

Public participation on the Sustainable Mobility Plan of the City of Tavira (PMSCT)

PREVIOUS NOTES:

1. It is strange that there are recurring linguistic errors in a document subject to consultation public.
2. It is strange that Point 1.4. *Organization of this document* lists Chapters that do not are part of the Index, nor are they included in the document.
3. Concepts appear at the beginning of the text, which are only exposed much later, making the chaotic reading and making understanding difficult. The most obvious is the “coexistence zone”.
4. Most of the designed pieces that accompany this plan make it impossible to analyze them by the its size, orientation and lack of captions (they are completely illegible).

These are signs of the lack of care and rigor that the document and process suffer from.

GENERAL ASPECTS:

1. NON-TRANSPARENT PROCESS AND OBSTACULIZING PUBLIC PARTICIPATION

- i. Public participation constitutes a duty and a right of citizens and, as a rule, requires additional effort from citizens. It is therefore essential that entities facilitate this participation. Something that does not happen in this document, in which it is impossible to make markings and copies and which has a format whose size makes dissemination and sharing difficult. Participation cannot just be a methodological cliché.
- ii. In Point 1.3. - METHODOLOGY, in figure 1.2. – *General approach to carrying out the PMS in the city of Tavira*, stated: “*Participatory approach: Involve citizens in all phases of the process*”. Now this didn't happen. Despite several expressions of interest at the Chamber Meeting and Municipal Assembly, there was no opening for citizen involvement or information “*at all stages of the process*”; According to the document now presented for public consultation, we are already in Phase 3 “*This phase, which corresponds to this report, ends with an implementation program that integrates (...)*”. It thus appears that the process did not comply with the “*national guidelines that point out methodological recommendations regarding the preparation of plans of this nature*” (page 6).
- iii. As the CMT initially informed that it was granting 8 days (and on the last day of the CP it extended the deadline for another 10 days) as a period for collecting contributions from citizens for a document of almost 100 pages, which was already a failure of the process (due to the lack of involvement in previous phases), ends up being a real attack on citizen participation, despite the announced intention to “*Involve citizens in all phases of the process*” which appears on page 6. It is completely incomprehensible that a Plan commissioned in 2019 will now be announced with an insignificant deadline for the participation of Tavirenses, without any prior public clarification sessions that would encourage citizen participation.
- iv. This Plan includes several CMT projects (point 2 of this Plan) that have not yet been made known to the population. It seems strange to us that a Plan is presented to the public that offers proposals on projects that the population is unaware of at the moment. It also seems strange to us that the said projects are dated

February 2023 (more than 1 year ago) and some of them approved in the minutes of a Chamber meeting since 2016, within the scope of the Tavira Urbanization Plan (PU).

- v. The drawings that accompany this plan make it impossible to analyze at a glance. its size and lack of subtitles (they are completely illegible)

Example: In the Jardim da Alagoa project, in addition to being impossible to understand the captions and their correspondences, we only see two green circles, three smaller circles of different colors and the intersection of a road. Now, any commercial establishment owner should be able to predict in the medium/long term where they will have their terrace and what the plan is for the garden in the square where they operate.

- saw. Although one of the specific objectives is "*Promoting the rational use of individual motorized modes*", the concept of "rational use" is not defined, nor are indicators that operationalize it defined. In fact, there is no longer any connection with the objectives shown in Fig. 1.1. (page 6) in the rest of the document. An appropriate objective would be to reduce the presence of "individual motorized modes" within the city and the definition of clear targets and indicators to measure this reduction.

- viii. Within this period, several communications were made by our Association with several requests in relation to this CP that never received a response from the CMT (extension of deadline, consultation of the administrative process, consultation of phases 1 and 2 of the Plan and consultation of plans set out in point 2 of this Plan).

two.

OBSOLETE OBJECTIVES BECAUSE UNAMBITIOUS

- 1. OBJECTIVES:** The central objective of the sustainable mobility plan for the city of Tavira (Figure 1.1.) is defined: *Promote the balance of all modes of transport while contributing to encouraging the change to more sustainable modes of transport.* This is the first major weakness of this mobility plan: its lack of ambition.

- i. In times of climate crisis, which particularly affects the Algarve region, an innovative and courageous vision that does not place all modes of transport on an equal footing ("balance") would be imperative.

Note: The recent denunciation of the Energy Charter Treaty by Portugal is a clear position that the era of "technological neutrality" is over. This treaty, which protects investments in fossil energy, is now obsolete. In the same way, a city that wants "balanced" mobility across all modes of transport is a city without vision and that does not follow the current imperative of sustainability, merely claiming that it does so, with methods that are too slow ("incentive") to the urgency we live in.

This is serious, especially when you want to define an Action Plan with a 10-year horizon (page 7).

- ii. The plan presented increases the number of parking lots and the circulation of cars in the city, ignoring the cultural, historical, landscape and environmental values that constitute Tavira's identity. A mobility plan must consider all users of public space: pedestrians, cyclists, motorists, users of public transport. It must also be integrated into a global development plan for the city and the municipality and take into account the current reality of the world - climate change, the increase in respiratory and lung diseases, the extreme phenomena of intense rain, heat waves,

decrease in rainfall, with the consequent water scarcity that is felt intensely in the Algarve region. In this context, a mobility plan must focus on reducing the emission of greenhouse gases, increasing pedestrian and cycling routes, encouraging the use of public transport, reducing the areas of waterproofed streets and roads, in conjunction with the entire community life, namely increasing green space and rain. The proposal for a “coexistence” zone that continues to allow widespread circulation – albeit with restrictions – in urban trees and areas where water infiltration occurs the heart of the city makes no sense.

- iii. It is now recognized that cities have to transform into spaces organized around people. There is no shortage of inspiring examples, as is the case of Pontevedra in Galicia: *“Public space is a scarce asset, and it should be for people” “With a public space dedicated to pedestrians, the Galician municipality is a global example of a city designed for people, not cars.”*

SPECIFIC ASPECTS OF PMSCT ANALYSIS

REQUALIFICATION OF SQUARE DR. ANTÓNIO PADINHA (Jardim da Alagoa) - point 2.2 of the Plan:

On page 10 of the Plan it is stated that *“the project for the requalification of this square sent by the Municipality foresees the widening of the sidewalk and the relocation of the existing square to the North, providing for a circulation lane that establishes the connection between Rua Almirante Cândido dos Reis and Rua 5 de Outubro. The entire pavement of the roadway must be capable of reducing speed and must be an area that gives priority to pedestrians, with 2 tree-lined flower beds, bicycle parking, reserved spaces for loading and unloading and buried areas for waste collection. (figure 2.3)”*

It seems strange to us that they place a representative figure of a plane rotated 90 degrees (figure 2.3) in relation to its natural orientation and then make reference to the changes based on cardinal points and captions that cannot be read. We have to guess where the streets mentioned are and imagine what changes are proposed by the CMT.

The requalification plan presented by the Municipality involves the destruction of the existing garden, reducing it to 2 flowerbeds crossed by a road that divides the Square in half, increasing conflict between pedestrians, bicycles and motorized vehicles. In other words, it does not solve current problems and even destroys the existing Historical and Natural heritage.

The Plan's recommendation in relation to that proposed by the CMT appears to be quite reasonable and logical, allowing the preservation of the existing garden and promoting the creation of an surrounding square that, with a simple and well-designed remodeling, would allow the area around the square to be maintained as pedestrian, with terraces for spaces that already exist – restaurants, cafes, etc...

Jardim da Alagoa (Praça Dr. António Padinha) is an integral part of the identity and urban cultural landscape of the city of Tavira and is well referred to in the Plan as a *“central location in the historic center of the city”*. It is a place that is in itself a legacy of memories and affection, loved by many Tavirenses and visitors to the city. This “romantic garden” is part of what makes Tavira special. Jardim da Alagoa was created in 1915 by the first president of the CMT, Dr. António Pires Padinha, after whom it was named. This Garden currently includes botanical species from five continents. In 1971, the monument to Bishop D. Marcelino Franco, Bishop of the Algarve born in Tavira, was inaugurated, on the centenary of his birth (1871-1955)”. This garden is mentioned on the website of the Portuguese Association of Historical Gardens, where you can read: *“The Alagoa garden is located in a very particular context, as it is completely nestled between notable buildings, constructions from the 15th century and the Church of the Convent of São Paulo (Church of the former Convent of Nossa Senhora da Ajuda) dating back to the 17th-*

XVIII." Its existence, such as it is, generates an atmosphere of beauty in the surroundings and in the landscape composition of Tavira, characterizing the history and landscape of the city. It should be noted that the Garden is always very well looked after and provides interpretative services to many who stroll through it and contemplate the various botanical species present, such as shrubs, centuries-old trees, plants or flowers of the season, with the following species being highlighted: araucaria- de-Norfolk (*Araucaria heterophylla*), Canary palm (*Phoenix canariensis*), Chinese thuja (*Platycladus orientalis*), oleander (*Nerium oleander*) and marshmallow (*Malvaviscus arboreus*). Urban cultural landscapes must be cared for, valued and safeguarded and there is currently legislation that establishes obligations in relation to their protection, as can be read in the considerations about the trees, on page 16 of this document. Tavira, as a representative community of the Mediterranean Diet Cultural and Intangible Heritage of UNESCO, must pay maximum attention to preserving the Historical, Environmental and Cultural identity of green spaces and other spaces of enjoyment that enhance conviviality and healthy lifestyles.

Our proposal for this space is:

- keep Jardim da Alagoa the same as it is ensuring the usual care.
- close Praça Dr. António Padinha to road traffic or, ultimately, follow the suggestion that the Plan proposes (road connection between R. Almirante Cândido dos Reis and Rua da Porta Nova, the rest being pedestrianized)
- dedicate the surroundings of the square to pedestrian and bicycle circulation, allowing space for terraces and increasing areas for conviviality and pedestrian enjoyment.
- remove parking spaces only allowing motorized access for loading and unloading, access to garages and emergency vehicles.

Note: Although there are positive recommendations to reduce the circulation of " motorized vehicles in relation to the current use of Praça Dr. António Padinha", we consider that road traffic on Rua 5 de Outubro (about which the document refers : "In view of the high pedestrian flows recorded in this square"). When today there is a permanent conflict between pedestrians and cars on this street, this street would have to be closed to traffic, avoiding collisions and pollution. The aforementioned "balance of all modes of transport" is detrimental to the effective promotion of pedestrian movement, appropriate both in terms of climate and people's health.

REQUALIFICATION OF THE RIVERFRONTS - RUA DO CAIS - point 2.3 of the Plan

In Europe, there are many cities that have eliminated car traffic from their centers. Why would it be that in Tavira, a city whose historic center can be easily explored on foot, there would be a route for cars in the city center and even more so, cutting in half a central garden space that is eminently privileged for pedestrians and children's games? children?

CMT intends to create a pedestrian area on both banks of Gilão, at least during the period of greatest tourist demand and the consultancy company proposes, without any sensitivity to the experience of this entire square, "establishing axes of coexistence of pedestrians and vehicles", increasing pollution and putting children's social areas and games at risk? To sweeten this idea, the possibility of it being a "transitory solution" is discussed, as if a supposed "solution" that is wrong could be better because it later ceases to exist.

This recommendation is shocking and unacceptable, representing a glaring setback for both residents and tourists. It would be unthinkable for CMT to actually take such a step backwards in terms of sustainability and the well-being of garden users.

Motorized traffic on the Gilão Bridge is not necessary, it contributes to the increase in vehicle circulation in the city center and only serves to provide access to shops and the few parking spaces that exist and which are planned to be eliminated in the long term, as mentioned on the page

13. This plan is a good opportunity to get ahead of time and make this measure effective now.

There are exemplary planning models in other cities where there are many areas where automobile circulation is prohibited, except for access to garages, loading and unloading and emergency vehicles.

No explanation is presented in this plan to justify the new route and the maintenance of car traffic on the bridge.

REQUALIFICATION OF DR STREET. MARCELINO FRANCO - point 2.4 of the Plan

There is currently a central tree-lined divider and CMT intends to eliminate it and create a new parking area. In other words, less green, more streets and more cars in the heart of the city in stark opposition to the current paradigm of creating urbanism for people and not for cars.

In summary:

- The project proposes that the entire area be made impermeable;
- The Proposal does not represent the cycle network and does not represent the historical surroundings;
- The *Church of Ondas* - Monument of Public Interest - is removed from the route (Ordinance, nº 740- EN/2012, DR nº252, of 31 December 2012). It is regrettable that a project that presents itself as "structuring for the city" ignores this exceptional monument of the city and only considers the Cine-Teatro António Pinheiro in the figure presented.
- The disappearance of the central island of this street completely destroys the area's character;
- The identity of the place is destroyed.
- The green landscape of this square disappears.

In relation to the PMSCT proposal for this CMT project, if the idea is to reduce traffic in one direction, simply eliminate the road that runs next to the cinema and transform it into a sidewalk. The parking proposal that the CMT presents and that the Plan reinforces is a measure completely opposite to a sustainable mobility plan as it will attract cars to the center, although there are parking alternatives very close by - next to the Municipal Market and next to the Bridge of Discoveries.

The only parking permitted should be for loading and unloading and emergency vehicles and should clearly be in parallel, as recommended by the PMS in order to increase the space available for sidewalks/terraces.

Despite the total illegibility of the plan captions in figure 2.9. It is possible to deduce that almost the same number of parking lots remains compared to the current situation. This area should give priority to pedestrian circulation by removing parking from the site and increasing the size of the corridor square, improving it with the installation of gardens, shade trees and areas for leisure, socializing and pedestrian enjoyment. The Jardim/Praça da Corredoura deserved more, due to its history, its positioning and its surroundings. In this garden, in other times, the main dances and cultural events in the city of Tavira took place.

REQUALIFICATION OF LARGO DA FEIRA - point 2.5 of the Plan

It is permissible to install a car park at this location (expected: 479 spaces), to prevent cars from entering the historic center. However, the requalification of the fair square (page 15 and 16) should have been debated with all interested parties. This is a strategic space that is located next to schools, swimming pools and the municipal pavilion, between social neighborhoods and housing developments in the city. It is true that the space hosts the monthly Tavira market only once a month and that during the

The remaining days of the month have no use, except when pétanque tournaments are held there. However, the way in which this requalification will be carried out and whether this is the only strategy or solution for this space should be reviewed. Paving and waterproofing this location, which is a low-lying area of the city and, therefore, an area subject to flooding by floods, may not be the best strategy for the city. Another aspect is that Tavira lacks green areas and, taking this into account, a proposal should have been drawn up that included a more ecological and sustainable rehabilitation of this space, going beyond the common installation of shade trees in car parks.

The answer to renewing the city and making it more sustainable lies in creating more energy-efficient solutions, such as promoting localized urban agriculture, water conservation, and the creation of green areas such as urban parks. Cities currently have a heavy carbon footprint and to counterbalance this it is necessary to make the landscape "greener" in order to offset carbon emissions. Words such as ecological urbanism, sustainability and smart growth/project must be on the agenda, in social and urban policies, in future projects proposed for the cities of the future.

REQUALIFICATION OF RUA DE S. PEDRO AND RUA DE SANTO ESTÊVÃO - point 2.6 of the Plan

This Plan resolves the problem of Rua de São Pedro and the station's level crossing, and it is proposed to make it a one-way street, accompanied by the installation of sidewalks and cycle paths, while at the same time it is not planned to close the level crossing, contrary to what is indicated as necessary in the next 20 years and referred to in this document. We consider unacceptable the disregard and contempt that is shown to CEAT - Centro de experimentação Agrária de Tavira when in the Plan it is said that it will be considered to "revisit" the road and road and pedestrian tunnel project that was proposed by Infrastructures of Portugal and which was rejected in public consultation phase with an explicitly unfavorable Environmental Impact Statement from the Portuguese Environment Agency.

CONSTRUCTION OF OVERELEVATED PASSAGE OVER THE N125 - point 2.8 of the Plan:

This passage will certainly have a positive impact on the crossing of the N125 for those who use the Porta Nova stop, residents of the Marlim urbanization and occasionally people who want to visit the Fair Park, however, it seems like an isolated solution that does not present continuity, which makes its analysis difficult. On the other hand, by creating this air crossing in this area without ensuring an air passage over the railway line, we are increasing the number of railway crossings when one of the intentions of this plan was to eliminate these crossings. In fact, this objective seems to be so important that it leads to reconsidering a proposal that failed in public consultation due to having received a negative opinion from the APA, presented in this plan as *Nova Via between Rua de S. Pedro and the roundabout of EB2/3 D. Manuel I*.

Note: The construction of the elevated walkway over the EN125 (page 20) is a good proposal (if access to it is properly taken care of), it should also be replicated in other urbanizations, namely: Mato de Santo Espírito, Vale de Caranguejo, Quinta do Morgado and Nova Tavira. In addition to the "socio-demographic framework of the project that indicates its advantages for the pedestrian mobility of residents of urbanizations north of the EN 125", municipal surveys and studies should be carried out on the pedestrian mobility habits of citizens.

INTEGRATED MOBILITY STRATEGY

SYSTEMIC APPROACH - point 3.1. of the Plan

This approach states that the aim is to "(...) *divert traffic from crossing the city*" and counter "*the abusive use of cars, particularly in central areas (...)*". If these intentions are

genuine and not just alleged, it is incomprehensible and incoherent that, simultaneously, the crossing of the Bandstand garden is proposed and an almost omnipresent “coexistence” between cars and pedestrians is sought, even in the heart of the city.

INTERVENTION CONCEPT - point 3.2. of the Plan

In the “*zone of excellence of the city*”, “*the focus is on the creation of a coexistence zone that covers a significant part of the so-called Central area and whose objective is to discipline and clarify the rules of automobile, pedestrian and cycling circulation (. . .)*.”

A proposal for “a coexistence zone” in the heart of the city is obsolete.

It is positive, on page 23, the recommendation of “*a strong focus on inspection*”, which really is a flaw in the current situation, in which the occupation of sidewalks by vehicles is systematic and remains completely unpunished.

The recommendation for the “*Intra-wall zone*” and what refers to “*cycling mode*” is also positive.

The proposal to “relocate the bus terminal, preferably close to the train station” does not seem sufficiently justified, as the current location is not very far from the train station and, although in fact, somewhat steep, it seems more “justified” for the desire to create a silo for vehicles in the current location.

MITIGATE ROAD ACCESSIBILITIES IN THE CITY - point 4.2.2 of the Plan

This point contains, among other intervention proposals, the “Creation of a new road between Rua de São Pedro and the Rotunda of EB2/3 Dom Manuel I”.

This new road, which would “*definitively resolve the physical constraint of the level crossing*”, would allow “*the circulation of all eastbound traffic heading to educational establishments, the market, the center and even the Bridge of Discoveries*” .

In other words, the Plan proposes the creation of a road to cross the area belonging, for the most part, to the Tavira Agricultural Experimentation Center (CEAT), requiring the permanent allocation of CEAT land, classified as a National Agricultural Reserve.

Analyzing the intervention proposals described between pages 24 and 43 of the Plan made available, we can conclude that a high level of contradiction persists in the way this Plan was prepared. Based on calculations and probabilities (such as GDP growth), the plan estimates that traffic will increase by 20% in the next 10 years (natural increase in traffic demand), projecting 3 scenarios – Scenario 0 (current), Future Scenario 1 (future without changes) and Future Scenario 2 (future with the proposed changes) - in which in all of them, with or without the “*new road*”, the station roundabout and the D. Manuel I school roundabout will always remain classified as class A, that is, with fluid operating conditions. Therefore, since these roundabouts currently work well, and the “*natural increase in demand for future traffic*” remains the main basis for creating the “*new road*”, it is not clear why they suggest the “*new road*”. It should be noted that in the calculations and considerations referred to in the Plan, the importance of CEAT was not considered even once, despite the many mentions of “*environmentally sensitive areas*” or the considerations of Tavira as a city of “*historical occupation*”. The environmental, historical, agricultural, educational, food and cultural value of this strategic location, which is a Regional and National hub of innovation, with several projects under development, was completely ignored. Justifying not building “*new roads*” in the southeast precisely because they are “*environmentally sensitive areas*” but pointing out building “*new roads*” in the CEAT is, to say the least, incoherent. It is also ignored that the crossing of a road with “*circulation at 50 km per hour*” and an “*overpass to the railway*” will promote “*traffic crossing the city*” and the “*circulation of all eastbound traffic*” precisely next to a

second and third cycle school. It causes us surprise and a lot of confusion that in the following point they contradict themselves when they say that they intend to “reduce and eliminate pedestrian accidents in urban areas through improvements in (...) traffic calming measures”! Finally, it becomes difficult to believe that these intervention proposals are solely the authorship of the company. And the question remains: In phases 1 and 2 of the PMSCT, did Tavira Chamber contextualize the company on the regional and national importance of CEAT? If he didn't do it, he had a duty to have done it.

Please note: To facilitate the entry of cars into the city, this Plan proposes a road whose price is the destruction of a greater value to be preserved, the CEAT: “strategically located in Tavira, chosen as a representative community of the same (Mediterranean Diet) , in its multiple structuring dimensions, namely: promotion of active health and sustainable nutrition, defense and dissemination of its historical and cultural heritage, biodiversity and traditional landscape, know-how and endogenous resources and local production, responsible consumption and seasonal food supply, as a way of better mitigating and adapting to the great challenges of the future: climate change, the protection of increasingly sensitive and critical resources such as water and soil, in parallel with more balanced spatial planning .”

Probably, the authors of the Plan did not have in-depth information about the CEAT space and the APA assessment, disregarding that it “constitutes a unique and irreplaceable cultural and genetic heritage” and not taking into account that the route “is close to the secondary schools Dr. Jorge Augusto Correia and basic schools D. Manuel I, with the insertion in this location potentially worsening road safety conditions, as well as increasing the emission of air pollutants and noise levels”. Only ignorance of these conditions could, with a certain “technical blindness”, lead the authors to propose the sacrifice of a place considered unique and irreplaceable to the circulation of individual transport.

The CMT will certainly not follow such a proposal devoid of love for the identity of Tavira and the History of Algarve agriculture.

It is, therefore, our responsibility to preserve the full potential of Posto Agrário de Tavira (CEAT) as the heart of Mediterranean lifestyles and above all as a legacy for new generations.

Alternative proposals for the “new path”, if justified:

1. Aerial or underground pedestrian crossings can be made, for example: from the station railway to São Pedro alley.
2. Studies can be carried out to create an underground tunnel/tunnels for the circulation of vehicles in other locations, resulting from the future suppression of level crossings, without having to sacrifice the CEAT and all its potential for Tavira and the country.

If the creation of a “new road” is really necessary, the following could be planned to the west of CEAT:

- would serve the populations of the parish of Santa Luzia,
- guaranteed access to the Earth Museum and CEAT's “green lung”, without harming the core of CEAT values recommended in the DM Safeguard Plan,
- did not separate the Mediterranean Diet Farm, the community gardens, the DM competences (of national importance), the experimental fields and infrastructures to support agriculture and the schools of the Earth Museum and building centers with the potential to support activities related to DM,
- did not harm pedestrian connectivity with the school district, which was a huge educational and pedagogical asset, and the schools gained in terms of security because they were not “trapped” by roads and insecurity,
- did not fragment CEAT, complying with its importance and safeguard and allowing its enjoyment and use in an undisturbed manner.

IMPROVE THE CIRCULATION SCHEME IN THE CENTRAL CENTER OF THE CITY - point 4.2.3. LO 1.2 of the Plan

This point states: *"the concept of intervention for the central area of the city is based on the requalification of public space with a view to reallocating the canal space for soft modes, particularly for pedestrians"*. But immediately afterwards, in total contradiction, a proposal for Rua Marcelino Franco, in the center of Tavira, is to increase the presence of private vehicles and a design oriented towards vehicles and not pedestrians, with 2 return roundabouts at the ends of the road. road (to order vehicles to reverse direction), and increasing the possibility of parking (on both sides of the road), removing pedestrians from the possibility of sitting on the benches that existed in the central divider and losing the trees that were there. they exist.

IMPROVING SAFETY WHEN TRAVELING - point 4.2.4. LO 1.3 of the Plan

The measures to improve pedestrian circulation conditions, signage and the implementation of traffic calming measures are positive, however, the speed limit of 40 km/hour proposed *"in a generalized way"* for all streets with cycling routes on a common road (shared with the car) should be reduced to 30km/hour. *"In recent years"* refers to the years 2018-2020. We are in 2024. The years to analyze should be the years 2021-2023.

This sentence demonstrates the total lag of this plan in relation to current times. Are we going to decide the future of city mobility based on data from 2018-2020? Since that date, there have been changes in behavior, numerous works have taken place, travel patterns have changed, there has been a pandemic and a war in Europe, etc.

At this point they suggest several traffic lights that seem quite unnecessary. Just put on soundtracks and we won't have to deal with light pollution and energy expenditure.

IMPROVE COVERAGE OF PUBLIC TRANSPORT AND INTERMODAL SERVICES - point 4.3. 002 of the Plan

4.3.1. Framework and guidelines

According to the Plan, *"In phase 1 it was determined that the weight of trips by residents of the city of Tavira made by public transport was less than 5%"*. This is absolutely no surprise, because urban road services are not adequate and are even unknown to the population, contrary to what the plan states. Not only are there areas of poor coverage, but regularity is low and the circuits are long, and there is not even disseminated information about the existence and free use of Up and Down. When a resident of Tavira for over 30 years was still unaware of this possibility of free travel, one can assess the degree of secrecy in which this offer has been involved.

Furthermore, timetables at stops are often illegible due to the poor condition they are in.

The provision of public transport should be clearly advertised, for example, in places like the railway station, if it is really to be used and not just *"for English to see"*, as is currently the case. By the way, tourists would also have to be encouraged to use public transport, which does not happen (e.g. with information at the Tavira Tourist Office and at the train and bus stations).

Correcting this deficiency with the 3 lines of Guidance provided for in the Plan to improve the coverage of Public Transport services and intermodality is absolutely urgent. *"Restructure the urban public road passenger transport network, expanding the city's expansion zones and adapting it to the needs of the resident and visiting population, with shorter, more competitive and connected circuits at key points in the network."* A great proposal. The proposed circuits seem to guarantee good coverage. However, *"the minimum frequency of 1 circulation/hour per*

sense," is completely insufficient; 2 circulations/hour per direction is not ideal, but necessary. The same need in relation to operation on weekends to access the beaches. Supporting is the proposal to keep these services free for residents, but create transport tickets for visitors and tourists.

RESLOCATION OF THE TAVIRA BUS TERMINAL - point 4.3.3.1. of the Plan

The justification presented for the relocation is not convincing, as, regarding the distance from the train station, there are proposed alternatives that are even further away. The real reason for this proposal seems to be the intention of transforming the *"current terminal building into an automobile silo to support the city's central core"* which goes completely against the fact that they want to reduce emissions in this zone.

Regarding alternative 2: *"on Rua Luís de Camões, adjacent to the building of the Regional Directorate of Agriculture and Fisheries of the Algarve, with access from the station roundabout and less than 150 meters from it"*, once again this The plan proposes disregarding the CEAT space and the activities of community interest that currently take place there (community gardens). These activities should, on the contrary, be cherished and respected, due to the commitment of resident citizens to self-production of food (67 households) in a sustainable way.

In relation to Alternative 3 (Next to the GNR facilities - area north of the N125), it is far from the train station, has no pedestrian access and involves crossing a national road (N125). Totally unacceptable.

WELCOME CONDITIONS AT TPCR STOPS – point 4.3.3.2. of the Plan

"While improving conditions at stops is entirely necessary, the proposal to introduce scooter or bicycle systems " – although, in principle, it may make sense – is very questionable, taking into account the negative experiences of other cities. As someone from Tavira has already commented, *"then it is at the river that the bicycles and scooters end up"* – a situation already observed [in other places today](#).

Not to mention the disruption to pedestrian circulation when scooters are left on sidewalks, a situation that is widely criticized. In the historic center of the city, with its small size, the preferred circulation is certainly pedestrian.

IMPROVE THE PUBLIC INFORMATION SYSTEM IN VARIOUS SUPPORT - point 4.3.4. LO 2.3 of the Plan

As already mentioned above, the existence of bus timetables at stops is currently completely insufficient, both due to the poor condition they are in and the insufficient publicity of the existence of this free public transport offer. Making perfect sense to make all information available in digital format, it is good not to forget that there are people who are not always attached to their cell phones, especially older people, and also provide all physically visible information in the appropriate places.

PROMOTE AND DEVELOP THE CYCLING MODE - point 4.4. 003 of the plan

The use of bicycles is, without the slightest doubt, to be promoted, with numerous advantages as set out in the Plan. In Portugal, with the lack of habit and even priority given to this mode of transport, it is a risky means of transport for those who use it. As such, *"the creation of safe infrastructures that provide safety and comfort when using this mode of transport"* is essential. Particularly with regard to children and young people, on all cycling routes the aspect of safety and priority must be strongly ensured. In fact, the biggest incentive for using a bicycle is safety and

as such, this criterion must be paramount in all interventions in this area. All access to schools must include cycle paths and there must be adequate equipment for parking bicycles in the schools themselves.

The proposed bicycle repair points (page 48) do not exist in cities where bicycles are traditionally used, and here they appear to be expensive equipment that requires maintenance and is of little use.

IMPLEMENT SHARED MICROMOBILITY SYSTEMS - point 4.4.3. LO 3.2 of the Plan

The Plan proposes the implementation of a shared micromobility system in the city of Tavira, with 17 stations/ parking locations. This proposal for a disproportionate number of stations in such a small area does not make sense and favors the emergence of conflicts over the spaces it occupies, in addition to increasing maintenance costs. Those who ride a bike also take a few steps between Marcelino Franco and Praça da República.

PROMOTE THE USE OF PEDESTRIAN MODE - point 4.5. 004 of the Plan

The prioritization of pedestrian mode in the city center is indisputable, and this is recognized in point 4.5.1 of the Plan. As for the guidelines, the *"Creation of the coexistence zone in the central core of the city"* is the one that raises fundamental questions regarding the circulation of cars.

Unfortunately, the Plan presented here is not organized in such a way that it is possible to understand, up to this point, (page 58) what is meant by "coexistence zone". Only in this chapter is this concept revealed (spread across several points) and in an inconsistent way:

- *"Car traffic is only permitted in this area at a maximum speed of 20 km/hour"* (page 58); but, strangely and contradictorily, on p. 62 states: *"the maximum speed allowed within the coexistence zone, which is recommended, in Tavira, of 10 km/ time"* (page 62).
- In these areas the priority given to motor vehicles is eliminated and their volume is reduced. Entrances and exits must be properly marked with specific signs that indicate the establishment, from that point onwards, of a new circulation regime and the pavements no longer have an altitude difference between the roadway and the sidewalks and are differentiated in terms of materials and colors.
- The circulation of urban public transport services in Tavira is permitted in this area, as long as it is carried out in electric minibuses.
- In the coexistence zone to be created in the central nucleus of Tavira, parking must be strictly necessary for residents, loading and unloading and support for commerce and services existing there, and must be priced and ordered so as not to conflict with pedestrian circulation and cycleable.
- *"It is recommended that there only be spaces reserved for loading and unloading, residents with reduced mobility, pharmacies, official entities and emergency vehicles, ensuring effective supervision of these in order to avoid situations of abusive occupation of the space."* (page 61).
- *It is recommended that, within the coexistence zone, there are no parking spaces with more than 6 continuous places.* (page 62)

The recommendations regarding parking make perfect sense, and effective monitoring is of the utmost relevance, as currently it almost doesn't happen.

However, and this is the fundamental criticism, in these areas motorized circulation remains open to most car drivers, and is not restricted to just loading and unloading, residents with reduced mobility, pharmacies, official entities and emergency vehicles as should be the case. .

The Plan indicates the existence of this type of "coexistence" on Av. da Liberdade; Now everyone knows that it doesn't make sense for cars to circulate in the area in front of the CMT and the Roman bridge. The tourists who use the terraces in that place would certainly appreciate being able to enjoy them without having to breathe the pollution produced by exhaust and without the noise and landscape being disturbed by monstrous SUVs.

In conclusion, as previously stated, an objective of coexistence in this central area of the city is obsolete, incomprehensible and unacceptable.

On the other hand, a glaring problem for those who walk around the city in the center is the abusive and recurrent occupation of sidewalks/public spaces by terraces or store displays. The Plan notes this reality (page 61) but does not make any recommendations for improvements in favor of pedestrian circulation in this regard, only referring to restrictions on bicycle circulation. It's incomprehensible.

REQUALIFY STRUCTURAL PEDESTRIAN AXLES - point 4.5.2.4. of the Plan

The recommendations for *structuring pedestrian axes* make sense, especially the traffic calming measures and construction of sidewalks.

CREATE DETERRENT PARKS ON THE PERIPHERY OF THE CITY - point 4.6.3. LO 5.2 of the Plan

Not all of them have already been defined, but it is now considered of the utmost importance that green spaces – essential from the perspective of climate change – are not destroyed for parking cars.

SUPPLY AND DEMAND BALANCE

The implementation of the proposed measures for a supply that matches demand is not understandable because, apparently, there was a division of the city into 24 zones that are not included in this document.

Table 4.9 is also referred to. which does not exist in the document (it will probably be 4.8.) and it is said that there are "6 areas with a supply deficit" but in Table 4.8. there are only 5 areas with a deficit; Neither the zones nor the origin of the projections are explained.

DEFINE A MUNICIPAL REINFORCEMENT POLICY WITH STRENGTHENED INSPECTION - point 4.6.5. LO 5.4 of the plan

It is undoubtedly necessary, taking into account the current situation of lack of parking and the resulting illegal use and abuse of parking spaces. The proposal to differentiate tariffs between residents and non-residents is also positive.

INTRODUCTION OF SMALLER AND ENVIRONMENTALLY EFFICIENT VEHICLES - point 4.7.2.1. of the Plan

The proposed acquisition by the municipality of vehicles to be made available to traders leaves doubts regarding the costs and management of this system. Alternatively, it may make sense to subsidize the purchase by traders themselves of such small electric vehicles.

CREATE LOW EMISSION ZONES - point 4.8.5 of the Plan

As is evident, low emission zones must be created, however, in a city the size of Tavira and with the low traffic density that characterizes it and should characterize it, what is proposed at this point makes no sense. What makes sense is to eliminate motor traffic in this area as much as possible, giving preference to light means of transport and directing all motor traffic to areas peripheral to the historic center. Placing this restriction on cars prior to 2005 will only serve to promote social inequality, since not everyone has the economic conditions

to buy a new car.

PREPARE THE TRANSPORT AND MOBILITY PLAN FOR THE MUNICIPALITY OF TAVIRA - point 4.9.2 of the Plan

At the moment, there are many areas of the Municipality that are isolated due to the lack of a transport network that ensures that the people who live there can use the TC as a means of transport.

The transport network is not supposed to make a profit. It is a service to which we are all entitled and which should be guaranteed. Only in this way will it be possible to attract people to live in these more remote areas of the Municipality, counteracting the aging of populations and the desertification of the interior that has been occurring in recent decades.

The Municipality itself does not seem to prioritize profit as it facilitates free transport within the city for residents and non-residents.

To encourage the use of TC, there must first be a network that serves the following purposes:

- Daily transport that allows access to the city in the morning for school and work hours and to end of the day to return to their homes;
- Transport of adequate dimensions for the number of travelers - a City Council meeting was attended by people justifying that they did not increase the frequency of buses to a certain area because the bus that made the journey was too big and was too expensive. This speech makes no sense;
- Fleet renewal for more ecological and economical means of transport.

PREPARE SCHOOL MOBILITY PLANS - point 4.9.3 of the Plan

We fully agree with these recommendations. We just think that they are completely contrary to the recommendation in point 4.2.2.1 of the plan, which will lead to a greater concentration of traffic in the vicinity of the EB2/3 D. Manuel I school group.

PROPOSALS TO ADD TO THE PLAN:

- Construction of bioswales;
- Creation of "roundabouts with rain gardens";
- Redevelopment of public spaces in an environmentally, culturally and socially correct manner;
- Creation of more accessibility for people with disabilities and reduced mobility;
- Preservation of the city's characteristic gardens and urban cultural landscapes;
- Creation of a green lung, park and pedestrian interpretative farm of the Mediterranean Diet in CEAT;
- Creation of more pedestrian viaducts that connect the city to the various urbanizations north of the N125;

- Creation of “*play streets*” and “*school streets*”, safer and more educational streets that promote children’s quality of life and play. Example of Freiburg-Germany, Bristol-UK and Hackney Play street in England-Uk, etc. (in England more than 300 streets were closed for children to play)
- Creation of more pedestrian and cycling routes that are friendly to children and young people. Tokyo-Japan example. (In Tavira we have a promising initiative, mentioned in the plan, through the Rotinas Selvagens association.)
- Promotion of a more efficient public transport network.

FINAL CONSIDERATIONS

CONSIDERATIONS ABOUT THE TREE:

LAW 59/2021 on the protection of urban trees, recently approved by the government. This Law limits the felling of trees.

CHAPTER III Urban management

Article 15. Urban operations

Any urban planning operation that interferes with the public or private domain of the municipality that contains a wooded area must first present a survey and characterization of the existing vegetation, namely the species and their respective size and phytosanitary status.

Article 16. Requirements for urban operations

1 - Urban planning operations, regardless of their nature, must ensure the preservation of existing tree specimens, unless, on a basis of hierarchization of the experience of public space, their removal is justified, which must be substantiated and documented with photographs of the specimen and of the conditioning situation that justifies and frames the need for its removal.

2 - Any removal that occurs as provided for in the previous paragraph must always be compensated with the planting of a new tree in the vicinity of the site, as long as there are no constraints relating to infrastructure, the useful size of the public space, the removal of other specimens or issues phytosanitary.

3 - All opportunities must be taken to increase the arboreal heritage, particularly in terms of studying municipal public space or providing it to the municipality.....

Article 17. Compensation measures

1 - If a tree group is necessarily affected by repair works or by urban planning operations of any nature that make it impossible to maintain it on site, it must be compensated by its transplantation and/or planting of an equivalent area of trees in the same municipality, in area with territorially similar characteristics, and the respective tree cover must correspond to the vertical projection of the crowns in square meters of the existing one.

2 - If there is a need to value a tree or group of trees, namely to determine compensation for felling or damage caused or for the purposes of cost-benefit analysis, this is done in accordance with the guiding principles of the Granada Standard, or in accordance with another internationally recognized valuation method that, in addition to the value of wood, considers the landscape, environmental, social and cultural value of arboreal heritage.

3 - In the event of felling, it is mandatory to replace trees that guarantee doubling of the level of CO2 sequestration, preferably using trees native to the municipality, within a radius of no more than 10 km.

We do not know whether previous legislation was taken into account when preparing the plan and whether there is a classification of the trees affected by the same plan.

CONSIDERATIONS ABOUT URBANIZATION:

Although the association between development and the environment appears at the Stockholm Conference, it is at the World Environment Conference – Eco Rio, held in Rio de Janeiro, in 1992 (and later reinforced at the Habitat II Conference, in 1996), that emerge the first notes on the Sustainable City.

The concept, which is based on the promotion of sustainable living standards and habits, is based on production and consumption instruments, which enable not only the combination of economic aspects, but also socio-environmental aspects, which has been scientifically proven for a style healthier lifestyle for populations. Thus, the real reason for implementing sustainable development in our cities is the ability to meet the needs of the current generation, without compromising the needs of future generations. In other words, development that does not exhaust resources for the future.

Important commitments emerged from these multidisciplinary meetings, which contributed to formulating relevant action strategies, with a direct influence on reducing the impact of noise and automobile pollution in public spaces. From the set of solutions presented, the harmony between the operation of different means of transport stands out, free internet access in public spaces, the dynamism of local commerce, energy consumption reduction systems as some of the factors that contribute to quality of life in a sustainable city and also, in the field of interventions in public space: the increase in space destined for pedestrian enjoyment, complemented by the increase in green areas, the use of vegetal acoustic barriers, refracting sonic crystals and even the promotion of the use of private and public electric vehicles. However, between the emergence of the concepts and the practical application to the Portuguese reality, the path remains long and somewhat complex, especially in the construction of a true and effective education of populations towards sustainability and ecology.

Especially on topics that matter to the management and use of public space.

In this sense, it is important to mention that, at a time when pedestrian enjoyment, smooth mobility and spaces dedicated to contemplation and leisure are privileged in most central spaces of the main cities in Europe, with decision-makers and populations aligning efforts towards the With the almost total eradication of car traffic in these locations, the Sustainable Mobility Plan for the City of Tavira appears in complete contradiction with the European goals and directives expressed for the goals of reducing the carbon rate in Europe.

Replacing the historic squares and gardens, which preserve the last strongholds of Mediterranean cities, where community life developed over the last few centuries, especially around common spaces (of collective memory), this Plan stands a movement of total decharacterization and replacement of green spaces with elements from the domain of automobile traffic: roads, traffic signs, zebra crossings, roundabouts, car parks, among others.

Which, in a totally regressive way, is supported by outdated urban design intentions, which call for the practically total waterproofing of public spaces, especially in places where the issue of water infiltration (riverside spaces), should direct any and all interventions, not only for reasons linked to ecology, but also security.

In this sense, and after a detailed analysis of the Structural Projects promoted by the municipality, it is important to reflect on the serious influence of the indicated separate and disconnected interventions, mainly included in central spaces and historic neighborhoods (Ribeira, Alagoa and Corredoura), as well as the

changes that these will cause in the maintenance and safeguarding of fundamental heritage, cultural and identity values, which concern not only the local population, but all visitors today and in the future.

Having said this, it is unavoidable that any urban and/or architectural intervention of political-professional responsibility and competence, especially when carried out in urban areas of special sensitivity such as ARU's Urban Rehabilitation Areas and/or ZEP Special Protection Zones, requires exhaustive foundation within a framework of multidisciplinary "thought in action" using knowledge from specialties as diverse as: urbanism, architecture, archaeology, history and culture of the arts, physical and human geography, to anthropology, sociology and/or or economy.

It is now consensual and widely recognized by the various technicians responsible for the construction and (re)construction of the "Contemporary City" that interventions carried out within historic centers must honor the principles defended in the Charter of Athens (1931), which motivated the creation of the UNESCO (United Nations Educational, Scientific and Cultural Organization) in 1945 and which culminated in the first international doctrine directly associated with the preservation of historic cities - the European Charter for Architectural Heritage (1975) where it is argued that "... *conservation of architectural heritage largely depends on its integration into the lives of citizens and its consideration in territorial planning and urban planning plans*", which heralds what we still refer to today as *integrated conservation*: a multidisciplinary process that combines planning in multiple scales and urban management in favor of cohesive and balanced urban development.

Only the balance of the intended solutions can consider and result, not only in the functional, technical and aesthetic components of the public space, but also in the considerations of balance and stability of the banks themselves, in the criteria of economic and ecological sustainability (highlighting the variations and dynamics of a critical flood zone); in making road and mobility accessibility compatible (from cycle paths to pedestrian paths); and in the programmatic dynamics (permanent and seasonal), of social cohesion, inclusion and elevation of the heritage in question.

And only then, in a responsible way, is it urgent to enhance this opportunity for the city of Tavira, which involves "stopping to (re)think...", changing the point of view to broaden the equation, verifying the aspects and criteria of integration and comparing the alternatives, through proactive urban management, assuming an Urban Project methodology, without the precariousness and inadequacy of limited and limiting, deterministic and autocratic "planning", without courage or (re)evolution.

Ignorance about the complexity, sensitivity and methodological implications of the planning, design and design practices of public spaces (especially in central and historic areas), their infrastructures, programs and equipment, have resulted, throughout history (and the context of the Algarve is an example of this), in harmful and irreversible scenarios regarding the maintenance of the values of our material/immaterial heritage, particularly our cultural landscapes.

Therefore, we express ourselves by appealing to the urgency of "stopping to reflect" in favor of defining a comprehensive urban intervention strategy, which encompasses the entirety of the city's riverfronts, as a credible basis. With a view to updating and transforming the city of Tavira, through a strategic vision and supported by Participatory Decision Processes and based on Good Planning Practices, with Programs and Projects phased in time.

In these contexts of unique and complex urban problems, out of awareness, responsibility and ambition, cities, communities and their local authorities promote Public Ideas Competitions, open to technicians with proven experience in public space and/or intervention in heritage.

It is necessary to face the fragility that the planet faces and in this way we open an opportunity to investigate new urban and architectural possibilities. Increasingly, these days,

there is a tendency for urbanism to escape new ecological sensibilities, an inherent inability to ecology and urbanism.

“The historically constructed city is no longer experienced or understood in a practical way. It is just an object of cultural consumption for tourists, for aestheticians eager for spectacles and the picturesque.

Even for those who try to understand it with compassion, the city is dead. However, the 'urban' persists, in a state of dispersed and alienated actuality, as a germ and a virtuality (...) In other words, with regard to the city, the object of science is not given. The past, the present and the possible cannot be separated.” In Lefebvre, Henri. *Le droit à la ville*. Paris: Anthporos, 1968

It is important to recognize the unique opportunity to reevaluate the essence of the disciplines that help us think about the urban phenomenon: architecture and urbanism. In this way, we understand that urbanism cannot be disconnected from ecology/ sustainability. In this way, it can be seen as an instrument that provides practices and sensibilities capable of identifying new perspectives in the relationship with urban development. It is necessary to resort to these multiplicities of tools, techniques and methods that relate the new and the old. A multidisciplinary and collaborative approach.

We must recognize that the values that exist between reality and the proposed project negatively transform the landscape, without taking into account its surroundings or the historical layout of the places. The document is counterproductive and inefficient with the measures to be applied, on the one hand it states that there is an increase in the use of cars, as individual transport. On the other hand, the text seeks to respond to this problem with sustainable mobility standards. The conflict of interests proposed therein is notable. It is also understood that there is an intention to propose smooth travel, but once again this contradicts the layout of the proposed project, where the road mode is particularly notable.

It is necessary to create sustainability policies. The municipality is primarily responsible for caring for and maintaining the city. In this way, thresholds must be created between the city and the countryside, with hybrid territories, between urban areas and agricultural areas, following the climate and seasons. The quality of the city grows with the quality of its objectives, tools, equipment, services, products; It is important to avoid rigid and definitive solutions.

CONSIDERATIONS ABOUT CEAT - Tavira Agricultural Experimentation Center

The proposal that this Plan presents in point 4.2.2 of “Creation of a new road between Rua de São Pedro and Rotunda da EB2/3 Dom Manuel I” is not new and has already raised awareness, on the part of many Tavirenses and not only , strong protests and enormous misunderstanding. We highlight that in 2020, in the environmental impact statement for the Algarve Line Electrification project in the Faro – Vila Real de Santo António section, conducted by the Portuguese Environment Agency, the Assessment Committee issued a clear negative opinion on the highway crossing the CEAT (PN371 +317), with the following content:

“The components of the project to be developed outside the area affected by the DF generally present impacts of low significance and can be minimized, with the exception of the reestablishment of PN371 + 317. In this context and although the suppression of PN371 + 317 and reclassification to pedestrians constitutes an improvement in operating and safety conditions for railway circulation and pedestrian accessibility around Tavira station, the solution for reestablishing the road network presents significant negative impacts resulting from both the permanent allocation of CEAT land, which constitutes heritage unique and irreplaceable cultural and genetic background, whether in the proximity of the secondary schools Dr. Jorge Augusto Correia and basic schools D. Manuel I, where insertion in this location could worsen road safety conditions, as well as increasing the emission of atmospheric pollutants and levels of noise. A favorable decision is issued for the electrification project of the Algarve line in the Faro Vila Real de Santo António section, subject to compliance with the terms and conditions expressed in this document, except with regard to the proposed solution for the reestablishment of PN371 + 317. Consider -if there are no conditions to issue a decision in favor of the

technical solution presented for the reestablishment of PN 371 + 317, given the associated impacts and given that there is no demonstrated absence of viable alternatives that could avoid them.”

The reasons for this are not only relevant, but also well known:

- According to the General Directorate of Agriculture and Rural Development, this new road covers an area of RAN that is within the perimeter of the Sotavento Algarvio Hydroagricultural Development, which occupies an area of 2.07 ha (currently with part of the area occupied by orchard and some vineyard and the remainder uncultivated). The road proposed in the Plan would cross a plot made available on the National Land Exchange in 2015. This is land of use capacity class A, that is, with high agricultural suitability. Therefore, considers AHSA, the negative impacts, certain, direct, are of high magnitude and significant as the completion of the work will cause permanent occupation of the land delimited as Hydroagricultural Development, meaning that these will be areas that will not be able to be irrigated in the future .
- CEAT (former Posto Agrário) has been carrying out work prospecting, collecting, conserving and characterizing traditional varieties of Algarve fruit trees for almost a hundred years (developed by the former DRAPAlgarve, with support from community programs). This Center has an area of 29 ha, where *“today we have installed, preserved and are characterizing a collection with more than 700 references from fruit trees of the typical species of the traditional Algarve orchard, to the ampelographic collections of vineyards for wine and table, including pomegranate apples and loquat trees. Some, if they hadn't been safe here, would have been irretrievably lost, as was the case with our first apple from Monchique, which was almost extinguished by the fires”*, writes in the prologue of the book “The agrarian post of Tavira” Pedro Valadas Monteiro, at the time regional director of DRAP Algarve .
- As a genetic repository of unique and irreplaceable reference plant material, CEAT is a space strongly linked to Mediterranean values and cultures and, therefore, to the Mediterranean Diet itself, which has a central value for Tavira, not only focused on the past, but also for the future, as it foresees the creation of the Sustainable Food Innovation Hub, the Earth/ Mediterranean Diet Museum and the Mediterranean Diet Skills Center.

Let us also remember that a healthy lifestyle, embodied in the Mediterranean Diet, is not just about healthy eating or socializing. As lectured by Prof. Pedro Graça in his presentation *“5 Challenges to protect the health of the Mediterranean Diet”* at the Mediterranean Diet seminar held at CEAT in 2022, it is also a healthy lifestyle that includes physical activity and active mobility. It is therefore completely incoherent to destroy or harm this emblematic space, sacrificing it to individual motorized transport.

- The CEAT has a cultural identity and historical value, as evident in the book “The agrarian post of Tavira” by Ignacio García Pereda, published with the support of DRAP do Algarve in 2022: *“ Only with a lot of tenacity, stubbornness and professionalism on the part of leaders, technicians and operational staff from the Algarve Regional Agriculture Directorate, it was possible to keep alive the spark of this center that occupies a central role in the history of Algarve and national agriculture, widely recognized and cherished by citizens and institutions of society.”*

The proposal shown in figure 4.5, titled *“new road”* does not seriously consider that there is an [Environmental Impact Statement conducted by the Portuguese Environment Agency – APA](#), carried out four years ago, which gave an unfavorable opinion to the road crossing in CEAT - Tavira Agricultural Experimentation Center. It is therefore not understandable, nor acceptable, that in the mobility plan commissioned and now presented to public consultation by the Municipality of Tavira, entitled “Sustainable Mobility Plan for the City of Tavira (PMSCT)”, the proposed road to be built is maintained. The Plan did not take into account what characterizes Tavira, and, in particular, did not take into account the

natural and historical heritage of the city. CEAT (Tavira Agricultural Experimentation Center) represents and has been defended, as a strategic project for the city and the region, as a privileged center for promoting the Mediterranean Diet.

In this context, we emphasize that the Tavira Agricultural Experimentation Center - CEAT - identity site of the Mediterranean Diet, is an integral part of the strategy to promote the Mediterranean Diet in the city and the region that is undertaken by all project partners (CMT, UAlg, CCDRALg and 30 other entities in the region). Defined as a hub of innovation for sustainable food, integrating fields of experimentation/research, from the former Regional Directorate of Agriculture and Fisheries and now CCDR Algarve IP, Agriculture and Fisheries, projects to create a Mediterranean educational farm and also the recovery and preservation of traditional "forgotten" varieties of Mediterranean species from the region, as well as enhancing economic activities. It is also foreseen within the scope of PASDM - Mediterranean Diet Safeguard Plan, to create at CEAT the Earth Museum/ DM Interpretive Center, a living museum that will enable the presentation of the different dimensions of DM, the promotion of products and good practices linked to DM. Carrying out these activities will allow us to preserve biodiversity, value and transmit the Mediterranean lifestyle to future generations, demonstrate sustainable production methods and enhance the range of economic activities linked to the Mediterranean Diet.

The richness and defense of CEAT's natural and cultural heritage is well expressed both in the aforementioned DIA and in the Action Plan for the Safeguard of the Mediterranean Diet - 2023-27.

- The PASDM document - Plan to safeguard the Mediterranean Diet can be read [here](#).
- The news "BTL: Algarve will have a Mediterranean Diet museum" which was published in Jornal Barlavento on February 28, 2024 and disseminated by CCDR Algarve IP Agriculture and Fisheries can be read [here](#).

The intention of building this transit road in spaces with predominant agricultural occupation (orchard, vineyard and uncultivated areas) belonging, for the most part, to the Centro de Experimentação Agrária de Tavira of DRAP Algarve/CCDR Algarve IP Agricultura and Pescas, will destroy the unique character of this space that since 1926 has been part of Tavira's identity and serves the territory. It will separate the Earth Museum to be created, from Quinta da DM, the community gardens, the building, DM's skills center, infrastructure and equipment that support agriculture, experimental fields, collections and other DM projects in development, such as the proposals for a shared kitchen/UT or the training center, as well as the Schools that adjoin them, which results in a clear loss of key values for Safeguarding the Mediterranean Diet.

The PMSCT also points out alternative 2 (page 42) as a potential location for the new intermodal transport center, ignoring the fact that:

- this alternative is within CEAT and there is an exemplary community garden project;

The community gardens project, which began in 2020, marks the beginning of the revitalization of CEAT, advocates the vast majority of the SDGs - Sustainable Development Goals and provides food self-determination to more than 67 households in the city. The possibility of installing an intermodal transport center (alternative 3) in CEAT where Tavira's community gardens are currently located is an unacceptable option and clearly demonstrates how out of step with reality and CEAT's guiding principles this plan is.

- This alternative is adjacent to the Estação Agrária de Tavira building, DRAP/ CCDR Algarve IP Agriculture and Fisheries, an emblematic building, designed by the acclaimed architect Jorge Segurado, a pioneer in the implementation of the modernist language in Portuguese architecture. Building that will be requalified with the support of the PRR until the end of 2025, as can be confirmed [here](#).

- The experience of visiting CEAT as an interpretive and Mediterranean park is completely altered by crossing the road with motorized vehicles traveling at 50 km/h. It is about the immeasurable value of the environment, silence and walks, without disturbance or disconnection, with safety and a sense of natural beauty, in a context of inspiring atmosphere (slow living/slow food) and activity aimed at agricultural and food experimentation. . The Mediterranean Diet is a holistic approach and is part of the intangible cultural heritage of Humanity (UNESCO). It is Identity, History and Culture to be preserved, as a contribution of the region and the city to the country, and to Humanity.

CONCLUSIONS:

We present our disagreement with this Plan that:

- Even before its implementation, it defines obsolete objectives, implemented in a coexistence zone that continues to allow, albeit with restrictions, widespread car circulation, sacrificing absolutely central spaces such as Jardim das Palmeiras, *Jardim da Alagoa* (Praça Dr. António Padinha) or Jardim da Corredoura (Praça Dr. Marcelino Franco)
- It was prepared without the due involvement of the population recommended in it and presented for public participation in a document with linguistic errors, difficult to interpret and lacking in coherence. To make matters worse, the population was given a ridiculous period of 8 days (later extended to 18 due to residents' objections) to make their contributions to a document of almost 100 pages, without any framework being placed on the nature of public participation in a such a short deadline.
- It does not take into account the meaning and importance of preserving an emblematic space in Tavira, the Centro de Experimentação Agrária de Tavira (CEAT), located in the RAN area, with land of use capacity class A, and where there are " more of 700 references of fruit trees of species typical of the traditional Algarve orchard and ampelographic collections of vineyards for wine and table." It is a genetic repository of unique and irreplaceable reference plant material and a space strongly linked to Mediterranean values and cultures and, therefore, to the Mediterranean Diet itself, with a high cultural identity and historical value. There are primordial values that, especially in a time of climate crisis and biodiversity crisis, must be preserved for future generations. The CEAT crossing highway, also proposed in this Plan, was given a negative opinion by the Evaluation Committee of the "Electrification of the Algarve Line in the Faro – Vila Real de Santo António" project. It is unacceptable that the result of this evaluation is disregarded in this Plan to the point of re-presenting a proposal that has already been rejected. The possibility of installing an intermodal transport center (alternative 2) in CEAT, where Tavira's community gardens are currently located, is another proof of the contempt shown in this Plan in relation to this unique and irreplaceable space.
- It does not solve structural problems that have been going on for years and years, such as accessibility north of the N125 near the city center.
- Not everything is negative in the Plan, but it lacks ambition and a vision for the future. To favor individual car traffic, it unacceptable sacrifices the common good, health, leisure, biodiversity, and the city's very identity.

Bibliography

MOSTAFAVI, Mohsen and DOHERTY, Gareth. (Org.). *Ecological Urbanism*. São Paulo: Gustavo Gili, 2014

Other Connections

<https://jardinhistoricos.pt/ad/1000>

<https://cm-tavira.pt/site/ambiente/jardins-historicos/>

<http://www.dietamediterranea.pt/?q=en/ccdm-not%C3%ADcias/centro-de-try%C3%A7%C3%A3o-agr%C3%A1ria-de-tavira-projects-for-the-future>

https://commission.europa.eu/eu-regional-and-urban-development/topics/cities-and-urban-development/priority-themes-eu-cities/urban-mobility-and-accessibility_en

<https://www.consilium.europa.eu/pt/policies/clean-and-sustainable-mobility/>

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52021DC0811&qid=1644666550402>

https://siaia.apambiente.pt/AIADOC/AIA3291/aia3291_dia_tua202061113111.pdf

<https://www.drapalgarve.gov.pt/images/MioloAlgarve3.2.2310finalGuideBleed.pdf>

http://www.monumentos.gov.pt/Site/APP_PagesUser/SIPA.aspx?id=22395

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Citizens Movement for CEAT and Urban Gardens of Tavira

