

Republic of Serbia
Autonomous Province of Vojvodina

Provincial Secretariat for Urban Planning and Environmental Protection

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The Provincial Secretariat for Urban Planning and Environmental Protection, acting Assistant Provincial Secretary Nemanja Erceg, based on Decision No.140-031- 162/2021-02-3 of 10 June 2021, based on Article 18 of the Law on Strategic Environmental Assessment ("Official Gazette of the RS", No.135/2004 and 88/2010), Article 24, par. 2 and Article 39 of the Provincial Assembly Decision on Provincial Administration ("Official Journal of APV", No.37/2014, 54/2014 – other decision, 37/2016, 29/2017, 24/2019 and 66/2020), in the process of gathering opinions on the Report on Strategic Environmental Assessment as regards the General Urban Plan of the City of Novi Sad by 2030, issues the following

OPINION

on the Report on Strategic Environmental Assessment

For the purpose of giving consent to the Report on the Strategic Assessment of the environmental impact of the General Urban Plan of the City of Novi Sad by 2030, the City Administration for Urbanism and Construction Affairs of the City of Novi Sad submitted a request for an opinion. The request was accompanied by a Report on the Strategic Environmental Assessment prepared by the PUC "Urbanism" from Novi Sad.

After checking the formal compliance of the content of the Strategic Impact Assessment Report, it was found that it contained chapters prescribed by Article 12, paragraph 2 of the Law on Strategic Environmental Assessment ("Official Gazette of RS", No. 135/2004 and 88/2010).

Upon reviewing the Report on Strategic Environmental Assessment as regards the General Urban Plan of the City of Novi Sad by 2030 (the Report) it can be stated that the nature, content, goals and timeframe of the Plan are explained in a very clear way. All strategic activities of the Plan are clearly set. The Report does not include an overview of the relationship of the Plan with other strategic, planning and normative acts in terms of explaining how the environmental objectives defined in these documents have been considered during the preparation of the Plan.

In the chapter Environmental Monitoring, it is stated that the following environmental parameters are monitored in the area covered by the Plan: quality of surface waters, air quality, noise level and aeropollen. In the chapter *Quality of Surface Waters*, graphic representations of ecological and chemical statuses for the Danube for two months of the current year are given at four measuring points. These graphs have not been explained, no appropriate conclusion has been drawn, and no data source has been cited. The chapter *Air Quality* states that air quality has been monitored in Novi Sad since 1971. The report cites the conclusions contained in the Final Report on Determining Air Quality during 2020, which was prepared by the Institute of Public Health of Vojvodina. The report does not contain any comment on the conclusions taken. The chapter *Noise Level* provides graphical representations of noise indicators at selected measuring points. The presented data refer to measurements performed in the period from July

2020 to June 2021. The data were taken from the City Administration for Environmental Protection. These graphs have not been explained, nor has a conclusion been drawn. *The Aeropollen* chapter provides a graphic presentation of the daily variation in the presence of different aeropollen classes during June of the current year. It is stated that the monitoring of airborne pollen has been carried out since 2002. The measurement is performed by the Palynology Laboratory in Novi Sad. At the end, there is a table showing the degree of risk for the occurrence of allergic reactions in Novi Sad in June 2021, with no comment or conclusion. Since the results of monitoring show data for the current or previous year, although it is stated that some of the parameters are monitored for years, the writer of the report should have explained the extent to which it was possible to provide the necessary baseline data. The state of the environment presented in this way does not contain conclusions drawn from the undertaken analyses and does not show trends, so it can be said that the description of the state of the environment is not in line with the defined objectives of the strategic assessment.

In the chapter *Characteristics of the Environment and the Environmental Issues and Challenges Discussed*, it is stated that the Plan discusses a number of existing and potential environmental challenges, and proposes certain planning solutions to regulate or mitigate these problems.

The chapter *Results of Previous Consultations with Interested Bodies and Organizations* provides a list of bodies and organizations that have submitted their conditions for the development of the Plan.

In the chapter *General and Specific Objectives of the Strategic Assessment and Selection of Indicators*, general and specific objectives of the strategic assessment are defined and appropriate indicators selected. The selected indicators were not used in drafting the strategic assessment.

Given that the Plan does not envisage solution variants, the Report considers two possible solutions: solution 1 - to adopt the Plan and solution 2 - not to adopt the Plan. The writer of the report came to the conclusion that accepting solution 1 is more unfavorable from the aspect of environmental protection, while accepting solution 2 would create conditions for improving the quality of life and implementing measures for protection and improvement of the environment. The report contains a clear description of measures to prevent and limit negative and increase positive environmental impacts.

The Report evaluates the size, spatial dimensions, probability and duration of the impact of planning solutions on the objectives of strategic assessment, provides evaluation criteria, and the results of the evaluation are presented in tables. The identification of cumulative and synergistic effects of planning solutions on the environment is shown in the table. In the chapter *Assessment of the Impact of Planned Activities on the Environment*, an assessment of the impact of planned solutions on environmental factors, natural and cultural assets, population and infrastructure was performed. There is no explanation in this chapter of how the data related to air quality and surface waters, noise and aeropollen were taken into account in the assessment, i.e. the previously provided data on the state of the environment.

In the chapter *Environmental Monitoring Program*, appropriate monitoring is proposed and indicators for environmental monitoring are selected based on the description of the objectives of the Plan.

The Report contains guidelines for the preparation of lower-level strategic assessments and environmental impact assessments, and explains the methodology used for drafting the Report. The difficulties encountered by the writer of the Report during the drafting relate to the lack of a unified methodology for strategic impact assessment and the lack of data related to the monitoring of all environmental factors in the area covered by the Plan.

In the concluding remarks, the writer of the Report states that the purpose and use of the area were defined in accordance with the well-considered long-term development needs of the concerned area. The assessment of the impact on land, air, surface and groundwater was done based on the present and future purposes, the existing municipal equipment, the established environmental monitoring, and also,

protection measures were determined to create better living conditions and conditions for the protection of natural values of the area.

Acting Assistant Provincial Secretary

Nemanja Erceg

Deliver to:

1. The addressee
2. The records office