

Project number: 639  
Project acronym: trALLs  
Project title: Alpine Industrial Landscapes Transformation

---

## DELIVERABLE D.T2.2.2

---

### Existing policies on local/regional level assessment reports

---

Work package: **T2**

Activity: **A.T2.2**

Organization: **BSC Kranj**

Authors: Uroš Brankovič, Selma Terčon, Helena Cvenkel

Deliverable date: **14.6.2019**

Version: **Final**

Dissemination level: **Project partners**

Dissemination target: **Stakeholders and  
General Public**

**Full policy document with a belonging Exell table available also on:**

<http://www.bsc-kranj.si/projekti/trails>

*This project is co-financed by the European Regional Development Fund through the Interreg Alpine Space programme*

## CONTENT

<b>1</b>	<b>INTRODUCTION .....</b>	<b>3</b>
<b>2</b>	<b>TERMINOLOGY .....</b>	<b>4</b>
<b>3</b>	<b>GOVERNMENTAL FRAMEWORK .....</b>	<b>5</b>
3.1	ADMINISTRATIVE FRAMEWORK.....	5
3.2	REGIONAL/LOCAL ACTORS' NETWORK.....	11
<b>4</b>	<b>POLICY ANALYSIS .....</b>	<b>18</b>
4.1	INTRODUCTION .....	18
4.2	NATIONAL LEVEL .....	19
4.3	REGIONAL LEVEL.....	30
4.4	LOCAL LEVEL .....	33
4.4.1	<i>Strategic documents</i> .....	33
4.4.2	<i>Planning documents</i> .....	35
4.5	IDENTIFICATION OF THE GAPS .....	45
<b>5</b>	<b>CONCLUSION .....</b>	<b>47</b>
<b>6</b>	<b>SOURCES .....</b>	<b>48</b>

# 1 INTRODUCTION

Policy framework is one of the important bases to pursue any intervention in the territory. The Alpine area is first influenced by the macro-regional policies such as Alpine Convention and EUSALP as the macro-regional strategy of the region which set the global goals and guidelines for the region. In addition, each test area is influenced by the policies on the lower governance levels, including the national, regional and local level. The idea of the WPT2 is to evaluate the situation in the testing areas in a comprehensive way, covering environmental, social, economic and spatial issues (see Figure 1). As a frame for these detailed assessments, a separate policy reports are created as deliverable D.T2.2.2. This deliverable is part of the collection of four regional reports (prepared by regional partners) which further serve as an input for activity A.T2.3 Co-assessment procedure synthesis and evaluation, more precisely the D.T2.3.1 Final Comparative Report, and are important as an input for the feasibility study for potential development opportunities for the TAs.

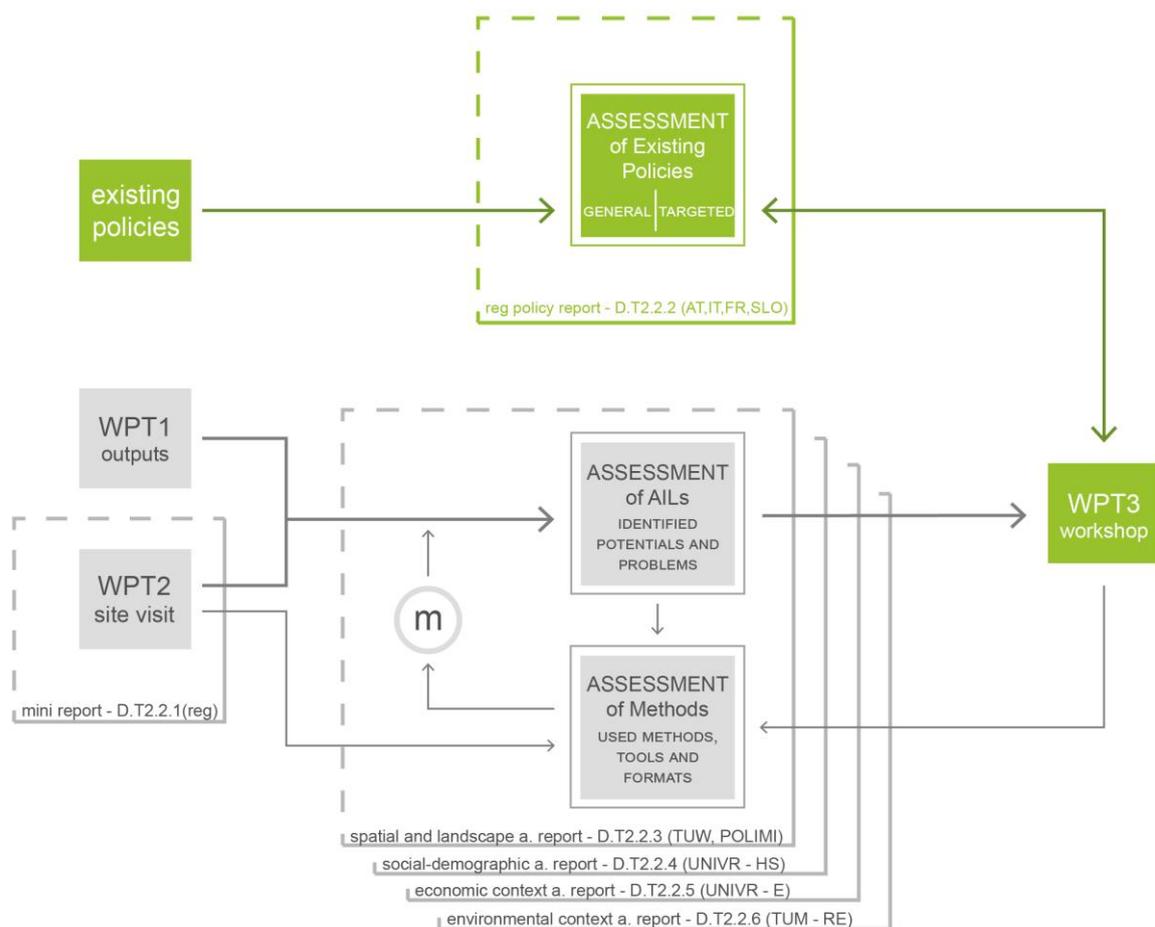


Figure 1: Scheme of the assessment framework, with the emphasised policy assessment

The aim of this deliverable is to collect and evaluate existing policies in each of the test areas with regards to industrial brownfield sites' redevelopment. Thus, the analysis objective is to find out how well the current policies enable and support the implementation of opportunities identified in D.T2.2.3 – D.T2.2.6 and further elaborated in WPT3. First basic question of the analysis is, if industrial brownfield sites are a policy issue in the selected areas at all or if there is any governmental attention to the topic existing at the moment. Each regional report is crucial to further valorise successfulness of the policies and strategies to enable AIL transformations. Analysis of policies is focused on recommendations of types and funding mechanisms, models for transformations, possibilities for the development of innovative funding models to facilitate the regeneration in the small and medium-sized towns in the Alpine region.

## 2 TERMINOLOGY

Throughout the document there are several terms used characteristic for the policy analysis. In this section the definitions are provided in order to have a common understanding of the words.

**Action plan** - a sequence of steps that must be taken, or activities that must be performed well, for a strategy to succeed. An action plan has three major elements (1) Specific tasks: what will be done and by whom. (2) Time horizon: when will it be done. (3) Resource allocation: what specific funds are available for specific activities.

**Actors' network** – a graphical representation or description of all stakeholders engaged in a certain process and their relations in terms of distance, power of relations, direction of influence and frequency of the contacts.

**Financial incentive** – a governmental measure that provides founding to deliver certain objectives; it can be in a form of subvention or loan, granted by the state or European Union, private investment

**Governance/administrative framework** - structure of a government and reflects the interrelated relationships, factors, and other influences upon the institutions. It tells about the delineated power and the governing or management roles in an organization or overall. It includes description of the rules, procedures, and other informational guidelines.

**Institutional framework** – descriptive or/and graphic representation of all institutions and stakeholders (public, private, non-governmental) relevant to adapt or/and deliver a certain policy document, measure etc.

**Policy document** – a document, adopted by either a ministry, a regional or local administration, that sets the objectives and guidelines for the development of a certain sector, geographical area or policy field. In the case of this report we consider as policies the following types of

documents: legislation and other regulations, strategies, programmes, action plans and spatial plans.

Policy analysis – a systematic assessment of policy alternatives to inform the public, stimulate debate and lead to a desired course of action. It includes data collection and interpretation to clarify the causes and effects of public problems.

Spatial plan - A set of documents that consists of textual and graphical elements. It indicates a strategic direction for the development of a given area, states the policies, priorities, programmes and land allocations that will implement the strategic direction and influences the distribution of people and activities in spaces of various scales. Spatial plans may be developed for urban planning, regional planning, environmental planning, landscape planning, national spatial plans, or spatial planning at the Union level.

Strategy - a plan of action designed to achieve a long-term or overall aim, usually written in a form of a policy document.

Transformation model - is the framework for the redevelopment of the AIL that helps us to understand the organisation and relations between the elements, important for the successful transformation, such as local planning department, local decision makers, investors, public participation, needs of the locals etc. The Transformation model helps to understand the problems and opportunities of the AIL and acts as a framework to guide towards a successful redesign. The transformation model helps to manage site complexity by setting up key segments needed addressing and how to address them. In so doing it reduces the complexity of the transformation problems.

## 3 GOVERNMENTAL FRAMEWORK

### 3.1 ADMINISTRATIVE FRAMEWORK

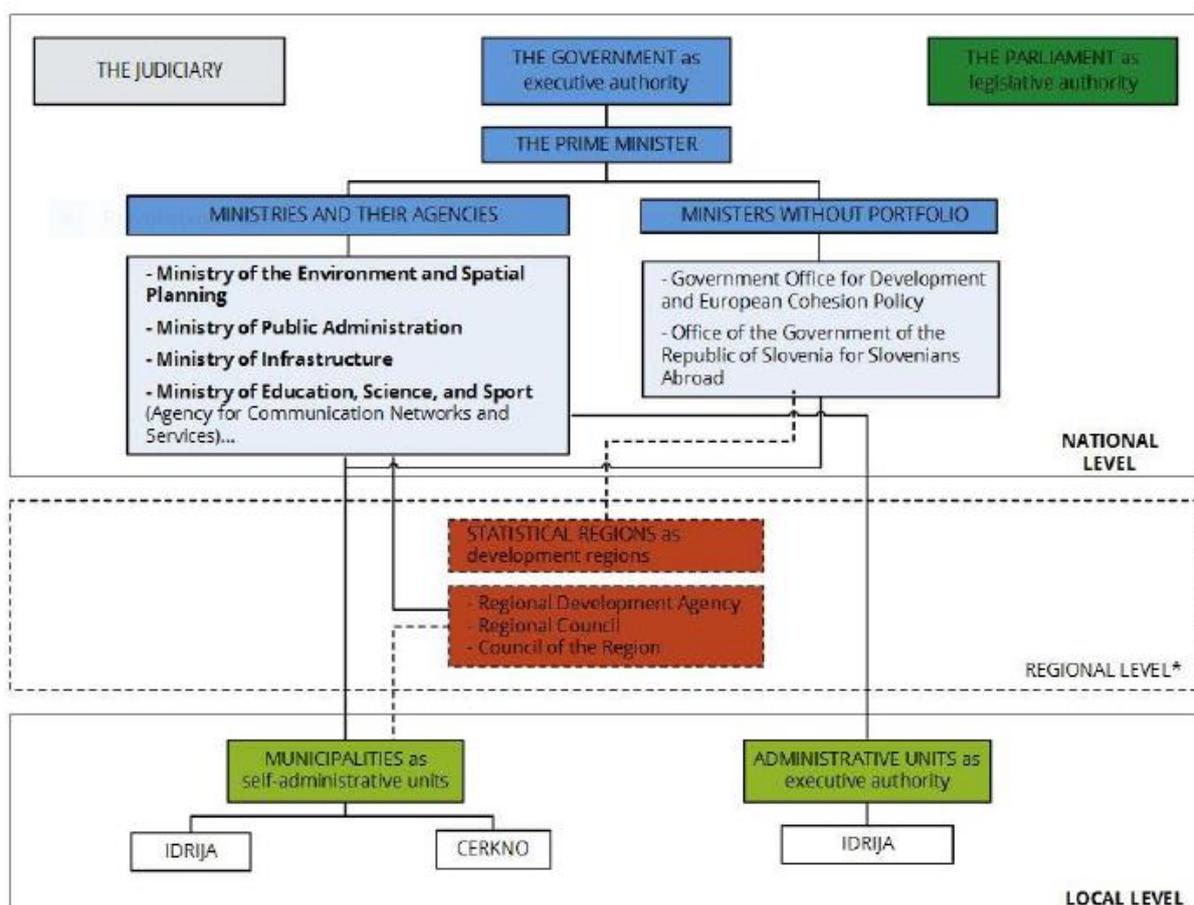
Slovenia is a unitary country with 2 governmental-administrative levels ;

- the national level with a state government and
- local level with 212 municipalities.

and 58 of so called "upravne enote" (administrative units). Comparing to all other trAILS partner countries, the most evident difference is the lack of regional administration level.

In Slovenia, the national authority is divided amongst the judiciary administration, the legislative authority embodied by the Parliament, and the government as an executive authority. The Parliament consists of the National Assembly, which is the highest legislative authority in the country (90 elected deputies), and the representative and advisory body the National Council (40 members- representatives of employers, employees, farmers, crafts and traders, non-commercial

fields, and local interests). The executive branch, as well as the supreme body of the state administration is the government of the Republic of Slovenia, consisting of the Council of Ministers and the President. The government implements and proposes state policies and the legislation (laws, regulations, strategies), as well as suggests the state budget. As oppose to the other countries included in TRAILS project (Austria, France, Italy and Germany), which have at least a three-level administrative division, the Slovenian administrative system only consists of two levels, the national and the local. At the local level, the Constitution of the Republic of Slovenia (Constitution; 1991) establishes a local self-government, carried out within municipalities that have the authority to autonomously manage local affairs. There are currently 212 municipalities in Slovenia, 11 of which are the so-called urban municipalities. The municipalities are in principle funded from its own sources. However, according to the law, the state can to some extent transfer its liabilities to the municipalities (e.g. education, nurseries, health care, etc.) and these need to be financed by the state. Municipalities regulate matters within its primary jurisdictions with municipal ordinances and rules, and the matters of transferred jurisdiction with decrees and other regulations, laid down by the national law.



\* There is no administrative regional level in Slovenia. The statistical NUTS3 regions function as development regions but without executive authority.

Figure 2: Administrative framework for Slovenia (Municipalities of Idrija and Cerčno, and Administrative unit of Idrija serve as an example of local level of administrative structure)

In general, municipalities issue local regulations and strategies in the fields of land use and spatial planning, mandatory and optional public utility services, public primary school and nursery provision, public health services, social services (adults' education, music school, library), and transport safety. Although, a large part of the state's duties is completed at the local level, the government has not transferred all the obligations to the municipalities. Instead, there is a network of the so called local administrative units or districts, which preliminary decide on the administrative matters within the jurisdiction of the state that have been transferred to the local community. These are not independent territorial authorities but are organisationally integrated in the federal provincial administrations (as district authorities), or within the greater cities. But despite of this, we still cannot describe Slovenia to have a three-tiered consistent administrative structure.

They perform specific tasks under the competence of the ministries, overseeing the legality, appropriateness, and professionalism of the work regarding the state's liabilities, completed in the local community bodies (Ministry of Public Administration, 2017b). The division of municipalities and administrative counties only co-occurs in the cases of larger municipalities.

A definition of a region as a "self-governing local community that manages local affairs of wider importance, and certain affairs of regional importance provided by law" is also given by the Constitution (Art.143, 1991). However, the regional level in Slovenia has no administrative or governance powers. Since there are no regions or provinces in the administrative sense, the division by statistical regions (NUTS3) also presents the regional policy implementation framework. Nevertheless, regions, as some form of institution, can operate through the regional development agencies or centres.

#### The Governance of land use and planning system – Levels of government and their responsibilities

National level: As in most unitary countries, also in Slovenia the national government adopts the framework legislation that structures the spatial planning system. It conducts most land-use related work through the Ministry of the Environment and Spatial Planning, which is responsible for the preparation of national level spatial plans, for environmental impact assessments, for the designation of nature conservation areas, for land surveys and for the provision of land and cadastre data.

In addition to the Ministry of the Environment and Spatial Planning, other ministries may also propose the preparation of National Spatial Plans if necessary. Furthermore, the national government influences land use through its responsibility for national roads, railways and other structures of national importance, for agriculture and for heritage protection. Through an administrative agency, the national government is also responsible for issuing building permits.

Regional level: No regional level of government exists in Slovenia, but Regional Development Agencies exist to support economic development at the subnational level. These agencies may

also initiate the preparation of inter-municipal Regional Spatial Plans although local communities should mainly initiate their preparation (see below).

Local level: Municipalities have the right to manage the spatial development in their jurisdiction except for those aspects that are under the direct control of the national government. They adopt municipal land-use plans in accordance with national guidelines that aim at creating rational, mixed and sustainable land-use patterns. Municipalities are allowed to form inter-municipal associations to prepare their Regional Spatial Plans, but this is rare in practice.

### Organisation of spatial and land-use planning in Slovenia

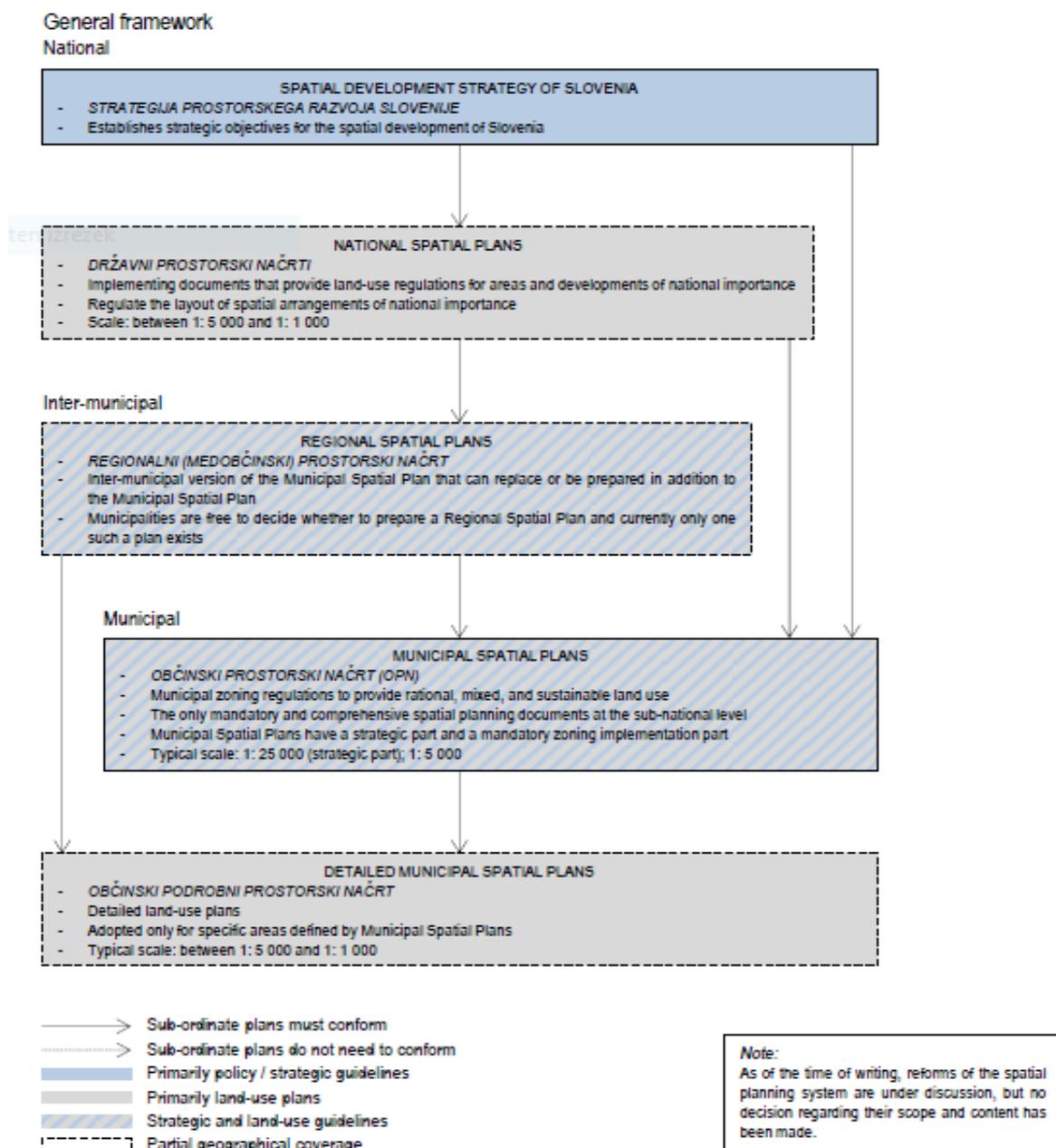


Figure 3: Administrative framework for spatial planning Slovenia

## Spatial and land-use plans

Slovenia operates a hierarchical system of plans. The highest level planning document is the *Spatial Development Strategy of Slovenia*, which outlines the main objectives for spatial development. It focuses on the description and development of spatial systems of national importance and considers settlements, transport, infrastructure, and environmental and landscape protection. The current *Spatial Development Strategy of Slovenia* was approved in 2004. As of the time of writing, it is under revision.

The national government can also adopt *National Spatial Plans*, which are spatial arrangements plans for development projects of national importance. These plans are prepared at scales between 1: 5 000 and 1: 1 000 and can override existing municipal land-use plans, but must follow the *Spatial Development Strategy of Slovenia*. They contain detailed outlines of permitted uses, built structures and parcellation. Their primary use is to ensure fast and uncomplicated planning for the construction and modernisation of infrastructure and other structures at national, regional and sometimes local level. Furthermore, they can also be used in other settings, such as for reconstruction after natural disasters (in which case they may exceptionally contradict the *Spatial Development Strategy of Slovenia*).

At the municipal level, the main planning document is the *Municipal Spatial Plan*. It is divided into two parts: a strategic part and an operational part. The strategic part contains objectives for the spatial development of a municipality, guidelines on the development of the built environment and a concept for commercial development of municipal importance. The operational part contains land-use plans (typically at a scale of 1: 5 000) and associated zoning regulations covering the entire municipality. It also specifies for which areas a *Detailed Municipal Spatial Plan* is required. Municipalities are obliged by the *Spatial Planning Act* of 2007 to prepare the operational part of a *Municipal Spatial Plan*. However, due to the lengthy planning process many municipalities had not prepared such a plan by 2015. In municipalities that do not yet have approved a *Municipal Spatial Plan*, the spatial planning documents are based on older legislation from 1984.

*Regional Spatial Plans* are comparable to *Municipal Spatial Plans* except that they are prepared jointly for several municipalities and adopted by inter-municipal associations. The co-operating municipalities agree on preparing a joint plan and specify who is responsible for drafting it. If it contains sufficient detail, a *Regional Spatial Plan* may be prepared instead of *Municipal Spatial Plans*. Municipalities are free to decide whether to prepare a *Regional Spatial Plan* and as of early 2019, only few of such plans have been adopted.

*Detailed Municipal Spatial Plans* are only prepared for specific areas. They contain detailed land-use regulations and specify permitted uses. They are typically drawn at a scale of 1: 1 000 or 1: 500.

## Major laws and regulations

The *Spatial Planning Act* of 2007 contains the framework legislation that regulates the spatial planning system of Slovenia. It also contains regulations regarding the provision of infrastructure for new developments and establishes a spatial information system. Other important acts include the *Environmental Protection Act*, which concerns nature conservation areas and the *Water Act*, which protects aquifers and contains provisions to prevent erosion. The *Agricultural Act* contains classifications of agricultural land that can protect it permanently from development.

Furthermore, the *Forest Act*, the *Land Survey Service Act*, the *Cultural Heritage Protection Act* and the *Public Roads Act* have major influences on land use.

#### Co-ordination mechanisms

On a general level, the *Spatial Development Strategy of Slovenia* is the main policy document to co-ordinate policies across sectors. With respect to the preparation of individual spatial plans, a special consultation process exists for ministries and companies with statutory competencies. During the drafting phase of a plan, they are obliged to state the requirements that it would entail for their sector. At the end of the drafting process, they need to approve the solutions that have been found. At the local level, municipalities have the task of co-ordinating between all stakeholders. Furthermore, municipalities may work with specific ministries on the particular aspects of land-use patterns and environmental regimes.

#### Expropriations

According to the Slovene Constitution, any real property ownership can be revoked or limited if it is in the public interest. The *Spatial Planning Act* lists four particular cases; infrastructure development; public safety and defence; land required for the provision of education, health care or social protection; and the construction of social housing. Other legislation also specifies that land can be expropriated for mining, for nature protection and for cultural heritage protection. In most cases, land is not expropriated but transferred amicably.

#### Recent and planned reforms to the system of land-use planning

The first decade after Slovenian independence in 1991 was characterised by a series of temporary reforms to the spatial planning system. The current system was established with the adoption of the *Spatial Management Act* in 2002 and its replacement by the *Spatial Planning Act* in 2007. Among other reforms, the *Spatial Planning Act* changed the hierarchical structure of spatial plans and the process through which *Regional Spatial Plans* are prepared. Since 2007, two minor reforms to the act have occurred and in 2010, the section relating to *National Spatial Plans* was substituted by a separate act concerning the topic. As of the time of writing, a major reform of spatial planning acts and of the building code was on-going, with the objective of adopting the legislation in early 2017. Finally, it was approved in mid-2018.

### 3.2 REGIONAL/LOCAL ACTORS' NETWORK

*Figure 3: A scheme of connections between the actors in your region/city*

**Table 1: Relevant regional/local actors, responsible for the transformation of the BPT zone as the Slovene AIL pilot site**

Name (of the institution)	Type (select among administration, private company, NGO, civil initiative, education, etc.)	Role (describe here what role they have for the AILs transformation, e.g. management of the funding, decision making, lobbying etc.)	Level of influence (1 – minor influence, 2 – moderate influence, 3 – major influence)
Municipality of Tržič*	Adm	As a main government-administrative body for the area of Tržič local community, M. of Tržič (MT) have the competencies and authorization for local affairs), which may be regulated by the municipality autonomously and which affect only the residents of the municipality (related to internal affairs, spatial planning, housing, traffic, social care and welfare, construction, agriculture, sport, education, and culture and cultural heritage...). Since 2017 municipality has been partly (and minor) owner of the BPT area. As a part of preparation of main local spatial planning and development legislation, MT prepared also all planning and expert documents for development of BPT, has been promoting location among bigger potential investors, tried to find solutions which would be balanced between protection and development and organized public debates among local/regional/national stakeholders. After buying some of minor land at the BPT location, it invested (also EU funds) and implemented basic infrastructure	3

		and some of public (green) areas (parking places, pump park, ...).	
Civil parish of Tržič	Adm	Civil parish represents the lowest and somehow the 4 <sup>th</sup> level of local self-governance, although without any formal competences and authority, but with strong representative role. In the case of civil parish of Tržič, it gathers and expresses interests of inhabitants of the city centre of Tržič on the development issues which includes also BPT area (and other brown-field areas), also by helping them to network and unite their participation and activities, and to to give a stronger voice for their suggestions and wishes.	1-2
Administrative Unit of Tržič	Adm	Administrative units of Tržič, who's territory coincidence entirely with the one of MT, ensures state responsibilities and manages affairs falling under the area of expertise of their respective ministries at level of unit. As such, it issues some of important spatial, housing-construction, environmental permissions, eg. building permission, operating permissions (for buildings), some types of environmental permissions, ...	2
Institute for Cultural heritage protection-Gorenjska Unit	Adm	The Institute for the Protection of Cultural Heritage of Slovenia, with regional branches, is a public institute that carries out professional and administrative tasks regarding the preservation of immovable and corresponding movable property and intangible cultural heritage around Slovenia. Among it's main task following are important also for the BPT rehabilitation: Drawing up conservation plans and restoration	2

		<p>projects, Supervising building, research and protective undertakings; and their implementation; Providing helpful advice to owners of cultural heritage; education and popularisation. In practical terms, this mean Institute issues permissions for interventions in protected areas or buildings of cultural heritage, prepares guidelines for demolition or renovation of cultural heritage, provides expert opinions and advices. It also educates and promotes about cultural heritage of BPT, and tries to give some suggestions, also based on best practices, how to balance heritage and development.</p>	
<p>Slovene agency for Environment (ARSO)</p>	<p>Adm</p>	<p>Slovenian Environment Agency is a body of the Ministry of the Environment and Spatial Planning that performs expert, analytical, regulatory and administrative tasks related to the environment at the national level. Its mission is to monitor, analyse and forecast natural phenomena and processes in the environment, and to reduce natural threats to people and property. As for BPT Tržič, it's important competences are issuing legally binding environmental permissions, assessments, guidelines...</p> <p>Among other Agency's tasks important for BPT are also: preserving natural resources, biodiversity and sustainable development; observing, analysing and forecasting natural phenomena and processes in the environment; ensuring legal protection and professional</p>	<p>2</p>

		assistance to participants in environmental encroachment procedures; ensuring high-quality environmental data for all target groups.	
Ministry for Space and Environment of Slovenia	Adm	Ministry prepares and implements legislation regarding topics important for AILs (space, spatial planning, ...), and also impacts municipal planning documents by guiding, controlling and confirming them. All these activities impact and could help to BPT. Ministry has expressed so far strong importance of AIL's rehabilitation and revitalisation (also the one of BPT Tržič) for economy, sustainable spatial development and quality of live, but has at the moment few efficient financial and non-financial instruments useful for AILs.	2
Ministry for Economic Development and Technology of Slovenia	Adm	Ministry prepares and implements legislation, programs and strategies regarding development and promotion of economy, regarding business development, and provides subsidies and other funds for business development. All these activities impact BPT Tržič and could also help the process of revitalization. Ministry has expressed so far strong importance of AIL's rehabilitation and revitalisation (also the one of BPT Tržič) for economy, sustainable spatial development and quality of live, but has at the moment few efficient financial and non-financial instruments useful for AILs.	2
Voje Co.	Comp	Voje company is the owner of the majority of BPT Tržič area, and as such very interested in full	3

		<p>revitalisation and activation of the area. It has been promoting location among investors to use BPT of their business and cooperates with Municipality and major actors to find successful solutions and approaches.</p>	
<p>Chamber of Craft and Small entrepreneurship, Unit of Tržič (Chamber of Tržič)</p>	<p>Comp</p>	<p>Chamber of Tržič, who's territory coincidence entirely with the one of MT, is a voluntarily professional association of craft and other small companies. It provides networking for companies in the community, trainings, and representation of interest of small business towards other actors in region and state. As such it also acts regarding using the potential of BPT areas for business development. It has also been assisting in promotion of BPT opportunities in order to transfer location from problem again to economic engine of community</p>	<p>2</p>
<p>Inhabitants of City of Tržič</p>	<p>Civil</p>	<p>Local population has very strong interest for revitalisation of BPT as it could provide them with economic, cultural, recreation and social opportunities (jobs, recreation activities, cultural activities, ...)</p>	<p>3</p>
<p>Inhabitants of Municipality of Tržič (except Tržič)</p>	<p>Civil</p>	<p>Local population of the Municipality of Tržič outside of strong interest for revitalisation of BPT as a major part of municipal capital territory where they search or could search for jobs, business, and cultural and social services.</p>	<p>2</p>
<p>Chamber of Commerce and Industry – Gorenjska region</p>	<p>Comp</p>	<p>It has been providing business promotion and networking for new companies to come to BPT and for economic revitalisation of the location.</p>	<p>1-2</p>
<p>BSC Kranj – Regional</p>	<p>Institution</p>	<p>It is a main development organisation in Gorenjska region</p>	<p>2</p>

Development Agency of Gorenjska region		also by coordinating preparation of regional development program and by coordinating preparation of regional development projects (Within so called Agreement of Regions scheme). As such it brings best practices, know-how, skills and possible solutions for development and revitalisation of ALLs in Gorenjska region trough EU and other projects.	
Museum of Tržič	Culture	Museum of Tržič is a major cultural institution in the community, with variety of exhibitions and connected heritage interpretation activities. As such it is also very interested to use part of BPT due to very limited space in a current building	2
Adult Education Center of Tržič	Public institution	Main informal education institution in the Municipality of Tržič, especially for the are our life-long learning programs and education programs for elders. As such it has been implementing since 2016 business education program called TržičPodjeten.si (=Tržič is entrepreneurial) which promotes new business ideas, business culture and enthusiasm among all interested citizens of MT.	1-2
Local tourism organisation of Tržič (within Municipality of Tržič)	Adm	Organisation is a main coordinator of tourism development and promotion in MT, being focused especially on tourism based on nature experience activities (nature education, recreation, sport, ..) and craft and industry heritage. As such it shows big and active interest for partial activation of BPT areas also for direct and indirect tourism activities, eg. by providing traditional and also	1-2

		innovative ideas about touristic use of BPT, seen as a big potential	
Student association of Tržič	NGO-Civil Society	Association joins student from the Municipality, even if they study "abroad" (mainly in Ljubljana) and provides them with cultural, sport and education activities, t.i. for better quality of life of youth; a part of these activities is directed in a help to students to increase their employment opportunities. As such it has strong and active interest for revitalization and reactivation of BPT Tržič, mainly by giving suggestions for such development of BPT to provide students and other youth with opportunities for employment, recreation, culture, ...	1-2
Union of cultural associations of Tržič	NGO-Civil Society	Union and it's members have big interest for new locations in BPT for cultural activities for local and other population trough which their member associations could provide some new (cultural) content to the BPT	1-2
Sport Union of Tržič	NGO-Civil Society	Union and it's members have milde interest for new locations in BPT for sport activities for local and other population trough which their member associations could provide some new (sport) content to the BPT	1
Tourism association of Tržič	NGO-Civil Society	As a volunteer association of tourism actors (mainly providers of accommodation) it shows big interest and provides traditional and also innovative ideas about touristic use of BPT, but also regarding general revitalisation and renovation of the area which currently damages image of city centre in the eyes of visitors.	1-2

*\* Tasks and authorities of Tržič municipality:*

*In order to satisfy the needs of its residents (also by spatial and economic development), a municipality has among other duties to perform activities for:*

*(a.) ensuring the conditions for the economic development of the municipality and carrying out tasks in the areas of accommodation and food service, tourism and agriculture;*

*b.) planning spatial development, carrying out tasks related to activities affecting the physical space and the construction of facilities, and ensuring the public service of building land management*

*c.) creating the conditions for the construction of housing and fostering an increase in social welfare housing fund*

*č.) promoting the services of social welfare for preschool care, the basic welfare of children and the family, for socially disadvantaged, disabled and elderly people,*

*d.) providing for protection of air, soil and water resources, protection against noise and the collection and disposal of waste, and performing other activities related to environmental protection,*

*e.) creating conditions for adult education that are important for the development of the municipality and for the quality of life of its residents;*

*f.) promoting the development of sports and recreation,*

*g.) promoting cultural and artistic creativity, ensuring accessibility to cultural programmes, ensuring library services for general education purposes, and caring for the cultural heritage on its territory*

*h.) constructing, maintaining and regulating local public roads, public paths, recreational and other public areas in accordance with an Act regulating traffic in the municipality and performing tasks concerning the municipal warden service*

## 4 POLICY ANALYSIS

### 4.1 INTRODUCTION

In the process of preparing policy analyse we collected and analysed over 30 policy documents, out of which 23 were at the end included into the final document with detailed argumentation.

The collection of documents is rather diverse, as they vary from top national legislation, strategic documents and major national cohesion policy guideline document to regional development plan and municipal spatial plans and development programs. Also their executive power is very diverse, as the national and local legislation is obligatory for (local) authorities, investors and other stakeholders, while some of regional development documents provide mainly a guidelines and recommendations (as some kind of “list of wishes”) and some of national non-legislation documents are just overviews and recommendations, which, however, carry relatively strong political weight and importance for future documents and actions due to their expert background and substantiated critics (eg. Report on spatial development in Republic of Slovenia, 2016).

Vast majority of the documents are coming from the sector of spatial planning, both on national, regional and local level, with regional and local development sector on the second place. There are also individual documents from sectors of environment (protection), housing and rural development.

We could say, in general, that there have not been so many policy documents concerning AILs if we consider that AILs, especially in urban centres, are often mentioned as one of the key problems of spatial and overall development of urban development and quality of life, and that rehabilitation or revitalization of these areas is presented as one of most difficult spatial and environmental challenges of urban settlements which present engines of national development. AILs are indeed mentioned in all national spatial planning and development documents, but with almost no detailed and concrete actions and instruments for tackling and solving this problem. This issue is included more or less as something that needs to be included because it is a EU-level challenge, and therefore also all progressive Slovene documents should include them, and because due to their size, visible degree of decay and often central location in urban settlements these areas cannot be ignored anymore.

In these documents AILs are mentioned mainly neutral or negative as one of biggest and most difficult spatial problems, especially in some of urban settlements (due to complicated ownership situation). There are some attempts to describe them also as a potential which could offer new opportunities for business, small industry, new apartments... in centres of urban settlements without using "fresh" (agriculture or green) land for future investments. At the same time, however, these parts of documents don't reflect much of optimism and certainty that such spatial development will actually happened. On the other hands almost all documents express certainty, that solving problem of (urban) AILs is important part of urgent change of patterns in spatial planning in Slovenia unless we don't want to see urban settlements in serious problems regarding space, environment and quality of life.

## 4.2 NATIONAL LEVEL

(1 to 2 pages)

During the policy analyses process we have identified around 20 national political documents which include important mentioning of AILs, while with having relevant chapters for trAILS project and on the subject of AILs in Alpine Space, we have in-depth analysed 14 of these documents.

These policy documents were following ones:

- *Decree on Spatial Development Strategy for Slovenia (2004);*
- *Environmental Protection Act adopted (2003);*
- *Resolution on the National Housing Programme 2015–2025 (2015);*
- *Spatial Planning Act of Slovenia (2018);*
- *National program for Environment (NPVO, 2003)*
- *Decree on Spatial order of Slovenia (2004);*

- *Rules on defining land for the construction of buildings (2013);*
- *Rules on the content, format and method of drafting municipal spatial plan and the conditions for identifying the areas of rehabilitation and scattered construction sites for the development and expansion of settlements (2007);*
- *Rules on the content, form and method of preparation of detailed municipal spatial plan (2007);*
- *Instructions for the preparation of planning conditions for the rehabilitation of degraded space (1993);*
- *Operational Programme for the Implementation of the EU Cohesion Policy 2014-2020 in Slovenia (2014);*
- *Partnership agreement between Slovenia and European Commission 2014-2020 (2014);*
- *Report on spatial development in Republic of Slovenia (2016);*
- *Gorenjska region: Guidelines for preparing regional development strategy for spatial and urban development sector (2019).*

Among these documents *Decree on Spatial Development Strategy for Slovenia (2004)* has set several goals regarding ALLs which indirectly define also their resolution. Among those most important are the *Goal 1: Rational and effective spatial development* and the *Goal 8: Prudent use of natural resources*. As subgoals to the Goal 1, Subgoal 1.2 calls for ensuring rational use of space and security of population with appropriate planning, multifunctional use and connecting different sectors, while Subgoal 1.3 calls for improvement of negative states in space by spatial and environmental measures. Goal 8 has also several subgoals among which is also 8.2: *Prudent use of space for urbanisation and control over expansion of urban areas*.

Scheme of spatial development of Slovenia within Spatial strategy has among its priorities and directions, which aim at achieving goals of spatial development of Slovenia, as one of the priorities a *Priority 3: Vital and settled cities* whose goal is defined in 3.2 as "location attractiveness is increasing, economic development is being ensured, safety and quality of living and working environment is being safeguarded, and infrastructure systems are being safeguarded. Activities of living, production and consumption are being developed in the line of spatial and environmental limitations."

Regarding development of spatial systems with directives for development on regional and local level, ALLs are mentioned in *Theme 1: Development of population settling* where one of the theme directions states that part of new land for settlements should be obtained by redevelopment of current state which includes activation of spatial and other potentials of existing buildings and other constructions.

In the line of this, Theme 1 also provides guidelines that internal development of settlements shall have priority ahead of extension to new land. Priority should be given to ensuring better use and more qualitative utilisation of empty and improperly used land within settlements (eg disused or improper quality locations, industrial complexes and similar).

Another umbrella legislation is *Environmental Protection Act adopted (2003)* (currently in the phase of adopting new one), which has an Article 24 dedicated to degraded environment and which says that Government can define a part of environment or certain areas as degraded environment if it is by the criteria from Article 23 classified in a class or level with maximum burdens. It can then define a rehabilitation program with a set of measures to improve quality of environment or certain elements of environment in that area, all in a cooperation with the municipality within which degraded area is located. Such program includes description of degraded elements of environment, target quality of environment after rehabilitation, set of measures to achieve such improvements, time-table for implementation of program, forbid some activities by the polluters, etc.

ALLs are somehow mentioned also in the *Resolution on the National Housing Programme 2015–2025 (2015)* which has had among goals of housing policy also the one that balanced offer of appropriate housing should be assured in Slovenia. To increase the extent of housing stock, enough and appropriately distributed quantity of building land with all communal equipment shall be provided on long term. In doing this, special attention should be paid to the activation of degraded urban areas which are suitable for apartment building and which allows to the cities wider urban, social and other types of regeneration. Goals of housing policy should be promoted also by the policy of apartment and land taxation policy.

Similar to this, *Spatial Planning Act of Slovenia (2018)* has among its principles also a rational use of space, as it says in Article 20 that in spatial planning rational use of space should be achieved by redevelopment and change of use of existing depreciated and populated areas in which redevelopment has an advantage over new land development.

Also concerning spread of settlements, Article 24 defines that in general settlements should be planned within already existing regulated settlement areas, only exceptionally as their spreading. Further on, development of spread of population within regulated areas of settlement should be preferentially planned as an internal development on free, depreciated and insufficiently used areas by means of intensifying and renewal; at the same time also harmonized ration between green and built areas, typology and morphology of settlements should be respected,

The article on internal development of settlement chapters rules that while planning internal development of settlement, a qualitative redevelopment of settlement or its part should be ensured, and which should have advantage against new development or substitute building. Better exploitation and more qualitative use of empty and inappropriately used or depreciated land within regulated area of settlement should also be followed.

Spatial Planning Act also states that it introduces several land policies measures which shall enable state, municipalities or associations of several municipalities to realize goals of spatial development and to direct development of population in a way that:

- ensures sufficient number and accessibility of building land for purposes of living, work and recreation;
- creates conditions for efficient management with land in public interest;
- ensures appropriate arranged space, ensures its general use and protects built public assets.

One of the positive measures is a possible partial exemption of communal contribution up to 50% in the case of top or side addition to the existing building or reconstruction of such building by the local municipality. On the side of negative promotional measures, municipality has a possibility, for the purpose of rational use of space and development of building land, to specify the areas where fees must be paid for unused building land.

Area where fees for unused building land are to be paid are specified by municipality with an act on the basis of goals and priorities of spatial development of municipality which are defined by spatial act and other development acts, trends in spatial development and on the basis of space units balance. Fees are determined by the act of municipality taking into account detailed purposed use of the space; fees cannot, however, exceed 0,3 EUR/m<sup>2</sup> of unused building land.

Not directly targeted at ALLs, but nevertheless very important, *National program for Environment (NPVO, 2003)* introduces in the environmental policy a concept of shared responsibility for environment which demands active involvement of all relevant stakeholders: state authorities, public and private companies and public.

Primary role of state is not concentrated only to the legislation sector, but also on economic planning and setting up favourable conditions for economic development, use of space and natural resources, ensuring access to information, education, changing situation on the market (eg. by taxes). Within this is also level of local self-government with it's jurisdictions concerning environment protection.

Companies with different activities effect the environment, eg. as consumers of natural resources or by impact on environment in all phases of production cycles. Regarding this relationship towards environment, companies can be divided into two groups: companies that search in environment protection their business interest to improve their position on market, and companies which still give priority to the profit maximisation over environment. NPVO defines goals and measures for both groups by so called double approach which includes both concept of constraint and concept of stimulation.

*Decree on Spatial order of Slovenia (2004)* sets up general rules of spatial planning: public benefit and private interest. Within such system, state and local communities' need to use spatial planning to:

- enforce and mutually coordinate public benefits and enable private interest in the area of space planning in a way that quality of space is preserved and improved;
- ensure possibility to enforce needs of current and future generations regarding use of space, quality of space and privacy and safety from the point of view of quality of living.

Large section within Decree concerning planning of population and settlements defines, among other, also that, in order to ensure economical and effective use of space, we should:

- exploit unexploited or low-exploited land for building within existing borders of population areas, but not at the expense of green areas or other open public spaces;
- redevelop degraded areas within populated areas.

Article 27 defines that areas of redevelopment/renovation should be determined by urbanistic scheme. In areas determined for redevelopment, criteria and conditions for all types of buildings

should be defined within spatial order of community until the elaboration of redevelopment plan. Urgent maintenance works and activities concerning cultural heritage protection are allowed until the elaboration of redevelopment plan.

Area of redevelopment should be wrapped up comprehensively, while also its relation towards settlement and wider space should be considered. Redevelopment of individual buildings is possible only within the compound of testing, programming and arranging area of redevelopment. In areas intended for redevelopment state of environment should be defined and with renovation and appropriate planning suitable state of these areas should be ensured.

By the redevelopment within urbanistic scheme it should be defined aim of concept, type of problems, goals and direction of redevelopment and above all economic, environmental, social, urbanistic, architectural and landscape aspect. Urbanistic scheme should, based on adequate expert basis and testing, define measures which would ensure, among 9 goals, also "revitalisation of disused (degraded) and below-standard areas"

Planning and implementation should be carried out with reasonable use, renovation of existing building and with inclusion of these buildings into new qualitative spatial structures. Process of renovation has to enable gradual building up and completing structure networks, building for service activities and other equipment of the settlements. Renovation should also be planned in a way that it ensures efficient use of energy and materials.

Revitalization should be accompanied by energy renovation of buildings which means among others: moderate increasing of compactness of population by fitting new buildings in which arrangement of buildings, their orientations and distances in-between enables rational infrastructure networks (distribution networks), good insulation and minimizes need for cooling.

Revitalisation of the area, where a higher level of use of land for building is planned, is possible only based on preliminary comprehensive examination (evaluation) of acceptability and capacity of the space regarding urbanistic, morphological, social, cultural, environmental and cultural heritage characteristics of the area.

In the line of needs for comprehensive development of settlement, disused (degraded) areas or parts of it can be determined for new economic activities and for development of other activities as housing, cultural, sport, commercial and leisure activities, respectively. Housing renewal should be designed and implemented in a way that will ensure improving of housing standard for all population. Renewal should also be, comparing to the building of new apartments, economically justified, with only exception for renewal of settlement and building which have a status of heritage. When carrying out the renewal, special focus should be put on public surfaces and buildings, their external look, urban equipment of streets and squares and to the greening of these areas.

*Rules on the content, format and method of drafting municipal spatial plan and the conditions for identifying the areas of rehabilitation and scattered construction sites for the development and expansion of settlements (2007)* These rules among others define *Requirements for determining areas for development and expansion of settlements*. Development of settlement includes internal

development of settlement, redevelopment and expansion. In these processes, internal development and redevelopment have advantage against the expansion of settlement.

Article 34 defines that areas of internal development of settlement are areas, where more qualitative conditions for living are ensured by the redevelopment, restoration and rational use of extensively used building land, respectively, and by the care for conservation of qualitative urban and architectural heritage. Article 35 defines that areas of redevelopment are areas or land where complete or partial redevelopment is being implemented.

Comprehensive redevelopment is stipulated when there is a need to improve functional, technical, spatial-designing, housing, economic, social, cultural and ecological conditions in certain settlements and parts of settlements or when this can be joined by such a preservation of identity values of settlement, architecture and cultural heritage that creates qualitative conditions for settlement development. Area of comprehensive revitalisation can be based on expert basis within municipal spatial plan defined also for settlements for which urbanistic plan is not planned. Comprehensive revitalisation is to be elaborated for disused (degraded) areas, demolished, damaged, unsuitable exploited or abandoned buildings which are subjects of renovation. As areas of partial revitalisation are determined surfaces in the settlement which are devaluated due to inappropriate or extensive use, unsuitable quality of living or inappropriate infrastructure.

For areas of comprehensive revitalisation (rehabilitation) municipal detailed spatial plans are to be prepared, which can be prepared also for individual parts for partial revitalisation.

*Urbanistic plan: Role and importance of urbanistic plan.* Urbanistic plan is a basis for comprehensive planning of urban centres development. When defining urban centres, directions defined in the national strategic spatial plan are followed. Urbanistic plan is made in the line with expert methods of spatial, urbanistic, architectural and landscape planning and with methods of local population and other interested stakeholders' inclusion and participation in the elaboration process.

Territory of urban plan covers areas of condensed constructing, that is areas of condensed built buildings and constructional engineering facilities of various purposes with belonging surfaces needed for their use and functioning, green areas in settlements, water surfaces and their watersides which runs within the settlement and agriculture and forest surfaces withing the settlement.

For an area of comprehensive renewal of settlement, guidelines for program for comprehensive renewal are defined within the urban plan, and these guidelines include:

- type and aim of the comprehensive renewal,
- mode of comprehensive renewal from the economic, social, cultural, energetic, urbanistic and architectural aspects,
- set of financial and other instruments and measures for setting up and implementation of comprehensive renewal,
- conditions and directions for interventions to the space and other arrangements in the area of comprehensive renewal which are in force until the passing municipal detailed spatial plan.

For individual areas of comprehensive renewal priorities and directions can be defined according to the gradual realization of planned arrangements for spatial renewal. For the territory of comprehensive renewal detailed municipal spatial plan is elaborated. Preservation plan as an obligatory element of such detailed plan is elaborated only in the case when the area of comprehensive renewal includes protected architectural, settlement or archaeological heritage.

One of the articles (Article 43) also states for the areas of internal development directions should be defined for partial renewal, rational use of extensively used surfaces and for securing spatial arrangements and interventions that are in public interest.

*Rules on the content, form and method of preparation of detailed municipal spatial plan (2007)* defines detailed content, form and modes of preparation of the detailed municipal spatial plan (detailed plan). Such spatial plan is made for spatial ordering of certain areas, t.j. rehabilitation of dispersed building and for comprehensive or partial renewal of settlement.

Contents from chapters of such plan should be defined in such a details that can be basis for elaboration of projects for issuing building permit according to the regulations for constructing buildings. In detailed plan such solutions and measures are defined on the areas where buildings and areas of cultural heritage are recorded, that they would enable and ensure their comprehensive preservation. If protected architectural, settlement and archaeological heritage are included in the territory of comprehensive renewal of settlement, such detailed plan has to contain preservation plan elaborated by the regulations of cultural heritage protection.

In detailed plan also detailed solutions and measures are defined which should ensure environment protection, nature preservation, including with solutions and plans linked to the water arrangements, arrangements of agriculture and forest lands and exploitation of mineral raw materials.

More specifically targeted at AILs were short *Instructions for the preparation of planning conditions for the rehabilitation of degraded space (1993)* defines criteria of preparation and content of spatial arrangement terms for rehabilitation of degraded space (in following act of legislation) for areas of illicit interventions in space recorded according to the Article 11 of the Law on settlement arranging and other interventions in space.

The success of the past policies about AILs (before 2016) could be checked in the *Report on spatial development in Republic of Slovenia (2016)* which contains a chapter 3.2.4 *Degraded land* which states that the goal of spatial policy is to promote wider use of already built, but abandoned or poorly used land for the purpose of settlements' development. In this report degraded urban areas are defined as land, where use of buildings and facilities (devices) is abandoned or partly abandoned and therefore in various phases of decay.

Report includes as one of priorities also *Priority 3: Vital and settled cities* where it states that vital and settled cities are main actors of economic, cultural, environmental and any kind of other development. In Slovenia, however, cities had not preserved this role due to the obsolete industry or those industries which is based on the cheap labour force. These cities have also not oriented on time into new, prospective activities and don't open new, different jobs (in entrepreneurship,

tourism, green energy sector, transport services, technologies for environment protection, etc.). Because of such trends, also constructing of apartments, public services and above all renewal has stagnated in those cities. Degradation of old urban areas have occurred, not only of old industrial, mining and military areas, but of entire old city cores. Slovenia has therefore experienced in much small extend than in comparable urban areas in EU a process called "renaissance of cities" while the predominant trends are stagnation of urban centres, escape from cities and extreme suburbanization. In Slovenia we failed to realize a priority principle about more condensed, compact cities with short distances. Edges of cities are unremarkable; landscape has been degraded as well as city silhouette. Inside of the urban frame, many lands remain unbuilt because of ineffective land and tax policies and speculations.

Implementation of the housing policy which includes several measures and has had impact also on the use and rehabilitation of degraded areas was in the Report evaluated as poor: (a) Setting up a program of measures of land policy for promoting functioning of land market was not successful as the set of measures is insufficient and those measures that has been implemented are not enough (eg. pre-purchased right). This is the situation also because the implementation of measures that were written down in the spatial legislation is limited by the (lack) of knowledge and skills of municipal officers. Also promotion of the enforcement of different measures of urban land policy in local communities which would ensure bigger offer of equipped land was also evaluated as unsuccessful as this measures are totally in the domain of municipalities. Communal contribution as a financial measures of land policy doesn't work. Setting up criteria for enforcing spatial measures has not been implemented; only measures that has been implemented were pre-purchased right measure and temporary measures of protection of land planning. There is almost a total lack of financial support for buying and equipping building land for the purpose of apartment constructing and other public interests; the only exception is possibility for exemption for payment of communal fee (in city municipalities of Koper, Velenje, Slovenj Gradec, ) which has been, however, municipal measure and not state-level support.

Transformation of Slovene space in the period before elaboration of Policies of spatial development of Republic of Slovenia (adopted by Slovene government in 2001) was evaluated as unplanned and spontaneous, with characteristics of recklessly dispersed building outside of condensed settlements and devaluation of cultural landscape and settlement heritage. More than a decade after this document was prepared it was established that such trends have continued also in the following decade (between 2001 and 2015). Trend of suburbanisation has had continued especially in the functional areas of bigger cities. Service and supply activities has been moving out of city centres to their margins, often to the immediate vicinity of bypass roads and motorway junctions as these locations are economically attractive. Moving of these activities to margins impoverishes cities of their "content", causes their population emptying and aggravates supply possibilities for population. Attractiveness of suburb neighbourhoods is further raised by high prices of apartments real estates in city centres, high mobility of population and well-developed road infrastructure.

In the preparatory or guideline paper called *Gorenjska region: Guidelines for preparing regional development strategy for the spatial and urban development sector (2019)* it is stated in chapter 2.5 *Guidelines for the priority areas for individual activities which are important for development of region* that priority in urban settlement should be given to the creation of conditions for development of small and middle-size entrepreneurship which would contribute to the reduction of daily work migrations. For supporting further development of priority areas

for concentration of economic activities investments are need for communal equipping of build land. While doing this priority should be given to the renewal and reactivation of depreciated areas with appropriate purpose of use ahead of interventions to and exploitation of new, fresh lands.

In the chapter *2.7 Guidelines for developing priority areas for housing supply* it is stated to increase fund of public hat housing policy on national level was defined with the Resolution on the *National Housing Programme 2015–2025*, which has stressed 4 goals of national housing policy among which the stressed ones are importance and urgency to increase fond of public rental apartments, renewal of existing housing fund and constructing of public rental apartment on the areas where need for apartments is the biggest, which are in the lines of spatial policy (rational use ich are in the lines of spatial policy (rational use of space, strengthening of polycentric urban system, increasing quality of living, ...) and where economic capabilities of population to solve their housing question are weak . In the strategy for regional development it is abided that enough apartments and suitable surfaces for apartment constructing should be ensured in urban settlements. Within this, apartments and surfaces for apartment constructing are to be preferentially ensured by the renewal of devaluated areas or by appropriate renewal or condensing of existing housing areas with low (housing) built density.

Beside legislation documents, there were only several strategic development documents which has mentioed specific measures and resources to tacke the issue of ALLs across Slovenia, mainly in urban areas.

One of them was *Operational Programme for the Implementation of the EU Cohesion Policy 2014-2020 in Slovenia* which is among other underlying that the role of the cities is a crucial in reaching goals of EU 2020 but only if models of sustainable urban development will be set up within it, if they will allow successfull connecting with their hinterlands and if they will establish control over the use and quality of public space and housing stock.

Measures under 2.6.5 were titled *Measures for improvement of urban environment, revival of cities, rehabilitation and decontamination of degraded land (including with areas where transformation is taking place) reduction o fair pollution and promoting measures for reduction of noise* . There were also number of specific goals connected with this set of measires, among which also *Specific goal 1: Effective use of space in urban areas*

Operation program therefore states that Slovenia will, by using measures of this Priority investment, promote using of internal potentials of city areas to ensure more effective use of space in urban areas. With implementation of projects of urban renewal Slovenia will invest into re-activation of free and poorly used land in the cities. By doing this slovenia will reduce conflicts because of interventions to new (fresh) land and consequently reduce burdens for environment from the perspective of more effective use of resources. By this way we will create conditions for development of economic and social activities and more attractive urban environment for work and living.

Same problems, challenges and goals were mentioned already in the *Partnership agreement between Slovenia and European Commission 2014-2020*, with a *Thematic goal 6: Preservation and protection of environment and promotion of effective use of resources*.

With a Thematic goal 6 need for bigger investments in these priority sectors were recognized based on the situation analyse: these were among other investments into more rational (effective) use of space of urban areas and exploiting their development capabilities. Situation with problems and challenges was here described similar as for the Operational Programme for the

Implementation of the EU Cohesion Policy 2014-2020 in Slovenia regarding Renewal on urban areas.

With Thematic goal 6 investments from 4 funds will be used complementary: European Regional Development Fund (ERDF), EU Cohesion Fund (CF), European Agriculture Fund for Rural Development (EAFRD) and European Maritime and Fisheries Fund (EMFF). Funds from ERDF will be directed also into investments in projects of urban renewal and exploitation of development potential of urban areas .

Thematic goal 6 was placed within Chapter 3: *Comprehensive approach to the territorial development*, whos goal is to ensure balanced development and ensure to all citizens to use given natural resources and opportunities, but with considering also specifics of each area.

Parallel to the preparation of strategic and program documents on state level, 12 regional development programs were being prepared for the period 2014-2020 (RRP) at the regional level (regions NUTS 3). These programs should define regional development capabilities and strategic development goals on regional level and connection with state strategic goals. To such regional development should according to this document contribute also urban centres which met with criteria for using sources for sustainable development or urban areas (via CTN mechanism), as they will, based on appropriately prepared urban strategy and effective implementation, focus on the issues of improvement of competitiveness of urban areas and improvement of quality of life. With Thematic goal 6 special attention should be within this topic given to the rehabilitation of degraded areas, especially by using CTN mechanism.

Chapter 3 has had subchapter *3.1 Arrangement for ensuring comprehensive approach in using funds of Joint strategic framework (JSF or SSO in Slovene) for territorial development of specific/special sub regional areas* and *3.1.1: Sustainable development of urban areas* within.

Stress of urban development has been in period of 2014-2020 directed into increasing competitiveness and attractiveness of cities. For that reason, main focus of activities should be in direction of: - reactivation of degraded areas and free, poorly used surfaces within the cities, and comprehensive renewal of apartment neighbourhoods,

Sustainable urban development is based on internal development of urban areas (exploiting potentials of degraded urban areas, potentials of free and poorly exploited areas for development inside of urban areas) and well functional cooperation and connecting with other cities and surroundings.

From this perspective main purpose of the promotion of sustainable urban development is to create, by comprehensive approach to the planning and by implementation of investments, conditions for stronger economic growth and social inclusion. Selected cities will be implementing investments in the sectors of comprehensive urban renewal with number of measures, among which measures for reactivation of degraded and free lands in cities, revitalization of city centres, energy efficiency, sustainable mobility and accessibility, ensuring conditions for creating new jobs and social inclusion.

Stress in this process is on the comprehensive approach in planning and implementing investments which would in selected area reasonably connect and solve simultaneously more issues. With an aim of effective spending of funds meant for promoting sustainable urban development following starting points were set up: conditions and purposes of using entire territorial investments for promoting sustainable urban development are in the line of rules of European structural and investment funds, status of city municipality and tasks which a municipality is performing in the framework of urban development, investments into urban

sustainable development will be allowed to implement in all 11 city municipalities: Ljubljana, Maribor, Koper, Kranj, Celje, ....

For using these funds city municipalities need to prepare sustainable urban strategies (TUS) based on which they would compete for funds for realization of strategy measures. Sustainable urban strategy – TUS is therefore a condition for gaining funds for co-financing operations in the field of sustainable urban development on the eligible areas. Operations which will be selected for implementation through the CTN mechanism (Comprehensive Territorial Investment) will have to follow goals and challenges for ensuring sustainable urban development in Slovenia. Their implementation will be limited to the territory of urban settlements and settlements of urban areas within city municipalities. If all conditions will be met from the side of eligible city municipalities Slovenia will potentially implement 11 comprehensive territorial investments.

Frame value of funds planned for comprehensive development of urban areas was in total around 117 million EUR of which big majority should come from EU Fund for Regional Development and to smaller extent from Cohesion Fund.

#### Conclusions of chapter:

Big majority of evidenced and analysed documents which are tackling this issue of AILs are those from spatial planning sector, followed by environmental and (cohesion) development documents (2 documents in each group) and by one document concerning housing policy and the role of AILs within it.

All the documents underline the necessity to use AILs, especially within city centres, for future economic and housing development in which use of already used and degraded areas should have advantage against exploitation of new, fresh land. Majority of these descriptions in all documents are, however, the same, without any concrete solutions, approaches and transformation models.

Each of these policy documents have at least one of its goals which directly or, if indirectly, very clearly target AILs. Also contents of goals are very similar, t.i. to stop spreading of spatial development on fresh land if this can be avoided, to do that by rehabilitation (renewal, redevelopment) of land which is entirely or partly abandoned or inappropriately used and to do that also for improving the environment and quality of life in some areas, with urban centres stressed, which are endangered by trends which at least partly also caused degraded areas to be born.

AILs are mentioned, directly or indirectly in all these documents (with very different names), while connotation is also very diverse. These areas are seen as a problem, but not so much because of its nature, because they are presented often as some kind of victim of changed trends in economy and life style, but because of the complexity of the issue (ownership, environmental burdens (often due to past (industry) activities, decay of building material, ... In some rare documents with positive view on degraded AILs they are seen at best as a potential, but with no opportunities presented, not even blurred ones.

Except several policy documents, the only elements where ALLs are used are visions, goals and recommendations within policies, while only 3 of them have also some policy measures and instruments. These supporting measures are:

- a.) positive supporting measures/instruments: 1.) partial exemption from paying land use fee when owner actively rehabilitate degraded land or buildings within, 2.) financial resources for project of degrade areas rehabilitation (renewal) potentially provided by Cohesion Fund, and 3.) Detailed spatial plan and urbanistic which can be prepared for ALLs as problematic degraded areas, and which include some very detailed instructions for renewal/rehabilitation (also for getting building permissions)
- b.) negative supporting measure/instrument: 1.) obligation to pay land use fee if the land is not used for building and connected activities

As for models for transformation, there is no clear models mentioned within all analysed policy documents. It is, however, possible to construct some kind of (partial) model by elements from different documents:

Detailed spatial plan and/or urbanistic plan to get a detailed overview of the situation at ALL, to make a plan of interventions needed, to get first concrete solutions for implementation phase and to get planning basis for (public, EU) financing

+

Funds which are (potentially) provided for renewal of ALLs in Slovene municipalities within *Operational Programme for the Implementation of the EU Cohesion Policy 2014-2020 in Slovenia*

+

Partial exemption from paying land use fee as a supporting financial instruments to help and encourage investors into degraded areas and buildings within.

= TRANSFORMATION MODEL

This "model" is, however, not complete, with some of important elements missing, with elements not being totally harmonized and coordinated.

### 4.3 REGIONAL LEVEL

As Slovenia does not have a 2<sup>nd</sup> level of administrative self-governance, t.j. regions, it is no surprise that there is almost a total gap for policy documents at the regional level.

There is, however, a division of Slovenia into 12 statistical and development regions, with Gorenjska region as one of them. According to this, at the start of EU 7-years financial perspective regional development programs are prepared for each of this "regions" also for Gorenjska; so far 2 of such programs have been prepared (2006-2013 and 2014-.2020 period). There are also 33 of some kind of informal LEADER or LAG regions which always include several local communities

each; in Gorenjska there are 2 of such LEADER regions, one for LAG Škofjeloško pogorje (4 local communities in western Gorenjska) and LAG Gorenjska košarica (other 14 local communities in central, eastern and northern Gorenjska, also municipality of Tržič), which both have it's Local development strategy for 2014-2020.

We have found and analysed 2 regional documents where AILs are mentioned:

- *Regional development program of Gorenjska 2014 – 2020 (2014)*
- *Local development strategy for LAG Gorenjska košarica 2014-2020 (2016)*

*Regional development program of Gorenjska 2014 – 2020 (2014)* has been defining and tackling degraded area, which were created due to the abandonment of previous activities and new degraded areas due to closure of waste depots. Degraded areas have been tackled within the *Development topic 4: Environment, space and infrastructure* in which one of 5 goals has been: *Introducing concepts of sustainable urban development of cities*. Within this Topic 4 one of investment measures were also *4.1 Investment measures in the sectors of environment, space and infrastructure*.

Within this gr selected theme is *Sustainable urban development* where challenges are decline in the number of jobs, inappropriate traffic policy, obsolete infrastructure, degraded urban areas, huge urban apartment neighbourhoods, loss of development energy, increasing pollution o fair and environment, dying down of city centres and unsuitable green system of cities which all demand implementation of measures for improving the situation which has to be realized in the new program period (2014-2020). Within this development chapter *project "Rehabilitation of degraded areas* was defined and financially estimated at 20 million EUR.

Local development strategy for LAG Gorenjska košarica 2014-2020 (2016) has among it's thematic chapters also *thematic fields 3: Environment protection and nature preservations* which states that due to urbanisations pressures, bankruptcy of production companies and consequently long-year periods when degraded and abandoned areas were not maintained and have decayed (including with disordered green areas), this present for environment and nature conservation a large burden and also a challenge. For this reason they need to be put in order and reactivated, also because they are often source or areas of water resources, so that their situation has impact also on the state of water and waterside nature, which further enable them to use funds from European Maritime and Fisheries Fund (EMFF).

Within the above-mentioned Thematic field 3 there was a special goal dedicated to this topic tittle *Goal 2: Developing and re-activating degraded and abandoned areas and giving them new contents*.

Indicator for this goal has been defined as Size of the area at which sustainable green approaches are used for ensuring environment and nature protection and should reach 450m<sup>2</sup> by the end of Strategy implementation in 2022-2023 by using 750 000 EUR of EU fund from all 3 major Funds financing Strategy.

Measure tackling with this topic has been *Measure 3: Development and reactivation of degraded and abandoned areas* which has aimed to ensure re-activation of degraded areas and ensure

revitalisation of degraded areas (buildings, green and waterside land, ...) and contribute to better use of potentials of degraded areas.

### Conclusions of chapter:

As it is seen from the detailed description above, there are 3 sectors who are tackling: regional development, spatial (urban) planning and environment.

All these documents are same type of regional development documents as even LEADER approach, which was until 2014-2020 period targeted exclusively at the rural areas, now includes development activities for both urban and rural areas.

Topics of AILs are included within both of two regional policy documents, but with quite limited scope and with limited, we could say also insufficient stress and importance given to this topic. Connotation of AILs is rather negative as it is seen as a problem or at least as a big (urban) development challenge which has not been solved since 10 or 20 years. At the same time this issue is presented as something which is a result of general negative trends in urban and general spatial development and will need to be solved, together with changing these trends and patterns.

Between the lines and a bit uncertain, these degraded and unused areas are presented also as a potential opportunity for more sustainable spatial and environmental development, which could lead to a better quality of life of local population and more sustainable local economy patterns. Documents, however, don't reflect any optimism that major private and even public actors of use of space (commercial and production companies, public authorities, ...) will significantly change their spatial behaviour for production, infrastructure, commerce and housing activities.

Regional "policies" which are not real policies due to the lack of regional level of self-government, include only few of elements: a.) spatial and economic development guidelines and recommendations, and b.) regionally approved projects which have, by being included in these documents, stronger possibility of getting regional development funds provided by the state or EU.

Policy documents do not include any transformation models for AILs, only local and regional projects (within Regional development program of Gorenjska) and project areas (within Local Development Strategy of LAG Gorenjska košarica) concerning AILs as a basis for obtaining national and EU funds for solving this issue. Solutions for AILs, also a successful transformation models, are yet to be found as a part of these projects.

Although there are no clear models mentioned within all analysed policy documents, it is, however, possible to construct some kind of model by elements from different documents, also from state level. Added to the structure of a "model" described in state level chapter, we can here add regional projects (within Regional development program) as a regional framework for direct and concrete solving of AIL challenge, and direct financial sources provided by LAG Gorenjska košarica calls for projects.

## 4.4 LOCAL LEVEL

### 4.4.1 STRATEGIC DOCUMENTS

We have found around 5, but included in analyse and analysed 3 policy documents, which are in fact just 2 policy documents as development strategy for City municipality of Kranj are just two documents with one, same function.

These documents are:

- *Strategy for development of Municipality of Tržič 2008 – 2020;*
- *Strategy for Sustainable development of City Municipality of Kranj (CMK) 2008 – 2023;*
- *Sustainable urban strategy of City municipality of Kranj 2030.*

As an important development paper for the home community of BPT, *Strategy for development of Community of Tržič 2008 – 2020* contains within the Natural capital chapter as one of priorities also Space and as one of activity program also "*Regeneration of industrial areas*". Two measures were directly aimed for this program: *Communal equipping* and *Promotion and public-private cooperation*. In the section Physical capital and sector Technology development, entrepreneurship and innovativeness one of priorities has also been Promotion of entrepreneurship. A program "*Offer of business location and buildings*" was dedicated to this priority with following measures:

- development concept for business-craft zones
- promotion of disused building in areas for production (manufacturing)
- development of business locations,
- business incubators.

Within the *Strategy for Sustainable development of City Municipality of Kranj 2008 – 2023* measure 0.1 defines new spatial policy with several goals, among which also: preserving and strengthening identity of space and landscape, preventing conflicts among housing – agriculture – industrial activities, minimizing interventions to the agriculture land and introducing and enabling revitalisation of degraded urban areas.

Spatial policy is mentioned within the *Sustainable urban strategy of City municipality of Kranj 2030* (document with same function as above mentioned Strategy) within the chapter about potentials of disused areas and preserving of natural space in the city and it's hinterland, where past trend that economic growth in the 2005-2010 period increased pressure of investors (mainly commercial sector) on the very limited space and agriculture land on the margins of city, mainly spontaneously and unbridled, and without a concept. Small and middle-size production and

service companies on the other side couldn't get locations which would be reasonably priced and therefore many of them moved in neighbouring business zones in Šenčur and Naklo.

### Conclusions for the chapter:

All the above-mentioned documents deal spatial planning/spatial development, while development documents for Municipality of Tržič also mention business promotion.

All these documents mention ALLs, both within description of situation, and in the strategic-planning part. Within document for Municipality of Tržič, one of its measures is "promotion of disused building in areas for production (manufacturing)", while first development document for CMK defines new spatial policy with several goals, among which is also introducing and enabling revitalisation of degraded urban areas (ALLs are tackled also indirectly by some of other goals).

The connotation is rather similar than in regional and state level documents; content and way of description reflects that this is a serious problems, that has stayed for long time unresolved and still has no clear models for solution, while in some weak way it is also described as a hidden spatial potential (eg. to save some fresh (agriculture) land from being built).

Documents include following element: general aim for spatial development, goals (in document for CMK) and several measures (in document for Tržič). There are, however, concrete projects missing and above all models for transformation and revitalisation, respectively, of these areas.

Policy documents don not include any concrete transformation models, but Tržič document includes some potentially useful semi-models or better say instruments as elements of such models, eg. program called *Promotion and public-private cooperation* and following measures:

- development concept for business-craft zones
- promotion of disused building in areas for production (manufacturing)
- development of business locations,
- business incubators.

What is not mentioned who are actors (investors) to implement these instruments, what is their concrete content and where would funds come from.

---

#### 4.4.2 PLANNING DOCUMENTS

During our work we found several relevant or even very relevant local planning documents for solving the situation in the BPT area, and in general on local level in Gorenjska region. We added here also mentioning of Municipal spatial plan of City municipality of Kranj in order to show it is regional challenge and that Tržič has a partner in these projects.

During our work we have evidences over 10 policy documents with 7 being at the end included and analysed for this report:

- *Decree on the spatial planning conditions for the redevelopment of degraded area in the Municipality of Tržič (1993);*
- *Municipal spatial plan of City municipality of Kranj (2014);*
- *Decree on the Municipal spatial plan (MSP) of the Municipality of Tržič (2016);*
- *Decree on detailed spatial plan (DDSP) for the spatial planning unit TRŽ 11 (TRŽIČ - BPT) (2016);*
- *"Valorisation and conservation bases for a revitalisation of BPT area" (2015);*
- *"Revitalisation of industrial areas of BPT Tržič- Outline plan of traffic and communal development/arrangement and public areas (2016);*
- *Project ideas by Department of Landscape Architecture of TU München (2018).*

By the *Decree on the spatial planning conditions for the redevelopment of degraded area in the Municipality of Tržič (1993)* spatial arrangement conditions for redevelopment of degraded space within the community of Tržič were accepted. Among these also number of these areas were legalised.

In 2014 a new *Municipal spatial plan of City municipality of Kranj* was adopted which has given basis for activating free land in the surroundings of existing industrial and business zones within the narrow city area and support renewal of abandoned degraded land and empty buildings for new public, business and other fruitful city programs. Within the City municipality of Kranj some 88,87 ha of land was assessed as degraded urban areas or 160 ha if also areas where suspicion about degradation is present.

*Decree on the Municipal spatial plan (MSP) of the Municipality of Tržič (2016)* is a fundamental spatial document and basis for all interventions in the space on the entire area of municipality, except the areas which are defined by state spatial documents. In the process of preparing of this plan procedure of comprehensive assessment of effect on environment and assessment of the acceptability for protected areas.

MSP defines starting points and goals of spatial development of municipality, defines and arranges spatial development of local importance and determine terms for setting up buildings

in the space of entire area of Municipality of Tržič by taking simultaneously taking into account guidelines of state spatial acts, development needs of community and protection requirements. This decree is considered when issuing building permissions for constructing objects, when fitting objects in space, when changing purpose of objects and use of space, at the preparation of detailed spatial plans and other interventions defined by regulations. Beside MPP also other documents defining public-legal regime in space need to be followed when making above described actions in space (changing purpose of land, building permissions, ...).

Goal of MSP is to enable balanced spatial development and long-term fulfilling development and other needs and balancing these needs with public benefits on the area of environment protection, nature and cultural heritage conservation, protection of natural resources, defence and protection against other hazards.

Fundamental condition for balanced spatial development is forming and implementing strategy of population development which will enable at one hand effective and economically justified organisation and development of all activities in space, while on the other hand enable also rational use of natural resources, improvement and protection of environment, and natural and man-made heritage.

In such MSP the priority is given to the development of municipal centre with ensuring spatial conditions within existing degraded areas.

Municipality will also preferentially support setting up companies from service sector, companies which require more knowledge and are ecologically incontestable and companies which use in their programs local renewable resources (water, wood).

Some guidelines regarding spatial development were set for most important activities. Regarding population development goals were set to ensure settlement development with an internal development, with renewal parts of settlements and rehabilitation and renewal of degraded areas. Comprehensive renewal of settlements in the areas of municipality is not foreseen.

Extension of settlements is allowed only in cases when there are no more suitable land or free objects within settlement for ensuring conditions for development of housing, economical and other capacities.

Internal development and renewals of settlements have advantage over settlement expansion. With renewal and revitalisation of empty and inappropriate used of land (abandoned and unsuitable locations) will be ensured more qualitative use of space. Internal development of settlement and rational use of land are to be ensured with changes of existing use of space and existing objects, enabling intertwining of use of space and by densifying of extensively used populated surfaces. Internal connatural development of settlements is to be ensured by planning balanced ration between built and green surfaces.

Renewal of selected areas (urban or rural cores) is to be implemented based on Municipal detailed spatial plan (MDSP); in the case of MDSP which is basis for comprehensive renewal of settlement and technical heritage, is Conservation plan for renewal obligatory part of MDSP.

Development of city of Tržič will be in the future within MSP carried out predominantly as an internal development with renewal and revitalisation of settlement and filling. Spatial development will be directed to a larger extend into city itself and into functionally connected settlement of Bistrica at Tržič by renewal, densifying and reconstructing of existing settlement areas.

- Development of activities across settlements: Supply and service activities are located into municipality centre, that is city of Tržič together with Bistrica at Tržič. In the areas of settlement cores are to be located housing activities with an intertwinement of social, catering, supply and service activities. For development of social activities spatial conditions are ensured within settlements of Križe and Bistrica at Tržič, and especially within the old town of Tržič. Production activities are to be located within existing production and economic zones.
- Guidelines for urbanistic shaping of settlements: Harmonious design look of settlements is to be safeguarded by complying several guidelines. Characteristic settlement and architectural morphology (distribution, shaping and volumes of objects) and elements of landscape structure is to be preserved in settlements. Development of settlements should fit to the existing surface topography, network of water streams, directions of communications and directions&configurations of existing build structure. Preserving of existing green and developing new ones is to be ensured with an aim to develop urbanistic and social functions and links with natural hinterland.
- Guidelines for spatial development of tourism and free-time activities: In the line of guidelines from the national strategy creation of joint touristic regions is to be promoted. Territory of northern and central part of municipality, along with the area of city of Tržič, is among areas that are part of border tourism region. Development of tourism is to be preferentially directed in old city core of Tržič, Diversity of preserved rich cultural heritage and nature are good basis for tourism development.
- Guidelines for cultural heritage protection: Spatial development in municipality is to be directed in a way that cultural heritage and characteristic settlement, landscape and architectural typology and morphology is comprehensively preserved. At the same time heritage is to be included into tourism development and objects and areas of heritage are developed in the line of guidelines of authorized institutions.

Protection of cultural landscape is promoted through system of spatial planning and through preserving of traditional uses of space. Urbanisation should not impact on quality and typology of heritage and cultural landscape. On the territory of municipality are number of cultural heritage objects which give identity to the space. By planning spatial development comprehensive cultural heritage protection should be safeguarded, and also appropriate use of heritage in the line of modern needs and way of life should be ensured. At the same time heritage should be treated as goods of current and future generations.

During spatial planning spatial interventions should be guided and planned in a way that areas and objects of existing cultural heritage are preserved and renovated, especially settlement heritage.

Most of decaying units of cultural heritage are presented by abandoned industrial objects, production buildings and farmhouses which need to be cared for and renovated, especially when they form distinctive ambience within the settlements as this significantly

affect on the recognisability (identity) of the space. It should be prevented decreasing of number of objects of cultural heritage due to bad management with them and illegal interventions in space (illegal demolitions).

*Decree on detailed spatial plan (DDSP) for the spatial planning unit TRŽ 11 (TRŽIČ - BPT) (2018)* defines for area of BPT Tržič a description of spatial plan, fitting of the plan into the territory, conditions of connecting buildings to the public economy infrastructure and to the built public good, criteria and conditions for parceling, solutions and measures for comprehensive preservation of cultural heritage, solutions and measures for protection of environment, natural resources and natural preservation, solutions and measures for defence and security against natural and other hazards, and protection against fires, conditions for protection of human health, graduality of spatial plan implementation and size of tolerable deviations from functional, design and technical solutions, directions for defining criteria and conditions for ceasing of validity of detailed spatial plan.

In the area following activities are allowed by this spatial plan:

- Tertiary activities: trade, transport, storing, catering, tourism and services (information and communication services, financial and insurance services, real-estate business, expert, science and technical services and other diverse business activities;
- Quaternary activities: public administration, health services, social and child care, education, cultural, firefighter, entertainment and recreational activities, religious activities, free professional and activities of extraterritorial organisations and bodies;
- Production activities which takes place in closed premises do not excessively burden the environment (level of environmental burden is defined by appropriate elaborates).

In the DSP spatial development interventions are planned for individual morphological units (MU) from A to G (eg. MU A is Central core of factory with hydro power plant, MU B are newer factory halls with bigger volumes, MU D is central area of predominantly empty buildings, MU E is a rim area with green areas and subsidiary objects, ...). For each of the units (A, B, C, D, ...) it was defined:

- Allowed purpose and activities, respectively;
- Allowed types of interventions;
- Size of the objects (buildings, infrastructure, ...);
- Shaping of the objects.

Beside these MUs, other main planning elements were also architectural, landscape and design solutions for traffic and open spaces, terms for arranging and designing urban equipment and preserving of public monuments and memorial boards, and undemanding and simple objects and objects for informing and advertisement.

It is important that on the area of planning based on this spatial plan, it is not allowed to increase the factor of development of land. Only equal or lower factor comparing to current actual status (in 2016) is allowed.

With the interventions to the entire area of BPT Tržič the main guidelines shall be opening of this closes area to the public, loosening up of the space and freeing historically and arhitecturally important building in a harmony with cultural heritage preservation and protected charateristics in all aspects. Importan is also to improve image and preentation of cultural heritage. Look of the existing building should be preserved, and look of reconstracted buildings is upgraded with qualitative new guidelines and made alive with new programs.

Beside giving rather detailed charateristics and development guidelines for all major parts of BPT Tržič area, there were some parts, especially public ones, which got even detailed plan&instructions for concrete development implementation.

As an example of such plan with detailed instructions directed by this detailed spatial was a plan that by intense greening this area should visually connect itself with forest areas on the northern and southern margin. In such way it shell present a park style "extension" of the old market core of Tržič and simultaneously offer open space with presentation of qualitative industrial arhitecture. It is neccessary to deliberately approach to the greeing of the area and by this allow direct and free view on the protected area of cultural heritage. In the connection with comprehensive cultural heritage preservation a Preservation plan for renewal of BPT Tržič industrial area was elaborated already before preparing detailed spatial plan.

Another concrete intervention, also public ones, has been a museum path which should be established paralel with a road between buildings number 7, 38, 39, 4, 3 and object number 2 in the lenght between object number 1 till building number 45. Museum path should be of interpretation nature and meant for passangers and other visitors.

One of the general and fundamental guidelines was also that a size of the BPT area and the extension of varuious interventions requires careful planning and profound consideration regarding the course of linking different phases.

The priority in the planning&arranging of the of BPT area is given to the arranging green area which includes removal of selected buildings with an aim of freeing larger surface aimed to be park area and for arranging walking and bike paths including with renovation and/or reconstruction of object along the path in same scale and with more nature friendly matrials (wood) which will be meant for public program and restaurant program. Developing green margins will enable easier moving adn passage of visitors along the margins of BPT from northeastern to western margins. This should be followed by the developing of road and temporary parking space in the areas, simultaneously with a development of infrastructure.

On the buildings which are not allowed to be removed can the authorized body for cultural heritage protection with conditions defines maintainance works which should be realized before any other intervention. This should be followed by other interventions, including removal of some selected buildings with an aim of opening the area and creating of open space meant for passangers and public, with paved and green areas.

Developing parking spaces on the place of removed buildings is forbidden except on the southwestern angle area. After the arranging of first of future three allowed parking areas temporary parking spaces, allowed within the first phase of renovation, should be canceled and redeveloped into public open spaces.

As a step in the process of Municipal Spatial Plan of Tržič in 2016 (and consequently also detailed plan for BPT) Regional unit of Slovene institute for cultural heritage protection has issued in 2015 a starting-point conservation requirements for renovation of the area which are important part of regulating documents for interventions in the area. The entire area is under culture protection regime as a industrial heritage which has to be preserved even if with new contents. This requirements has been prepared and presented by the Institute in 2015 within a document "*Valorisation and conservation bases for a revitalisation of BPT area*" where recommendations were suggested for the revitalisation of the area.

Within the document a valorisation of individual part of the former complex was done and all objects divided into 3 groups (A, B, C), with A being highest and C lowest valued objects. For each of these buildings a development directive was prepared which needs to be fulfilled within the future development of the area, with balancing and comparing potential future contents rather than with strict separation of individual objects.

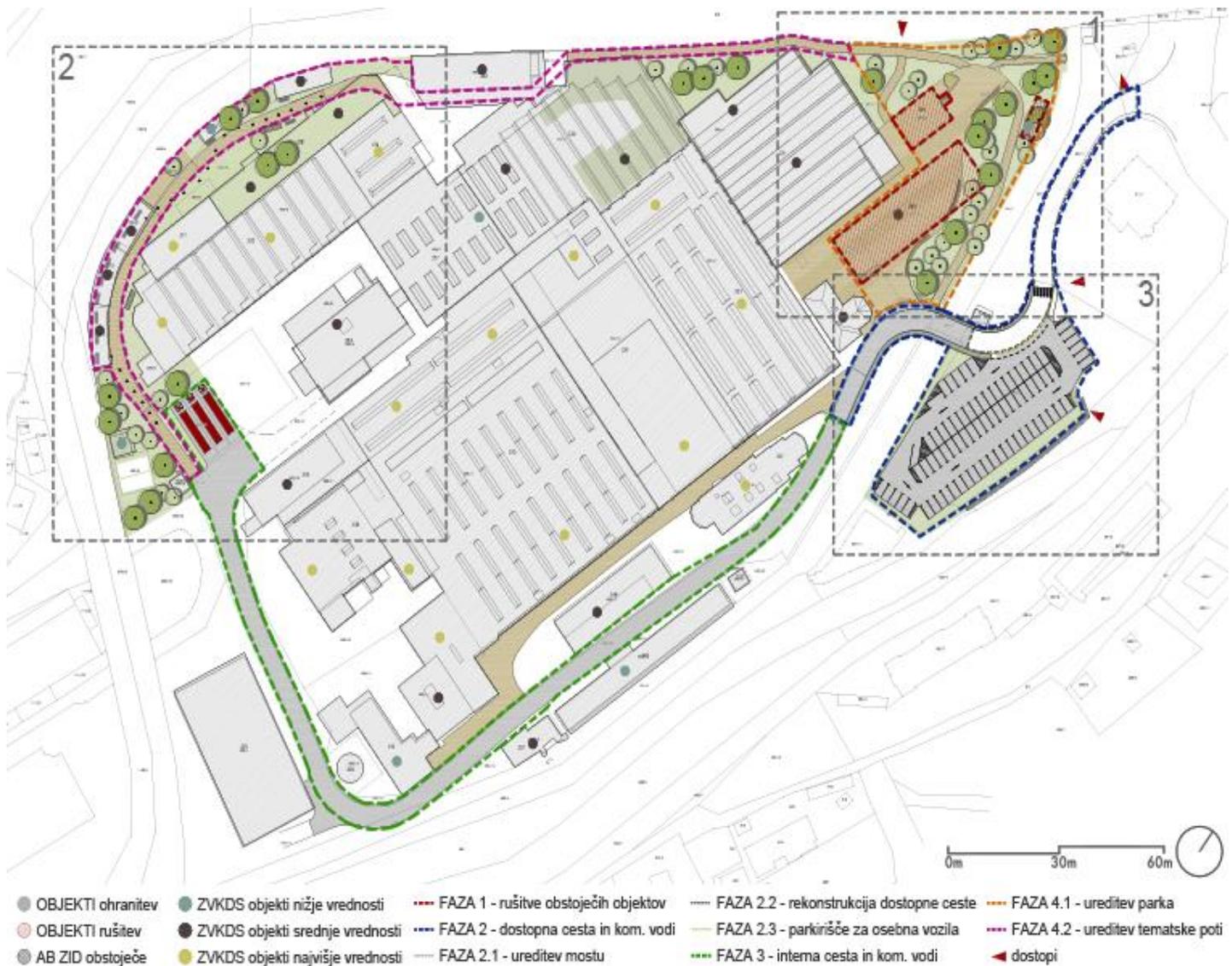
Based on these general planning documents and as one of basic developmental and revitalisation implementation documents, Municipality of Tržič prepared by external expert company in 2015 (and presented to the public in autumn 2016) a planning document called "Revitalisation of industrial areas of BPT Tržič- Outline plan of traffic and communal development/arrangement and public areas" which contains idea concepts for traffic and communal arranging and public area in this disused area. For this purpose further strategic document was prepared in 2016 for designing traffic infrastructure and other infrastructure in the area.

Purpose of the project was to elaborate outline plan in two variants for development of traffic and communal infrastructure in the area of BPT Tržič. First variant was based on the program starting points and outlines, respectively which were prepared by majority owner of BPT land. Second variant was prepared in cooperation with Municipality of Tržič who ordered this project and who presents public interest.

During the elaboration of outline plan and cooperation with both Municipality of Tržič and private owner of the area, a need for short-term (urgent) accessibility development was shaped; such development would allowed the start of activation of the land, while at the same time public and potential investors would see that a revitalization has started on the BPT area. Area would by planned additional contents became accessible for broad public which is in favor of future programs here (museum activity, crafts, commerce, etc.)

For this purpose a proposal for development of the area at the entrance to the BPT and for green belt along Tržiška Bistrica river was elaborated. Activities on this areas will be publicly accessible and will in the future supplement new contents of BPT.

Map 1: General map within "Revitalisation of industrial areas of BPT Tržič" showing main idea concepts for the spatial revitalisation of BPT area with a special stress on 3 public interventions on it's margins



And finally, as an example of most concrete plans for revitalisation of BPT Tržič area, student group from the Department of Landscape Architecture of TU München headed by dr. Udo Weilacher visited BPT area in October 2017 and prepared by spring 2018 a set of 4 interesting, creative and innovative project ideas.

Their starting point was that after decades of producing textile and when the BPT factory was closed, it left a gap in Tržič. This gap divides the historic old town on the northeast and the newer parts on the southwest. The old town is very heavily built-in, it lacks in quality open spaces. In

contrary the newer residential area mostly has detached houses with private gardens. On these two sides of the town we get two very different situation, but the outcome is very similar. Tržič does not have enough open spaces to the population, especially if we consider that most of the open area are used as parking lots.

Starting strategy for all project ideas were to activate the spaces only with small initial points which can spread out in the further phases. The aim of our project is to create a bond between the residents and the BPT complex. It is useful for the local economy as well, because the buildings are rentable on a fair price for crafts and start-ups and if these companies are expanding, they can invest more money in the site. To reach these goals we work with phases and scenarios. These phases are centred around the municipality, the local economy and foremost the residents of the town and redound the bonding between them and the site.

All project ideas prepared by the TU Munchen student groups can be downloaded at the BSC Kranj's website of the trAILS project: <http://www.bsc-kranj.si/projekti/trails>

These well elaborated and comprehensive project ideas were following:

- *Aquaculture Facility* – project idea was to convert former BPT site into an aquaculture facility with an annual fish weight of 575 tonnes, which can be regionally marketed and can also be used for export. This would include aquaculture pounds, fishing pounds for visitors, fish restaurant, location for (tourist) visitors;
- *Research campus for sustainable agriculture* – the project idea was to transform the BPT complex into research campus for sustainable agriculture which would be as a sustainable, dynamic and systematic campus already by it's structure learning polygon for green buildings, water system and green spaces and as such opened also to tourists and citizens;
- *Spatial complex with diversity of micro-characters* - the project idea was to transform the BPT complex by using it's diversity of micro-characters. The quality of the former textilmill BPT is constituted by a high diversity. Over 50 existing micro-characters are creating the identity of the closed down area. The aim of the project idea is to keep the diversity of the area under any circumstances. The area can be transformed flexible without losing its face, as long as the defined characters are always kept. For this purpose, the personalities are categorized by the strength of their character. After the activation of the area by the initiation of acupunctual interventions, the process starts. Starting with the transformation of the less characteristics, a (symbolic) new layer will be added in each phase. The developed strategy should not provide a finished complete solution, but guide through the following complex transformation process;
- *Complex for green tourism and other green activities* - the project idea was to transform the BPT complex into the area for different activities of green tourism, recreation and other green free-time activities of locals as well as tourists. The design mainly retains part of the buildings which would be given new functions, such as tourist service center,

traditional handcraft workshop, café and so on. The rest of the building will be demolished, and the construction waste will be used for the remodelling of the site landscape. The central region will be developed under the principle of the low maintenance for natural restoration, in order to support new development in the future. The design focuses on the basic services of tourists, the daily space requirements of local residents and the economic and ecological benefits that the site may create for the town. The main functions of this site will include tourist service area, community park area and land to be developed. And the design will add multiple walkways to the surrounding residential neighbourhoods, rivers and woods, connecting site with nearby surrounding areas.

### Conclusions for the chapter:

The most important guideline for spatial development, which has strong importance for AILs, is that internal development and renewals of settlements have advantage over settlement expansion. With renewal and revitalisation of empty and inappropriate used of land (abandoned and unsuitable locations) will be ensured more qualitative use of space.

Development of city of Tržič will be in the future within MSP carried out predominantly as an internal development with renewal and revitalisation of settlement and filling. Spatial development will be directed to a larger extend into city itself and into functionally connected settlement of Bistrica at Tržič by renewal, densifying and reconstructing of existing settlement areas.

As for development of activities across settlements, supply and service activities are to be located into municipality centre, that is city of Tržič together with Bistrica at Tržič. In the areas of settlement cores are to be located housing activities with an intertwinement of social, catering, supply and service activities. For development of social activities spatial conditions are ensured within settlements of Križe and Bistrica at Tržič, and especially within the old town of Tržič. Production activities are to be located within existing production and economic zones.

It is also important that Municipality (as stated in the Municipal plan) will preferentially support setting up companies from service sector, companies which require more knowledge and are ecologically incontestable and companies which use in their programs local renewable resources (water, wood).

As concretely for area of BPT, one of the important remarks in policy documents is, that it is not allowed to increase the factor of development of land. Only equal or lower factor comparing to current actual status (in 2016) is allowed.

With the interventions to the entire area of BPT Tržič the main guidelines shell be opening of this closes area to the public, loosening up of the space and freeing historically and arhitecturally

important building in a harmony with cultural heritage preservation and protected characteristics in all aspects. Important is also to improve image and presentation of cultural heritage. Look of the existing building should be preserved, and look of reconstructed buildings is upgraded with qualitative new guidelines and made alive with new programs.

Regarding production activities which might take in BPT Tržič are in closed premises, they should be the ones that do not excessively burden the environment (level of environmental burden is defined by appropriate elaborates).

As a result of all this, planning vision for BPT is to be transformed from solely production area to an area where production areas are equally combined by public areas (museums, parks, recreation areas), meaning also that transformation should be done in public-private partnership. By concrete plans and documents directions are given to open the area externally and internally, that is to build different traffic infrastructure to open the area but also to connect it with neighbouring parts of Tržič City centre.

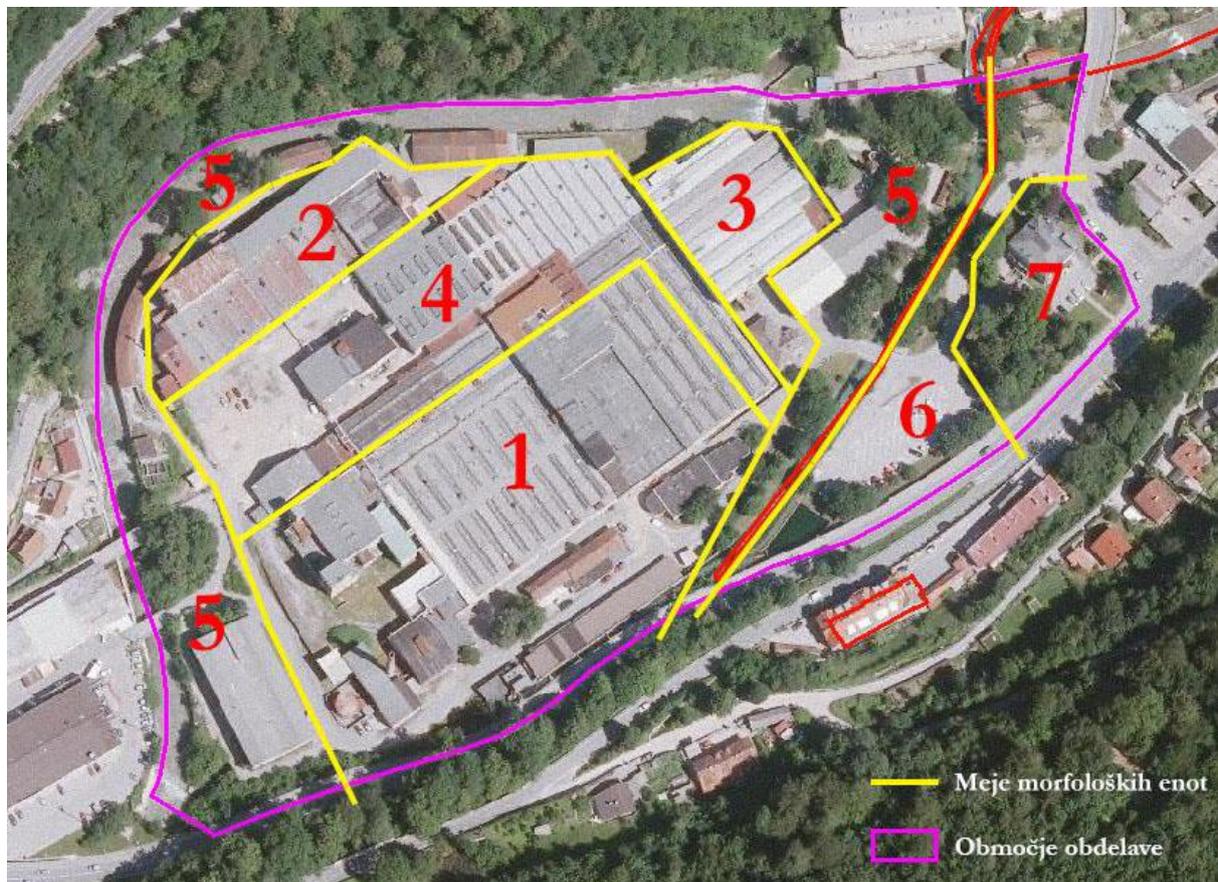
For public areas, especially open public areas, Detailed spatial plan gave already very concrete instructions for implementation (eg. parking places, parks, connecting bridge, Museum path, ...), so it is no surprise that after Municipality of Tržič bought some of marginal areas, lots of these plans were already realized in 2018-2019 period.

This new model of spatial development of BPT Tržič is illustrated also by the Map 1 (Page 41).

**Table 2: Designated land use and design guidelines in the test area.**

Land use category	Size of the area (m <sup>2</sup> )	Design guidelines
Unit 1 (A): Core area with power plant	No data	To be preserved and reconstructed or renovated (for primary, secondary and tertiary activities)
Unit 2 (B): Newer factory halls of bigger spatial volumes	No data	To be preserved and reconstructed or renovated (for primary, secondary and tertiary activities)
Unit 3 (C): New weaving mill	No data	To be demolished and turned into area of stationary traffic
Unit 4 (D): Central area of predominantly empty newer buildings	No data	To be demolished and turned into open public space
Unit 5 (E): Margin of the area with green area and subsidiary buildings	No data	To be used as a green area (park, walking and biking paths, playgrounds...)
Unit 6 (F): Area of traffic connection and parking spaces	No data	For traffic and parking

Unit 7 (G): Area with villa and remining of park	No data	To be preserved and reconstructed or renovated (also as a part of green space)
--	---------	--



Map 2: BPT area with internal borders of architectural morphological units who have individual design guidelines for the future (violet line-border of BPT area, yellow lines-borders of morphological units). Explanations of the individual unit can be found in Table 2. Letters A-G correspond to the signs used of these units in the Decree on detailed spatial plan for BPT (2018) and Conservation plan for BPT from 2015.

## 4.5 IDENTIFICATION OF THE GAPS

After studying different policy documents at different levels, it can be said that AIL transformation is moderately covered by them, quite far from the focus that they would need. Even at the start of 2000s the issue of AILs was mentioned in policy documents often indirectly (by the expressions as “prudent use of space” and “internal development of settlements”) with descriptions and definitions as they would be just copied from one to another document. AILs and their situation(s)

were always described in very short paragraph, not showing their complexity and diversity. Almost no instruments were mentioned.

The difference between different administrative levels is of course that state and also partially regional level is concerned about general situation of AILs across Slovenia, while those on regional (partly) and local are concerned almost all about concrete AILs or even individual AIL.

Instruments, though rare, are to be found in policy levels on all levels, with state level with moral general, and local level with concrete use of these instruments.

Following issues of AILs transformation which should be addressed:

- Know-how and skills of AILs owners as their managers;
- Public-private relationships, cooperation and partnerships;
- Networks of partners on different level aimed at solving AILs challenge;
- AIL transformation models and how to create them, also by connecting and upgrading existing individual instruments;
- Motivation instruments, both positive and negative/financial and non-financial, for the owners to solve degraded AILs;
- Motivating, directing or even ordering to public and also private investors to use land in AILs before heading to greenfield.

From the existing incentives/models that support transformation of AILs, we see as the most useful and promising:

- Detailed spatial plan, urban plan and renewals plan as they enable more detailed overview of the current situation and give some more concrete guidelines and instructions;
- Sustainable urban strategies which has become mandatory for city municipalities if they want to use urban development funds, and where municipalities are almost forced to deal with AILs more seriously;
- Public-private partnerships, with public authorities taking over or buying and then revitalizing parts of degraded areas (as in the case of BPT);
- Gradual approach in realization of transformation rather than comprehensive and complete approach. Such approach with first, though small concrete steps for revitalization and transformation implemented as soon as possible gives development energy to entire transformation process and attracts new actors (even investors).
- Development, visualization and public presentation of project ideas for potential transformation scenarios (as it was done by TUM student groups for BPT). This can also help to give new, positive energy and enables stakeholders (eg. investors) to look the air from different perspective and open their ideas.

## 5 CONCLUSION

ALLs and their transformation has been since 1990s recognized as severe spatial, environmental and economic problems, but has only gradually and slow got more important and above all more concrete place in policy levels, especially on state and regional level. One of the weaknesses for that is also the absence of regional level of administration which could maybe can more specialized know-how and skills to solve them, but also that state could not find some effective tools to tackle often private owned ALLs. This has so far improved but it is far from sufficient and effective.

There are several issues to be addressed to improve current situation:

- More knowledge and awareness of all actors about ALLs and overall importance of their transformation, for environment, quality of life and economy, also in the view of overall negative and even catastrophic spatial trends in Slovenia;
- If needed, to train specialized regional ALL transformation managers which would be authorized to coordinate the processes;
- Introduction of new instruments for promoting active use by regarding active green owners and "punish" passiveness of owners and important actors, and above all promote, order and control stronger use of already existing instruments;
- Promotion of private-public transformation model, also in a gradual way if model for transformation of entire ALL hasn't produce any effective solution in longer period of time;
- Preparing regional spatial plan which would give a regional level position, role, importance and (investment) promotion to individual ALL;
- More use of comprehensive project ideas, eg. project ideas which were prepared on several occasions by architects or landscape architects for BPT. To get this, more active role of local administrations, associations, companies, business associations, public and private cultural and social institutions...should be promoted;
- Get for all ALLs more detailed and comprehensive datas and assessments (economic, environmental, ...) , also by assessing position and potentials on wider scale (regional, national, cross-border, macroregional, EU).

As for current administrative and actor network(s), we believe that it lacks knowledge and skills, that is it is too fragmented and uncoordinated. Beside local administrations not many actors have real or given power to coordinate and direct a process of ALL transformation. This is a problem as local administration are most often multipurpose services and often too small for such challenging process.

## 6 SOURCES

1. *Decree on Spatial Development Strategy for Slovenia (2004)*. Official Gazette of the Republic of Slovenia, n. 76/04 (15.7.2004).

Retrieved at (in Slovene language): <http://www.pisrs.si/Pis.web/pregledPredpisa?id=STRA12>

2. *Environmental Protection Act (2004)*. Official Gazette of the Republic of Slovenia, n. 39/06 (22.4.2004).

Retrieved at (in Slovene language): <http://pisrs.si/Pis.web/pregledPredpisa?id=ZAKO1545>

3. *Resolution on the National Housing Programme 2015–2025 (2015)*. Official Gazette of the Republic of Slovenia, n. 92/15 (4.12.2015).

Retrieved at (in Slovene language):

<http://www.pisrs.si/Pis.web/pregledPredpisa?id=RESO114>

4. *Spatial Planning Act of Slovenia (2017)*. Uradni list RS, št. 61/17 (2.11.2017).

Retrieved at (in Slovene language).

<http://www.pisrs.si/Pis.web/pregledPredpisa?id=ZAKO7341>

5. *Resolution of National Environmental Action Plan 2005-2012(NPVO, 2006)*. Official Gazette of the Republic of Slovenia, n. 2/06 (6.1.2006).

Retrieved at (in Slovene language):

<http://www.pisrs.si/Pis.web/pregledPredpisa?id=RESO41>

6. *Decree on Spatial order of Slovenia (2004)*. Official Gazette of the Republic of Slovenia, n. 122/04, 33/07 – ZPNačrt (12.11.2004).

Retrieved at (in Slovene language):

<http://www.pisrs.si/Pis.web/pregledPredpisa?id=URED3526>

7. *Rules on determining building plots (2013)*. Official Gazette of the Republic of Slovenia, n. 66/13, 77/17 – ZMVN-1 (5.8.2013).

Retrieved at (in Slovene language):

<http://www.pisrs.si/Pis.web/pregledPredpisa?id=PRAV11279>

8. *Rules on the content, format and drawing-up of municipal spatial plan and on criteria for specifying dispersed settlement areas in need of restoration and for specifying areas for new settlement (2007)*. Official Gazette of the Republic of Slovenia, n. 99/07 and 61/17 – ZUreP-2 (30.10.2007).

Retrieved at (in Slovene language):

<http://www.pisrs.si/Pis.web/pregledPredpisa?id=PRAV8105>

9. *Rules on the content, format and drawing-up of municipal detailed spatial plan (2007)*. Official Gazette of the Republic of Slovenia, n. 99/07 and 61/17 – ZUreP-2 (30.10.2007).

Retrieved at (in Slovene language):

<http://www.pisrs.si/Pis.web/pregledPredpisa?id=PRAV8106>

10. *Instructions for the preparation of planning conditions for the rehabilitation of degraded space (1993)*. Official Gazette of the Republic of Slovenia, n. 56/93 (8.10.1993).

Retrieved at (in Slovene language):

<http://pisrs.si/Pis.web/pregledPredpisa?id=NAVO101>

11. *Operational Programme for the Implementation of the EU Cohesion Policy 2014-2020 in Slovenia (2014)*. Office of the Government of the Republic of Slovenia for development and European Cohesion Policy (11.12.2014).

Retrieved at (in Slovene language):

[https://www.eu-skladi.si/sl/dokumenti/kljucni-dokumenti/op\\_slo\\_web.pdf](https://www.eu-skladi.si/sl/dokumenti/kljucni-dokumenti/op_slo_web.pdf)

12. *Partnership agreement between Slovenia and European Commission 2014-2020 (2014)*. Government of the Republic of Slovenia (28.7.2014).

Retrieved at (in Slovene language):

<https://www.eu-skladi.si/sl/dokumenti/kljucni-dokumenti/partnerski-sporazum-slovenska-verzija.pdf>

13. *Report on spatial development in Republic of Slovenia (2016)*. Ministry of Republic of Slovenia for Space and Environment (2016).

Retrieved at (in Slovene language):

[https://www.gov.si/assets/ministrstva/MOP/Publikacije/c5a7a4e249/proocilo\\_o\\_prostorskem\\_razvoju.pdf](https://www.gov.si/assets/ministrstva/MOP/Publikacije/c5a7a4e249/proocilo_o_prostorskem_razvoju.pdf)

14. *Gorenjska region: Guidelines for preparing regional development strategy for spatial and urban development sector (2019)*.

Retrieved at (in Slovene language):

15. *Regional development program of Gorenjska 2014 – 2020 (2015)*. Regionalna razvojna agencija Gorenjske - BSC, poslovno podporni center, d.o.o. (3.6.2015).

Retrieved at (in Slovene language):

<http://www.bsc-kranj.si/library/files/upload/Regionalni%20razvojni%20program%20Gorenjske%202014-2020.pdf>

16. *Local development strategy for LAG Gorenjska košarica 2014-2020 (2016)*. Regionalna razvojna agencija Gorenjske - BSC, poslovno podporni center, d.o.o. (28.10.2016).

Retrieved at (in Slovene language):

[https://www.las-gorenjskakosarica.si/wp-content/uploads/STRATEGIJA\\_LAS\\_GK.pdf](https://www.las-gorenjskakosarica.si/wp-content/uploads/STRATEGIJA_LAS_GK.pdf)

17. *Strategy for development of Municipality of Tržič 2008 – 2020*. Municipality of Tržič (October 2007).

Retrieved at (in Slovene language): <https://www.trzic.si/projekti/strategija-razvoja.html>

18. *Strategy for Sustainable development of City Municipality of Kranj (CMK) 2009 – 2023 (2014-2023 in revised version)*. Mestna občina Kranj (May 2009, 9.6.2014).

Retrieved at (in Slovene language):

[https://www.kranj.si/files/06\\_mestna\\_obcina/strategija\\_razvoja\\_MO\\_Kranj/strategija\\_razvoja\\_-\\_koncna\\_verzija.pdf](https://www.kranj.si/files/06_mestna_obcina/strategija_razvoja_MO_Kranj/strategija_razvoja_-_koncna_verzija.pdf) (initial version, accepted in Municipal Council in 2009)  
[file:///C:/Users/HP/Documents/BSC/TRAILS/PolicyAnalyse/Gradiva/2\\_1-strategija-mok-2014-2023-10060214.pdf](file:///C:/Users/HP/Documents/BSC/TRAILS/PolicyAnalyse/Gradiva/2_1-strategija-mok-2014-2023-10060214.pdf) (revised version, but never accepted in Municipal Council)

19. *Sustainable urban strategy of City municipality of Kranj 2030 (2016)*. Mestna občina Kranj (27.1.2016).

Retrieved at (in Slovene language):

<https://www.zmos.si/wp-content/uploads/2019/01/MO-Kranj-TUS.pdf>

20. *Decree on the spatial planning conditions for the redevelopment of degraded area in the Municipality of Tržič (1994)*. Official Gazette of the Republic of Slovenia, n. 62/1994 (7.10.1994).

Retrieved at (in Slovene language):

<https://www.uradni-list.si/glasilo-uradni-list-rs/vsebina/1994-01-2138/uredba-o-prostorskih-ureditvenih-pogojih-za-sanacijo-degradiranega-prostora-obcine-trzic>

21. *Municipal spatial plan of City municipality of Kranj (2014)*. Official Gazette of the Republic of Slovenia, n. 74/14 (17.9.2014).  
Retrieved at (in Slovene language):  
[https://www.kranj.si/files/06\\_mestna\\_obcina/mestna\\_uprava/Urad\\_za\\_okolje\\_in\\_prostor/neuradno-precisceno-besedilo.pdf](https://www.kranj.si/files/06_mestna_obcina/mestna_uprava/Urad_za_okolje_in_prostor/neuradno-precisceno-besedilo.pdf)
  
22. *Decree on the Municipal spatial plan (MSP) of the Municipality of Tržič (2016)*. Official Gazette of the Republic of Slovenia, n. 35/2016 (13.5.2016).  
Retrieved at (in Slovene language):  
<https://www.uradni-list.si/glasilo-uradni-list-rs/vsebina/2016-01-1524/odlok-o-obcinskem-prostorskem-nacrtu-obcine-trzic>
  
23. *Decree on detailed spatial plan (DDSP) for the spatial planning unit TRŽ 11 (TRŽIČ - BPT) (2018)*. Official Gazette of the Republic of Slovenia, n. 70/2018 (2.11.2018).  
Retrieved at (in Slovene language):  
<https://www.uradni-list.si/glasilo-uradni-list-rs/vsebina/2018-01-3466/odlok-o-obcinskem-podrobnem-prostorskem-nacrtu-za-obmocje-enote-urejanja-prostora-z-oznako-trz-11-trzic---bpt>
  
24. *Valorisation and conservation bases for a revitalisation of BPT area" (2018)*. LUZ d.d. (May 2018).  
Available at (in Slovene language):  
<https://www.trzic.si/doc/aktualno/knp-bpt-celota.pdf>
  
25. *Revitalisation of industrial areas of BPT Tržič- Outline plan of traffic and communal development/arrangement and public areas (2016)*. PROTIM RŽIŠNIK PERC arhitekti in inženirji d.o.o. (November 2015).  
Retrieved at (in Slovene language):  
[http://www.lex-localis.info/files/b7c27fc4-436f-4458-896e-948b76fc5b8e/1271790547780000000\\_08\\_Priloga-2-Idejna-zasnova-Obcina-Trzic.pdf](http://www.lex-localis.info/files/b7c27fc4-436f-4458-896e-948b76fc5b8e/1271790547780000000_08_Priloga-2-Idejna-zasnova-Obcina-Trzic.pdf)
  
26. *Project ideas by Department of Landscape Architecture of TU München (2018)*. Faculty of Architecture, Technical University of Munich Prof. Dr. Sc. ETH Zürich Udo Weilacher (2018).  
Retrieved at (in English language): <http://www.bsc-kranj.si/projekti/trails>