

Implementation challenges of Integrated Sustainable Urban Development Strategies in Spain during the period 2014-20

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Abstract

Integrated Sustainable Urban Development Strategies (ISUDS) have become the approach adopted by Spain for the promotion of sustainable urban development co-financed by the ERDF during the period 2014-20. While previous research has mainly focused on the design stage of these policies, this study focuses on the implementation stage. Through document analysis and in-depth interviews with actors from the Spanish public administration, this study reveals a low rate of execution of the strategies and the challenges faced by local entities. This research aims to broaden our knowledge about ISUDS in Spain and to propose measures that could improve the implementation of future European programmes on urban sustainability.

Keywords: urban sustainability; EU urban policy; Integrated Sustainable Urban Development Strategies (ISUDS); urban regeneration; sustainable urban development

Resum. *Reptes en l'aplicació de les estratègies de desenvolupament urbà sostenible i integrat a Espanya durant el període 2014-2020*

Les estratègies de desenvolupament urbà sostenible i integrat (EDUSI) han esdevingut l'enfocament adoptat per Espanya per a la promoció del desenvolupament urbà sostenible cofinançat pel FEDER durant el període 2014-2020. Les investigacions prèvies han posat atenció principalment en la fase de disseny d'aquestes polítiques; tot i això, aquest estudi se centra en les fases de gestió i implementació. A través de l'anàlisi documental i d'entrevistes en profunditat amb actors de l'Administració pública espanyola, aquest estudi revela un índex baix d'execució de les estratègies i els reptes a què s'enfronten les entitats locals. Aquesta investigació pretén ampliar el nostre coneixement sobre les EDUSI a Espanya i proposar mesures que puguin millorar la implementació de futurs programes europeus sobre sostenibilitat urbana.

Paraules clau: sostenibilitat urbana; política urbana de la UE; estratègies de desenvolupament urbà sostenible i integrat (EDUSI); regeneració urbana; desenvolupament urbà sostenible

Resumen. *Retos en la implementación de las estrategias de desarrollo urbano sostenible e integrado en España durante el periodo 2014-2020*

Las estrategias de desarrollo urbano sostenible e integrado (EDUSI) se han convertido en el enfoque adoptado por España para la promoción del desarrollo urbano sostenible cofinanciado por el FEDER durante el periodo 2014-2020. Las investigaciones previas se han centrado principalmente en la fase de diseño de estas políticas; sin embargo, este estudio se centra en las fases de gestión e implementación. A través del análisis documental y de entrevistas en profundidad con agentes de la Administración pública española, este artículo revela un bajo índice de ejecución de las estrategias y los retos a los que se enfrentan las entidades locales. Esta investigación pretende ampliar nuestro conocimiento sobre las EDUSI en España y proponer medidas que puedan mejorar la implementación de futuros programas europeos sobre sostenibilidad urbana.

Palabras clave: sostenibilidad urbana; política urbana de la UE; estrategias de desarrollo urbano sostenible e integrado (EDUSI); regeneración urbana; desarrollo urbano sostenible

Résumé. *Défis liés à la mise en œuvre des stratégies intégrées de développement urbain durable en Espagne au cours de la période 2014-2020*

Les stratégies intégrées de développement urbain durable (EDUSI) sont devenues l'approche adoptée par l'Espagne pour la promotion du développement urbain durable cofinancé par le FEDER au cours de la période 2014-2020. Les recherches antérieures s'étaient principalement concentrées sur la phase de conception de ces politiques, alors que cette étude se concentre sur les phases de gestion et de mise en œuvre. Grâce à l'analyse de documents et à des entretiens approfondis avec des acteurs de l'administration publique espagnole, cette étude révèle un faible taux d'exécution des stratégies et les défis auxquels sont confrontées les entités locales. Cette recherche vise à élargir nos connaissances sur les stratégies intégrées de développement urbain durable en Espagne et à proposer des mesures susceptibles d'améliorer la mise en œuvre des futurs programmes européens portant sur la durabilité urbaine.

Mots-clés : durabilité urbaine ; politique urbaine de l'UE ; stratégies intégrées de développement urbain durable ; régénération urbaine ; développement urbain durable

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1. Introduction

In recent years, policies that promote sustainable urban development have gained momentum. Different institutions at all scales have taken part in this trend. The United Nations have addressed the increase in urban population and its challenges for the planet in recent Habitat conferences. In Europe,

the urbanisation rate is over 75% (Pesaresi et al., 2016), making it one of the most urbanised continents in the world. Moreover, European cities are estimated to generate 85% of GDP (European Commission, 2019). As a result, the European Union has developed different urban sustainability policies. The Conference of European Sustainable Cities and Towns held in Aalborg in 1994 is a turning point in the introduction of these policies in Europe, as well as the European Spatial Development Strategy (European Commission, 1999), which includes the so-called spatial approach that has paved the way for a succession of place-based policies in the following years (Barca, 2009; Mendez, 2013). In the programming period 2014-20, the promotion of sustainable urban development was encouraged through funding for Integrated Sustainable Urban Development Strategies (ISUDS).

The present study analyses the development of this programme in the Spanish context, as problems in its implementation have been reported and there is the possibility that European funding may be lost due to missed deadlines. Moreover, even if the key principles of European Cohesion Policy for the period 2014-20 and the design of ISUDS are well established, less attention has been given to the implementation phase of these strategies, since previous research has mainly focused on the design stage. In this vein, this research aims to comprehend the challenges faced by public administrations in the implementation of the allocated funds, through document analysis and in-depth interviews with actors from the local, regional and national administrations, and poses the following research questions: 1) What does the spatial distribution of the funding demonstrate?; 2) What percentage of the allocated funding has been implemented?; and 3) What reasons are behind that level of implementation?

For this purpose, this study is divided into the following sections: First, specialised academic literature on European urban policies is reviewed, drawing particular attention to strategic planning, sustainable urban development and integrated approach. This section also addresses the development process of ISUDS in Spain by elaborating on the governance models and structure of each strategy. Next, the data and methodology section provides details of the documents examined in this research and outlines the interview procedure. Then, the discussion section correlates the findings explained in the results section with specialised literature. Finally, the conclusion offers a set of recommendations to enhance European urban policies.

2. From URBAN to ISUDS: Towards an integrated approach to urban sustainability in Spain

Since its entry into the European Union in 1986, Spain has been incorporating European urban policies through different programmes. These include early experiences such as URBAN 1994-1999, URBAN II 2000-2006 and *Iniciativa Urbana* 2007-2013. The URBAN I Initiative was launched in 1994 as a response to some of the challenges faced by European towns and cities

such as high unemployment, the risk of social exclusion and the deterioration of the built environment. The URBAN II initiative was concerned with the economic and social regeneration of cities and neighbourhoods in crisis and the promotion of sustainable urban development. The aim of *Iniciativa Urbana* 2007-2013 was the implementation of innovative urban regeneration strategies through an integrated approach that considered social, economic and environmental aspects in accordance with the principles and strategic orientations of Community policies. In the same period, 2007-13, the European Union funded other local and urban development projects for municipalities with a population between 20,000 and 50,000 inhabitants that were not provincial capitals. These early experiences introduced a new integrated approach to urban regeneration policies and reveal the impact of Europeanisation in southern European member states such as Spain (Carpenter, 2013).

The programme of Integrated Sustainable Urban Development Strategies (ISUDS) corresponds to the period 2014-20 and is a comprehensive and sustainable approach to economic, environmental, climatic, social and demographic challenges in urban areas, which aims at strengthening the role of cities in the Cohesion Policy (de Gregorio Hurtado, 2014, 2015; de Gregorio Hurtado and González Medina, 2017; González Medina, 2013; González Medina and Fedeli, 2015; González Medina and Huete García, 2018; Huete García et al., 2016; Nasarre y de Goicoechea et al., 2017). These policies show, especially during the period 2014-20, that urban sustainability policies in Europe can be summarised as a set of actions and measures according to the principles of strategic planning, sustainable development theories and the promotion of an integrated approach.

With regard to these principles, Hall and Tewdwr-Jones (2010) underline that, in the latter part of the 20th century and the beginning of the 21st, an increasing reliance on strategic planning forms that are not integrated within traditional planning instruments can be observed. In Spain, the White Paper on Sustainability for Urban Planning (Fariña Tojo and Naredo, 2010) is the reference report that provides guidelines for strategic action towards more sustainable planning, proposing a set of essential recommendations for sustainable urbanism. Therefore, the concept of sustainable development can be used as an overarching framework to shift from short-term policies and narrow interests to a more holistic and inclusive activity that considers the cumulative impacts of local proximity, as well as the wider ecological and ethical implications of local choices (Berke, 2002). However, even if previous experiences of European urban policies have significantly encouraged a change of mentality for municipal corporations and different social agents, the regulatory framework for urban planning in Spain is still characterised by rigidity and lack of alignment with the guiding principles of European policies (Fariña Tojo and Naredo, 2010; González Pérez, 2007). Yet other authors such as Pascual and García (2008) hold that these new urban policies reflect a profound reorientation of the approaches and priorities in public intervention strategies according to the principles and objectives of strategic planning, which has produced a

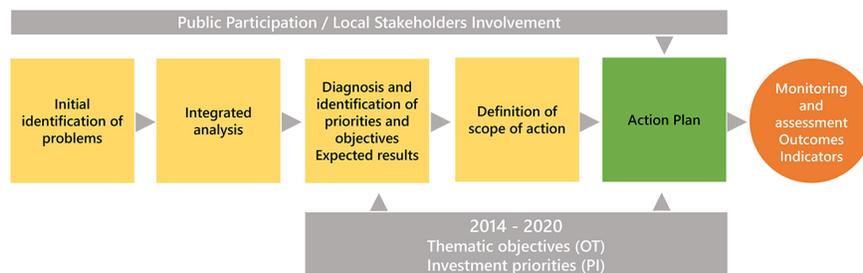
substantial change in urban planning, as González Medina and Huete García (2020) also point out. In a similar vein, these procedures are also considered to lead to a process of homogenisation of practices related to urban policies that become another instance of Europeanisation (Marshall, 2005; Hamedinger and Wolffhardt, 2010), which also has some implications for Spanish urban policies (de Gregorio Hurtado, 2021).

Since urban issues have various intertwined dimensions, it is generally assumed that sectoral approaches should be replaced by integrated strategies (Di Gaetano and Strom, 2003; Fioretti et al., 2020). The adoption of the Leipzig Charter in 2007 marked a significant turning point in the implementation of integrated approaches to urban development in Europe. In the Spanish context, Alonso Ibáñez (2016) points to five key elements to identify an integrated urban policy:

- 1) It adopts a transversal and multidirectional city strategy, aligning the different resources and sector policies.
- 2) It creates coordination platforms for cross-cutting vertical actions or multi-level governance, as well as horizontal actions between stakeholders that enhance citizen participation.
- 3) It merges budgets from different levels of government.
- 4) It articulates and combines all periods (short, medium and long term) and spatial scales (region, city, neighbourhood).
- 5) It includes the social capital in a shared project, which is not limited to land classification, housing production and infrastructures development.

In this context, the role of structural funds and the European Regional Development Fund (ERDF) has been crucial. In the period 2014-20 each EU Member State received a minimum of 5% of the ERDF, to be invested in urban sustainability strategies; in Spain this amount was 8%. The second chapter of the ERDF regulation address specific provisions for the treatment of territorial features and includes, in Article 7, a statement regarding sustainable urban development. It states that urban sustainability actions shall be implemented through integrated territorial investment (ITI), community-led local development (CLLD), a specific operational programme, or a specific priority axis, which is the approach that has been adopted by Spain.

The funds are distributed according to two main criteria: the first is to support integrated strategies that tackle the economic, environmental, social and demographic challenges of urban areas; the second aims to undertake integrated territorial investment through a specific operational programme (European Parliament and Council of the European Union, 2013). The Spanish operational programme, which the European Commission approved in 2015, aimed to help the Spanish economy recover competitiveness through a more sustainable and resource-efficient model under four priorities: transition towards a low-carbon economy, sustainable transport, sustainable and integrated urban development, and the improvement of water quality. Since then,

Figure 1. Structure of urban development strategies

Source: Own composition from original in RIU Report (2015).

Spain has launched three public calls for applications, for which several cities have presented strategies. The first call was published in December 2016, the second in July 2017, and the third in December 2018.

In order to coordinate these urban development policies that receive funding from the EU, the Spanish Ministry of Transport, Mobility and Urban Agenda had previously created the Urban Initiatives Network [*Red de Iniciativas Urbanas*], known by its Spanish acronym RIU. This body has published a reference guide advising municipalities on how to develop an integrated sustainable urban development strategy (RIU, 2015). As a result, there is great homogeneity among the documents produced by different municipalities, since all of them have almost the same chapter structure.

As Figure 1 shows, the role of the spatial dimension in the design stage is essential, since the spatial delimitation of its scope of action is one of the requirements for obtaining financial support, as well as the provision of an integrated analysis in accordance with ESDP and ERDF regulations. The investment priorities and thematic objectives defined by each municipality have to be related to those listed in the ESDP, and the basis for the definition of projects included in the Action Plan. The ERDF supports eleven investment priorities, known as thematic objectives. Each integrated sustainable urban development strategy (ISUDS) must be based on these objectives. In addition, public participation is an ongoing element throughout the design and monitoring stages of the strategy, since one of the pillars of urban sustainability is the ability to achieve wide and durable consensus, involving citizens in the decision-making process. However, as Arnstein (1969) explains, not all of these processes effectively answer to citizen control, as it is rather frequent to find examples of tokenism, including surveys and consultations. Indeed, most of the municipalities implemented specific participation processes around the design of the strategies. In this vein, de Gregorio Hurtado (2021) highlights that the participation processes in Spain were mainly structured through sectoral workshops.

With regard to the structure of the reference guide for creating an integrated sustainable urban development strategy (RIU, 2015), the first chapter

is an integrated analysis of the defined area, which consists of an exhaustive study of several topics, mainly environmental, social, economic, territorial, etc. Yet, despite the integrated analysis announced, most of the strategies merely present a compilation of data and sectoral analyses. Only a few establish relationships between the topics and develop a properly integrated approach. The diagnoses follow the traditional form of SWOT analysis, and both the analysis and the diagnosis are linked to the thematic objectives in two aspects: on the one hand, a horizontal integration that tries to avoid unlinked, isolated or disconnected actions or sectoral policies; and, on the other, a vertical integration composed of a hierarchical structure to which all administrative levels contribute. Given the decentralised government structure of Spain, this vertical integration is crucial. The following chapter of the guide deals with the definition of the scope of action of the strategies. As a specific part of the municipality is targeted by the investment, the strategy must accurately define a locality in terms of location, area and boundary. Therefore, the 173 selected strategies stick to the principles of place-based policies. This area can be drawn, i.e., represented spatially. Then the schedule and implementation stages are addressed in the subsequent chapters. Both are part of the Action Plan, which includes a timetable and detailed programme dates, actions, and the financial support needed. At the end, a set of indicators to monitor and assess the outcomes are established.

In addition to this, urban areas eligible to submit ISUDS are defined in an Order¹ of the Spanish Ministry of Finance and Public Administration, which establishes four types of urban area that can submit ISUDS:

- 1) For cities or functional urban areas of more than 100,000 inhabitants, the maximum aid to co-finance is 15m euros.
- 2) For cities or functional areas greater than 50,000 and fewer than 100,000 inhabitants, the maximum aid to co-finance is 10m euros.
- 3) For cities or functional areas greater than 20,000 and fewer than 50,000 inhabitants, the maximum aid to co-finance is 5m euros.

Therefore, different municipalities belonging to the same functional area are allowed to submit ISUDS.

In terms of governance, the operational programme of ISUDS in Spain involves a complex management structure (Figure 2). There is a managing authority, the General Directorate of European Funds, which is responsible to the Ministry of Finance and Public Administration. Then there are two intermediate bodies: the General Directorate of Urban Development, which supervises large municipalities; and another body that is subsidiary to the Ministry of Territorial Policy and oversees medium and small municipalities.

1. Annex I of Order HAP/2427/2015, of 13 November, approving the conditions and the first call for the selection of Integrated Strategies of Urban Sustainable Development to be co-financed through the ERDF operational programme for sustainable growth 2014-2020.

Figure 2. Governance of the management and implementation process of ISUDS in Spain



Source: Own elaboration.

The municipalities, which are the key actors in the implementation of the strategies, are defined as light intermediate bodies. They are responsible for the selection of the operations to be co-funded. These are submitted by the Municipal Units and Departments, known as Implementation Units.

3. Data and methodology

This study employs qualitative research methods such as document analysis and in-depth interviews to analyse the geographical distribution and level of expenditure of the allocated funds. First, the STRAT-BOARD, the dataset that collects all the strategies implemented in the period 2014-20, and the Official State Gazette (BOE), in which the different calls for applications are issued, were consulted. The result of the initial call is published in provision 9052 of BOE No. 239, published on 3 October 2016. Likewise, the outcome of the second call is published in provision 8814 of BOE No. 176, of 25 July 2017, and finally, the strategies selected in the third call appear in provision 17349 of BOE No. 304, of 18 December 2018. The 173 selected strategies are geolocated and a thematic map is created, which shows graduated symbols that vary in size depending on the amount of funding allocated.

The documentary analysis of the annual implementation reports published by the General Directorate for European Funds of the Ministry of Finance

and Public Administration between 2019 and 2022 has been used to examine the level of expenditure of the allocated funds. These documents also contain information on the measures proposed for the implementation of the funds. To achieve a deeper understanding of the underlying reasons for the current low level of expenditure, twenty-five interviews were held in autumn 2021 with politicians, technical staff and civil servants from the public administration at local, regional and national level. The interviewees were approached at meetings organised by the URBACT national point and scientific congresses and seminars, as well as contacted on the recommendation of other interviewees. The interviews were semi-structured and conducted both in person and by telephone. The questions raised were related to the principles of integrated sustainable urban development, the design stage of the strategy document, the level of implementation, the degree of execution and the problems encountered:

- Q1. To what extent did the existence of a pre-existing strategy facilitate fundraising and implementation?
- Q2. Was the strategy document prepared using municipal resources or was it drawn up by external expert firms?
- Q3. What were the main problems encountered in the implementation of the strategy?
- Q4. Is an urban agenda being developed or planned?

The interviews were coded using an open-source qualitative data analysis software tool (Rampin and Rampin, 2021). To organise the information gathered, the responses were classified into different groups according to the key challenges identified by van der Zwet et al. (2017), which are related to capacity, regulation and governance, as shown in table 1. This information is shown in Table 5 with varying shades of grey that show the relationship between the responses and the key challenges.

Table 1. Categorisation of the responses from the semi-structured interviews according to the Key Challenges identified by van der Zwet et al. (2017)

Key Challenges / Questions		Q1	Q2	Q3	Q4
KC1 – Capacity	KC1.1 – Institution				
	KC1.2 -Stakeholders				
	KC1.3 Financial				
KC2 - Regulatory	KC2.1 – Complexity				
	KC2.2 - Domestic policy framework				
	KC2.3 – Ambiguity				
KC3 - Governance	KC3.1 – Communication				
	KC3.2 - Decision making				
	KC3.3 – Coordination				

Source: Own elaboration.

4. Results

4.1. Geographical distribution of the allocated funds

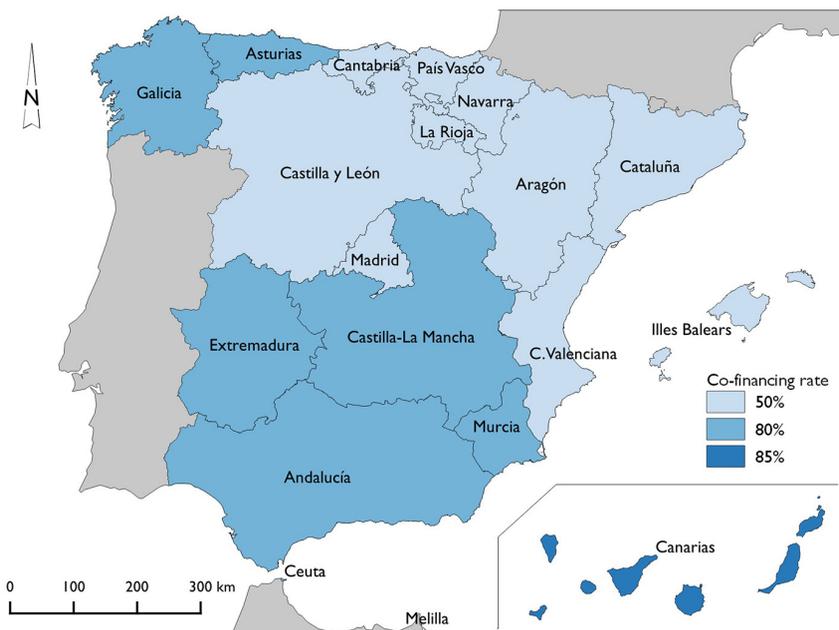
According to STRAT-BOARD, there are 1,048 strategies in Europe. Considering the data compiled in 2016 by the National Institute of Statistics on the Population Gazetteer (INE, 2016), there were 400 municipalities in Spain with more than 20,000 inhabitants, and 173 of these have received European funding for sustainable urban development. Thus, approximately 43% of the eligible municipalities have obtained this funding. Following the three groups of cities defined according to the eligibility criteria, the selected strategies are summarised in Table 2.

Table 2. Selected ISUDS by municipalities grouped according to their population

Population (inhabitants)	Municipalities	Selected ISUDS	% Selected
> 100,000	62	44	71%
50,000–100,000	83	47	57%
20,000–50,000	255	81	32%

Source: Own elaboration based on data from the Population Gazetteer and the different ISUDS calls for proposals.

Figure 3. Co-financing rate applied in Spain in the ISUDS process



Source: Own elaboration.

Table 3. Total amount of funds allocated, classified by Autonomous Region and public call

Autonomous Region	1st Call		2nd Call		3rd Call		Total	
	Strategies	Million €						
Andalusia	24	239,976,552	15	104,296,975	22	189,315,061	61	533,588,588
Aragon	2	8,888,000					2	8,888,000
Asturias	2	14,999,705	1	10,308,120	1	5,044,729	4	30,352,554
Cantabria	1	3,891,000			1	2,976,643	2	6,867,643
Castilla-La Mancha	5	43,984,000	3	19,078,341	7	44,395,985	15	107,458,326
Castile and León	3	24,450,000	1	14,068,685	1	5,018,438	5	43,537,123
Catalonia	2	30,000,000	2	17,555,778			4	47,555,778
Valencia	10	83,030,999	5	35,584,770	5	28,972,043	20	147,587,812
Extremadura	5	50,000,000	3	20,000,000	4	14,469,550	12	84,469,550
Galicia	12	83,137,999	4	35,000,000			16	118,137,999
Balearic Islands	1	12,710,000			1	7,965,000	2	20,675,000
Canary Islands	5	48,855,494	3	22,130,721	3	29,998,476	11	100,984,691
La Rioja			1	1,961,815	1	1,807,959	2	3,769,774
Madrid	6	30,463,201	1	3,428,176			7	33,891,377
Murcia	3	24,999,134	1	14,070,973	4	22,385,925	8	61,456,032
Navarre	1	2,663,000					1	2,663,000
Basque Country	1	9,289,000					1	9,289,000
Total general	83	711,338,084	40	297,484,354	50	352,349,809	173	1,361,172,247

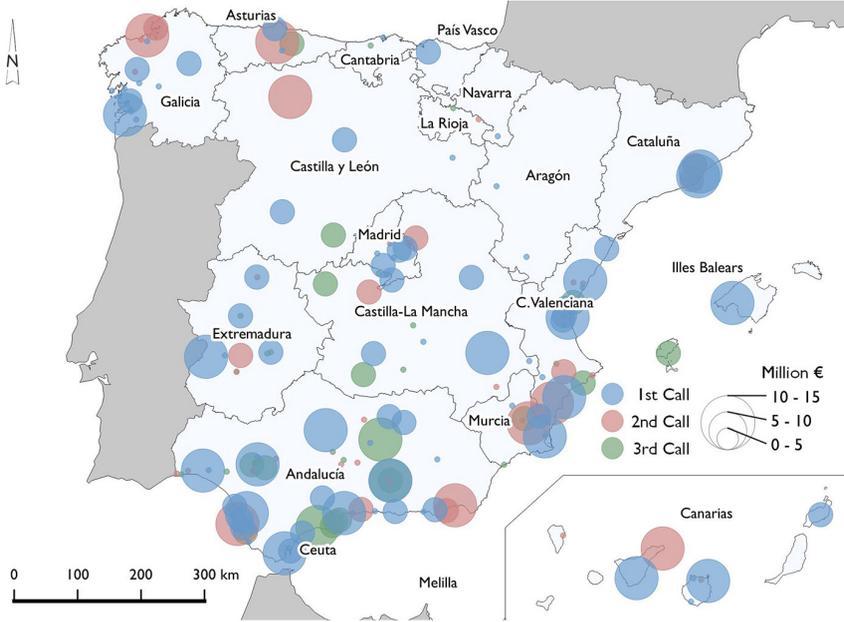
Source: Own elaboration based on the data of the three calls for proposals.

Figure 3 shows regional divergence in the rate of co-financing provided by the EU, according to the criteria of the Cohesion Policy. Thus 80% of co-financing corresponds to Autonomous (or NUTS2) Regions whose GDP per capita is less than 75% of the EU average: Andalusia, Castilla-La Mancha, Extremadura and Galicia. Asturias and Murcia are also included in this group as phasing-out regions in 2007-13, while the Canary Islands sees its rate of co-financing increased to 85%. The most developed regions and the Autonomous Regions considered in the phasing-in group during the former period of cohesion policies had a rate of co-financing of 50%.

Funding was distributed through open calls, and the ISUDS were selected in a similar way to other Member States such as Portugal, France, Italy or Germany (van der Zwet et. al, 2017). The first call was launched in November 2015 and ended in December 2016. 83 strategies were approved and slightly more than 52% of the funding was allocated. The resolution of the second call was published in July 2017, when 40 cities obtained funding, accounting for 21.9% of the resources. The third and last call opened in September 2017 and 50 strategies were selected.

The geographical distribution of the allocated funding is shown in Figure 4. The map illustrates a clear dichotomy between regions, owing to the eligibility criteria and rates of co-financing. Cantabria, the Basque Country, Navarre, La Rioja and Aragon have received less funding as they are some

Figura 4. Geographical distribution of allocated funds by city, and classified by public calls



Source: Own elaboration based on the data of the three calls for proposals.

of the most developed European regions, according to the criteria established by the Cohesion Policy. Thus, the allocation of funding has focused on Mediterranean regions such as Andalusia, Murcia, Valencia and Catalonia. Other regions that have benefited from European funding are the Canary Islands and Extremadura, as well as Galicia and Asturias in the northwest.

The map demonstrates how the first call prioritised the strategies submitted by the most populous cities: Barcelona, Valencia, Seville, Málaga, Murcia, Palma de Mallorca, Las Palmas de Gran Canaria, Bilbao, Córdoba and Vigo. All of them obtained the maximum funding available. Yet, the fact that different municipalities are allowed to submit ISUDS and access financing together as functional urban areas is another important new feature of this urban policy. Functional urban areas are understood as metropolitan areas or conurbations formed by several municipalities. In the eligibility criteria, these areas are defined as follows: groups of municipalities of more than 20,000 inhabitants each, areas made of a central municipality of over 20,000 inhabitants and surrounding town councils under this range of population, and conurbations formed by local authorities with a population of more than 20,000.

In the first call, seven applications from functional areas were selected. In the second call, only Hellín (Albacete) benefited from European aid, and, finally, in the last call, the functional areas of Granada, Plasencia, Huelva, Tene-

rife, Almería, Badajoz Camas and Bormujos (Seville) were chosen. Therefore, there is a clear predominance of strategies presented by single municipalities. Moreover, when joint strategies have been presented, they have been promoted by the regional administration, i.e., provincial councils and governments of the Autonomous Communities.

The efforts made by small and medium-sized municipal corporations are also worth noting, especially those with a population of fewer than 25,000 inhabitants. This group includes 26 municipalities. Despite their small population and size, these towns have a significant functional role for territorial cohesion in Spain, as they build a link between remote rural areas and major city networks and infrastructures; particularly those located in very sparsely populated territories – the so-called *España Vacía* or empty Spain (del Molino, 2016).

4.2. Insights about low expenditure derived from annual implementation reports

The 2022 annual implementation report delivered by the General Directorate for European Funds (GDEF, 2022), which is responsible to the Ministry of Finance and Public Administration, states that the level of expenditure of the allocated funds is still very low. The least developed regions have declared having spent 10% of the programmed amount, transition regions have reported spending 12.2%, and the most developed regions 15.08% of the total funding. As Table 4 shows, according to the information collected from the different annual reports, the percentage of implemented actions declared by the beneficiaries is still very low.

The reports are also meant to include some of the measures taken to prevent the loss of funds. The different annual reports consulted, i.e. 2019, 2020, 2021 and 2022, include a section that details the issues that affect programme performance, and both the 2019 and 2020 reports explain the measures that have been taken in compliance with Article 50(2) of EU Regulation 1303/2013. In this sense, while in the 2019 report there is no mention of the urban axis (axis 12), the following annual report remarks on the low implementation of the strategies in all regions (GDEF, 2020: 339). As a result, it is stated that coordination between intermediate bodies and local entities has intensified in order to shorten deadlines for the certification of expenditure (GDEF, 2020: 341). The 2021 report reiterates the low implementation rate

Table 4. Percentage of expenditure executed and declared by types of region

Region	Total (€)	Co-financing rate	% of expenditure executed and declared			
			2019	2020	2021	2022
Less developed	101,483,252	80%	1.90%	2.49%	4.55%	10%
Transition	958,631,554	80.60%	1.79%	4.33%	8.26%	12.20%
More developed	806,313,710	56.65%	2.16%	6.28%	10.27%	15.08%

Source: GDEF (2019: 124; 2020: 139; 2021: 148; 2022: 149).

of axis 12 and the expectation that the absorption of funds will be incomplete at the end of the period (GDEF, 2021: 374). Yet, there is no mention of possible measures that could be taken to solve this problem. Finally, the latest annual report available, from the year 2022, recognises the problem of implementation of axis 12, whose allocated funds are not expected to be absorbed by the time of closure, as stated in GDEF (2022: 373). Nevertheless, as in the 2021 report, no remedial measures are suggested.

In fact, it should be considered that the implementation of these funds depends on strict deadlines. The regulations governing these strategies make it difficult to act flexibly, since December 2023 has been set as the N+3 deadline for the completion of ERDF-funded projects, and there is no possibility of extension according to decommitment policy. Therefore, the information gathered in the different annual reports shows that the risk of losing European funding for urban sustainable development is very high, particularly in some of the municipalities.

4.3. Challenges for executing expenditure related to ISUDS

The low percentage of expenditure reveals a dysfunction between the success in allocating funds and their actual implementation by local authorities. In order to learn about the challenges faced by municipalities when executing strategies, semi-structured interviews with actors from the local, regional and national administrations were carried out.

The data in Table 5 is organised based on the outcomes of the text analysis from the interview transcripts. The correlation between the responses and the key challenges is indicated by varying intensities of the same colour. A lighter shade is used when fewer than 25% of the answers relate to one of these key challenges, while a darker shade shows that between 75% and 100% of the answers refer to them. Table 5 reveals that the most common answers are related to the complexity and ambiguity of the calls for proposals, coordination problems, and issues derived from the domestic political framework.

Table 5. Answers from semi-structured interviews grouped by Key Challenges

	Key Challenges / Questions	Q1	Q2	Q3	Q4
KC1 – Capacity	KC1.1 – Institution				
	KC1.2 -Stakeholders				
	KC1.3 Financial				
KC2 - Regulatory	KC2.1 – Complexity				
	KC2.2 - Domestic policy framework				
	KC2.3 – Ambiguity				
KC3 - Governance	KC3.1 – Communication				
	KC3.2 - Decision making				
	KC3.3 – Coordination				

Source: Own elaboration.

Most local actors responded to the first and second questions that the strategy document had been prepared by external expert companies. Some respondents indicated that no previous strategy document was available and that it was made *ad hoc* for the call. Thus, the absence of previous experience in strategic planning was a common element in the different interviews. Only large municipalities, where there are greater human and financial resources and which had previously worked with European calls, have experience in the production of strategic documents. Yet even when the strategy document had been developed by staff of the municipalities, the interviewees emphasised that it had been a great effort by a small group of people.

Particularly rich and diverse were the responses to the third question, about the problems encountered. Most of the interviewees highlighted the lack of human resources in municipalities to implement the funds. This lack of human resources is not unique to local councils, but also affects the Ministry, where there is not enough staff to undertake all the tasks involved in monitoring the funding. Other difficulties identified were the bureaucratic rigidity of the call for applications, the inefficiency and administrative overload generated by the governance scheme, the large number of thematic objectives in comparison with previous calls or the fact that technical staff did not have experience handling indicators.

The governance scheme distinguishes between Light Intermediary Bodies and implementation units, both within the municipality. Theoretically, this framework allows different departments to show interest in the projects of the strategy document they would like to develop. However, this approach has not been reflected in practice despite having been carried out according to the regulations. In local councils, especially in the smallest ones, it is usual that an operation is assigned to a specific department without competition between the different areas; that is, it is already known from the beginning which department is going to address each project. Yet carrying out this governance scheme has increased bureaucracy.

Another aspect that has had a significant impact on the implementation of ISUDS were the 2019 Spanish local elections and the paralysis experienced in the second quarter of 2020 due to COVID-19. Regarding municipal elections, several municipal governments changed, and so did their political composition and goals. Another widespread problem stems from rising prices in the construction sector, which has meant that some of the approved tenders have not found companies interested in carrying them out, and this has led to delays. As a result, some strategies have been abandoned or reformulated, making it difficult to meet the deadlines.

The last question addresses the existence of a future urban agenda, to check the degree of Europeanisation of integrated strategic planning paradigms. In order to encourage this approach to planning, the Spanish government has designed the Spanish Urban Agenda, which is a strategic document that guides the development of urban sustainability policies in municipalities. This strategy offers and deploys a toolbox for municipalities interested in its implementation

to develop their own action plans. Yet, the results show a low uptake of this approach, focusing mainly on governance issues such as administrative coordination and decision-making capacity.

5. Discussion

EU Cohesion Policy has played a key role in promoting ISUDS (Mendez et al., 2021). The high level of financial support and the number of strategies designed align Spain with other European countries such as Portugal, France, Italy and Germany, as they have all followed a similar process of management of funds for sustainable urban development (van der Zwet et al., 2017).

The data collected from the three calls of applications in Spain show that ISUDS are distributed among large, medium size and small municipalities, which differs significantly from the European Commission's proposal that, as Mendez et al. (2021) pointed out, sought to concentrate funding in larger cities. Furthermore, there are also discrepancies in terms of the mechanism used, with integrated territorial investments (ITI) being preferred by the Commission as they are considered to be particularly relevant for the implementation of ISUDS (Domorenok, 2017; Mendez et al., 2021). The disperse geographical distribution of ISUDS in Spain demonstrates that the institutional capacity of authorities and local institutions is crucial, as González Medina and Huete García (2020) argue. In this vein, Huete García et al. (2023) point out that urban strategies for single cities, with centralised management and supported by only one fund, are less integrative than those that obtain funding from various sources, are planned for several municipalities, and have a decentralised governance scheme. Both aspects highlight the weakness of European influence in the strategy implementation process. In addition, the present study reveals that the number of strategies designed by co-operation between municipalities or for functional areas is low.

In general terms, the design of the strategies covers key issues of sustainable urban development. The strategies have a place-based approach, and include stakeholders and monitoring indicators according to the methodology devised by Medeiros and van der Zwet (2020). Likewise, ISUDS policies have similar thematic objectives and show a sort of trickle-down Europeanisation of urban policies in the different Member States (Carpenter et al, 2020). Yet, the improvement of institutional capacity which was intended by these strategies is notably limited, since the strategy design phase has mostly been carried out by external expert firms. Regarding the role of consultancy firms, it is worth mentioning that, on the one hand, companies were created specifically for this purpose and, on the other, the large consultancy firms in the country offered municipalities tailor-made strategies for the calls and therefore without a real strategic approach. Likewise, many municipalities have hired communication and project management experts whose contracts are limited to the duration of the implementation phase of the ISUDS. This leads to a temporary improvement of institutional capacity, yet prevents permanent staff who continue

performing their daily tasks from acquiring sufficient knowledge about integrated sustainable urban planning. Thus, this is related to a low development of institutional capacity, as no transformations are incorporated in the vision, organisation and functioning of local administrations, since the focus is mainly on fundraising (Navarro et al., 2022). Likewise, the implementation of European urban programmes is higher in cases where there is previous experience (Casado Maestre et al., 2018). As Peris and Bosch (2020) suggest, to achieve urban sustainability transformations, the incorporation of innovations in terms of governance, processes, methodologies and organisation is needed. To some extent, these deficiencies are some of the challenges that the Spanish Urban Agenda aims to address, providing a roadmap for municipalities to define a long-term action plan (de Gregorio Hurtado and González Medina, 2020).

Thus, the data collected and the interviews carried out in this study show that Spanish cities are still facing major limitations when implementing strategies. Some of these constraints are related to those pointed out by de Gregorio Hurtado (2017): lack of a multi-level framework for urban regeneration, the inertia of sectoral approaches, and the obstacles to develop real participation processes. These challenges are a distinctive feature of southern European countries that reinforce north-south differences (Chorianopoulos, 2002). The research findings of the present study are also in line with the challenges identified by Domorenok (2017: 228) in Italy, such as the limited capacity of local bodies to handle increased financial and operational responsibilities due to a lack of expertise and resources, limited representativeness and operational capacity of local partnerships, political interference and urban rivalry between larger and smaller cities, and possible tensions between local and central administrations due to the delegation of responsibilities. As Chamusca (2023) points out in the case of Portugal, it has become clear that the governmental structure is too centralised, excessive local competition in terms of funding makes the process more complex, and the concepts are applied more in theory than in practice. In addition, Davies and Blanco (2017) suggest that these difficulties are linked to the austerity measures introduced in 2007 and tightened in 2013, which have reduced the number of public employees in Spanish municipalities. Indeed, this is a common situation in southern Europe (Medir et al., 2017). In this vein, the effectiveness and efficiency of strategies can be undermined where existing capacities are limited (van der Zwet and Ferry, 2019). As such, diminished public administrations and weak financial capacity at municipal level make it difficult to meet the deadlines and objectives posed by the managing authority.

6. Conclusions

The present study has aimed to shed light on the implementation of Integrated Sustainable Urban Development Strategies (ISUDS) in Spain during the period 2014-20, since previous research has mainly focused on the design stage of these strategies. This research has demonstrated that the strategy documents analysed adopt, at least from a theoretical perspective, the general principles of an inte-

grated approach, strategic planning and sustainable urban development. Yet, despite the amount of funds allocated and the fact that 173 Spanish cities have been selected in three competitive calls for proposals, the rate of implementation of these strategies is extremely low, and so is the impact of the strategies. As a result, many cities risk losing a large part of the allocated European funds. In spite of the efforts made by the local authorities and the huge task of coordination carried out by the national administrations, the percentage of selected operations funded is far from meeting the deadlines and objectives planned.

Thus, the implementation of the funds evidences serious structural weaknesses in local administrations, as revealed by the interviews carried out in this study. The main problems faced by the municipalities in the execution of the strategies are lack of human resources, administrative burden and tight deadlines. These problems have been classified according to three key challenges: capacity, regulations and governance. In terms of capacity, the collected answers focus on the administrative burden, lack of previous experience and tight deadlines. As to regulations, local actors highlight the complexity of dealing with intermediate bodies and to the lack of guidelines. In this context, they also point out the ambiguity in the correspondence between objectives and operations. Finally, the problems of governance at municipal level are related to the processes of decision-making and coordination.

As a result, the analysis carried out in the present study contributes to putting forward some recommendations that could improve future European programmes of urban sustainability in Spain. Firstly, it would be useful to reinforce the analysis and reflections with practical experiences in which dysfunctionalities can be observed. In fact, while the presentation of the best practices and good policies is widely adopted in the evaluation and monitoring of urban policies, less attention is given to cases of failures, problems and mistakes. Secondly, it is essential that long-term strategies are based on a broad consensus, since the 2019 local elections have revealed the weakness of these strategies, which have been abandoned or reformulated due to political changes. Thus, not only should the entire strategy be provided with cross-cutting citizen participation, but the achievement of stable and lasting consensus should also be encouraged, so that the implementation of the principles of sustainable urban development is not jeopardised. Thirdly, small and medium-sized cities require technical support and skilled human resources to access funding on equal terms, since having to manage an increased administrative burden may discourage the creation of ISUDS by small municipalities in the future.

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