

Trilogue on the Energy Performance of Buildings Directive - ECF Position Paper

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Executive Summary

The lack of safe and accessible bicycle parking has been identified as one of the main barriers to regular cycling, the most-energy efficient of all transport modes. The European Cyclists' Federation (ECF) therefore strongly welcomes the position of all three institutions with respect to bicycle parking in residential and non-residential buildings as part of the recast of the Energy Performance of Buildings Directive (EPBD). Original arguments for inclusion of bicycle parking and analysis of the current directive and its implementation can be seen here <https://www.ecf.com/what-we-do/making-buildings-fit-cycling>

This ECF position paper sets out eight key recommendations as to optimise the provisions related to bicycles in the forthcoming trilogue negotiations. Proposals for specific amendments are listed in the ECF '4-column' table.

ECF key recommendations

1. Introduce a general statement on parking policies.
2. Keep a definition of a bicycle parking space and require quality requirements.
3. Opt for 15% of total user capacity rather than 15 % of average user capacity devoted to bicycle parking in non-residential buildings, and also;
 - i. Inclusion of cargo bikes
 - ii. Inclusion of charging parity between eBikes and eCars
4. Improving paragraph (3) and reigning in the power of the opt-out clauses
 - i. Amending the opt-out clauses
 - ii. Allowing assessment by local authorities
5. Improving paragraph (4) for residential buildings
 - i. Charging parity between eBikes and eCars - To include electrically power assisted cycles and L-category vehicles in the 12 (4) (a)
 - ii. Consider space required also for bicycles with larger dimensions than standard bicycles.
 - iii. To redefine the 'opt-out' clauses.
 - iv. To allow bicycle parking to be built even if there is no car parking.
 - v. Allow assessment by local authorities if implementing opt-out clauses.
6. Not allow a generalised opt-out/derogation for all SMEs for non-residential buildings.
7. Require Member States to provide technical assistance for bicycle parking.
8. Coherence of policies for buildings, soft and green mobility and urban planning.

Explanations for the suggested recommendations (full amendments after)

1. Recital 40 - Introduce a general statement on parking policies

The Commission and Council text sets out in a general tone the case for bicycle parking. So does the Parliament, with additionally laying out the case for electric power assisted bicycles. ECF recommends keeping the European Parliament text for Recital 40.

Importantly the Parliament also puts forward the suggestion that Member States should replace 'minimum' car parking requirements with 'maximum' car parking requirements. It makes a stronger case for the promotion of sustainable transport and incorporating that into housing and building development.

As recommended by the International Transport Forum¹ and EU funded project Park4Sump², parking spaces in urban development projects should not be oriented to expected future demand of motor vehicle use but should achieve modal split targets with a view to sustainable urban development. For car parking this implies substituting minimum requirements with maximum requirements. A lot of academic research has focused on the relationship between minimum car-parking requirements and higher rates of car ownership and car use.

ECF therefore recommends that Member States review their relevant car-parking policies and consider introducing maximum norms, in particular in those areas that are well served by public transport, walking and cycling. In addition, ECF recommends Member States to support local authorities in developing and implementing SUMP with a particular focus on the integration of housing policies with sustainable mobility and urban planning. This text would provide the impetus for Member States to start this progress.

Building requirements should have an important part to play in improving mobility options and use in our cities. As such they should be seen in the context of SUMP implementations and supporting local authorities in these implementations. Again, this text makes this case.

2. Recital 57b - Keep a definition of a bicycle parking space

This is a useful definition as to the quality of a bicycle parking space. It includes *safety and security* and talks about the variety of bicycles. It is important to use the word parking *space* rather than parking *place* as it recognises the different sizes of bicycles. We would recommend including "accessibility" within the definition. Poor access, such as steep ramps, or spaces tucked away behind large motor vehicles, would make the spaces unusable. Article 12 (8) of the Parliament text also calls for Member States to provide technical assistance in the building of bicycle parking, which we would also recommend.

¹ <https://www.itf-oecd.org/parking-prices-and-availability-mode-choice-and-urban-form-0>

² <https://park4sump.eu/sites/default/files/2021-02/EN%20%28web%29.pdf>

3. Article 12 (1) and 12 (2) – To opt for 15% of total user capacity rather than 15 % of average user capacity devoted to bicycle parking in non-residential buildings

ECF would recommend keeping the Parliament text, in particular the use of 15% of total user capacity of the building, rather than 15% of the average user capacity as suggested by Council. ECF also proposes to keep the inclusion of bicycles of larger dimensions, and of electrically powered assisted bicycles.

i. Article 12 (1) and 12 (2) – 15% total user capacity

15% of user capacity is a good measure as it does not refer to car parking and treats bicycle parking on its own merit. However, there is a difference between total user capacity (Parliament) and average user capacity (Council). We believe that 15% average capacity is impossible to really understand or measure, whereas total capacity is a more understandable and often required figure for public authorities such as for fire protection authorities. It is also the more ambitious measure of the two. Given that 6 Member States have also said that they wish to be more ambitious in their negotiations with the Parliament and this may be an opportunity to do that.

ii. Article 12 (1) – Inclusion of cargo bikes

ECF would recommend the inclusion of the phrase “considering the space required also for bicycles with larger dimensions than standard bicycles” as suggested by Parliament. This would then include tricycles for physically impaired people, cargo bikes, and other such larger cycles. Cargo bike sales are increasing rapidly in recent years and this is a trend that we do not see abating. According to conservative figures from the City Change Cargo Bike project.³ Cargo bikes are projected to sell around 500,000 bikes this year, *with a 60% increase in sales year on year.*

This is a great opportunity to move to sustainable modes of transport for last mile delivery, and to provide alternatives to family motor cars that can carry goods, shopping, and children. In Europe, it is estimated that 50% of all motorised trips that involve the transport of goods in cities could be shifted to cargo bikes and bicycles. This is coming, cargo bikes will be ubiquitous over the next few years – provided they can be parked easily. EPACs (power assisted eBikes) followed this same trajectory a few years ago.

iii. Article 12 (1) and 12 (2) – Inclusion of Electric Power Assisted Cycles (EPACs) and charging parity with electric cars

Electric Power Assisted Cycles (EPACs) are causing a revolution in the cycling sector. They are able to travel longer distances, go up steep hills and provide support for those that don't feel as physically fit to ride a conventional bicycle. EPACs are now responsible for around 23% of the total number of bicycles sold in the EU, that is around 5 million bikes in 2021, and this is still increasing by 15-20% every year⁴. *This makes them the most popular electric vehicle in the European Union.* In order to cater for the large number of bikes in the population and to stimulate even more growth it is important that we also provide charging for these bikes. Charging at offices would stimulate electric bicycle use in commuting, one of the most popular uses of these bikes.

³ <http://cyclelogistics.eu/wp-content/uploads/2022/09/European-Cargo-Bike-Survey-Results-2022.pdf>

⁴ These figures come from CONEBI the industry cycling body. Can be provided on request.

Cargo bikes are mainly electric power assisted and charging at shopping or commercial residencies would stimulate the picking up of goods in commercial centres. Requirements are only a household plug that can be an easy addition to the electric car charging infrastructure. Given the fact that EPACs are the most popular electric vehicle in Europe we would ask for parity with electric car charging; so where a charging point is required for an electric car then we would ask for a household plug to be available, where ducting or cabling is required for an electric car we would ask for that to be available also for a household plug.

4. Article 12 (3) – Opt-out clause for Articles 12 (1) and (2)

i. Article 12 (3) – Opt-out clause for Articles 12 (1) and (2)

We would recommend excluding the phrase that allows Member States to adjust bicycle parking requirements for buildings “that are not typically accessed by bicycles” as proposed by the Council. The nature of this directive is not to cater for what is *currently* being used. The nature of the directive is to increase the use of those tools and devices that will improve the energy performance of buildings, not to cater to the *current* level of energy performance but aiming to *increase* it. There is much evidence that shows that where cycling infrastructure, including bicycle parking, is provided, more people will use it⁵. Therefore, we should reach for further ambitious levels of bicycle parking in order to go above and beyond the current *status quo*. The opt-out is still available but is subject to an assessment by the Local Authorities (please go to the next point 4 (ii)).

ii. Article 12 (3) – inclusion of Local Authority input

We would recommend to either delete the opt-out clauses above, or to provide assessment from the local authorities to take into account local conditions as suggested by Parliament. This is a simple solution to allow important input from the local level. There is only vague wording in the Commission and Council texts and there should be a way to have some consideration as to whether there is to be a decrease in the bicycle parking requirements. We would also recommend that this decision is taking on a project-by-project assessment of the building’s development. A general derogation at the national (or local) level would fragment and segment the EU market, while the objective should be to have common rules. We believe a general ‘opt-out’ would be counter-productive to common standards/rules.

⁵ Eva Heinen & Ralph Buehler (2019): Bicycle parking: a systematic review of scientific literature on parking behaviour, parking preferences, and their influence on cycling and travel behaviour, Transport Reviews, DOI: [10.1080/01441647.2019.1590477](https://doi.org/10.1080/01441647.2019.1590477)

5. Article 12 (4) – Residential buildings

Here ECF agrees with the general principle of Commission, Parliament, and Council to have 2 bicycle parking spaces per dwelling (or residential unit) for all new/renovated buildings over 3 car parking spaces.

In addition, we also recommend -

i. As per the Parliament text - To include Electrically Power Assisted Cycles (EPACs) and L-category vehicles in the 12 (4) (a)

Here we agree with Parliament to have some sort of equivalence with electric cars and to allow the charging (a simple household plug and /or wiring/cabling for this plug) of EPACs and other smaller electric mobility devices.

ii. To include the phrase “considering the space required also for bicycles with larger dimensions than standard bicycles”, similar to the Parliament text in Article 12 (1)

As laid out in point 3.1 (Art 12 (1)) cargo bikes can be a crucial tool to allow the shift from inefficient large modes of motorised private transport to sustainable active transport. Parking requirements are particularly important for residential buildings as this is where the bike will be stored for the majority of its time. Parliament includes space for larger bicycles in non-residential buildings, however it is important that there is space to store these bicycles once they have returned from their ‘non-residential use’. Therefore, we would argue that it is just as important to include larger bicycles in Article 12 (4) as it is in non-residential buildings as laid out in Article 12 (1). It does not make sense to have space for larger bicycles at the end of one leg of the journey but not at the other (home) end point of the return journey where the bicycle will spend much of its life.

iii. As per Council text – to not split New and Renovated Residential Buildings, and to not include the ‘opt-out clause “where technologically and economically feasible” for renovated buildings.

The Parliament splitting of new and renovated residential buildings into (b) and (ba) is due to the inclusion of the phrase “where technologically and economically feasible” for renovated residential buildings. We believe this is unnecessary given that there is already an opt-out/derogation later in this paragraph. Consequently, we would recommend deleting the phrase “where technologically and economically feasible”, meaning there would be no need to split into (b) and (ba). In conclusion, it would be much simpler and clearer to use the Council formulation to not split new and renovated, to delete (ba) and bring new and renovated buildings under (b).

iv. As per Parliament text – to include (bb) in order to allow the development of bicycle parking space where there are no car parking spaces.

We believe this could be an oversight from the Commission and Council. This Parliament addition provides alternatives to new building residents to have access to a form of transport if public authorities choose to not allow car parking as mandatory in new buildings. This gives the choice to

exclude private motor cars from building regulations for all new residential buildings but also providing for an alternative sustainable transport mode.

- v. As per Parliament text – to include the use of the derogation/opt-out clause that requires Local Authority input for both new and renovated residential buildings.**

As laid out in point 5.2 on Article (12) (3) we believe that there should be input from local authorities on the parking requirements in their jurisdictions for both new and renovated residential buildings.

6. New Article 12 (5a) – SME opt-out.

ECF believes that this opt-out would seriously undermine any relevance of the Directive and would allow a complete derogation of almost all non-residential buildings. A SME is defined⁶ as any enterprise employing less than 250 people (micro ≤ 10 , small 10-49, medium 50-250). However, *98% of all commercial enterprises are SMEs*⁷, therefore the Directive would no longer apply to 98% of commercial non-residential buildings. This is a tool that is too blunt.

There are already opt-out conditionalities that are baked into the Directive to allow Member States to adjust the bike parking requirements. This tool would make the Directive a guide rather than piece of legislation to be implemented. We should allow the trigger point of number of parking spaces to filter out those buildings that would or would not have space; 5 car parking spaces for New/renovated and 20 (or 10) for all others. This, along with the opt-out possibilities in Article 12 (3) should be more than sufficient. Furthermore, there is much evidence which shows that increasing and improving facilities for cyclists, including bicycle parking, has major positive economic impacts on retail, food and other SME service businesses.⁸ Improving bicycle parking in and around commercial centres would improve footfall and income for SMEs.

7. Article 12 (8) – Quality requirements and technical assistance for bicycle parking

The Commission and Council calls for technical assistance with regards to recharging points for electric vehicles. We believe that, in agreement with the Parliament position, assistance should be provided when implementing bicycle parking. There is a plethora of bicycle parking infrastructure styles and designs, some excellent and some truly terrible that will damage a bicycle. The Member State should provide guidance on which would be appropriate in which circumstance. This should not be overburdensome as there is excellent literature and guidance already in circulation.

⁶ <https://op.europa.eu/en/publication-detail/-/publication/6ca8d655-126b-4a42-ada4-e9058fa45155/language-en>

⁷ <https://leap4sme.eu/wp-content/uploads/2021/07/LEAP4SME-D2.1-SME-energy-and-economic-mapping-in-Europe.pdf>

⁸ We have an ECF report here https://ecf.com/sites/ecf.com/files/CYCLE_N_LOCAL_ECONOMIES_internet_0.pdf on the benefits to local business on increased and improved cycling infrastructure such as bicycle parking. Others here <https://cyclingsolutions.info/cycling-and-shopping/>
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/509587/value-of-cycling.pdf
<http://content.tfl.gov.uk/walking-cycling-economic-benefits-summary-pack.pdf>

8. Article 12 (9) - coherence of policies for buildings, soft and green mobility and urban planning

ECF recommends the European Parliament text. Input from local authorities and supporting them in improving and increasing sustainable modes of transport, particularly in how they can integrate mobility into housing and urban planning policy, can be crucial in improving coordination between the two different sectors.

Below is a '4-column' table laying out the important paragraphs in the text that are important for bike parking and sustainable mobility along with our recommended amendments in full.

Council and Parliament changes are in red

ECF changes when there are changes from all institutions are in blue

Art/Rec	Commission draft proposal	EU Council Approach	European Parliament position	ECF Recommendation
Recital 40	<p>Promoting green mobility is a key part of the European Green Deal and buildings can play an important role in providing the necessary infrastructure, not only for recharging of electric vehicles but also for bicycles. A shift to soft mobility such as cycling can significantly reduce greenhouse gas emissions from transport. As set out in the 2030 Climate Target Plan, increasing the modal shares of clean and efficient private and public transport, such as cycling, will drastically lower pollution from transport and bring major benefits to individual citizens and communities. The lack of bike parking spaces is a major barrier to the uptake of cycling, both in residential and non-residential buildings. Building codes can effectively support the transition to cleaner mobility by establishing requirements for a minimum number of bicycle parking spaces.</p>	<p>Promoting green mobility is a key part of the European Green Deal and buildings can play an important role in providing the necessary infrastructure, not only for recharging of electric vehicles but also for bicycles. A shift to soft mobility such as cycling can significantly reduce greenhouse gas emissions from transport. As set out in the 2030 Climate Target Plan, increasing the modal shares of clean and efficient private and public transport, such as cycling, will drastically lower pollution from transport and bring major benefits to individual citizens and communities. The lack of bike parking spaces is a major barrier to the uptake of cycling, both in residential and non-residential buildings. Building codes can effectively support the transition to cleaner mobility by establishing requirements for a minimum number of bicycle parking spaces.</p>	<p>Promoting... A shift to active mobility such as cycling can significantly reduce greenhouse gas emissions from transport. As set out...from transport. With the increase in the sale of electrically power-assisted cycles and other L-category vehicle types, precabing for those vehicles in new residential buildings and, in residential buildings undergoing major renovation, precabing or ducting, when technically and economically feasibility, should also be provided to facilitate the installation, at a later stage, of recharging points. As set out...non-residential buildings. Union requirements and national building codes can effectively support the transition to cleaner mobility by establishing requirements for a minimum number of bicycle parking spaces., and building bicycle parking spaces and related infrastructure in areas where bicycles are less used can lead to an increase in their use. The requirement to provide bicycle parking spaces should not be dependent on, or necessarily be linked to, the availability and supply of car parking spaces, which may in certain circumstances be unavailable. Building codes should also replace 'minimum' car parking requirements with 'maximum' car parking requirements, particularly in those areas that are already well served by public transport and active mobility. options. Member States should support local authorities in developing a nd implementing sustainable urban mobility plans with a particular focus on the integration of housing policies with sustainable mobility and urban planning, thereby ensuring and prioritising accessibility of all new major urban developments by active mobility and public transport</p>	<p>ECF recommends <u>keeping</u> the <u>European Parliament</u> text.</p>

Art/Rec	Commission draft proposal	EU Council Approach	European Parliament position	ECF Recommendation
Article 2 57b			'bicycle parking space' means a designated space for at least one bicycle that provides secure and easy storage for a variety of bicycle types, and, which may be lit and protected from the weather	'bicycle parking space' means a designated space for at least one bicycle that provides secure and easy storage for a variety of bicycle types, and, which may be lit and protected from the weather. It should be easily accessible without a steep slope or obstacle such as stairs, close to the entrance/exit.
Article 3a new 3.			3. Member States shall implement local level integrated mobility plans and sustainable urban mobility plans that are aligned with IRPs and encompass public transport planning and deployment with other means of active and shared mobility, as well as the related infrastructure for operating, recharging, storing and parking	ECF recommends <i>keeping</i> the <i>European Parliament</i> text.

Art/Rec	Commission draft proposal	EU Council Approach	European Parliament position	ECF Recommendation
12(1)	<p>With regard to new non-residential buildings and non-residential buildings undergoing major renovation, with more than ten five parking spaces,...</p> <p>Member States shall ensure [...]</p> <p>(a) "At least one bicycle parking space for every car parking space."</p> <p>Where the car park is physically adjacent to the building, and for major renovations, renovation measures include the car park or the electrical infrastructure of the car park.</p>	<p>With regard to new non-residential buildings with more than five car parking spaces and non-residential buildings undergoing major renovation, with more than ten five car parking spaces,...</p> <p>Member States shall ensure</p> <p>(c) "At least one bicycle parking spaces representing at least 15% of the average user capacity of the building for every car parking space."</p> <p>Where</p> <p>(a) the car park is located inside the building, and, for major renovations, renovation measures include the car park or the electrical infrastructure of the building; or</p> <p>(b) the car park is physically adjacent to the building, and, for major renovations, renovation measures include the car park or the electrical infrastructure of the car park.</p>	<p>With regard to new non-residential buildings and non-residential buildings undergoing major renovation, where that renovation includes the car park or the electrical installations of the building with more than ten five car parking space, where the car park is located inside the building, is physically adjacent to, or has a clear link with, the building</p> <p>Member States shall ensure</p> <p>(b) the installation of pre-cabling for every parking space to enable the installation, at a later stage of recharging points for electric vehicles, electrically power-assisted cycles and other L-category vehicles types; and</p> <p>(c) at least one bicycle parking spaces representing at least 15% of total user capacity of non-residential buildings, considering the space required also for bicycles with larger dimensions than standard bicycles</p>	<p>ECF recommends <u>keeping</u> the <u>European Parliament</u> text.</p>

Art/Rec	Commission draft proposal	EU Council Approach	European Parliament position	ECF Recommendation
12 (2)	<p>With regard to Member States shall lay down requirements for the installation of a minimum number of recharging points for all non-residential buildings with more than twenty parking spaces, by 1 January 2025 Member States shall ensure...and at least one bicycle parking space for every car parking space, by 1 January 2027.</p>	<p>With regard to Member States shall lay down requirements for the installation of a minimum number of recharging points for all non-residential buildings with more than twenty parking spaces, by 1 January 2025 Member States shall ensure by 1 January 2027 ...and... c) bicycle parking spaces representing at least 15% of the average user capacity of the building and at least one bicycle parking space for every car parking space, by 1 January 2027.</p>	<p>With regard to Member States shall lay down requirements for the installation of a minimum number of recharging points for all non-residential buildings with more than twenty, and if technically, economically, feasible, ten parking spaces Member States shall ensure... bicycle parking space, representing at least 15% of the total user capacity of the building and with space required also for bicycles with larger dimensions than standard bicycles by 1 January 2027 by 1 January 2025</p>	<p>ECF recommends keeping the European Parliament text.</p>
12 (3)	<p>Member States may adjust requirements for the number of bicycle parking spaces in accordance with paragraphs 1 and 2 for specific categories of non-residential buildings where bicycles are typically less used as a means of transport.</p>	<p>Member States may adjust requirements for the number of bicycle parking spaces in accordance with paragraphs 1 and 2 for specific categories of non-residential buildings where that are not typically accessed by bicycles are typically less used as a means of transport</p>	<p>Member States may, subject to an assessment by local authorities, taking into account local characteristics, including demographical, geographical and climate conditions adjust requirements for the number of bicycle parking spaces in accordance with paragraphs 1 and 2 for specific categories of non-residential buildings where bicycles are typically less used as a means of transport</p>	<p>Member States may, subject to an assessment by local authorities, taking into account local characteristics, including demographical, geographical and climate conditions, allow a project-by-project adjustment adjust of the requirements for the number of bicycle parking spaces in accordance with paragraphs 1 and 2 for specific categories of non-residential buildings where bicycles are typically less used as a means of transport</p>

Art/Rec	Commission draft proposal	EU Council Approach	European Parliament position	ECF Recommendation
12 (4)	<p>With regard to new residential buildings and residential buildings undergoing major renovation, with more than ten three parking spaces, Member States shall ensure:</p> <p>And</p> <p>(a) at least two bicycle parking spaces for every dwelling.</p> <p>...Where, in the case of major renovation, ensuring two bicycle parking spaces for every dwelling is not feasible, Member States shall ensure as many bicycle parking spaces as appropriate.</p>	<p>With regard to new residential buildings with more than three car parking spaces and residential buildings undergoing major renovation, with more than ten three parking spaces, Member States shall ensure:...</p> <p>And</p> <p>(b) at least two bicycle parking spaces for every dwelling residential building unit</p> <p>...Where, in the case of major renovation, ensuring two bicycle parking spaces for every dwelling residential building unit is not feasible, Member States shall ensure as many bicycle parking spaces as appropriate.</p>	<p>With regard to new residential buildings and residential buildings undergoing major renovation, where that renovation includes the car park or the electrical installations of the building with more than ten three parking spaces, where the car park is located inside the building or the car park is physically adjacent to, or has a clear link with the building</p> <p>Member States shall ensure</p> <p>(a) in new residential buildings, the installation of pre-cabling for every parking space, and, in residential buildings undergoing major renovation, the installation of precabling or, where technically and economically unfeasible, ducting for every parking space to enable the installation, at a later stage, of recharging points for electric vehicles and electrically power-assisted cycles and other L-category vehicle types;</p> <p>(aa) the installation of at least one recharging point;</p> <p>b) at least two bicycle parking spaces for every dwelling in new residential buildings</p> <p>ba) at least two bicycle parking spaces for every dwelling in residential buildings undergoing major renovation, where technologically and economically feasible.</p> <p>bb) in new residential buildings with at least three dwellings and where there are no car parking spaces, at least two bicycle parking spaces for every dwelling where technologically and economically feasible.</p> <p>By way of derogation from the third subparagraph [(b)], Member States may, subject to an assessment by local authorities and taking into account local characteristics, including demographical, geographical and climate conditions, adjust requirements for the number of bicycle parking spaces.</p>	<p>With regard to new residential buildings and residential buildings undergoing major renovation, where that renovation includes the car park or the electrical installations of the building with more than ten three parking spaces, where the car park is located inside the building or the car park is physically adjacent to, or has a clear link with the building</p> <p>Member States shall ensure</p> <p>(a) in new residential buildings, the installation of pre-cabling for every parking space, and, in residential buildings undergoing major renovation, the installation of precabling or, where technically and economically unfeasible, ducting for every parking space to enable the installation, at a later stage, of recharging points for electric vehicles and electrically power-assisted cycles and other L-category vehicle types.</p> <p>(aa) the installation of at least one recharging point;</p> <p>b) at least two bicycle parking spaces for every dwelling in new residential buildings and with space required also for bicycles with larger dimensions than standard bicycles.</p> <p>ba) at least two bicycle parking spaces for every dwelling in residential buildings undergoing major renovation, where technologically and economically feasible</p> <p>bbba) in new residential buildings with at least three dwellings and where there are no car parking spaces, at least two bicycle parking spaces for every dwelling where technologically and economically feasible.</p> <p>By way of derogation from the third subparagraph [(b)], Member States may, subject to an assessment by local authorities and taking into account local characteristics, including demographical, geographical and climate conditions, adjust requirements for the number of bicycle parking spaces.</p>

Art/Rec	Commission draft proposal	EU Council Approach	European Parliament position	ECF Recommendation
New Article 12 (5a)			<p>Following a reasoned request by a Member State, the Commission may decide to allow that Member State, to adjust the requirements in paragraphs 1 and 2 for specific categories of buildings where:</p> <p>(a) the building is owned and occupied by small, medium and micro enterprises as defined in Title I of the Annex to Commission Recommendations 2003/31/EC; or</p> <p>(b) the buildings only have temporary use in accordance with Article 9 of this Directive.</p>	ECF recommends deleting the European Parliament text.
12(8)	Member States shall ensure the availability of technical assistance for building owners and tenants wishing to install recharging points	Member States shall ensure the availability of technical assistance for building owners and tenants wishing to install recharging points	Member States shall ensure the availability of technical assistance for building owners and tenants wishing to install recharging points and bicycle parking spaces.	ECF recommends keeping the European Parliament text.
12(9)	Member States shall consider the need for coherent ensure the coherence of policies for buildings, soft and green mobility and urban planning.	Member States shall consider the need for coherent ensure the coherence of policies for buildings, soft and green mobility and urban planning.	<p>Member States shall consider the need for coherent ensure the coherence of policies for buildings, soft, active and green mobility climate, energy, biodiversity and urban planning</p> <p>To ensure an effective combination on private e-mobility, active mobility and public transport, Member States shall support local authorities in developing and implementing sustainable urban mobility plans (SUMPSs) with a particular focus on the integration of housing policies with sustainable mobility and urban planning.</p>	ECF recommends keeping the European Parliament text.

Further information

ECFs web page devoted to bike parking and the EPBD

<https://www.ecf.com/what-we-do/making-buildings-fit-cycling>

ECF's report comparing regulations for off-street bicycle and car parking in Europe

<https://ecf.com/users/fabian-k%C3%BCster/trusted-content/making-buildings-fit-sustainable-mobility>

ECF's factsheet on national transpositions of the 2018 Energy Performance of Buildings Directive revision

<https://www.ecf.com/sites/ecf.com/files/ECF-Factsheet-EPBD-2018844EU%20%28lang.check%29.pdf>

ECF's suggested amendments to the European Commission's 2020 proposal for the revision of the Energy Performance of Buildings Directive

<https://ecf.com/ecf-amendments-to-european-commissions-proposal-for-revision-of-energy-performance-buildings-directive>

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