

Position statement regarding EC proposals for a *Common Provisions Regulation*

SEPTEMBER 2018

Key points

- PURPLE insists on the central importance of **the territorial dimension** of funds designed to deliver EU Cohesion Policy. Other dimensions are valid and important but the territorial dimension should never be subjugated to other concerns
- A **place-based** approach should drive all else. Cohesion Policy delivery should, at its most basic, be about policy delivery that impacts positively upon what happens in specific locations - upon daily realities in given places. Correctly understanding individual places and their local territorial nature, challenges, dynamics and potential is a key prerequisite to successful funding programme design and delivery. This should be clearly reflected throughout the CPR
- A full, up-to-date, and accurate understanding of European territories needs to underpin programme design, funding decisions and management arrangements. The nature, extent and potential contribution of **peri-urban areas of Europe** needs to be explicitly recognised and harnessed as part of the fund-shaping and programme delivery processes
- The **thematic concentration** reflected in the proposed five policy objectives serves to give focus to the purpose and use of funds as well as having the effect of limiting scope. It is imperative therefore that the correct objectives are identified. The relationship between the five areas identified should also be considered - the fifth proposed policy objective should, in practice, serve as an umbrella requirement or take the form of a cross-cutting theme
- The specific referencing of **urban, rural and coastal areas** within the CPR is to be welcomed insofar as it gives a territorial dimension to what might result. Any over-simplistic use of the terms and concepts of “urban” and “rural” is however to be avoided. Urban and rural are inadequate terms to convey the complexity of modern European territories. In reality, urban and rural overlap and co-exist in what PURPLE considers the **peri-urban**. This should be explicitly recognised in programme documentation and design
- That same quoted reference to “urban, rural and coastal areas” is however to be opposed if its meaning is to **exclude other types of territory** and PURPLE asks for exact clarity on this point. What it absolutely must NOT do, is to serve to somehow exclude peri-urban areas where rural and urban co-exist and where localities are deemed to be insufficiently rural nor sufficiently urban to qualify for programme participation
- The complexity of territorial types - and the relationships between them - needs to be understood, acknowledged and written into funding programmes. **Rural-urban linkages** need to be recognised and taken into account. Programme provisions should support interactions across traditional urban / rural boundaries and recognise the **particular peri-urban** nature of social, economic and environmental issues in such places

- PURPLE welcomes references to **functional areas** as this reflects and reinforces the underpinning emphasis on place which should be common to all elements of Cohesion Policy implementation mechanisms. We do however add the caveat that functional area and “functional urban area” should not be regarded as synonymous – functional areas will often encompass territories of varying types. Indeed they often accurately reflect the growing importance of peri-urban areas
- Any **strengthening of the urban dimension** of territorial development and territorial strategies needs to be approached with some caution. Nor must local become over-identified with urban – both **peri-urban and rural local** have just as much legitimacy. Any flexibilities and additional support in the establishment and implementation of locally-led territorial strategies which are extended to urban areas are just as much relevant and applicable to peri-urban and rural areas
- The proposed European Urban Initiative provides for “city to city cooperation”. There is nothing inherently problematic about that, but it is vital to realise and recognise that **rural to rural or peri-urban to peri-urban cooperation is every bit as legitimate and valid**
- The desirability of **fund alignment** where this serves as a way to bring about much-needed simplification, or to enable more joined-up local implementation to occur, is to be warmly welcomed. That observation does however need to be tempered with the realisation that different funds have different focuses and specific objectives, and whilst that remains the case, a continuing distinctiveness between them is to be expected. Coherence between funds and uniformity are not the same thing
- That distinctiveness between funds also needs to be borne in mind in the face of any call for **programme harmonisation**. Also important here is the consideration that to make any aspect of the funds uniform should also take a case by case account of what that uniform condition is as well as the desirability of uniformity itself. (for example an across the board flat rate of x% may be appropriate and welcome, but only if the “x” is right)
- Synergy across programmes within the CPR is an important concern. **The exclusion of EAFRD from the scope of the CPR** is therefore regrettable in the extreme. Its negative impact will be keenly felt in peri-urban areas where it will make it more difficult to design and subsequently manage genuine place-based programmes with efficient governance arrangements designed to ensure maximum local impact. PURPLE calls for this proposal to be reversed in the interests of all local actors, and of peri-urban ones especially, where the need to break down all artificial barriers between “urban” and “rural” is at its greatest
- **Eligible programme areas** for future funds – at international, national and sub-national levels - should all be based on the principle of inclusivity not on that of excluding those deemed to be outside of appropriate “lines on a map”. Where cooperation is likely to bring benefit the approach to programme design should be an enabling and flexible one
- **A place-based approach** is not only about “where” but also about “whom”. Based on the fundamental premise that place-based approaches are best developed and implemented by those who understand them best and have the greatest stake in their wellbeing locally, it follows that there is a subsidiarity and local engagement dimension to the way in which funds are designed and delivered
- **Actors at the sub-national level** should therefore be involved in a broader multi-level governance model, in a meaningful way at all stages of funds development, finalisation and delivery. Any calls for a greater concentration of power and influence at the sub-European level is welcome, but the default in such cases should be the local not the national level