Rennes were not consulted during the thematic negotiation process of the ROP. The projects submitted under the ITIs they manage must fall within one or more of the following regional priority areas: mobility, renewable energy, biodiversity, and digital technologies. Meanwhile, the Aix-Marseille-Provence Metropolis was partially involved in the selection of themes under Objective 5.1 of the ROP, in connection with its own European Strategy. Thus, the extent to which urban local authorities were associated with the definition of ITI priorities varies significantly between regions.

Furthermore, according to the ANCT (2024), the identification of urban territories eligible for EU cohesion policy funding differs across regions. In seven ROPs, the eligible territories were specified in the programme itself. For example, the Brittany ROP states that the ITIs are managed by Rennes Métropole and Brest Métropole. In the Grand Est Region, the eligible territories are the Mulhouse Urban Community and the Strasbourg Eurometropolis. In other programs, calls for projects or calls for expressions of interest were issued to select the areas eligible for urban territorial strategies. For example, the Occitanie Region launched a call for expressions of interest aimed at territories seeking to benefit from a specific territorial

³ Corsica, an island in the Mediterranean, is not included, even though it is a region in its own right. To distinguish it from the French overseas regions and territories, Corsica is traditionally integrated into metropolitan France, even though it is located 200 km from its nearest coast.

development tool called “Integrated Territorial Approach” (ATI). It included two components: urban ATI (€16 million) and rural ATI (€38.4 million). Only the selected territories could then access the ERDF funds under Priority 5 of the 2021–2027 Regional Programme. Furthermore, so as to be selected, a territory had to be engaged in a Territorial Contract with the Occitanie Region—a multi-annual agreement covering infrastructure or facility projects and their funding. Making access to ERDF subsidies conditional on this kind of strategic and financial alignment could be a constraint. For instance, while Toulouse Métropole was selected to benefit from the ATI tool, the region’s requirement for a prior signed Territorial Contract caused over three years of delay before the metropolis could access its ERDF funding envelope.

4 Urban structure and governance of Cohesion Policy

4.1 Spatial boundaries and administrative configuration

4.1.1 The scope of application of the Cohesion Policy corresponds to the jurisdiction of the metropolitan government

In the case of Strasbourg, the metropolitan government—referred to as the *Eurométropole de Strasbourg* (EMS)—is the public authority responsible for the local implementation of European cohesion policy. This is why **its jurisdiction exactly matches that of the Integrated Territorial Investment (ITI)**, the instrument used to implement the EU Cohesion Policy. The creation of EMS on January 1, 2015, marked the culmination of over five decades of intercommunal integration efforts pursued by both local and national public authorities.

The first step in this process was the creation by the French state, in the mid-1960s, of “urban communities”, which brought together the municipalities of France’s largest metropolitan areas outside Paris. The goal was to address the mismatch between existing administrative structures and the geographical reality of urban agglomerations. This institutional shift aligned with contemporary academic and political debates—both in the United States and various European countries—that highlighted the negative effects of institutional fragmentation and advocated for the creation of strong metropolitan institutions (Tomàs, 2020). The establishment of local authorities at a scale higher than the municipality was intended to ensure “a better distribution of resources across the territory and, through their planning capacity, a more harmonious location of facilities, activities, and housing” (Jouve & Lefèvre, 1999: 839).

The urban community is a public body with legal personality, empowered to levy taxes and endowed with a set of significant mandatory competences, which it exercises in place of its member municipalities. At the time, these responsibilities primarily included the development of planning and urban development documents, road infrastructure and sanitation policies, the management of public housing agencies, as well as transport and waste management policies—alongside additional optional competences.

The initial urban communities were imposed by the State on local elected officials (Desage, 2010). They were created by Law No. 66-1069 of December 31, 1966, in a handful of major cities: Bordeaux, Lille, Lyon, and Strasbourg. In Strasbourg, the urban community was officially established on December 4, 1967. Over time, the intercommunal structure expanded by only five municipalities: on January 1, 2017, the communes of Achenheim, Breuschwickersheim, Hangenbieten, Kolbsheim, and Osthoffen joined EMS. These communes had previously belonged to a small intercommunal body of only 6,500 residents, which, due to its limited size, was required to merge with another intermunicipal structure under the 2010 Territorial Reform Law. This minimal expansion resulted in a slight enlargement of the ITI perimeter between the two programming periods—2014–2020 and 2021–2027—ensuring continued alignment with that of EMS.

Furthermore, it is noteworthy that as early as 1972, the administrative services of the City of Strasbourg and the Urban Community of Strasbourg were merged into a single administration—an uncommon case in France, indicating a high level of integration between the central city and the intermunicipal authority, which would later become EMS.

An illustration of the influence of local elected officials in shaping new forms of governance for French metropolitan regions is the remarkable continuity in territorial scope between the former

communautés urbaines and the current *métropoles*. The MAPTAM Law made no mention of expanding metropolitan areas, nor did it provide any mechanism for doing so—leaving such decisions to the discretion of local mayors. Among the 15 *métropoles* created by the MAPTAM Law, 7 retained exactly the same boundaries as their preexisting intercommunal bodies (Demazière et al., 2020). However, over the past decades, most of these city-regions have experienced substantial population and economic growth as well as urban deconcentration (suburbanization), which would justify considering an extension of the metropolitan government’s territory.

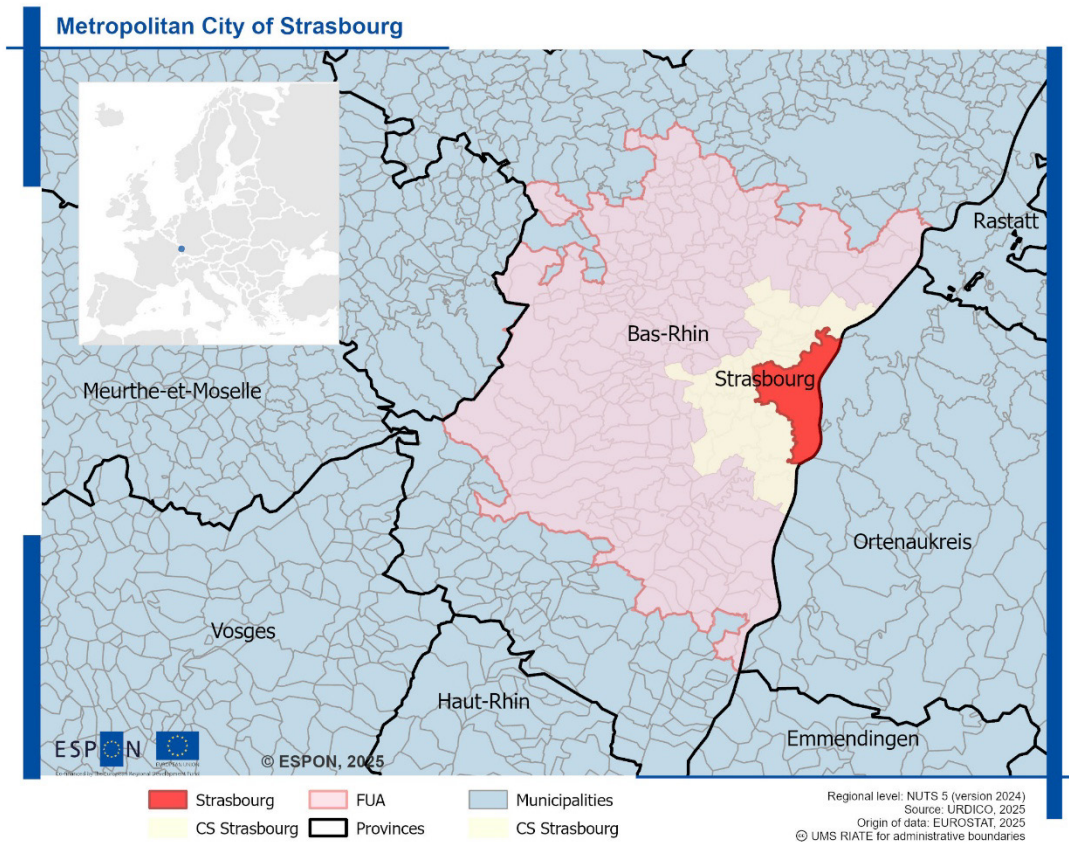
In Strasbourg’s case, the perimeter of the metropolis remains very close to that of the urban community created by the State in 1967. EMS now includes 33 municipalities, 28 of which had already been part of the urban community for half a century. Strasbourg (like other French *métropoles* such as Bordeaux, Lyon, or Nantes) exemplifies a frequent gap in France between the *de jure* metropolis and the *de facto* metropolis. As previously mentioned, with 517,386 inhabitants spread over 337.6 km² in 2022, EMS covers only the core of the metropolitan area. In contrast, in 2021, the functional urban area (FUA) defined by the OECD and the EU encompassed 268 municipalities and 864,993 inhabitants across a territory of 2,227.1 km². Thus, compared to the EMS, the FUA includes eight times more municipalities over an area six times larger.

Table 4.1
Spatial boundary of Strasbourg’ case study

2014-2020		2021-2027	
Level	LAU(s)	Level	LAU(s)
Eurométropole de Strasbourg	Municipalities of Bischheim, Blaesheim, Eckbolsheim, Eckwersheim, Entzheim, Eschau, Fegersheim, Geispolsheim, Hoenheim, Holtzheim, Illkirch-Graffenstaden, Lampertheim, Lingolsheim, Lipsheim, Mittelhausbergen, Mundolsheim, Niederhausbergen, Oberhausbergen, Oberschaeffolsheim, Ostwald, Plobsheim, Reichstett, Schiltigheim, Souffelweyersheim, Strasbourg, Vendenheim, La Wantzenau, Wolfisheim	Eurométropole de Strasbourg	Municipalities of Achenheim, Bischheim, Blaesheim, Breuschwickersheim, Eckbolsheim, Eckwersheim, Entzheim, Eschau, Fegersheim, Geispolsheim, Hangenbieten, Hoenheim, Holtzheim, Illkirch-Graffenstaden, Kolbsheim, Lampertheim, Lingolsheim, Lipsheim, Mittelhausbergen, Mundolsheim, Niederhausbergen, Oberhausbergen, Oberschaeffolsheim, Osthoffen, Ostwald, Plobsheim, Reichstett, Schiltigheim, Souffelweyersheim, Strasbourg, Vendenheim, La Wantzenau, Wolfisheim

Source: author’s own elaboration

Map 4.1
Spatial boundaries of Eurométropole de Strasbourg, France



Source: author's own elaboration

4.1.2 French metropolitan areas: strong local authorities

This section explores how metropolitan governance and cooperation are organized in Strasbourg. To address this issue, we must consider the institutional reform that gave rise to metropolitan governments (*métropoles*) in France in the mid-2010s. The national government had two main motivations (Demazière, 2021). First, the foundational level of local government in France is highly fragmented. In 2018, France had nearly 35,000 municipalities, representing 30% of all municipalities in the European Union, despite having only 13% of its population (Demazière, 2021). Moreover, 86% of these municipalities had fewer than 2,000 inhabitants. As a result, successive French governments have long encouraged municipalities to join voluntary inter-municipal cooperation bodies, known as EPCIs ('Établissements Publics de Coopération Intercommunale'). *Métropoles* represent the most advanced form of EPCIs, and 22 of them were created in the mid-2010s.

In terms of powers and territorial scope, *métropoles* often inherit the structure of pre-existing urban communities, which had been established in major urban areas in the mid-1960s. Another key motivation for the creation of *métropoles* was the global financial crisis of 2008, which pushed governments from both the left and the right to adopt austerity measures and implement territorial reforms in order to meet the requirements of EU economic governance agreements introduced after the Eurozone crisis (Pasquier, 2016). Local government finances came under significant pressure:

first due to the 2010 business tax reform, which caused a drop in local tax revenue, and then because of an unprecedented reduction in state grants (–€11 billion between 2015 and 2017).

On these foundations, two successive local government reforms were carried out between 2010 and 2016. These included: (i) the reduction in the number of regions through mergers, (ii) the nationwide coverage of inter-municipal cooperation, and (iii) the creation of *métropoles*.

This last development demonstrates remarkable policy continuity between left- and right-wing governments in France over the past decade. In 2010, a law on the Reform of Local Authorities made it possible to create a new type of EPCI, called a *métropole*, for any group of municipalities with over 500,000 inhabitants. The powers granted to *métropoles* were those of an urban community, expanded through statutory transfer or agreement to include departmental and regional competencies. However, only one *métropole* was created as a result of this law: Nice.

In 2014, the MAPTAM Law (Modernisation of Territorial Public Action and Affirmation of Metropolises) formally designated 14 additional *métropoles* alongside Nice. These included Strasbourg, as well as Bordeaux, Grenoble, Lille, Lyon, Nantes, Rennes, Rouen, and Toulouse, selected based on their prior status as urban communities and their population of over 400,000 within a conurbation of more than 650,000 inhabitants. Others were added later, bringing the total to 22 *métropoles*. Some of them—such as Brest, Nancy, or Toulon—have significantly smaller populations and economic potential than Lyon, Marseille, or Paris (Demazière et al., 2020).

A *métropole* is a public institution with legal personality and the ability to levy its own taxes. It has a set of mandatory competencies, exercised in place of the member municipalities, in areas such as spatial planning, economic development, housing, energy, tourism, and culture. The MAPTAM law expanded the scope of responsibilities previously held by urban communities. In particular, the following additional powers were transferred to *métropoles*:

- In planning and economic, social, and cultural development: *métropoles* can participate in the governance of competitiveness clusters and hold shares in technology transfer companies. They may also take charge of tourism promotion and support for higher education and research institutions, in coordination with the regional plan for higher education, research, and innovation.
- In transport: *métropoles* are now mobility authorities, rather than merely providers of urban transport.
- In environmental matters: their responsibilities were significantly extended to include contributions to the energy transition; drafting and adoption of local climate-energy plans; creation, expansion, maintenance, and management of urban heating and cooling networks; development and upkeep of charging infrastructure for electric or hybrid vehicles; and the management of aquatic environments and flood prevention.

In brief, **a *métropole* exercises major responsibilities in place of the municipalities it brings together, including territorial planning, social policies, housing, economic development, culture, tourism, and environmental management.**

Table 4.2
Administrative configuration and responsibilities in France

Level	NUTS	Responsibility
<p>State Administrations</p> <p>They generally have their headquarters in the capital, Paris but, since the 1960s, deconcentration has had the function of shifting the control and implementation of government action to the regional level.</p>		<p>They are the highest administrative authorities combining administrative and political functions. Their decisions can be applied throughout the national territory. Local services of the state administration are traditionally organised at departmental level. However, since the 2000s, with some department-level services merged into region-level services.</p>
<p>Regional Government</p> <p>France is divided into 18 regions (<i>régions</i>). Since the 1980s, decentralization has moved the centre of gravity of French administration to regional authorities.</p>	Regions: Nuts	<p>Regional governments deal with economic development, regional planning, vocational training, construction and maintenance of high schools and inter-city transport. They have considerable budgets but they lack separate legislative authority</p>
<p>Departmental Government</p> <p>There are 100 departments. Each of them is administered by an elected body called a departmental council</p>	Departments: Nuts 3	<p>The main areas of responsibility of a department include the management of social and welfare allowances, the building of junior high schools, and local roads.</p>
<p>Local administration</p> <p>There are 35,000 municipalities. However, all municipalities, whatever their size or geographical position, are currently involved in a voluntary grouping to which they transfer resources and competences. These groupings are eligible for major government subsidies, which has encouraged municipalities to engage in them.</p>	Municipalities : LAU	<p>The main competences of municipalities are in urban planning, housing, environment, and management of pre-elementary and elementary schools.</p> <p>Groupings of municipalities have extensive fields of action, such as economic development, transport, urban planning, housing, culture, etc.</p>

Source: author's own elaboration

4.1.3 Metropolitan Governance: The Decision-Making Bodies of the *Eurometropolis of Strasbourg* and Its Relations with Member Municipalities

The powers of *métropoles* are very significant: spatial planning; economic, social, and cultural development; local housing policy; urban policy; protection and enhancement of the environment and living conditions; management of public services of collective interest. The MAPTAM law (Art. L. 5217-1) defines that “The metropolis is a public inter-municipal cooperation establishment with its own taxation, bringing together several municipalities that form a single, contiguous area with no enclaves, within a space of solidarity, to jointly develop and implement a project for the planning and economic, ecological, educational, cultural, and social development of their territory, with the aim of improving cohesion and competitiveness and contributing to the sustainable and inclusive development of the regional territory. It promotes metropolitan economic functions, its transport networks, and its academic, research, and innovation resources, in a spirit of regional and interregional cooperation and with attention to balanced territorial development.” The terms

competitiveness and cohesion are used here, indicating that for the legislator, metropolises, including Strasbourg, have full responsibility both for supporting businesses and innovation and for social inclusion and protection of vulnerable populations.

The institutional framework of EMS consists of the following key entities: the deliberative assembly is the metropolitan council, composed of metropolitan councillors elected by universal suffrage through a dual voting system on the municipal election lists in the 33 member municipalities. Thus, metropolitan councillors are elected by citizens as part of the municipal elections held every six years. The 99-member metropolitan council then elects its president and the vice-presidents, who form the executive board. In July 2020, Ms. Pia Imbs was elected president of EMS. Within the metropolitan board, the president is supported by 20 vice-presidents who are each responsible for a specific area of competence. In addition, a standing committee is composed of the president, the vice-presidents, and 38 members of the council, and all the mayors of the member municipalities have a seat. This standing committee meets 10 times a year.

Until the renewal of the metropolitan council in July 2020, the composition of the board went beyond the president and the vice-presidents and included 39 elected councillors, for a total of 60 members. The board, also known as the standing committee, had delegations from the metropolitan council and met at least 10 times per year in closed sessions to manage the day-to-day affairs of EMS.

Since the new executive was established, the board no longer has delegated powers. Its composition has been expanded to include 10 community councillors, making a total of 31 members, to whom the president has delegated some of her responsibilities. Under the internal rules adopted on August 28, 2020, it meets at least once a quarter, and in practice before the meetings of the metropolitan council, in closed-door sessions. In addition, a plenary commission, bringing together all metropolitan councillors, meets between board and council meetings to prepare them. This organization allows all metropolitan councillors to take part in public sessions where all deliberations are adopted.

Law no. 2019-1461 of December 27, 2019, concerning civic engagement in local life and the proximity of public action, created articles L. 5211-11-2 and L. 5211-11-3 of the CGCT, which require that after each municipal election, the president proposes the adoption of a governance pact to the community council. The law also makes the creation of a conference of mayors mandatory.

According to a report by the Regional Chamber of Accounts, even before these provisions came into force, the internal regulations of EMS already provided for a conference of mayors to meet upon the president's invitation (Chambre régionale des comptes, 2024). In practice, these meetings occurred at least monthly. In parallel, plenary and thematic commissions also met regularly at the level of the general directors of services. By deliberation on June 25, 2021, EMS and its member municipalities adopted a governance pact formalizing this operating method. In this framework, partnership agreements establish the terms of relations between the member municipalities and EMS. For example, mayors of member municipalities are informed about matters that have been subject to deliberation. A vice-president in charge of territorial equity and dialogue was appointed in 2020, and a department of inter-municipality, composed of a director and 3.5 full-time equivalent staff, was established to maintain the link between the mayors of member municipalities and EMS.

In the end, «the provision of information and the inclusion of member municipalities, as formalized in the governance pact, are effectively ensured » (Chambre régionale des comptes, 2024: 24).

4.2 Actors' Constellation and Governance

Describing the actors involved in delivering cohesion policy and territorial development governance is paramount to understanding the urban dimension of cohesion policy at the local level.

To this purpose, we provide a detailed description of the actors' network configuration by answering the following questions:

- Who are the main actors involved in territorial development?
- What responsibilities do they cover?
- How integrated are cohesion and spatial planning sectors?

4.2.1 The main actors involved in territorial development and rural-urban relationships

The major public actor in Strasbourg's development is, without a doubt, the *Eurométropole de Strasbourg*. As a public establishment for inter-municipal cooperation, EMS exercises certain powers previously held by the municipalities within its territory. Its powers are extensive:

1. economic development: creation and management of business zones, innovation and business support, support for higher education and research, attractiveness and tourism, land and real estate
2. planning of the metropolitan area: spatial planning, mobility organization, road creation and maintenance, involvement in the planning and governance of train stations, energy, environment, and ecology
3. housing and social policies: initiatives for social housing, improvement of the housing stock, priority neighborhoods
4. urban services: water and sanitation, waste collection, cleaning of public spaces
5. culture and leisure: culture, sports, neighborhood life.

More recently, the spring 2020 elections brought a green-left coalition to power in both the City of Strasbourg and at the metropolitan level. Pia Imbs succeeded Robert Herrmann as president of EMS in July 2020. Following this, priorities shifted. This is clearly reflected in the new multi-year investment program adopted by the new assembly for the 2021–2026 term. With a budget of 1,32 billion euros corresponding to an average of €220 million per year, this program clearly reflects an ambition to foster the ecological, social, and democratic transformation of the region, through the development of public transportation and the development of cycle paths, the thermal renovation of buildings and a greening policy, the improvement of air quality; a financial support for the housing sector and to local economy. In financial terms, the 2021–2026 investment policy budget represents a 20% increase compared to the one adopted in 2014 which totalized 1,095 billion euros.

In contrast with the capacity and influence of the *métropoles*, it is worth noting that the MAPTAM law, which created this category of inter-municipal grouping, remains rather brief in defining the specific goals assigned to metropolitan governance. Article L. 5217-1 of this law states that “The metropolis is a public inter-municipal cooperation establishment with its own taxation, grouping several contiguous municipalities without enclaves within a solidarity-based area, in order to jointly develop and implement a project for the economic, ecological, educational, cultural and social development of their territory to improve cohesion and competitiveness and to contribute to the sustainable and inclusive development of the regional territory. It promotes the metropolitan economic functions, its transport networks, and its academic, research and innovation resources,

in a spirit of regional and interregional cooperation and with attention to balanced territorial development.” Thus, **EMS is considered to be a political institution that fosters territorial cohesion among its member municipalities and acts in an integrated and cross-cutting way across a variety of policy domains.** Two main development goals are mentioned in the law: “competitiveness” and “cohesion,” but the official text provides no guidance on how to define or operationalize these objectives. **It is therefore up to the elected officials of EMS to define the development goals of the entity, which is not associated with any mandatory document or procedure.** Furthermore, **the “solidarity area” composed of the member municipalities is geographically limited, especially compared to the size of the functional urban region,** which is six times larger and eight times more populous. How, then, are the relations between EMS and the surrounding territories organized? If joint projects are carried out, what form do they take and what spatial planning principles do they reflect?

In France, the area of metropolitan institutions (*communautés urbaines*, and more recently, *métropoles*) is generally seen as constraining when it comes to city-level territorial development (Motte, 2007; Demazière, 2021). To overcome this spatial limitation, several initiatives have been proposed in recent years aimed at creating broader governance structures for metropolitan areas. These initiatives have produced mixed results and have not yet come to fruition (Demazière et al., 2022). Two of them are particularly relevant to Strasbourg.

In 2010, the Law on the Reform of Local Authorities introduced “metropolitan hubs” (*pôles métropolitains*) as a highly flexible form of governance. These hubs have the legal status of a mixed syndicate and are composed of several inter-municipal groupings, ranging from as few as two (Nîmes, Alès) to as many as 20 (Caen Normandie) (Bariol-Mathais, 2017). About twenty such hubs have been established in France, with half of them located outside major metropolitan areas (Demazière et al., 2022). Unlike metropolises, metropolitan hubs do not adhere to the principles of exclusive competence or territorial continuity. They can create a network of geographically distant cities that collaborate on interterritorial challenges and planning issues. This institutional form is seen by local actors as “a breath of fresh air” because it is not subject to the general logic of territorial reforms and offers greater flexibility and room for experimentation (Vanier, 2017).

The Alsace Metropolitan Hub was created in 2012 by the Urban Community of Strasbourg and Mulhouse Alsace Agglomeration. It was expanded to include Colmar Agglomeration in 2015, and later the agglomeration communities of Haguenau and Saint-Louis in 2019. This hub brings together 1,060,000 residents, representing half the population of the European Collectivity of Alsace and more than half the jobs located there. Its goals are “to strengthen the European visibility and international outreach of the five agglomerations, consolidate their position in the Upper Rhine area, and structure a metropolitan offer for the benefit of all Alsace. The hub aims to affirm the driving role of the major agglomerations and achieve a critical mass to be influential at the European and international levels. It can also serve, when appropriate, as a tool for cross-border cooperation.⁴” The hub emphasizes the involvement of the agglomerations in managing a major cultural institution: the Opéra national du Rhin. However, this institution actually resulted from the 1972 merger of the orchestras of Strasbourg, Mulhouse, and Colmar, and was not created by the hub. The five member agglomerations of the hub do present common approaches to urban development (decarbonized mobility, sustainable development) and economic action (tourism attractiveness, automotive and health sectors, etc.). But the cooperation initiatives seem secondary compared to the individual actions carried out by the member EPCIs in these same areas. For instance, in 2024, the

⁴ Strasbourg.eu website, accessed March 21, 2025. <https://www.strasbourg.eu/pole-metropolitain-alsace>

budget of the Alsace Metropolitan Hub is about €0.8 million, which is relatively modest and tends to suggest that this structure plays only a minor role.

Another mechanism for cooperation between urban and rural areas in France is the “reciprocity contracts” (*contrats de réciprocité*). These contracts were conceived during the Rural Assizes in 2014 and revived during the Interministerial Committee on Rurality on March 13, 2015. This cooperation framework focuses on joint projects that produce mutual benefits for two territories, one urban and one rural. The logic of reciprocity contracts “helps move beyond a top-down view of spatial planning to build strategic agreements” (ADEUS, 2022: 3) between the territories involved. The idea is that each territory has its own strengths and resources to share for mutual benefit.

There is currently such a **reciprocity contract between the City of Strasbourg, EMS, and the Northern Vosges Regional Nature Park** (around 93,000 inhabitants, 111 municipalities across eight inter-municipal communities). Since the park’s creation in 1975, the City of Strasbourg has been a statutory member of the mixed syndicate that manages the park. More recently, in response to the challenges of energy, ecological, and social transitions, cooperation began to take shape. In 2017, initial reflections and partnerships emerged around the timber industry. Building on this, the contract signed by the three parties for the 2023–2026 period aims to foster collaboration on three development priorities: “jointly designing a more sustainable spatial planning model; developing solidarity in environmental protection, biodiversity, and low-carbon energy; supporting a rural, local and sustainable economy” (ADEUS, 2022: 5). As of now, these three priority areas are being implemented through around ten actions. Here too, **this cooperation linking Strasbourg to other areas in its hinterland appears to have a limited impact.**

4.2.2 What is the coherence of Strasbourg's development with national and regional objectives?

As we saw earlier, due to its competences, political and administrative capacities and thanks to its important financial means, EMS is widely recognized by public and private stakeholders as a central and legitimate actor in the region. It exercises major responsibilities in place of the municipalities it brings together, including territorial planning, social policies, housing, economic development, culture, tourism, and environmental management. We now turn to the relationships between EMS and other spatial levels of government. In France, **since the early 1980s, the State and local authorities have developed the habit of carrying out joint public actions formalized in the form of contracts** aimed at achieving one or more common objectives. **These contracts define the actions on which the signatories agree, establish an implementation schedule, and determine each party's financial contributions.**

Contracts respond to the need for new modes of public action, marked by a plurality of actors, the complexity of problems to be solved, and the scarcity of resources available to meet growing objectives (Demazière, 2005). First, decentralization has placed the State and local authorities on an equal footing in the process of developing and deciding public policies, which requires a “mutual adjustment” (Duran and Thoenig, 1996:591). Local authorities are now able to negotiate with the State on public decisions concerning their territories, and the State has had to find other means of persuasion than the circulars previously imposed. The contract allows the State to reposition itself in a leadership role while seeking financial support from local authorities. Furthermore, the distribution of powers among the different local authorities (municipalities, departments, and regions) encourages greater cooperation among them.

The State and local authorities have also had to deal with the emergence of new territorial disparities, to which the traditional method of sectoral interventions does not respond effectively.

Contracts allow for partnership-based but also multidimensional actions, adapted to the specificities of the territories. They mobilize actors in the fields of urban planning, housing, employment, education, culture, public services, etc.

It is with the **State-Region Plan Contracts** (CPER) that contractualization emerged in the public sphere. Law No. 82-653 of July 29, 1982, requires regions to develop their own plan, for a period of five years, identical to the national plan. Based on this plan, the region can enter into a contract with the State when its orientations are compatible with those of the national plan. CPERs allow regions to cooperate with the State, but also to gain the legitimacy to coordinate policies implemented at the regional level, even though regions have no control over other local authorities. Over time, the use of CPERs has increased, with financial volumes rising from €11 billion to €30 billion between the 1984–1988 period and the 2015–2020 period. Moreover, since the 2000s, CPERs have begun to include the participation of departments and large city EPCIs. This reveals a willingness on the part of the State to encourage bottom-up approaches while giving local actors significant freedom of adaptation. Local authorities and EPCIs are led to build their own methods for regulating their relationships (Duran and Thoenig, 1996).

For the 2015–2020 CPER programming, the objectives were to strengthen the competitiveness and attractiveness of French territories through efficient transport networks, public-private partnerships for research and innovation, projects promoting ecological and energy transition, green growth and the development of the digital economy, and integrated territorial development. These themes align with the priorities of the EU Cohesion Policy for the same period. The State and the regions committed to mobilizing €14.3 billion and €15.2 billion respectively, in addition to €900 million from the sub-regional signatory local authorities.

Regarding the 2021–2027 State-Region Plan Contracts (CPER), although the content may vary depending on regional challenges, three major common priorities have been defined for all regions: ecological transition; research, innovation and higher education; social and territorial cohesion. CPERs must be coordinated with European funds for 2021–2027 and the 2021–2022 recovery plan. They are accompanied by a "regional recovery agreement" intended to deploy part of the "France Relance" plan credits in the territories, rolled out by the State over the 2021–2022 period.

In the Grand Est region, the CPER 2021–2027 amounts to €4.8 billion, with 50% funded by the State and 50% by the Region. In addition to the three priorities mentioned above, cross-border cooperation is included.

In 2022, the State, the Grand Est Region, the European Collectivity of Alsace, and EMS also signed a Territorial Pact for Resilience and Ecological Transition (PTRTE). The PTRTE is designed as a tool to coordinate public policies to support the territorial and ecological transition of the territories. The signatories of this pact committed to supporting EMS and the 33 municipalities that are members of it in identifying the most appropriate public funding sources for the realization of their projects. Priority areas covered include the energy renovation of public buildings and public lighting, greening of public spaces, and transformation of the vehicle fleet. In February 2024, after reviewing nearly 3,000 funding schemes, more than 600 operations had been carried out or launched since 2021. This represents a total amount of nearly €335 million in aid provided by the partners. For example, many municipalities have been able to complete thermal renovation projects for schools or other public buildings under their responsibility. The PTRTE covering the EMS territory lists over 1,200 operations that may be carried out over the 2022–2026 period. This generates a total investment need of over €2 billion. In this context, Pia Imbs, President of EMS, stated: "I am delighted with the number of projects requiring investment. This is excellent news for the environment and especially for our territory. However, it is crucial to emphasize that the success of this pact will depend on the active participation of all the stakeholders involved. Citizens,

businesses, and organizations must all play a key role in the implementation of these projects and the success of this ambitious initiative.”⁵

Moreover, **the Grand Est Region signed in 2024 a “metropolitan contract” with the City of Strasbourg and EMS.** This contract lists projects of common interest, which will be co-financed by these partners. 90% of the Region’s contribution (€55 million out of €63 million) is earmarked for metropolitan projects led by EMS. These include mobility projects, a shared responsibility of both institutions.

Finally, it is worth mentioning the **Triennial Contract “Strasbourg European Capital”**, which has been a renewed commitment for over forty years between the State and local authorities — the City of Strasbourg, EMS, the European Collectivity of Alsace (CEA), and the Grand Est Region — to ensure the financing of operations aimed at consolidating and expanding Strasbourg’s functions as a European capital. The 15th triennial contract, signed for the 2024–2026 period, commits the signatories to continue responding to issues related to Strasbourg’s accessibility (€97 million), the functioning of European institutions (€66 million), the international educational offer (€7 million), and to support Strasbourg’s European influence in culture and research (€125 million). The total amount of operations under this contract amounts to €296 million. It will be covered as follows: €94.9 million by the State; €35.6 million by the Grand Est Region; €22.4 million by the European Collectivity of Alsace; €62.8 million by EMS; €79.6 million by the City of Strasbourg; and €0.6 million for the Strasbourg airport.

In conclusion, we can say that through numerous contracts, **French public actors — the State, the Region, the departments, and EMS — agree on certain objectives and pool financial resources to co-finance projects in Strasbourg.** Currently, the main themes are mobility and the thermal renovation of public buildings. Furthermore, the timing of State-Region Plan Contracts has deliberately been aligned for decades with the programming periods of European structural funds. **Nevertheless, given the relatively small amounts of EU Cohesion Policy funds available to Strasbourg actors, the European influence on the strategies implemented locally is likely limited. This weak Europeanization is likely a fairly general case in large French urban areas.** However, it stands out somewhat in the context of Strasbourg, which is also one of the capitals of Europe.

⁵ Eurométropole de Strasbourg (2024), Un pacte régional pour la réussite de la transition écologique. Communiqué de presse, <https://www.strasbourg.eu/documents/976405/475941402/0/3d87ba4e-6a84-d742-a192-41fc1b816e50> Accessed on 20 June 2025.

Table 4.3
Actors' constellation and governance in Strasbourg

Name of the actor	Level	Responsibility	
		Cohesion Policy	Spatial Planning
National government	National	National cohesion policy	National government and Parliament define the overall priorities and spatial planning instruments used at subnational levels. The national government also initiates bilateral and multilateral contracts
Région Grand Est	Subnational (regional)	Regional Cohesion policy	The Region is in charge of elaborating the <i>Schéma Régional d'Aménagement Durable et d'Égalité des Territoires</i> which sets guidelines to other plans. With the national government it signs the <i>contrat de plan Etat-Région</i> . Région Grand Est managed to be involved in the contact that the national government signed with EMS after the COVID-19 pandemic (PTRTE).
Collectivité Européenne d'Alsace	Subnational (provincial)	No role	
Eurométropole de Strasbourg	Subnational (metropolitan)	Metropolitan Cohesion policy	Région Grand Est signed with EMS and the City of Strasbourg a "metropolitan contract".
Ville de Strasbourg	Local	No role	The national government, the Grand Est Region, the European Collectivity of Alsace, EMS and the City of Strasbourg also agree on a Triennial Contract "Strasbourg European Capital", to realize projects aimed at consolidating and expanding Strasbourg's functions as a European capital

Source: author's own elaboration

4.3 The involvement of Strasbourg in Cohesion Policy

This section aims to explore the actual participation of Strasbourg in delivering the Cohesion Policy for the 2014-2020 and 2021-2027 periods. For this purpose, we answer the following guiding questions:

- To what extent has EMS been involved in Cohesion policy and the related national and regional programming?
- What kind of role is EMS playing in Cohesion Policies (Managing Authority, Intermediate Body, single/collective Beneficiary)?
- Has its role changed from the 2014-2020 and 2021-2027 programming periods?

The final aim is to explore the role of city administration in delivering the urban dimensions of the Cohesion Policy (direct vs. intermediate) in the two programming periods (see section 4.3.1 and 4.3.2).

4.3.1 2014-2020 programming period

For the 2014–2020 period, EMS acted as an intermediary body. It managed a financial envelope in a comprehensive manner: EMS was in charge of the selection of projects but also of the instruction and payment of applications. By a resolution dated 10 July 2015, the Alsace Regional Council delegated to EMS the management of a €7.5 million ERDF envelope in the form of a global grant. An additional envelope of €500,000 was granted on 21 May 2021, by the Grand Est Regional Council, thus bringing the total amount of the ITI (Integrated Territorial Investment) to €8 million. The ERDF envelope is managed as a global grant, making Strasbourg a unique case

in France for the 2014–2020 programming period. Similarly, the national administration delegated an ESF envelop of 5.45 million euros to EMS.

With regard to the ITI territory, at the request of the EMS, the strategy has been extended to encompass its entire area. However, the managing authority (the Region), in line with the European Commission’s requirements, has imposed that 40% of the ITI envelope be allocated to priority urban neighbourhoods (QPV – *Quartiers Prioritaires de la Politique de la Ville*), with certain actions specifically targeting these areas. These neighbourhoods face massive structural unemployment, resulting in acute social precarity, particularly among 15- to 24-year-olds, the age group most affected by this phenomenon. It has developed an economic strategy based on partnership: 'Eco 2030 Strategy – A Territory to Grow'. This strategy, defined in 2015, set a target of creating 27,000 jobs by 2030. It followed the 'Strasbourg Eco 2020' strategy, launched in 2009 following the municipal elections. While the earlier strategy focused on flagship projects such as the international business district, the modernization of the music and convention centre, enhancing Strasbourg's international accessibility, and the development of digital and medical technology hubs, the Eco 2030 Strategy—aligned with the ITI—focuses on service sector development, business creation support, and assisting the digital transition of industry (France, 2015).

In terms of implementation and governance, the ITI is managed by the European Funds Unit, comprising four staff members within the “Employment and Social Economy” department—one of three departments under the Economic Development and Attractiveness Directorate of EMS. This unit oversees the entire grant process, from programme coordination to file archiving.

The decision-making process is broadly similar for ERDF and ESF credits included in the ITI. For ERDF projects, once assessed, files are presented to the ERDF Technical Committee, composed of local partners (State, Grand Est Region, consular chambers, EMS departments, etc.), and then submitted to EMS thematic elected officials. Projects are subsequently referred for advisory opinion to the Regional Programming Committee. This committee assesses eligibility criteria, but not the project’s substance—highlighting that the projects funded align with Strasbourg’s metropolitan policy. Final approval is given by the EMS Council, which determines the funding. Typically, three to four deliberations are submitted to the Metropolitan Council each year. Notably, **there has never been any divergence between the opinion of a consulted partner and EMS’s final decision** (e.g. no case where a project opposed by a partner was nonetheless approved by EMS).

Regarding the ESF funds granted by the State, the review process is similar. However, the advisory opinion in this case is issued by DREETS (Regional Directorate for Economy, Employment, Labour, and Solidarity). Unlike ERDF projects, it is not uncommon for DREETS to issue a negative opinion—either due to differing interpretations of which authority (State or Region) is responsible for the project under the ESF framework, or on substantive grounds, particularly if DREETS considers that the innovation dimension of a project is insufficient.

Table 4.4
Strasbourg’s engagement in delivering Cohesion Policy 2014-2020

Document	Level	Pro-gram-ming	Managing	Phase		Managing Authority	Inter-mediate Body	Role Beneficiary
				Implement-ing				
NOP ESF	National		X	X			X	
Alsace ROP	Regional		X	X			X	X

Source: author's own elaboration

4.3.2 2021-2027 programming period

This section describes the experience of EMS for the current programming period (2021 to 2027), focusing mainly on its role in delivering the urban dimension of the Cohesion Policy.

For this programming period, Strasbourg keeps being an intermediary body through an ITI. EMS managed a financial envelope in a comprehensive manner: it was in charge of the selection of projects but also of the instruction and payment of applications. The ERDF credit amounts to 10 million euros and ESF+ provides 5.1 million euros.

Table 4.5
Strasbourg's engagement in delivering Cohesion Policy 2021-2027

Document	Level	Pro-gram-ming	Phase		Managing Authority	Interme-diate Body	Role Benefi-ciary
			Managing	Implement-ing			
NOP ESF	National		X	X		X	
Alsace ROP	Regional		X	X		X	X

Source: author's own elaboration

4.3.3 Main differences

Regarding the governance structure, **there were only minor changes**. As regions merged in 2015, the ROP is now developed by the Région Grand Est which aggregated 3 regions, including Alsace. This regional government has been keen on maintaining the ITI tool for the 2021-2027 programming period, and has selected EMS as one of the two beneficiaries⁶. As to EMS, its boundaries slightly increased with the inclusion of 5 small communes in 2017. These communes may be eligible to the axis that fosters the revitalisation of town centers.

The main changes are about thematic priorities. Historically, Strasbourg has implemented various urban initiatives targeting priority neighborhoods. During the 2000–2006 period, an URBAN Community Initiative Programme (PIC URBAN) focused on the three main priority urban neighborhoods (QPV) of the metropolitan area. For 2007–2013, this effort continued with an Integrated Urban Programme (PUI), which expanded to cover ten designated sensitive urban zones (ZUS). In the 2014–2020 programming period, the European Commission required the Alsace Region to allocate 40% of ERDF funding to QPVs. EMS maintained this geographic targeting but successfully negotiated the inclusion of themes such as the social and solidarity economy and digital innovation, which were considered strategic priorities within the Strasbourg Eco 2030 framework.

⁶ The other ITI has been set up by *Mulhouse Alsace Agglomération*.

However, the digital axis did not achieve the expected results. Therefore, in a pragmatic approach, it was not renewed for the 2021–2027 programming period.

The priorities set out for the 2021–2027 ITI are closely aligned with the new economic strategy outlined in the Pact for a Sustainable Local Economy, which aims to support economic actors in the ecological transition. Accordingly, the circular economy has been identified as a key priority for EMS across its territory.

The axis supporting the two France 2030 projects stems from the reluctance of the Grand Est Region to allow EMS to undertake broader innovation initiatives within its territory, as this is considered a regional prerogative. Nevertheless, this axis is currently being restructured due to a timing mismatch between the France 2030 projects and the 2021–2027 programming period. As part of the mid-term review, EMS secured the right to support innovation projects carried out by companies located in industrial parks under its jurisdiction, based on its responsibility for economic development.

Continuity between the two programming periods is reflected in the focus of ESF+ funding on access to employment, particularly for young people, through skills development. One can also observe the allocation of part of the ERDF funding to priority neighbourhoods (QPV)—notably for business creation and development, and health-related projects. In the health sector, for example, all the community health facilities supported thus far by the ERDF are located in QPVs, even though the measure is intended to benefit the entire EMS territory.

Promoting the links between economic development, employment, and social inclusion remains a key challenge for EMS, as it not only serves the objectives of territorial development and competitiveness but also helps to ensure social and territorial cohesion.

4.4 Networking and lobbying activity

Participating in different arenas helps cities to be more influential and gain competitive advantages when it comes to benefitting from the EU Cohesion Policy. This section aims to explore the actual involvement of EMS in networking. We shall examine at which level of networking (e.g., international, EU, national levels) Strasbourg is involved and which kind of role it has.

Strasbourg appears to be an active player in European, international, and cross-border networks. To develop projects, promote the exchange of best practices, and highlight its actions and expertise, Strasbourg actively participates in various European, international, and cross-border networks. Its involvement in these networks also allows the city to advocate for the interests of Strasbourg and local authorities before European and international institutions.

With regard to **European networks**, Strasbourg has been a member of **Eurocities** since 1990. EMS actively contributes to the network's activities through various working groups. Another major network is the **Council of European Municipalities and Regions (CEMR)**, which brings together around fifty national associations of cities and regions from 41 European countries, thereby representing approximately 100,000 local and regional authorities. French cities and regions are represented in the CEMR by the **French Association of the Council of European Municipalities and Regions (AFCCRE)**. Strasbourg is a member of the CEMR's Steering Committee and has chaired the "Franco-German Relations" Commission since 2020.

Another key network is **Energy Cities**, a coalition of more than 1,000 cities from 30 countries promoting energy transition in Europe. A member since 1991, EMS is actively engaged in its initiatives.

EMS is also involved in several international networks. It plays an active role in **United Cities and Local Governments (UCLG)**, particularly on themes such as mobility and the localization of the **Sustainable Development Goals (SDGs)**. Strasbourg is a member of UCLG through **Cités**

Unies France, a network of French local governments engaged in decentralized cooperation. Within Cités Unies, Strasbourg participates in country-specific working groups (e.g., Haiti, USA, Russia, Tunisia, Japan) as well as thematic groups, such as the one focused on the SDGs.

Strasbourg is also a member of **ICLEI – Local Governments for Sustainability**, a global network of over 1,750 local and regional governments committed to sustainable urban development. EMS contributes particularly to topics such as the circular economy, urban nature, and air quality.

Regarding cross-border networks, the **Rhine Council** is worth noting. This body functions as a regional parliament of the Upper Rhine and brings together elected representatives from the main territorial authorities through thematic commissions. Its goal is to support the implementation of concrete projects by lobbying relevant authorities at both regional and European levels.

Within the **Trinational Metropolitan Region of the Upper Rhine (TMR)**, which aims to develop a shared regional planning strategy, Strasbourg participates in the **Political Pillar**, one of the four pillars of its governance structure (the others being science, civil society, and economy). Strasbourg also leads the **Network of Upper Rhine Cities**, an informal platform for cooperation and exchange among the 11 major cities of the Upper Rhine. The network aims to promote the consideration of cross-border urban issues in the Upper Rhine region and within broader urban policies.

Furthermore, EMS participates in the **Cross-Border Cooperation Committee (CCT)**, established by the **Treaty of Aachen** on January 22, 2019. The committee fosters dialogue between French and German authorities to facilitate cross-border cooperation. It monitors major cross-border projects and helps overcome administrative and legal obstacles through regulatory adjustments or exemptions. The committee includes representatives of national governments, local authorities such as EMS, parliamentarians, and Eurodistricts along the French-German border. It issues opinions and recommendations to decentralized authorities, as well as the joint Parliamentary Assembly and Council of Ministers.

Strasbourg is also a member of the **Mission Opérationnelle Transfrontalière (MOT)**, an association created in 1997 by the French government to coordinate cross-border issues at the interministerial level and support territories in their cooperation efforts. MOT has about a hundred members, primarily local authorities alongside relevant ministries and public bodies. Since her election as President of EMS, Ms. Pia Imbs has also acted as vice president of the MOT.

Finally, Strasbourg is a member of **France urbaine**, a national network that includes 108 members representing around 2,000 municipalities of various sizes, encompassing nearly 30 million residents. Within this network, the **European affairs committee** is co-chaired by **Jeanne Barseghian**, Mayor of Strasbourg and First Vice-President of EMS.

Table 4.6
Networking and lobbying activity of Strasbourg

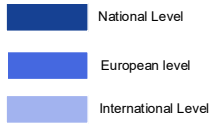
Name of the network	Level	Topic	Role	Additional comment
Eurocities	EU		Member	Member since 1990
Conseil des Communes et Régions d'Europe	EU		Member through the Association Française du Conseil des Communes et Régions d'Europe (AFCCRE)	Member of the managing board of AFCCRE and chair of the Commission « French-German relationships » since 2020
Energy Cities	International	Energy policy	Member	Member since 1991

Name of the network	Level	Topic	Role	Additional comment
United Cities and Local Governments	International		Participates in country-specific working groups and in thematic groups (e.g. SDGs)	Member through Cités Unies
ICLEI – Local Governments for Sustainability	International	Sustainability	Participates in thematic groups (circular economy, urban nature, and air quality)	
Rhine Council	International (cross-border)		Member	
Trinational Metropolitan Region of the Upper Rhine	International (cross-border)		Participates in the Political Pillar	
Network of Upper Rhine Cities,	International (cross-border)		Leader	This network is an informal platform for cooperation and exchange among the 11 major cities of the Upper Rhine
Cross-Border Cooperation Committee			Member	Established by the Treaty of Aachen in 2019, this committee fosters dialogue between French and German authorities to facilitate cross-border cooperation.
Mission Opérationnelle Transfrontalière	National		Member	
France urbaine	National		Member	Cochair of the European affairs committee through the Mayor of Strasbourg (also First Vice-President of EMS)

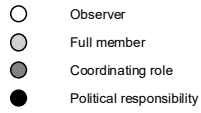
Source: author's own elaboration

Figure 4.1
Networking mapping of Strasbourg, France

Networks Levels

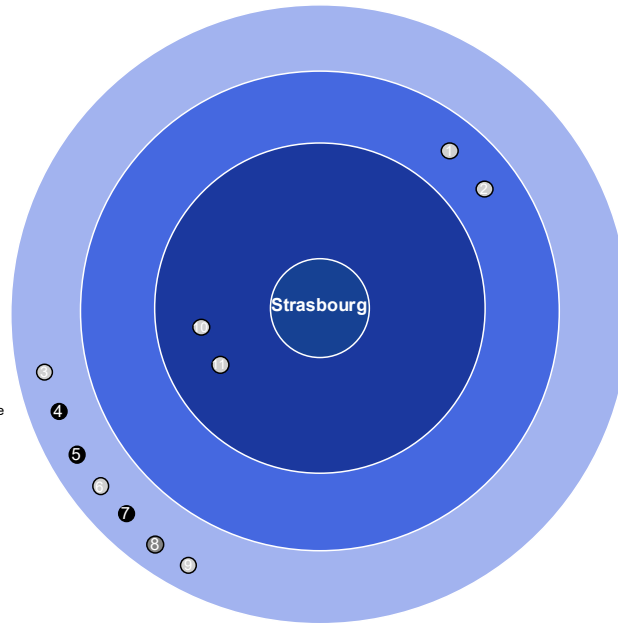


Role within the Network



Name of Network

- | | |
|--|---|
| EuroCities | Network of Upper Rhine Cities |
| Conseil des Communes et Régions d'Europe | Cross-Border Cooperation Committee |
| Energy Cities | Mission Opérationnelle Transfrontalière |
| 4 United Cities and Local Governments | France Urbaine |
| 5 ICLEI | |
| Rhine Council | |
| 7 Trinational Metropolitan Region of the Upper Rhine | |



Source: author's own elaboration

5 Administrative capacity and Institutional innovations

In this section we shall explore the innovations introduced by EMS to enhance its administrative capacity and to improve the coordination of urban issues at the metropolitan level with supra-local priorities and principles, including those at the EU, national, and regional levels.

5.1 Administrative capacity and management gaps

This subsection addresses the following guiding questions:

- Did Strasbourg have any capacity gaps or problems managing large EU projects or other large investments (from other resources)?
- What main barriers hinder the development of a well-functioning EU framework for urban investments in the case of Strasbourg? Some examples are unclear technical procedures; lack of well-qualified and stable staff; political will etc.

EMS has been managing European Regional Development Funds (ERDF) since 2002, i.e. at a time when such funds were still managed by the national administrations all over France. According to stakeholders interviewed, **EMS has gradually developed a very strong expertise in this area. On the other hand, it has successfully aligned the use of these funds with the territory's economic development strategy. Its technical capacity is considered outstanding.**

Evidence is provided by the controls linked to the ITI for the 2014–2020 period. In 2022, a total of 65 on-site inspections had been carried out, none of which revealed any significant irregularities. Audits conducted by the Grand Est Region (including quality and project controls) and the Inter-ministerial Coordination Commission for Controls confirmed the sound management of the ERDF funds delegated to EMS, with no major remarks.

For the current programming period, this high level of competence in managing European funds has a direct consequence: the rapid absorption of the credits allocated. For the 2021–2027 programming period, it is evident that ERDF funds were consumed at a remarkable pace—so much so that by the end of 2024, EMS was compelled to urgently reduce the intervention rate. As of today (beginning of year 2025), no credits remain available. The same situation applies to the Grand Est Region. This is a unique case in France, where, in contrast, the disbursement of cohesion funds tends to be slower and is expected to span the entire programming period.

This swift fund utilization highlights both EMS's ability to support project promoters and the strong demand for European funding within the territory—an interest effectively channeled by a well-structured ecosystem that includes EMS departments, municipalities, and chambers of commerce.

Besides, we should mention that, regarding the 33 member municipalities, EMS provides outreach and communication to elected officials and local technicians regarding access to European funding.

Although the administrative complexity of managing EU cohesion funds is real, this challenge is mitigated by a highly skilled team whose work helps disseminate best practices among project leaders and throughout the ecosystem. Based on the experience gained in successive ITIs, a network of contacts has been established, positioned in various EMS departments and responsible for sectoral projects supported by European funding. This network enables the sharing of expertise and information, and the gradual strengthening of human resources and skills development.

Additionally, EMS relies on external project management assistance for specific analyses related to State aid and public procurement.

Lastly, it is worth noting that **despite changes in political leadership in Strasbourg and EMS over the past two decades, there has been a continuous and strong commitment to European policies**—a reflection of the city's identity as one of the capitals of the European Union.

5.2 Multilevel governance

A functioning multilevel governance is paramount in delivering Cohesion Policy. On the contrary, poorly functioning governance is considered a hampering factor that slows its implementation. Based on the experience of Strasbourg, we aim here to specify:

- the state of multi-level cooperation in delivering the Cohesion Policy in France
- the gatekeeper role of the national or regional government
- the city's relationship with the different Managing Authorities (direct/indirect, complementary, or confrontational)?

In the French context - and potentially beyond - Strasbourg stands out as an exemplary case of multilevel governance. As we saw earlier (section 4.2.2), EMS shares development objectives with the province, the region, and the state, each of these actors being involved in the cofunding of projects that take place in Strasbourg⁷. EMS has successfully influenced the choice of the instrument (the Integrated Territorial Investment – ITI) and the possibility to manage European funds. Furthermore, it has effectively aligned the objectives of successive urban programmes with its own urban and economic development strategy. Its capacity is acknowledged both by the regional authority and by the national administration which delegate ERDF and ESF+ funds respectively.

Nevertheless, this situation of multilevel governance is quite exceptional in the context of France. As we saw in section 3 of this report, the dialogue between state administration and urban authorities is sometimes difficult. **Urban authorities sometimes feel that there is a tendency to re-centralize the decision about the EU funds and tools.** This was experienced in particular with the Recovery and Resilience Facility (see section 8). On the other hand, regional governments play a gatekeeper role for the ERDF and in some cases a city's relationship with the regional authority may be confrontational (Demazière, 2022).

5.3 Financial constraints and technical complexity

The political discourse always accompanies finance and funding availability on the Cohesion Policy in each country. Having in mind the experience of Strasbourg, we may say the following.

Firstly, regarding the accessibility of European funds (both direct and shared) available to Strasbourg, the case of the ITI clearly illustrates that the allocated amounts are wholly insufficient in light of the territory's needs and EMS's demonstrated capacity to use European funding efficiently. This situation applies to the current programming period, in which all available funds were allocated within just two years. EMS—together with the Grand Est Region—submitted a request to the European Commission for additional credits, but this request was denied.

⁷ These projects are agreed in the following documents: *Contrat de plan Etat-Région*, the *Contrat Métropolitain Régional*, the *Pacte Territorial de Relance et de Transition*, and the *Contrat triennal*.

Secondly, there are no issues related to the co-financing of projects supported by the ERDF under the ITI. Indeed, **EMS has deliberately chosen to maximise the leverage effect by almost exclusively supporting projects led by private actors.** As a result, these actors are not directly affected by growing pressures on public finances—including local government budgets—which are becoming apparent in France in the last ten years. However, in the case of Strasbourg, concerns are emerging regarding the financial structuring of health centre projects which may be supported by the ITI. Already, an increasing number of co-financing partners are required to complete these investments.

5.4 Innovations and good practices

To overcome institutional barriers, cities sometimes act as innovative hubs. This section explores whether Strasbourg has introduced innovative actions/initiatives that have allowed it to partially or totally overcome barriers and constraints related to the Cohesion Policy.

What innovations have been introduced? In Strasbourg, the innovations that appeared aim **to ease the difficulties that project initiators (such as small businesses or associations) may encounter when developing their projects.** Notable examples include:

- A one-stop-shop approach for ERDF funding: project holders are jointly received by the EMS staff and a representative from the Grand Est Region. This joint reception also applies to ESF+ projects whenever possible.
- A coordinated review process with the project's other financial backers, in order to apply the most favourable state aid scheme to the beneficiary.

Which kind of results can be observed (better EU management, improving of coordination, better policy alignment, etc.)? And how have those positive results been capitalised in delivering the Cohesion Policy?

Regarding coordination of policies and projects, we may say that the highly skilled team dedicated to the management of EU funds has established a network of contacts, positioned in various EMS departments. **This network enables the sharing of expertise and information, and the gradual strengthening of human resources and skills development** regarding the management of projects supported by EU funding. Several EMS departments have become familiar with the EU cohesion policy through their involvement in specific projects.

A **better policy alignment between the 33 member municipalities needs and the EMS** use of EU funding is looked for through outreach and communication to elected officials and local technicians regarding the access to European funding.

Thanks to the support provided by EMS's Europe unit, **private project initiators have clearly achieved significant skills development in legal and financial expertise.** Considering that 200 projects were funded by ESF and/or ERDF during the 2014–2020 period, this capacity-building effort is substantial.

The technical expertise developed and shared by EMS is all the more critical for the territory as the long-promised administrative simplifications of the CP have yet to materialise. On the contrary, controls have increased and are at times perceived as excessive or even surreal.

Lastly, EMS engaged in experience-sharing during the 2014–2020 period with other metropolitan areas or major urban authorities in the Grand Est region, encouraging them to apply for an ITI for the 2021–2027 programming period. Only Mulhouse followed suit. The other urban authorities that did not submit such a request can no longer receive funding from the Region due to full credit

consumption for some axes, whereas EMS and Mulhouse were able to secure funding through the ITI.

Table 5.1
Main innovations implemented at the local level

Name of innovation	Objective (barriers to overcome)	Innovative actions	Results	Additional comment
One-stop-shop for EU funding	Multiplicity of interlocutors for financial support for a project	Coordination of actors (EMS, Region, State branch) regarding the information to project bearers and the review process of applications	Reinforced coordination Better policy alignment	This innovation makes possible to provide the most favourable state aid scheme to the beneficiary
Network of EU funds (potential) users in various departments of EMS	Lack of experience in the applications to EU direct or shared funds and uneven capacity to manage EU funded projects	European funds network within EMS	Increased success rates to applications to EU funds Better management of EU funds by EMS	Strengthening of human resources and skills development regarding the management of projects supported by EU funding

Source: author's own elaboration

5.5 Added value of negative experiences

Sometimes, institutional failures pave the way for new, unpredictable solutions. However, due to the more than two decades long experience of Strasbourg in managing EU cohesion funds, **no negative examples or experiences were put forward by the people interviewed**. We can suppose that if any negative experience took place, this might have been a long time ago, and it could have given way to a good practice since then.

6 Cohesion Policy contributions to city long-term agendas

This section provides evidence-based information on whether and how the urban dimension of the Cohesion Policy contributes to Strasbourg's long-term agenda and the localisation of EU priorities. Additionally, this part explores how this policy framework can evolve to meet new and emerging needs.

6.1 Main development instruments

In this section we introduce and describe the existing development policy and planning instruments and the relevant sectoral instruments (including strategic plans, incentive programmes, and other relevant sectoral tools for context, etc.). Our aim is to address the following two series of questions:

- Which are the main development instruments in France and especially at the level of EMS? Are these instruments statutory or voluntary? Is it mandatory to develop them? Are they binding, and for whom?
- Regarding the instruments that address specifically the urban dimension of the Cohesion Policy, what are the actors involved in their development and implementation? What are their main objectives and how is their implementation intended?

6.1.1 To what extent are territorial development and spatial planning integrated?

In this section **we examine three planning documents that are compulsory in all large conurbations in France**: the spatial plan for the functional urban area (SCOT), the land-use plan (PLU), and the Territorial Climate-Air-Energy Plan (PCAET) which aims at mitigating the effects of climate change. For all three plans, EMS is a major player since it currently holds authority in spatial planning. Historically, in France, the decentralization laws of the 1980s led to the transfer of most urban planning powers to municipalities whatever their size. The 2000 Urban Solidarity and Renewal Act (SRU) expanded these powers to voluntary groupings of municipalities. In the spatial planning system, two core planning tools are involved: the Territorial Coherence Plan (SCOT) and the Local Urban Plan (PLU). These plans are regularly updated both in objectives and processes. They aim to reinforce environmental protection through the National Environmental Commitment Law (2010) or promote social diversity under housing and urban renewal laws (2014). Legislators and local governments have also introduced new environment-focused planning tools, like Territorial Climate Energy Plans.

At the scale of a living area, the SCOT is the cornerstone of urban planning in France. It replaced the former Master Plan (SD), shifting focus from land use to strategy and foresight. It aims to define a shared project across several groupings of municipalities. The SCOT expresses a political vision. It is not an operational tool for direct action but rather a framework and set of constraints to support future actions. As of January 1, 2020, France had more than 450 SCOTs, covering 95% of the population and 85% of municipalities. These figures reflect a genuine renewal in French spatial planning.

The SCOT holds legal authority that all other planning documents must comply with. It ensures territorial coherence by addressing major development balances (expansion/restoration/protection of natural areas), social diversity, and the variety of urban functions. It must also better

connect urban planning and transport. The SCOT is developed through a collaborative process involving municipal groups, the state, the region, the department, socio-economic stakeholders, and civil society organizations. However, implementing the SCOT is challenging due to the size and diversity of the territory, which often involves many municipalities from different groups and struggles to encompass an entire functional urban region (Motte, 2007).

In 2000, the SRU law also transformed the Land Use Plan (POS) into the Local Urban Plan (PLU), with the aim of municipalities defining urban projects rather than just zoning. Like the SCOT, the PLU has complex statutory goals related to land use diversity and environmental protection. It is developed by local elected officials at the municipal or inter-municipal level. The PLU must reconcile often conflicting interests from institutional, economic, or civil society actors. It outlines the urban planning vision of the municipality or municipal grouping, defining general policies for development, infrastructure, environmental protection, and ecological continuity. It sets general land-use rules that are legally binding for public and private actors alike.

In most cases, the PLU is developed at the municipal level. However, the state now encourages replacing it with the Intercommunal Local Urban Plan (PLUI), with “I” standing for intercommunal. The PLUI covers a broader area and integrates housing and transport planning. It can also be merged with the Local Housing Program (PLH), becoming a PLUH.

In Strasbourg, the SCOT was developed by a dedicated organization bringing together EMS and three surrounding municipal groups: the Canton of Erstein Community (28 municipalities, 48,000 people in 2021), the Kochersberg Community (23 municipalities, 26,000 people), and the Pays de la Zorn Community (20 municipalities, 16,000 people). The SCOT thus covers 104 municipalities and over 600,000 people, more than 500,000 of whom live in EMS. Approved in 2006, **the SCOT has been under revision since 2018 to address multiple transitions, particularly energy-related, and to strengthen cooperation with neighboring SCOT territories.** The new SCOT was approved by local elected officials in March 2025, then submitted for consultation with public authorities (Region, State, Chamber of Commerce, etc.) and a public inquiry, with final approval expected in December 2025.

As for the PLU, which covers EMS’s 33 municipalities, it was approved in 2016, revised in 2019, and amended in 2024. It addresses typical challenges faced by European metropolitan regions and is structured around three main directions, each with specific goals (Eurométropole de Strasbourg, 2019). The first objective, “A European metropolis on the Rhine, attractive and influential,” aims to strengthen the region’s regional and international appeal, integrate EMS’s development into a broader cross-border living area, enhance residential attractiveness, and adapt to lifestyle changes. The second objective, “A local, accessible metropolis,” involves providing sufficient, diverse housing, improving quality of life and services, leveraging territorial diversity, and expanding natural spaces and green-blue infrastructure. The third objective, “A sustainable metropolis,” seeks to prepare the region for a low-carbon society, promote agriculture, and control urban sprawl and land consumption.

In practical terms, **the PLU sets ambitious goals: 27,000 new jobs and 50,000 additional residents are expected by 2030, requiring the construction of 3,000 new homes per year.** These figures show that **the main objectives of spatial plans in Strasbourg are demographic and economic growth.** Social cohesion and territorial cohesion also appear but they are second-rank

objectives⁸. Strasbourg is no exception to the general case of large cities or city-regions in France, where the spatial planning tools have the mission to accommodate growth through greenfielding and/or through urban regeneration.

Alongside the SCOT and PLU, new planning tools have emerged in France to address specifically climate, energy, biodiversity and public health challenges. To meet these pressing environmental challenges and ensure a transition to sustainable energy use, lawmakers have introduced Territorial Climate-Air-Energy Plans (PCAETs). These are mandatory for municipal groups with over 20,000 residents and serve both strategic and operational roles. National policy assigns metropolitan authorities a key coordinating role in climate action alongside municipalities, private and public stakeholders, and citizens. In Strasbourg, the 2030 Climate Plan was adopted in December 2019 following broad consultation and co-development with local actors. It includes four main pillars: quality of life and resilience, transformation toward carbon neutrality, economic transition, and operational resources. The ambitious action plan covers public health, mobility, urban planning, energy, housing, social policy, sports, public and green spaces, biodiversity, agriculture, economy, circular economy, and citizen participation. After the 2020 municipal elections, EMS reaffirmed climate change as its top priority by declaring a climate emergency and accelerating the implementation of the Climate Plan 2030.

In 2024, a mid-term review of the Climate Plan was conducted. It assessed the territory's current situation (GHG emissions, energy consumption, air quality), the dynamics in play, and EMS's role as coordinator. This review highlighted both achievements and challenges, and outlined needed adjustments, aligning with new European, national, and regional policy developments since 2019. The updated version added **a new pillar focused on adaptation, resilience, and biodiversity protection, reflecting the increasing priority of these issues**. Regarding ecological and energy transition, there is a strong alignment between EMS objectives and national/EU goals.

6.1.2 The strong influence of a non statutory and non binding plan for the development of the 2021-2027 ITI

The **municipal elections of spring 2020 led to the arrival of a green-left coalition at the city of Strasbourg and consequently at the level of EMS**. This case is by no means unique in France. As wrote Marjorie Jouen (2023: 29) "In the big cities, the (municipal) elections were marked by the victory of candidates with strong ecological transition strategies. The mayors of Nantes, Grenoble, Paris and Lille were re-elected – the latter two thanks to a marked greening of the initial programme. New teams described as green succeeded in Lyon, Strasbourg, Bordeaux, Tours, Besançon, Annecy and Poitiers. Thus, from summer 2020, these new political teams were ready to implement their own green transition agenda (...). In addition, these metropolitan strategies and associated investments anticipated substantial support from the future EU cohesion policy. ».

In her first speech as **mayor of Strasbourg** in June 2020, Jeanne Barseghian **declared an ecological 'state of emergency'** and announced measures such as the demineralisation of the city centre, the creation of parks and cycle paths, and the exclusion of diesel vehicles from the city centre by 2025. At the level of EMS, Pia Imbs, mayor of the small municipality of Holtzeim (3,200 inhabitants in 2020), was elected president on 15 July 2020.

⁸ In the 'planning and sustainable development project' of Strasbourg's PLU, adopted in 2019, the term "employment" appears 10 times, 'economic growth' appears 4 times, while 'social cohesion' appears only 2 times and « territorial disparities » only once.

Pia Imbs has positions and **objectives that converge with those of the mayor of Strasbourg**, who supported her and is her first vice-president. Just before her election, she presented her project to the councillors of EMS as follows: "For almost a year, I have been working on a project that will take our 33 communes, from the largest to the smallest, into a new dimension. A conurbation that is exemplary in ecological, social and democratic terms. A metropolis that shines through its new practices, its sustainable regional planning and its unfailing cooperation between partners driven by the same objective: the ability of our metropolis to cope with future shocks, to offer a pleasant living environment for all, to guarantee access to jobs and leisure for everyone, and to put an end to the inequalities that are growing between neighbourhoods and communes". In summary, she added that « together, we need to enter an era in which the urgency of climate change becomes the central matrix of the Eurometropolis' public policies »⁹.


In this context, a voluntary and non binding planning instrument of EMS: is worth mentioning the "Pact for a Sustainable Local Economy" (*Pacte pour une économie locale durable*). As was underlined during several interviews, **it is the main planning instrument that is related to the urban dimension of the CP**. This plan has been established by EMS on a voluntary basis, together with many private actors (firms, not-for-profit organisations...) of the territory. It had predecessors in the form of Eco 2020, established in 2009 and Eco2030, established in 2015. However, it was developed and adopted in the aftermath of the municipal elections when the new mayor of Strasbourg, Jeanne Barseghian, has declared strong commitments to the ecological transition. On the other hand, *Décideurs* magazine notes that "during her campaign and in the days following her election, Jeanne Barseghian did not hesitate to reassure the business community". Indeed, she "wants to govern in the manner of the German Greens, i.e. by emphasising transparent discussion and collaboration with employers"¹⁰.

Between November 2020 and March 2021, EMS initiated the co-creation, in collaboration with the region's key stakeholders, of the "Pact for a Sustainable Local Economy." Through this participatory approach involving economic and institutional actors from the territory, **EMS aimed to scale up ecological transition efforts already underway and to make sustainable transformation a reality for all**, through balanced development that integrates ecological, economic, and social issues.

The Pact for a Sustainable Local Economy was formally adopted by the elected representatives of both the City of Strasbourg and EMS in May 2021. It now serves as EMS's new economic strategy, succeeding the "Strasbourg Eco 2030" framework that had guided the ITI during the 2014–2020 programming period. While officially positioned as a continuation of the work, partnerships, and trust developed under Strasbourg Eco 2030, **the Pact also reinforces the Climate Alliance by engaging economic actors around the objectives of the Climate Plan** and, more broadly, the Sustainable Development Goals (SDGs) adopted by the United Nations as part of Agenda 2030.

The Pact promotes a transition toward an economic model that benefits the entire local socio-economic fabric, encompassing businesses of all sizes, in all municipalities and neighbourhoods of EMS. It aims to protect and improve both the environment and public health. As both a shared

⁹ Kaiser Muriel (2020), Eurométropole de Strasbourg : qui est Pia Imbs, la nouvelle présidente qui dirigera l'agglomération, <https://france3-regions.franceinfo.fr/grand-est/bas-rhin/strasbourg-o/eurometropole-strasbourg-qui-est-pia-imbs-nouvelle-presidente-qui-dirigera-agglomeration-1853700.html> (consulté le 16 juin 2025).

¹⁰ Lucas Jakubowicz, « *Jeanne Barseghian, la discrète* [archive] » , sur www.magazine-decideurs.com, 2 juillet 2020 (consulté le 13 juin 2025).

roadmap, a collective commitment by local economic actors, and a strategic positioning document, the Pact aims to:

- Ensure balanced local economic development that uses resources sparingly, reduces environmental impact, and benefits as many people as possible;
- Amplify the collective dynamic and local initiatives for ecological, social, and digital transitions;
- Reinforce Strasbourg's role as a European laboratory for transitions.

Overall, the Pact unites local economic stakeholders and supports alignment between the strategies of the region's main economic development partners.

Regarding the **Integrated Territorial Investment (ITI)** of the 2021–2027 period, it is seen by EMS (and also by other actors) as the key tool supporting the Strasbourg's strategy for a sustainable local economy¹¹. The ITI is embedded within the integrated urban development strategy of the EMS, defined in a dual context: on the one hand, the upheavals linked to the COVID-19 crisis, and on the other, the renewal of executive and council bodies at both municipal and metropolitan levels. This dual context led to the prioritisation of new challenges for local economic development.

The 2021–2027 ITI is designed to address major European challenges, further intensified by the COVID-19 crisis. It is structured around three locally-led strategic pillars:

1) Initiatives awarded through national "France 2030" calls for projects

EMS has been selected for two calls for projects under the national "France 2030" programme. It received €10.2 million in State funding for the "Territories of Tomorrow's Health" project, which seeks to improve the health and well-being of EMS residents by supporting and scaling up innovations—technological, organisational, digital, or social—developed by local entrepreneurs, associations, and public actors. This project, with strong European added value, was made even more relevant by the pandemic, which placed health at the forefront of future challenges, and is designed to have long-term impact.

In parallel, the Citadelle Project—a low-carbon, resilient neighbourhood accelerator for transitions—targets the development of the northern and western parts of Strasbourg's Citadelle district. It aims to create a demonstrator neighbourhood that fosters sustainable urban planning, construction, management, and lifestyles, while promoting a local, sustainable, and solidarity-based economy. Both projects are embedded in key ITI sectors (health and circular economy), where European funding can act as a significant leverage alongside national and local financing.

2) Circular economy strategy

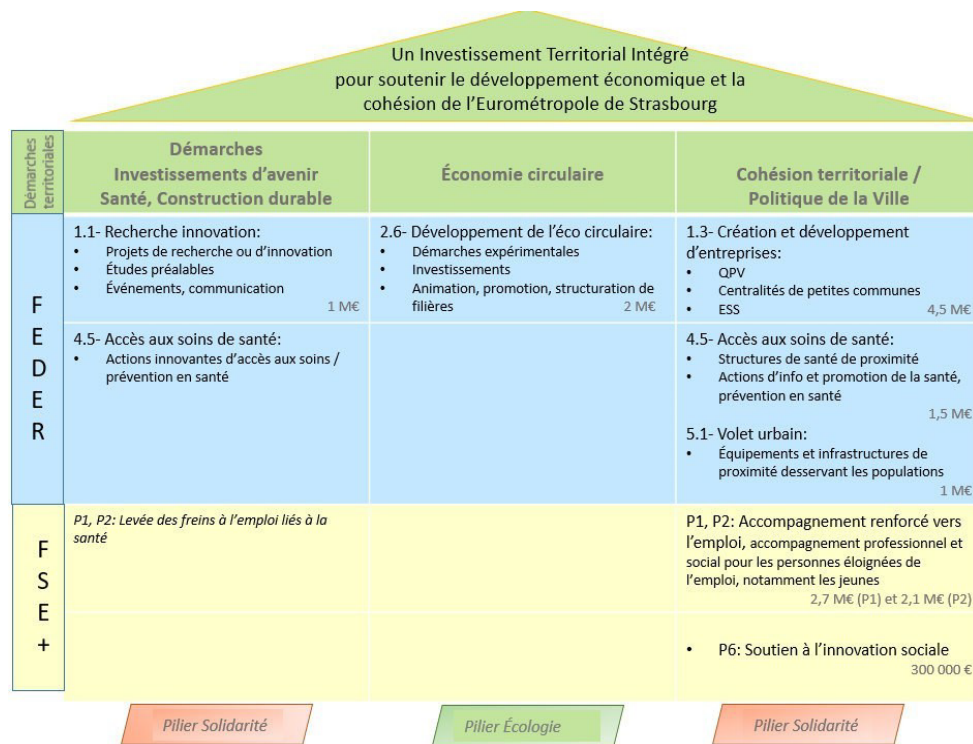
The European Union's Strategic Objective 2, "A greener, low-carbon Europe," addresses climate change through support for renewable energy, energy efficiency, and the circular economy. The urgency of these challenges was heightened by the COVID-19 crisis. Several initiatives driven by EMS under its Circular Economy Roadmap align with both European and national priorities, offer clear European added value, aim for long-term impact, and are sources of job creation, thus meeting EU cohesion policy goals.

¹¹ This said, it should be noted that, in addition to the ITI, support for the pact for a sustainable local economy also relies on other financial mechanisms (Start RSE scheme, support for the development of CSR in businesses, SEVE scheme, call for projects to support the green economy, etc.). Overall, the annual budget of the EMS economic development department is around €17 million.

3) Strengthening territorial cohesion through support for urban policy, retail, and the social and solidarity economy (SSE)

EMS acknowledges that sustainable urban development cannot be confined to urban policy areas and must extend beyond priority neighbourhoods (QPV), within a broader and integrated territorial strategy. Nevertheless, it remains important to continue supporting urban policy through the ERDF and ESF+ programmes managed by EMS. In addition, small municipalities (under 6,000 residents) often face commercial vulnerability, making them “fragile areas.” For the 2021–2027 programming period, EMS proposed expanding SME support (previously limited to QPVs) to these areas, aligned with its retail strategy. Furthermore, SSE organisations—key contributors to a sustainable local economy—remain eligible for support across the entire Eurometropolitan area.

Figure 6.1
Main axes of the ITI in Strasbourg



Source: Eurométropole de Strasbourg

Table 6.1
Main instruments at national, regional and local level

Instrument	Level	Type	Type (2)	Type (3)	Main Goals	Actors Involved
SRADDET	Regional	Strategy	Statutory and mandatory	binding for public authorities	The SRADDET sets medium- and long-term objectives in relation to a number of themes: territorial balance and equality, the location of various infrastructures of regional interest, housing, economical management of space, intermodality and the development of transport, energy management and development, the fight against climate change, air pollution, the protection and restoration of biodiversity, waste prevention and management	Public authorities, not-for-profit organisations, business representatives (e.g. chambers of commerce)
SCOT	Metropolitan	Strategy and zoning	Statutory and mandatory	binding for all subjects	The SCOT integrates and implements the objectives of national and regional public policies and provides a coherent framework for harmonising and coordinating spatial planning at the level of the EPCIs and communes concerned, particularly in terms of housing, land, mobility, economic and commercial development and the environment	Public authorities, not-for-profit organisations, business representatives, inhabitants
PLU	Metropolitan	Strategy and zoning	Statutory and mandatory	binding for all subjects	The objectives of the PLU are to achieve a balance between development and the protection of space, urban and social diversity and the economical or balanced use of space. In short, it is a reference document that helps to improve the organisation of town and country planning by laying down rules for land use	Public authorities, not-for-profit organisations, business representatives, inhabitants
PCAET	Metropolitan	Strategy	Statutory and mandatory	Non-binding	To reduce the region's greenhouse gas emissions; to adapt the region to the effects of climate change in order to reduce its vulnerability; to reduce sources of atmospheric pollutants; to promote energy sobriety; to improve energy efficiency; to develop renewable energies	Public authorities, not-for-profit organisations, business representatives, inhabitants
Pacte pour une économie locale durable	Metropolitan	Multisectoral: economic development, ecological transition, social cohesion	Non statutory	Non-binding	Synchronise and amplify responsible approaches and local transitions (ecological, social, digital) by local economic players	Public authorities, not-for-profit organisations, business representatives, inhabitants

Source: author's own elaboration

6.2 Localisation of Cohesion Policy

This section analyses whether and how local development policies and planning instruments contribute to implementing the Cohesion Policy. It investigates the level of coherence between the adopted documents and the Cohesion Policy strategies and principles. We address the following questions:

- Are the documents adopted coherent with the priorities of the 2014-2020 and 2021-2027 programming periods?
- If yes, which are the main priorities targeted? What are the mechanisms favouring such coherence: are local development policies and planning goals driven by the Cohesion policy and thematic objectives? If partially, what are the priorities targeted and those not? If not, why?

In France, the largest voluntary groupings of municipalities host substantial populations and therefore face numerous challenges in terms of social and territorial cohesion, employment, innovation or climate change. This explains why they are responsible for major policy areas, such as housing, urban regeneration, mobility, economic development, innovation and public services. As a result, **the thematic priorities of EMS reflect and resonate with the priorities of the European cohesion policy. This alignment is evident across various domains, including infrastructure, transport, social inequality and territorial disparities, economic development, and education. For example, the urban regeneration projects supported by the ERDF in Strasbourg's priority neighborhoods are directly in line with both EU cohesion goals and also with the national urban policy, i.e. the French "Politique de la Ville."**

As a consequence, we may say that, **during the 2014–2020 programming period, in Strasbourg, and more generally in France, there was generally an alignment between emerging local priorities—particularly in major urban areas—and those of the EU Cohesion Policy.** European funds supported a wide range of initiatives launched by local authorities, especially within the framework of the following three Thematic Objectives (TO):

TO4 – Energy transition (€2.1 billion): projects focused on improving the energy efficiency of public buildings (e.g. schools, sports and cultural facilities), renovating residential housing, modernising public lighting systems, and developing clean urban transport.

TO5 – Climate adaptation (€3.8 billion): funding was allocated to civil protection infrastructure, disaster risk management systems, climate-related land use planning, and environmental impact assessments.

TO6 – Environment (€4.9 billion, including €3.7 billion from the EAFRD): investments included public waste collection centres, composting facilities, the acquisition and restoration of natural areas, and the development of cycling infrastructure.

Regarding the localization of the Cohesion Policy, several instruments that we analysed in the former section are not relevant. This is especially the case of spatial plans, namely the SCOT and the PLU. In France, there is a structural divide between urban planning and spatial planning, even though territorial planning documents are intended to guide and facilitate local urban projects. We cannot perceive that the EU Cohesion Policy has a significant influence on spatial planning practices.

In the case of Strasbourg, we should take into account two instruments: the first one is the multi annual investment plan of EMS, the second one is the ITI 2014-2020. The multiannual investment plan for the period 2015-2019 provided for a total of €1 billion in programme authorisations.

Through this plan we can consider that all thematic objectives of the Cohesion Policy at that time were covered by EMS.

As to the ITI, it was based on the territorial development strategy of EMS, called « Eco2020 ». The aims of the ITI were to strengthen the competitiveness of small and medium-sized enterprises, to support labour mobility, to promote employment, social inclusion and to fight poverty. This is in clear correspondance with EU thematic objectives 2, 3, 8, 9 and 10.

Table 6.1
Coherence with the Cohesion Thematic Objectives 2014-2020

Tool	TO1	TO2	TO3	TO4	TO5	TO6	TO7	TO8	TO9	TO10	TO11
Pro-gramme pluri-annuel d'investis-se-ment	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
ITI		Yes	Yes					Yes	Yes	Yes	

Source: authors' own elaboration

Regarding the 2021-2027 programming period, we can say that, through the ITI, EMS is able to mobilize European funds to support innovation and economic development, to conduct actions related to the labour market and to support projects in the health sector, which has gained particular importance in the post-COVID-19 context. Such axes defined in the ITI are consistent with the *Pacte*, i.e. the local business mobilization plan for the ecological transition.

These three ITI pillars are aligned with EU priorities for 2021-2027, notably: SO 1: A smarter Europe; SO 2: A greener, low-carbon Europe; SO 4: A more social Europe; and SO 5: A Europe closer to citizens. They are also consistent with priorities defined in the Grand Est Region's ERDF-ESF+ Just Transition Fund (JTF) operational programme:

- Priority 1: Transforming the economy through smart specialisation, industrial and digital transitions, and business support;
- Priority 2: Accelerating ecological transition and responding to the climate emergency;
- Priority 3: Supporting employment, well-being, and quality of life through health, culture, and tourism;
- Priority 6: Leveraging committed local authorities and addressing the diverse needs of territories.

These priorities echo those of the Pact for a Sustainable Local Economy adopted by EMS. As outlined above, such strategy aims to scale up ecological transition initiatives launched by Strasbourg's stakeholders and to achieve sustainable transformation for all through development that balances ecological, economic, and social considerations.

The 2021-2027 ITI, which combines ERDF funding from the Region and ESF+ credits from the State, is primarily designed to enhance solidarity and make the territory more competitive and resilient.

As to the multiannual investment plan for the period 2021–2026, it was prepared by the new executive of EMS that was elected in 2020. It outlines the executive's main strategic priorities for the term. The total of this plan was set at €1.32 billion (see section 4.2.1). In February 2024, the executive revised the investment forecast upwards to €1.7 billion for the 2021–2026 period. This revision incorporated changes to the North Tramway project, whose cost was reassessed.

Table 6.2
Coherence with the Cohesion Policy Objectives 2021-2027

Tool	Cohesion Policy Objectives 2021-2027 ¹²				
	PO 1	PO 2	PO 3	PO 4	PO 5
Multiannual investment plan 2021-2026	Yes	Yes	Yes	Yes	Yes
ITI	Yes	Yes		Yes	Yes

Source: authors' own elaboration

To conclude, we should once again highlight the **disconnection between spatial planning and sectoral (and urban) policies**. This is certainly an issue, particularly given the size of the Strasbourg functional urban region, which extends far beyond the boundaries of EMS. For example, the EU Cohesion Policy as implemented in Strasbourg does not foster integration between rural (or peri-urban areas outside EMS) and the metropolitan core. This is mainly due to the structure of the respective OPs for ERDF and EAFRD, which do not facilitate synergies: the EAFRD OP only funds projects in rural areas. In the same way we can observe that there is no link between the EU Cohesion Policy and the Metropolitan hub (*Pôle métropolitain*).

6.3 Key investment areas

The key investment areas targeted by the local development plans can be approached through the multiannual investment plan of EMS for the period 2021-2026.

The first objective assigned to this investment plan is **to ensure the ecological transformation of the Strasbourg area**. Nearly 20% of the funds in the multi-year investment plan are devoted to this, in three main areas: developing mobility (€153m), adapting the region to climate change (€100m) and improving air quality (€34m). The second aim is **to support the transformation and cohesion of the Strasbourg region**. To this end, €190m has been allocated to the housing sector, an additional effort of €56m compared with the previous mandate, which amounted to €134m. This will make it possible to increase the supply of social rental housing (to help meet the objectives of the SRU law) and to ensure the thermal renovation of 2,000 social rental housing units per year, which is one of the objectives of the climate plan. Thirdly, investment works that are of

¹² In the period 2021-2027, the cohesion policy has five policy objectives (POs) for the ERDF, the European Social Fund+ and the Cohesion Fund: (i) A smarter Europe – innovative and smart economic transformation (PO1); (ii) A greener, low-carbon Europe (PO2); (iii) A more connected Europe – mobility and regional ICT connectivity (PO3); (iv) A more social Europe – implementing the European Pillar of Social Rights (PO4) and (v) A Europe closer to citizens – sustainable and integrated development of urban, rural and coastal areas through local initiatives (PO5).

major concern to the 33 EMS communes relate to **roads, cycle paths and pedestrian routes**. There are plans to undertake €210m of work throughout the EMS.

Table 6.3

Comparison of EMS investments (2014-2019 / 2021-2026), in million euros

Sector	2014-2019	2021-2026
Mobility, public and natural spaces	351	565
Urban planning	220	259
Economic development and higher education	254	173
Buildings and logistics resources	72	123
Sports	61	100
Others	137	100
Total	1,095	1,320

Source: Eurométropole de Strasbourg

For the ‘economic development and higher education’ theme, the lower volume of investment compared with the previous mandate can be explained by the completion of two major projects over the period, the *Palais de la Musique et des Congrès* (€78.6m) and the Strasbourg Public Administration Centre, comprising lecture theatres, teaching rooms, a document resource centre and offices (€59.5m).

7 Funding schemes and synergies

This section aims to provide an overview of the interaction between the urban dimensions of Cohesion Policy, other EU funding programmes, and both EU and national frameworks for public investments. We shall address the following key questions:

- How do Cohesion Policy investments synergise with other major EU investments (e.g., Horizon Europe)?
- How can other EU programmes support cities' strategies for sustainable urban development and help build the capacity needed to deliver on EU urban initiatives?

This activity will also explore the ability and creativity of cities to effectively leverage EU (and other) funding and financial opportunities.

7.1 Funding schemes

The objective of this section is to investigate the funding schemes that have been used by the Euro-métropole de Strasbourg in order to achieve local goals. More specifically, this section is based on gathered data and it addresses the following funding schemes:

- EU shared management funds,
- EU direct management funds,
- Recovery and Resilience Fund.

7.1.1 Nationally or regionally distributed EU funds

This section explores the funding derived from implementing, on the one hand, National Operational Programmes (NOP) and, on the other hand, the Regional Operational Programme (ROP) Alsace (in the 2014-2020 period) and the ROP Grand Est for the current programming period. In delineating the existing funding mechanisms, we address the following questions:

- How many projects have been activated using shared funds?
- Which is the main programme EMS benefits the most?
- Are those funds easily accessible for EMS?

In the case of Strasbourg, the ESF NOP and the ROP (which mixes ESF and ERDF) converge in a delegation to EMS for the management of an ITI. This rare degree of decentralization in the context of France was set up for the 2014-2020 programming period and has been continued for the 2021-2027 period.

The aims and tools of the 2014-2020 ITI were defined following the EU, national and regional guidelines, but they also took into account the integrated urban development strategy that was defined locally. **A common feature of such strategy adopted by EMS is that it has been developed and put in practice in collaboration with organizations representing businesses in the sectors of industry, commerce, and services (chambers of commerce and related networks). This alignment of goals and actions fosters synergies between public and private stakeholders.**

The 2014-2020 ITI ERDF programme of EMS included one axis dedicated to supporting creative and digital businesses (Axis 1), and another aimed at supporting business creation and development (Axis 2). In practice, fourteen percent of ERDF funds were allocated to Axis 1, and 86% to Axis

2, which covers support for social and solidarity economy (SSE) structures, businesses located in priority urban neighbourhoods (QPV), and business real estate. Sixty-two percent of funded projects were implemented in QPVs. Within the EMS area outside QPVs, 19% of the projects pertain to the digital and creative sector, 17% to SSE, and 2% involve innovation hubs.

As of 1 May 2022, under the ITI ERDF framework, **101 projects had been approved**, six of which were later cancelled. The total eligible cost amounted to €28.79 million, with €8.1 million in ERDF funding, representing 101.35% of the allocated envelope. Of these, 62 projects were led by businesses and 26 by associations. The programme is thus characterised by a strong predominance of projects managed by private entities, reflecting the will of EMS to mobilise private investment through the ITI. Furthermore, few projects received public co-financing apart from the ERDF contribution. The amounts of ERDF subsidies varied widely, from €2,300 to €2 million. EMS stakeholders observed that ERDF co-financing enabled project leaders to deliver higher-quality initiatives, enhance the accessibility and visibility of their establishments, and improve working conditions for their staff. Overall, the ERDF has contributed to boosting the territory's attractiveness, driving economic development in disadvantaged neighbourhoods, and expanding the range of goods and services offered. In a similar manner, **100 projects were funded by ESF within the ITI**, for a total of 5.1 million euros

It is noteworthy that **EMS chose not to direct ERDF funding toward its own projects, but rather toward those initiated by local stakeholders**. Actually, during the 2014–2020 period, only two projects were directly led by EMS. One consisted of a study on commerce in QPVs, with an ERDF contribution of €23,000. The other involved the renovation of a facility for an association promoting cycling mobility, which lacked the financial robustness to apply directly for ERDF funds. Here the ERDF contribution was 50,000 euros. This implies that EMS redistributed more than 99% of the ERDF funds. And **the leverage effect was real since the ERDF 8 million euros were complemented by more than 28 million euros brought by local actors**. In 2022, the 75 completed projects (over a total of 105 funded projects) accounted for nearly 20,000 m² of renovated space and over 180 jobs created.

The ITI is clearly the main instrument through which EMS gets access to EU shared funds. Excluding the ITI, for the two programming periods, **no project led by the City of Strasbourg or EMS were co-financed by the ESF**. Regarding the ERDF, accessed through the ROP, **only 4 projects of EMS** were cofunded during the 2014–2020 period, all of them totalizing 250,000 euros. These projects were in the field of ICT and all of them were cofunded by EMS only.

With regards to the 2021–2027 period, and outside the ITI, only 3 projects born by EMS are cofunded by the ERDF, for a total of around 170,000 euros. Similarly, the City of Strasbourg has also a cofunded project for a total of 127,000 euros. Its aim is to improve biodiversity in an urban context. For both programming periods, the small number of projects cofunded by ERDF through the ROP and the small amount of cofunding as compared to the ITI (the proportion is around 3% for the 2014–2020 programming period), together with the absence of ESF outside the ITI, show that **the ITI is clearly the main way for EMS to get access to the EU cohesion funds**. At the same time, since the cofunding obtained through the ITI is devoted quasi-exclusively to projects of private or public organisations outside EMS, we may conclude that **EMS cannot use EU Cohesion funds to help its ecological transition strategy**. Is this related to the tiny resources that could be provided by EU Cohesion funds, as compared to the local needs? Actually, it is not difficult to identify projects totally funded by EMS or by the city of Strasbourg whose total amount is close to that of the ITI (ERDF part). For instance, the city of Strasbourg has set up in 2020 a Canopy Plan, which involves planting ten thousand trees to provide shade and evapotranspiration for 30% of Strasbourg by 2050, as part of the fight against heatwaves caused by climate change, at a rate of one thousand trees per year. In addition, the soil will be demineralised to make it greener and allow

better infiltration of rainwater. Five million euros have been earmarked for this plan. In addition, a new 5.5-hectare park, Parc des Romains, will be open to the public from 2025. This is the first new park to be created in Strasbourg since 2014. It will cost €4.5 million to build.

Overall, we may say that **in Strasbourg, the ecological transformation is well underway, with progress already visible in key sectors like building renovation and low-carbon mobility. By 2030, the EMS plans to continue its ambitious deployment and mobilize all stakeholders.** EMS is refining its planning tools and public policies to better incorporate the challenges of energy transition and climate adaptation through a new vision of urban organization. All these efforts are in line with the EU priorities, but the fact is that they are not supported by the EU shared funds.

7.1.2 Other relevant EU funds and programmes

In the context that we just described, it is more than relevant to examine whether direct funding schemes provided by the EU are activated by EMS to finance its own strategies. More specifically we address here the following questions:

- How many projects have been activated using direct funds?
- Which are the main programmes Strasbourg is benefiting from (Horizon, Life, UIA/EUI, Interreg)?
- How relevant are the direct funds attracted compared to: (i) indirect funds; (ii) total city council budget and (ii) total local operational investments?

Regarding the INTERREG, EMS has so far been involved as coordinator in only one project (called BSW), an industrial ecology study in the energy sector. This project was successful and it is currently followed by another one which has the same aims. Another completed project aimed at the rehabilitation of a brownfield site (KaléidosCOOP). EMS is also currently involved in the development and deployment of a strategy to reduce rainwater collection and treatment infrastructure and to support the growing need for water in green urban areas (ReactiveCity) and another one in the field of green hydrogen refuelling infrastructures for public passenger transport and freight transport (H2MA). Two more INTERREG projects involving EMS have just started, one which aims to strengthen local energy communities and accelerate the deployment of decentralised energy systems (E2CUTIES) and the other which aims to reduce the carbon impact of public procurement (DeCarb-Pro). **In total, EMS has been involved in 7 INTERREG projects since 2020.**

With regards to Horizon, EMS is partner of an ongoing project which aims to bridge the adaptation funding gap by strengthening the capacity of public authorities to attract and orchestrate diverse sources of public and private funding (ClimateFit). It also provides technical assistance in a project which develops a methodology for assessing the costs and benefits of adaptation trajectories and strategies (MIP4Adapt). Another Horizon projects involving EMS seeks to develop systemic and integrated solutions for adapting to climate change, specific to the local context (SystR). This implies that **EMS is involved in 3 projects in the current programming period.**

Regarding LIFE, EMS is taking part in a project which will start in September 2025 for two years. This project seeks to draw up 'exemplary' investment plans for developing new heating and cooling networks in suburban municipalities, based entirely on low-temperature renewable energy or waste heat (IncentEU).

Thus we can see that through INTERREG, HORIZON and LIFE, which are three major EU programmes, **EMS has been or is currently involved in 11 European projects that clearly help it to make progress with energy issues and ecological transition.**

EMS is also involved in various sectoral programmes that contribute to change in its policies regarding gender, health, housing, etc. Within several programmes like CERV, 3HP, etc. one may quote 4 projects : (i) about time policy, (ii) on collaborative housing, (iii) on preventing and combating sexual harassment in nightlife venues, and (iv) about digital tools for disabled persons. In total, since 2020, EMS has been involved in 4 projects supported by sectoral programmes while the City of Strasbourg has been involved in 2 sectoral projects (one in the area of decentralised cooperation, the other to help take greater account of gender equality issues in budgetary practices).

As a conclusion, we may say that, **being involved in 15 directly funded European projects, EMS is very active in many EU direct programmes**, including INTERREG, Horizon and Life, and in various sectoral programmes. **Clearly such EU programmes support Strasbourg's strategies for sustainable urban development**, especially in energy transition, mobility and ecological transition. Since the projects have different aims than the ITI which is more about socio-economic development, we may say that, in the case of Strasbourg, **the Cohesion Policy funds coexist with other EU programmes, rather than they synergise with them.**

7.1.3 Other funding alternatives

At the European level, the **Just Transition Fund (JTF)** has a total budget of €17.5 billion for the 2021–2027 period. Of this amount, €7.5 billion comes from the Multiannual Financial Framework, with an additional €10 billion provided through the European Union's recovery instrument, *NextGenerationEU*. France has been allocated €1.03 billion, which is distributed among territories facing significant challenges related to industrial decarbonisation and industrial employment.

In the Grand Est region, the areas covered by the JTF account for 9.8% of national CO₂ emissions and approximately 90,000 industrial jobs. However, **the Strasbourg area, whose economy is predominantly service-based, is not eligible for JTF funding.**

The **REACT-EU scheme**, with a total envelope of €47.5 billion at EU level, has been set up to complement the ERDF, ESF and EARDF structural funds in order to overcome the damage caused by the coronavirus crisis and help territories recover. Unlike the Coronavirus Response Investment Initiative (CRII), REACT-EU is part of a medium- and long-term approach leading to a 'green, digital and resilient economy' and constituting a transition to the 2021–2027 Operational Programmes. In the Grand Est region, REACT-EU funding has been added to the ERDF and ESF envelopes for the period 2021–2023. The envelope for this region is estimated at €186 million and REACT EU has been deployed through calls for proposals.

Within the ReactEU scheme, EMS had two projects subsidized: the first one was about the energy renovation and extension of a gymnasium, while the second aimed at the thermal renovation, safety and accessibility improvements of a nursery school. The total cost of these projects was 1,05 million euros and ReactEU funded three quarters of it. Both projects were cofunded by the Region, while one of them was also cofunded by EMS and another one by the national administration. The EU funding is certainly very useful, but it should be noted that there are 106 nursery schools and 122 primary schools (in 2020) in the Eurométropole whose maintenance and renovation work is the responsibility of municipalities. There are also 70 sports halls. Out of these 228 schools, 60 are located in neighbourhoods with high concentrations of social problems, which have a major impact on educational success. **Thus the renovation of one school and one sports hall is probably**

just a drop in the ocean. At the moment, two new schools are being built in Strasbourg. The total cost of such projects is respectively 18 and 23 million euros¹³.

Other programmes (notably EIT Urban Mobility and Connecting Europe Facility) are mobilized by EMS in link with its mobility policy. Three projects have been carried out recently on that matter and two more are going to start this year.

As a conclusion, we may say that **EMS is very active in many EU direct programmes.** Besides such subsidies it is worth mentioning that the EIB has released two major loans: one for the City of Strasbourg, for the thermal renovation of schools, the greening of schoolyards and public spaces (€95 million over 25 years), and one for EMS on the theme of mobility (€120 million over 20 years).

7.2 Funding coordination mechanism

As we saw earlier (section 4.2.2), EMS and the City of Strasbourg are involved in various public action contracts, with the State and/or the Grand Est Region as its main 'partners'. We can mention three major contracts, all of which are **powerful mechanisms for coordinating funding from the municipalities, EMS, the Region and the State:**

- **The Triennial Contract “Strasbourg European Capital”** has been a renewed commitment for over forty years between the State and local authorities — the City and Eurometropolis of Strasbourg (EMS), the European Collectivity of Alsace (CEA), and the Grand Est Region — to ensure the financing of operations aimed at consolidating and expanding Strasbourg’s functions as a European capital.
- A **“metropolitan contract”** has been signed in 2024 between the Région Grand Est, the City of Strasbourg and EMS. This contract lists projects of common interest, which will be co-financed by these partners. 90% of the Region’s contribution (€55 million out of €63 million) is earmarked for metropolitan projects led by EMS. These include mobility projects, which is a shared responsibility of both institutions.
- A **Territorial Pact for Recovery and Ecological Transition (PTRTE)** was signed in 2022 by the State, the Grand Est Region, the European Collectivity of Alsace, and EMS. The PTRTE is designed as a tool to coordinate public policies to support the territorial and ecological transition of the territories. The signatories of this pact committed to supporting EMS and the 33 municipalities that are members of it in identifying the most appropriate public funding sources for the realization of their projects. Priority areas covered include the energy renovation of public buildings and public lighting, greening of public spaces, and transformation of the vehicle fleet.

Through these contracts, French public actors — the State, the Region, the departments, EMS and the City of Strasbourg — agree on certain objectives and pool financial resources to co-finance projects in Strasbourg. Currently, the main themes are mobility and the thermal renovation of public buildings. For instance, the thermal renovation of schools or other public buildings is under the responsibility of municipalities and the needed funding for this is huge. The

¹³ <https://www.strasbourg.eu/-/strasbourg-construit-de-nouvelles-ecoles#:~:text=Cette%20ann%C3%A9e%2C%20opr%C3%A8s%20de%2024.000,2024%20et%20en%20septembre%202025.>

PTRTE for the Eurometropolis territory has listed over 1,200 operations that may be carried out over the 2022–2026 period. This generates a total investment need of over €2 billion.

In contrast, **the funding available for Strasbourg through EU shared funds or direct funds is probably more than 100 times less** (between 15 and 20 millions for the 2021–2027 programming period). In this background, it is understandable that EMS has not sought to set up a funding coordination mechanism including EU funds. The issue for EMS is rather, on the one hand, **to use EU funds for projects that are not eligible to funding from other public actors** (the Region Grand Est, for instance), due to their small size or due to their aim. In this sense, we may say that there is implicitly a coordination between funding sources by EMS, but only project by project. On the other hand, the EU shared funds made available through the ITI (which represents the main EU funding tool) target private actors. In this way, **the leverage effect of EU funding is maximised**. This would not be the case if EU funded projects were cofunded by other public actors.

8 Recovery and Resilience Plan

As a unicum of post-COVID-19, the country's Recovery and Resilience Plan (RRP) has represented an alternative (or complementary) fund for cities and territories. This section explores how the RRF has been conceptualised and implemented in France and whether Strasbourg has benefitted from its funding scheme.

8.1 The Governance of Recovery and Resilience Plan

In response to the health and economic crisis, the Member States and the European Commission decided to implement a recovery plan called “Next Generation EU,” with a budget of €750 billion for the 2020–2023 period. The two main components are:

- **REACT-EU**, which supplements the 2014–2020 Cohesion Funds with an additional €47.5 billion for an immediate response to the economic and social crisis;
- **The Recovery and Resilience Facility (RRF)**, which provides support to Member States in the form of grants and loans, amounting to a total of €672 billion.

To benefit from the RRF, each Member State had to submit its National Recovery and Resilience Plan (NRRP) to the European Commission in early 2021. After review and approval by the Commission and the Council of the European Union, pre-financing was granted during the first half of 2021. In the case of France, the measures in the NRRP had to address the recommendations made by the EU to the national government regarding necessary reforms and investments. The European Commission also required that 37% of the NRRP budget be allocated to the green transition and 20% to the digital transition.

On 23 June 2021, the European Commission approved France's Recovery and Resilience Plan. On the same day, it adopted a proposal for a Council Implementing Decision to grant France €39.4 billion in RRF grants.

All the investments included in France's NRRP are part of the national “France Relance” plan, presented by the Prime Minister on 3 September 2020, and adopted by Parliament as part of the 2021 Finance Bill. The European recovery plan will thus cover 40% of the funding for France's national recovery plan.

In its report on how regional and local authorities were involved in drafting the NRRPs, the European Committee of the Regions (2021) is fairly critical of France. The NRRP development process began in May 2020, with the Ministry of the Economy, Finance, and Recovery playing a central role in drafting the “France Relance” plan. Internal consultations were conducted by the Ministry and included social, civil, and economic stakeholders, as well as the Association of French Regions and the National Agency for Territorial Cohesion (ANCT). “The meetings were mainly informative in nature. The Ministry informed participants about the structure of the NRRP and the coordination mechanism that might be put in place for managing NRRP and Cohesion Policy funds. However, the plan does not reflect the contributions of local and regional authorities to the NRRP's design” (European Committee of the Regions, 2021: 113).

The NRRP also lacks a territorial perspective, as the future strategies and programs aimed at supporting economic and social recovery following the coronavirus crisis are presented from a national viewpoint. Furthermore, subnational governments “are mentioned as implementing bodies and/or beneficiaries of the interventions, as well as playing a role in the monitoring process. It appears they did not play a role in designing the national strategy” (Committee of the Regions, 2021: 114).

Another critical observation concerns the very low visibility of the RRF in French public policy. This is due to the fact that these funds are being used alongside national funds under the framework of “France Relance.” More than the European measures, it is this national plan that receives the most media attention among territorial actors. The national government announced that some France Relance measures would be implemented locally via regional calls for projects or through deconcentrated management entrusted to prefects. A circular to that effect was sent by the Prime Minister to the prefects on 23 October 2020.

The plan includes four different types of interventions:

- Those designed at the national level and not intended for territorially differentiated implementation, such as aid targeting specific groups (e.g., thermal renovation support for households and SMEs). The same applies to aid distributed through national calls for projects (such as support plans for the aerospace and automotive sectors).
- Those aimed at allocating funding locally through calls for projects decentralized at the regional level, often managed by national operators (such as the Public Investment Bank, the Environment and Energy Agency, etc.).
- Specific funding envelopes under the responsibility of regional prefects, which must be used for the most mature and relevant investment projects in the targeted areas. The Prime Minister's circular calls on regional prefects to “pay particular attention to investments in disadvantaged urban neighborhoods and rural areas (public facilities, sports infrastructure, etc.).” This category also includes funds allocated to regional governments for recovery plan-related operations, mainly supporting thermal renovation of buildings and mobility projects. However, the allocation will be shared between regional prefects and presidents of regional councils.
- Funding tied to the different thematic areas of France Relance, assigned to a specific public policy and a clearly defined measure of the plan, but whose management will be decentralized. Prefects and local government services are considered best positioned to identify relevant projects for each measure in their territory. These funds will be decentralized progressively, in line with the advancement of local projects, allowing the government to reallocate them if needed to speed up implementation of the plan.

Of the €100 billion allocated to France Relance, €16 billion are to be monitored by regional prefects as part of regionalized funding envelopes, or by departmental prefects. This amount is supplemented by funds entrusted to regional governments (‘conseils régionaux’) in two key areas: the thermal renovation of buildings and mobility.

Overall, the recovery strategy adopted in France relies more on *deconcentration* than on *decentralization*, with the latter referring to local authorities acting as the State's key counterparts. According to the Prime Minister's circular, “a regional steering and monitoring committee will be established in each region. It will be co-chaired by the regional prefect, the regional director of public finances, and—where a regional agreement has been signed—the president of the regional council.” This committee must include “representatives of local authorities, social partners, business communities, departmental prefects, and deconcentrated state services.”

Table 8.1
The Governance of Recovery and Resilience Plan in France

Name of the actor	Level	Responsibility
President of the Republic, Prime Minister, Ministry of the Economy, Finance, and Recovery, other concerned Ministries	National	Development and overall responsibility of the <i>France Relance</i> Plan articulated with the RRF
Regional prefect	Regional	Coordination and implementation
Regional government	Regional	Implementation: allocation of funds only for the thermal renovation of buildings and mobility projects
Voluntary grouping of municipalities	Local	Potential beneficiary (if eligible to call for projects) Potential participant in the regional steering and monitoring committee

Source: author's own elaboration

8.2 Coherence with Recovery and Resilience Plan

In general, there is no coherence between the national RRP in France and the local tools that are used by EMS. This is a general situation in France for large urban governments. For instance, in the case of the *Métropole de Lyon*, its Vice-president for International and European Affairs declared: “In France, local and regional authorities have not been involved in the work carried out by the state and have no knowledge of the consequences of European funding on projects which are funded as part of the French recovery plan. RRF funds are integrated into the funds of the French recovery plan” (Demazière, 2022: 9).

To emphasise, the lack of the cofinancing approach (the additionality principle), we should say that the ANCT, together with the *Secrétariat Général aux Affaires Européennes* (SGAE) realised a guide to explain what could be financed by the RRF and what could be financed by the ESIF of the cohesion policy (to avoid double EU funding). There was indeed no visibility on what was financed by RFF or national credits in the national “plan de relance”. It was very complicated for local authorities to handle this lack of visibility. With such experience, the NRRP/RRF was not a model appreciated at the local level.

Adding to this lack of inclusion of local authorities in the RRP, it seems that, at the implementation level, the **national administrations have to a large extent focused on investments that target public property** (buildings housing the services of a prefecture, for example), not the property of local authorities. This is visible in the list of the first 100 beneficiaries of the RRF which has been published by the French Ministry of the Economy in accordance with European requirements. In the 2024 version of the list, a large number of recipients are administrations, public agencies, or universities, with projects primarily focused on building renovation. The first private company on the list appears in 13th place: Nacre, a company aiming to build a biorefinery in France's Pyrénées-Atlantiques region. **The only local authority among the top 100 beneficiaries is La Réunion, an overseas region.** It appears at the 61th rank. This situation stands in contrast to that of a neighboring country such as Italy, where the list of the top 100 RRF beneficiaries includes 16 regions and 12 municipalities.

A report made by the *Commission des finances du Sénat* in 2022, quoted by Jouen (2023: 32) mentions that around 10% of the France Relance expenditure (which includes €40bn from RRF) went directly to French local authorities: in order to compensate losses and revenues (€4.2bn), to implement sectoral measures (€3.7bn), and to support local public investment (€2.6bn). According to

Régions de France's own assessment, local authorities have provided €15bn as co-financing. As an example of a sectoral measure, the NRRP has devoted €1.3bn to the energy renovation of local authority buildings at all levels. €650m were made available to municipalities and voluntary groupings, €300m for departments and €300m for regions. In total, « 6,212 projects were selected via calls for projects, according to the dual criteria of the maturity of the project (quick implementation) and the energy gain of the investment. Of these projects, 65% were educational buildings, 12% cultural or sports facilities, while the rest were nurseries or administrative buildings, etc. » (Jouen, 2023: 32).

8.3 Recovery and Resilience Fund

Strasbourg has benefited from the Recovery and Resilience Fund, including within the sectoral call for projects on thermal renovation of buildings that we described above. However, we could not find any information on how many projects were proposed and how many of them have been financed. It seems that the RRF attracted is very little as compared to: (i) the total EU funds, (ii) total EMS budget and (iii) total local operational investments.

We should also mention another mechanism used by the national government for the implementation of the RRF: the contract. As we saw in section 4.2, since the decentralisation reforms in the early 1980s, relations between the state and the regions have been based on contracts. In the background of the RRF, regional prefects were asked by the Prime Minister to sign « contracts in favour of the ecological transition and territorial cohesion » (called CRTes) with groupings of municipalities who would wish to enter into such an approach. Such contracts were supposed to support local authorities in their territorial project. A total of 847 CRTes had been signed by September 2023.

As Jouen (2023: 33) notes, « in practice, almost every “intercommunality” accepted the approach, which sometimes took the form of a wish list, especially in the absence of a common local strategy, since the CRTes does not commit the state to co-financing the full list of projects. In fact, every year, the prefect must coordinate with the ministerial administrations to pick and choose what the state will subsidise or co-finance, either with the recovery plan funds, or other national funds. In the case of large cities, equipped with an established strategy, the CRTes look more like a too narrow coverage, due to a lack of sufficient funding and ambition on the part of the state ».

In the Grand Est Region, the Region is a co-signatory to every contract entered into by the State. Specifically, the EMS' Territorial Recovery and Ecological Transition Pact (PTRTE) announces an investment plan of nearly €2.5 billion by 2026. 250 Eurometropolitan projects and 460 projects from member municipalities are supposed to be carried out. This local recovery plan is part of the State's deployment of the "France Relance" plan, designed to respond to the economic crisis resulting from the health crisis. The partners of EMS and its 33 member municipalities are the European Collectivity of Alsace and the Grand Est Region. The ambition of these new contracts is to simplify and unify existing contractual arrangements with local authorities, in order to involve them fully in the recovery plan. The living and evolving nature of the plan is strongly emphasized by all the stakeholders implementing it. Among the projects planned across the Strasbourg area are numerous renovations, upgrades, and extensions to public buildings, the renewal of street lighting, the planting of schoolyards, the creation of school and after-school facilities, sports facilities, and more¹⁴.

¹⁴ <https://www.strasbourg.eu/-/bloc-notes-2-5-milliards-relance-transition-ecologique-ems>

9 Challenges and Policy Recommendations

Based on the former parts of this report and following the Urban Laboratory held on 30 June 2025, a series of challenges and policy recommendations can be put forward regarding the case of Strasbourg. They are presented below in section 9.1.

Thanks to the French stakeholder *France urbaine*, another session of the Urban Laboratory has been devoted to the management of cohesion funds in France's large conurbations. It was attended by 26 people representing 15 cities or large conurbation authorities. Based on the discussions, a second series of policy recommendations are presented in section 9.2. They aim at a better integration of large conurbations' needs and capacities into the management of the EU cohesion policy.

9.1 Challenges and recommendations based on the case of Strasbourg

9.1.1 Local Level

9.1.1.1 Challenges for Strasbourg

EMS is not directly involved in the development of EU cohesion policy at national level, but is involved indirectly through networks of local authorities such as *France urbaine*.

At the regional level, when developing the ROP, EMS is consulted and treated at the same level as other stakeholders who do not manage European funds, for example, consular chambers. Thus, despite its role as an intermediate body with a full delegation of ESIF envelopes, it does not have a privileged status and is not a decision-maker.

Mobilizing the economy to promote social and territorial cohesion is a long-term challenge for EMS, given the socio-spatial disparities it experiences (income gaps, high poverty rates, etc.).

Since 2002, EMS has developed very strong technical capacity in ERDF management through the European Funds Unit, which reports to the Economic Development Directorate. Local governance of EU cohesion policy is functioning well.

The priorities defined in the ITI are closely aligned with the EMS's economic strategy, which also constitutes an integrated urban strategy.

During the 2014-2020 period, apart from the ITI, EMS and the City of Strasbourg had very little access to ERDF funding and received no ESF funding.

Given the relatively small amounts of cohesion funds available to EMS, the EU influence on locally implemented strategies is very limited. On the other hand, EMS focuses on private project leaders (businesses, social and solidarity economy stakeholders) and its support for these project leaders, ensures a strong local presence of European guidelines.

The ITI is linked to the City Contract. It implements the Pact for a Sustainable Economy, which is in line with the Climate Plan. However, spatial planning documents (PLU, SCOT) are more traditionally focused on population growth and employment, and therefore do not intersect with local guidelines driven by European cohesion funds.

EMS actively leverages direct EU programs (INTERREG, Horizon, Life, other sectoral programs, etc.) to support its transition initiatives (particularly energy and mobility). These programs allow for networking and primarily finance job positions. Given that the ITI focuses on socio-economic

development, cohesion policy funds coexist with other European programs, rather than working in synergy.

European programs are not a lever for carrying out territorial alliance projects in the Strasbourg metropolitan region (cooperation between EMS and other institutional, social, or economic partners beyond its administrative boundaries), except through INTERREG. In this regard, two projects stand out: the establishment of a waste heat network and a study for the construction of a cross-border tramway line.

The contract signed with the State and the Region for the Eurometropolis territory (PTRTE) lists more than 1,200 projects likely to be carried out over the period 2022-2026. This generates a total investment requirement of over €2 billion. However, the funding mobilized by Strasbourg through EU joint funds or direct funds is more than 100 times less.

9.1.1.2 Policy recommendations

- Continue collaboration with other metropolitan and large urban areas at the regional, French, and European levels to highlight their effectiveness in implementing EU cohesion policy through projects that contribute to the region's quality of life and ecological and inclusive transition. On this basis, claim a role in defining EU cohesion policy for the post-2027 programming period and in discussions on the Social Climate Fund.
- Advocate for EMS to be able to freely determine, within the ROP co-developed with regional stakeholders, the thematic areas to be included in the ITI, based on Strasbourg's needs.
- While maintaining the ITI at the service of the EMS region, seek to leverage European programs to conduct collaborative and integrated projects in the Strasbourg metropolitan region. Cooperation between EMS and other institutional, social or economic partners beyond its administrative limits would contribute to the ecological transition of the wider metropolitan territory.

9.1.2 Regional Level

9.1.2.1 Challenges

In France the authority to manage ERDF and one third of ESF funds have been decentralized to regional governments in 2014 and, for the 2021–2027 programming period, this division of responsibilities between the State and the regions has been maintained. This **co-management of European Structural and Investment Funds (ESIF)** and the **quality of dialogue between the State and regions** do not eliminate a lingering issue: **the limited role given to other levels of subnational government**, such as **departments and intermunicipal groupings**. In an institutional system where subnational governments are fully autonomous from one another, urban authorities must earn their place in the CP governance. The governance of European Cohesion Policy in France tends to be more regional than multilevel, with some regional governments effectively assuming the role of “gatekeeper”.

For the current programming period, 8 regional governments have chosen to use ITIs whereas 13 regions used the ITI tool during the 2014–2020 period. For instance, in the Auvergne-Rhone-Alpes region, metropolitan governments had implemented an ITI during 2014–2020 and wanted to continue using it, but due to political disagreements they faced a veto from the regional government. Moreover, the financial amounts allocated to ITIs has decreased from 70% of the ERDF “urban” envelope in the 2014–2020 period to 42% for the 2021–2027 period.

Managing authorities (State, region) have a trade-off between the search for efficiency in the use of EU funds, which would lead to consider EMS as a key partner, and the search for territorially balanced development, which would lead to prefer funding projects in non metropolitan areas. This dichotomy prevents from maximizing the possible trickle-down effects of conducting collaborative and integrated projects in the Strasbourg metropolitan region (cooperation between EMS and social or economic partners beyond its boundaries).

9.1.2.2 Policy recommendations to Région Grand Est

- Enable EMS to continue implementing an ITI as a global grant in the post-2027 programming period.
- In preparing the ROP, recognize EMS's role commensurate with the one it plays in implementing the EU Cohesion Policy. This recommendation could be extended to other urban areas in the Grand Est Region.
- To the extent that EMS manages European funds, provide it with access, when its technicians feel the need, to the Grand Est Region's technical resources for European fund management.
- Draw on the EMS's extensive experience in managing European funds and aligning European, national, and regional objectives with its own urban and economic development strategy to encourage other large urban authorities in the Grand Est region to apply for an ITI (or equivalent tool) under delegation of full management for the post-2027 programming period.
- Allow EMS to contribute to the choice of the thematic axes of the future ROP, and to determine the objectives of the ITI, according to the needs of the territory
-

9.1.3 National Level

9.1.3.1 Challenges

France contributes more to the financing of the European Cohesion Policy than it receives, but the sum it was allocated slightly increased (€15.5 billion in the 2014-2020 period, €16.8 billion for the 2021-2027 period) and EU funds really matter for the cohesion of many territories all over France.

From one programming period to the current one, the number of operational programmes decreased in pursuit of greater efficiency, and because the number of regions was itself reduced. On the other hand, although **criticism of administrative complexity about the CP has been persistent**, it is not clear what **concrete solutions** have been proposed and implemented by the national administration to address this issue. The State is sometimes seen to over-secure its management procedures, invoking anti-fraud measures, but without providing additional technical assistance to support these increased administrative requirements.

The Recovery and Resilience Facility (RRF) is managed at the national level by the Ministry of Finance, which is separate from the ministries handling Cohesion Policy funds. The NRRP lacks a territorial perspective, as the strategies and programs aimed at supporting economic and social recovery following the coronavirus crisis are presented from a national viewpoint. It is hidden in *France Relance* and only regions play a part in its development and management. This implies that urban authorities that have been active in order to help social, economic and environmental actors, used mainly their own resources and received little support. Besides, it seems that, at the

implementation level, the national administrations have to a large extent focused on investments that target state-owned property.

The territorial scope of urban policy has significantly widened in the French case and the proportion of FEDER devoted to urban areas is very variable from a region to another one, while the selected instruments are diverse. The State is currently unable to propose an homogenous vision of what are the urban most territories most in need and which tools and instruments are the most efficient.

9.1.3.2 Policy recommendations

- Involve *metropoles* and other voluntary groupings of municipalities in large cities in the elaboration of the Cohesion Policy post-2027. This is coherent since the creation of French *metropoles* reflects the desire of successive national governments to create an institutionalized metropolitan level, contributing to competitiveness and cohesion, both nationally and at the European level. Such groupings developed an integrated approach to urban sustainable development, they have expertise in the use of CP funds, and their objectives are aligned with those of the EU.
- Simplify and streamline the implementation of European funds by reducing the management burden and controls in the justification of funded projects. In doing so, it is important to ensure that no legal uncertainty is created for local authorities.
- In a territorial development context, recognize the highly effective support for projects funded by the Strasbourg ITI, which are smaller in scale than those that can be supported by the State or the Regions, but essential for local economic development and social cohesion.
- Recognize that urban authorities are best aware of local needs and guarantee their autonomy as managers of European funds. This implies a certain flexibility in the management and implementation of European funds.

9.1.4 EU Level

9.1.4.1 Challenges

In the case of Strasbourg, the ITI clearly illustrates that the allocated amounts are insufficient in light of the territory's needs while EMS has demonstrated for two decades its capacity to utilise European funding very efficiently. During the current programming period, all available funds were allocated to local projects within just two years.

9.1.4.2 Policy recommendations

- The active participation of representatives from a recognized level of metropolitan government, such as the EMS, in CP planning and programming could contribute to refining policy mechanisms that more generally address metropolitan governance needs in Europe.
- Take policy initiatives to address residents' needs in housing, mobility, green infrastructure, waste management, energy management, etc., through coordination of instruments at the metropolitan region level. Strasbourg could be the site of such a "metropolitan pilot project."
- For direct EU funds (Interreg, Horizon, Life, etc.), allow institutions with management functions (such as the EMS) to access resources (operating costs, full cost of hiring

staff/technical assistance). Ease the requirement, which exists for some programmes, to recruit internally instead of promoting a position.

9.2 Recommendations based on the experience of France's large urban authorities regarding the implementation of EU cohesion funds

A complete set of policy recommendations have been formalised by *France urbaine* in several recent positions or manifestos intended for national authorities, the European Union or public opinion (France urbaine, 2024, 2025a, 2025b, 2025c). These recommendations regarding the implementation of EU cohesion funds have been discussed and refined during the second session of the Urban Laboratory held on June 30, 2025. Some of them concern specific spatial levels of decision making (regional, national and EU levels) while other proposals are addressed to all three levels. Proposals regarding the future Social Climate Fund or directly managed funds are also presented in a final section.

9.2.1 Policy recommendations at the regional Level

- Have the allocation of the ERDF towards sustainable urban development (currently 8% in the ERDF regulation, aim for 15%) calculated at the regional level, in order to ensure its readability and to determine the share that actually goes to urban authorities, at the forefront of the transition in view of their skills (housing, mobility, economic development, energy, water, waste, etc.);
- Recognize that large cities, agglomerations and metropolises have the free choice of themes and tools for territorializing European funds (in particular the automatic use of integrated territorial investments - ITI) to maximize the leverage effect of European credits for integrated strategies for the inclusive ecological transition;
- Guarantee genuine co-development of regional operational programs in the territory of large agglomerations and metropolises, on the model of the regional scheme for economic development, innovation and internationalization (*schéma régional de développement économique, d'innovation et d'internationalisation* -SRDEII), in view of the challenges of financing the ecological, social and inclusive transition and the skills that are mobilized at these levels;
- Ensure territorial equity by limiting the gatekeeper role played by the Region, which may result, depending on the case, in the exclusion of large urban areas from programming, of communities/urban areas from certain ROP funding lines, or else, of constrained PO axes, under constrained thematic envelopes...

9.2.2 Policy recommendations at the national level

- Implement a long-term planning principle to give territories the necessary visibility to secure sustainable investments, with a potential operational implementation in the Recovery and Ecological Transition Contracts (CRTE - contracting tool between the State and inter-municipal authorities/groups of inter-municipal authorities) or in a *Contrat Intégré de Transition écologique et Solidaire* (CITÉS).
- Reflect in national regulations the European framework that would be defined to ensure the principle of partnership and inter-territorial dialogue, in order to avoid any "regional filter"

- Explore the idea of a State-Regions-Intermunicipal authorities governance pact for cohesion policy (as proposed for 2021-2027, but which did not come to fruition).

9.2.3 Policy recommendations at the EU level

- Securing a few fundamental principles:
 - **The principle of multi-level governance** must be defended and strengthened: refocusing European funds solely on projects of national ambition and on competitiveness issues, to the exclusive benefit of businesses and to the exclusion of public stakeholders, could lead to a disconnection from local needs, particularly for urban areas that combine the challenges of competitiveness, ecological transition, and social transition (notably with the implementation of the European Green Deal) within a global perspective integrating all the issues of planning, mobility, inclusion, and territorial cohesion.
 - **The principles of subsidiarity and partnership:** these principles must translate into effective co-development of regional operational programs with major cities, towns, and metropolitan areas, which play a key role in structuring local sectors, innovation, and competitiveness.
 - **The principle of additionality:** a genuine approach to co-financing and leveraging European funds should be implemented, and such a principle must not be overlooked, as was the case with the French recovery plan (NRRP);
 - **The principles of multi-annual planning and predictability:** sustainable investments require visibility. Urban areas must therefore be able to rely on cohesion policy to implement long-term planning that is not subject to a "stop-and-go" approach. Resource predictability is the primary condition for securing the structural investments our cities must make (urban areas are major contributors to civil investment in France);
 - **The principle of territorial equity:** should a distribution key be provided for the management authority of European cohesion policy funds in texts at European level in order to avoid a "regional filter"?
- Guarantees to be provided in the future European regulations for the post-2027 period:
 - **Choose efficiency by guaranteeing urban areas funding** that is commensurate with the challenges they are best able to address for Europe (in particular, by increasing the percentage of funding reserved for sustainable urban development to 15%, with calculations at the regional level);
 - **Strengthen the role and position** of large cities, agglomerations, and metropolises in the implementation of European funds, while securing a framework for cooperation and partnership with other levels of governance.
 - **Encourage and strengthen the earmarking of European funds** for interterritorial cooperation projects serving the Alliance of Territories: metropolitan hubs, territorial and rural balance hubs, interterritorial CRTes, or any other scale freely determined by territories carrying out cooperation projects, including cross-border one.
 - **Promote cross-cutting initiatives targeting territories**, such as the Cities Mission or the Adaptation Mission (Horizon Europe), and ensure that participation in these European initiatives automatically triggers access to funds from the relevant sectoral program and/or the European Structural Investment Funds of the

Cohesion Policy. This is particularly true since these initiatives support climate transition projects at the local and inter-territorial levels.

- **Integrate a cross-cutting imperative between the European Commission's Directorates-General** to meet the objective of integrated and territorialized contractualization commensurate with its global and interdependent nature.

Based on the experience of large cities authorities in France, *France urbaine* has also developed a series of proposals that concern simultaneously the regional, national, and European levels. These are as follows.

- Guarantees to be provided in the future European regulations for the post-2027 period:
 - Complex administrative procedures, particularly those concerning public procurement and fund management, must be simplified at all levels (European, national, and regional) to promote more efficient use of funds and avoid the administrative burden that hinders local authorities;
 - Clarify the rules to enable urban areas to identify obligations and constraints that fall under the regional, national, and European levels (e.g., criteria, thresholds, co-financing rates, requests for supporting documents, etc.);
 - An incentive for Member States/managing authorities to build a framework for financial and contractual dialogue that allows local authorities to assume the investments required to fight climate change.

France urbaine also expressed some recommendations regarding other European funding. Regarding the **Social Climate Fund**, the proposals are as follows:

- Achieving the objectives of the Social Climate Fund is less a matter for the State than for large cities and metropolitan areas. The criteria for assessing the proper use of the SCF will ultimately depend on the mobilization capacity of urban areas;
- Financial support must be directed where it is most useful, to the relevant stakeholders: the Social Climate Fund must not lead the State to use funds to fill budget deficits or finance existing measures, especially if achieving the objectives depends on the budgets of other stakeholders (risk of diverting funds away from the territories, in line with the similarity of the RRF);
- The Social Climate Plan must guarantee access for local authorities, particularly large cities, towns, and metropolitan areas on the front lines, to Social Climate Fund credits to support the public policies they are implementing to assist the most vulnerable in the ongoing transitions (housing, energy);
- Guarantee local governance that supports territorial investments by the relevant local authorities and provides visibility into how credits are allocated and territorialized.

Regarding directly managed programs, *France urbaine* would like the processes to be simplified, for instance regarding the signature procedures for agreements, such as those for Horizon Europe or Erasmus. *France urbaine* also argues that attention should be paid to the future Competitiveness Fund (see Eurocities positioning) and to the European Local ENergy Assistance (ELENA) set up by the European Investment Bank. Eventually, *France urbaine* wishes that particular attention be paid to the revision of the system of State aid, and in particular its application to local authorities and their local operators, which will have to be taken into account from the start of work.

10 Conclusion

Strasbourg is the main metropolitan area in the East of France and it is one of the capital cities of the European Union. EMS is the 9th voluntary grouping of municipalities in France outside Paris, and it is attractive in terms of population and jobs. Over the past two decades the population's environmental awareness has been reinforced by a proactive policy regarding mobility, housing and biodiversity. However, EMS also ranks 3rd among French urban territories in terms of income inequality. In the city of Strasbourg itself, a quarter of the population (35 000 households) live below the poverty line. As a result, social and territorial cohesion is a long lasting challenge for EMS.

Like other French *métropoles*, EMS is not included in the design of the EU Cohesion Policy at the national level. It is consulted indirectly through network organisations like *France urbaine*. In the development of the ROP, it is consulted, but it is not decision maker. Since 2002, EMS has successfully lobbied to receive a full delegation for managing ERDF and ESF. This is a unique case in France. Strasbourg shows a situation where EU Cohesion Policy is embedded within a long-standing framework of metropolitan cooperation—over 50 years old. Furthermore, the EU Cohesion Policy is highly decentralized in the sense that strategic priorities are defined by the metropolitan council and executive bodies themselves.

The CP tool used by EMS during the last two programming periods is the ITI. There is a strong stability between the 2014-2020 and 2021-2027 programming periods, regarding tools, target groups, and a real autonomy *vis-à-vis* the region and the national administration. EMS has developed a very strong technical capacity in managing the ITI, and more generally EU funds. The priorities set out in the ITI are closely aligned with the economic strategy of EMS whose aim is to scale up the ecological transition efforts of local economic and institutional actors. This orientation is in accordance with the local Climate Plan. So far, other spatial planning documents approved by EMS aim at demographic and economic growth and to conciliate them with social cohesion and ecological and energy transition is a real challenge. The ESIF funds are used to help to implement the strategies of EMS but the actual EU funding represents around 1% of the EMS budget. Therefore, the added value of EU funding is more qualitative than quantitative.

EMS repeatedly chose not to direct ITI funds toward its own projects, but toward those initiated by local stakeholders, especially SMEs and associations. This support to local actors creates a leverage effect: every euro invested has 2 euros as counterpart. However, outside the ITI, very few projects born by EMS or by the City of Strasbourg get funding from the ERDF while no ESF funding is available outside the ITI. Thus, we may conclude that EMS cannot really use EU Cohesion funds to help its ecological transition strategy, even though projects in energy, mobility or cleaning the environment require huge investments. A contract signed with the State and the Region for the Eurometropolis territory has listed over 1,200 operations that may be carried out over the 2022-2026 period, generating a total investment need of over €2 billion.

Regarding EU direct programmes, including INTERREG, Horizon and Life or other sectoral programmes, EMS is quite active to get them support Strasbourg's strategies for sustainable urban development. Since the ITI is more about socio-economic development, we may say that, in the case of Strasbourg, the Cohesion Policy funds coexist with other EU programmes, rather than they synergise with them.

Metropolitan governance in Strasbourg is remarkable. However, the boundaries of Strasbourg Métropole have been quasi stable for 50 years in spite of suburbanisation and economic decentralisation. As a result, there is a mismatch between the *de jure* metropolis and the *de facto* metropolis. This situation can be found in most large conurbations in France. The tools to organise dialogue

and cooperation between metropolitan and rural or suburban areas should be reinforced and the spatial planning tools should be better connected to the EU orientations and to the EU cohesion policy. Strasbourg is no exception to the general case of large cities or city-regions in France, where the spatial planning tools have the mission to accommodate growth through greenfielding and/or through urban regeneration. However, in response to climate, energy, resource, biodiversity, and public health challenges, EMS must rethink territorial development: reduce greenhouse gas emissions through better transportation control, save resources (energy, water, soil, air), and preserve biodiversity. This includes more cooperation with the surrounding areas in France and in nearby Germany. By so doing, the thematic priorities of EMS would resonate even more with the priorities of the European Cohesion Policy.

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Interviews & interactive sessions

Interview 1 – Officer at France Urbaine, 4 April 2025

Interview 2 - Coordinator for the ITI 2014-2020, Eurométropole de Strasbourg, 8 April 2025

Interview 3 – Head of Managing Authority Regional Directorate for Economy, Employment and Solidarity, 10 May 2025

Interview 4 - Coordinator for the ITI 2021-2027, Eurométropole de Strasbourg 19 May 2025

Interview 5 – Officer at Région Grand Est Antenna in Strasbourg, 6 June 2025

Interview 6 – Head of Managing Authority Région Grand Est, 17 June 2025

Interactive Session 1 - Policy lab Strasbourg, 30 June 2025

Interactive Session 2 - Policy lab France, 30 June 2025

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