

Public consultation on the LULUCF – review of EU rules

A contribution from the Peri-Urban Regions Platform Europe (PURPLE)

Preface

PURPLE is grateful for the opportunity to participate in this consultation exercise. As a transnational network of public authorities, we see the particular points which the LULUCF Regulation focuses upon, as having a broader significance for all those with an interest in ensuring that Europe’s 2030 climate ambitions set out within the European Green Deal are successfully realised. We strongly encourage our own member regions and all others to position their policy and practice with regard to LULUCF in this broader context, a context which requires joined-up thinking and joined-up implementation of that approach.

As part of our contribution to this exercise we wish to highlight the particular role and contribution of peri-urban areas and how this needs to be formulated as part of the LULUCF “story”. That contribution should be recognised with a clear appreciation of the role that peri-urban areas play in terms of for example, water storage, or in mitigating the effects of urban heat islands. This in turned needs to be placed into an overarching territorial – as opposed to sectoral, or any other – context, where a place-sensitive and place-aware approach is adopted and capitalised upon.

Context

Within this debate we need to retain a broad focus and be thinking about land and land-use in many forms, not only crop growing but about open space as heathlands, grasslands and peatlands for example – as well as forestry obviously. We also need to be taking into account the varying nature of land and landscape in territories of different kinds where the size of land parcels, the mix of open and built-upon (soil-sealed) space, and the homogeneity or otherwise of land-use in one particular area will vary dramatically.

We might then usefully think about different types of territory and the varying contributions they might be best placed to make - “contributions” in the sense that we use it here is close to talking about the “efforts” that can and should be made by different actors and again we would highlight the efforts of peri-urban areas and ask that their specificity not be overlooked or misunderstood. This in turn links closely to the area of the *Effort Sharing Regulation* and as the consultation guidance itself suggests, these multiple aspects need to be looked at in parallel and in a joined-up manner as part of a broader range of complementary instruments.

Key points and principles

A territorial approach

Our approach to this subject is overtly - and unapologetically - a territorial one. An approach aligned with the principles and recommendations of the Territorial Agenda 2030 which “underlines the importance of and provides orientation for strategic spatial planning and calls for strengthening the territorial dimension of sector policies at all governance levels”, and which echoes the sentiments of the recently published Leipzig Charter 2.0 in talking about the “common good” – where places of one type act in ways that go beyond self-interest. This in turn ought to be based on a realisation that territories of different types a) have different roles to play, and b) act in ways which impact one upon the other.

For example, it is in peri-urban areas, where land-use is typically multi-functional, where land use and land ownership are often fragmented, and where governance arrangements typically reflect the complexity of the “on the ground” situation, that many – and more – valuable contributions are to be found and where many valuable lessons might be learned. We might, and should, build upon this and use it to form part of a rounder narrative around urban – peri-urban – rural solidarity in terms of realising emission reduction ambitions when focusing on changing land use and forestry.

Coherent with spatial planning regimes

It is important to take an approach that goes beyond the “sectoral” and which recognises that the sector (“land-based” – or whatever alternative term we might employ) goes beyond industry operators. In particular, it is imperative to keep clear sight of the fact that land use is very much the responsibility and remit of public authorities at national, regional and sub-regional levels and the spatial planning regimes for which they are responsible. The technical nature and focus of the LULUCF provisions with regard to reducing GHGs and to CO₂ removals must not blind us to the fact that any such mitigation measures need to be placed into the larger land use and land use change context. Of course, we are aware that in one sense at least this complicates the picture given that the moment we talk about spatial planning we are passing into an area where the EU lacks legal competence, that needs to be openly recognised but does not remove the need to join up approaches.

Involving public authorities

It should follow therefore that the role – and therefore stakeholder status – of regional and local authorities needs to be built into our thinking and activities here – public authorities as landowners and land managers as well as in their role as planners have a major stake in this subject, they will inevitably be directly involved in its implementation and the associated data capture etc. These are all clearly the concern of regional and spatial planners responsible for developing broader and multi-dimensional land-use plans of varying sorts at sub-EU levels. One cannot sensibly be addressed in isolation from the other. There is an imperative here for coherence and broad involvement in both approach and action. Indeed, it is also the case that the topics relevant to LULUCF Regulation implementation and compliance will themselves cut across various functions within large and complex public authorities themselves.

With a place-sensitive dimension

It is the context of spatial planning for example – and here we deliberately highlight an instance characteristic of peri-urban areas – that decisions are made about airport runway expansions and the clearing of open and/or wooded space to enable that to happen, plus any resulting compensatory measures. In similar vein, there are particular considerations about mineral extraction in peri-urban areas where extractions are commercially attractive as building materials for nearby urban centres, and this might be of particular concern where for example, peri-urban forestry is removed to access the gravel beneath. How that is planned for, allowed or not allowed to happen, and subsequently compensated for, will be the concern of mineral plans which in turn sit within broader spatial (land-use) plans.

These are offered only as contextualised examples, but hopefully serve to illustrate the point that different types of places (territories) face different challenges, have different opportunities and therefore have different contributions/efforts to make. The reference to peri-urban forests may prove an apposite one as they are already recognised as valuable territorial assets bringing multiple benefits not only in terms of carbon storage and contributions to improved air quality close to urban centres, but also as leisure/recreation resources with the health and wellbeing benefits that result.

We should also adopt a similar place-sensitive approach when thinking about how we can best draw upon the tools already at our disposal to help us bring about our stated aims with regards to land use in the most effective ways. Policy tools such as the TA2030 and the Leipzig Charter 2.0 have already been referenced in this context but we should also be thinking about policy programmes such as the European Structural and Investment Funds, the reformed CAP, and LIFE (inter alia), where focused support might be given to develop, sustain and maximise interventions with a clear contributory role – to again provide what is often a peri-urban example, for instance in the case of maintaining streuobstwiesen (orchard meadows) in areas around German cities.

PURPLE (Peri-urban Regions Platform Europe)

PURPLE is striving for greater recognition of Europe's peri-urban regions in European policy and regulation, to ensure long term sustainability for these important, complex, and multi-functional territories. Its members represent peri-urban territories, where urban and rural features co-exist.

These areas are working together to maximise the advantages resulting from their location in proximity to large cities while minimising adverse impacts on the character, landscape and environment that make them distinct and special. Peri-urban regions in Europe are facing over-pressure. The balance between sustainable open space, sustainable agriculture and urban spatial and economic dynamics needs to be re-established. There are opportunities as well as challenges for those living and working in peri-urban regions, which should be reflected in tailor-made policies and strategies.

Contact:

Vincent O'Connell

Secretary General

secretarygeneral@purple-eu.org

0044 7989973561