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Urban agriculture and the policies of the European Union: the need for renewal

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Abstract

Short title: Urban agriculture and the policies of the European Union

To date, analyses of European policies as they pertain to urban agriculture and new modes of socio-technical innovation are rare, beyond general assessments that recognise relative degrees of influence. The purpose of this paper is thus to provide a targeted review of key European policies that impact and are likely to impact upon urban agriculture and sustainable modes of food provisioning, with a particular focus on the Bristol city-region, to provide contextualisation. Through interviews with key actors in the city-region we reflect on the importance not only of European level policies but also of how they are perceived and interpreted at a local level. By way of a systematic review based on key themes relevant to urban agriculture, the paper presents analysis of some of the key policies that are perceived to act to enable or frustrate the development of urban agriculture. The paper concludes by considering the ways in which a renewal of the CAP in particular might empower urban agriculture.

Keywords: EU policy, urban agriculture, multifunctionality, innovation, urban and rural dynamics.

1. Introduction – the scope of EU level policies

For some time the demand for food in cities has outgrown the supply capacity of their hinterlands: they have drawn increasingly on globalized systems of supply. With the perception of the increased vulnerability of these globalised systems to perturbation, either through climatic changes, increased global competition or interruption to logistic systems, this dependence has become questioned (Steel, 2008). For example, Lang argues that many of these flows constitute the new fundamentals of the food system, which if not addressed will be a considerable threat to the sustainability of food supplies to urban areas (Lang, 2010). Contemporary urban forms and settlement patterns reflect the presence of global surpluses of food with the ecological costs realized away from the point of consumption.

There has a been a range of proactive responses to these perceived threats, either through popular mobilizations such as the Transition Town movement or a host of civic food projects, through to governmental and trans-governmental policy responses (Renting *et al.*, 2003, Renting *et al.*, 2012). This has seen a new constellation of disciplinary discussions of issues that were previously conceived of as rural questions. Food production, the externalities of farm businesses, the multifunctional use of land and the recycling of nutrients are re-addressed through urban framing. The previous public policy dichotomy of distinct urban and rural policies saw food as a non-urban question with the city solely concerned with consumption.

A technological fix has already appeared in the form of propositions aligned to 'vertical farming'; the use of architecture in alliance with emerging technologies to urbanize food production. This, it is suggested, will be realized through proposals such as tower blocks purpose built or re-purposed to intensive horticulture production or bioreactors where the skin of the building is used as an algal breeding resource. Whilst such proposals harness a utopian strand of urban thinking garnered through the lens of technological innovation, others have turned to a re-alignment of the relationships between urban areas and their

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hinterland. Particular attention is being paid to brownfield sites within the urban envelope, the peri-urban fringe of cities and how food chains can be re-engaged with proximate cities rather than the globalized food chains.

This re-alignment has charged existing actors with new purposes: municipal authorities, city councils, urban consumers and social movements have become engaged with the topic. Simultaneously, high level policies, such as those from the European Union (EU), have become the focus of renewed attention and debate, as both constraints and enablers of future sustainable urban food provisioning. The European Commission (EC) is directing some policy initiatives explicitly towards urban food, but many other policy areas are having an indirect impact. In the meantime local interpretation of a range of regulations has a bearing on the range and type of interventions that are deemed permissible and how they are permitted to act. To date, analyses of European policies as they pertain to urban agriculture and new modes of socio-technical innovation are rare, beyond general assessments that recognise relative degrees of influence.

The purpose of this paper is thus to provide a targeted review of key European policies that *a priori*, are likely to have an influence over, and are likely to impact on, urban agriculture, and other sustainable modes of food provisioning, with a particular focus on the Bristol city-region as an exemplifying case study to provide contextualisation. This has been done in order to assess how such supra-national policies are perceived, understood and might impact in practice at the local level. Thus, a review of European policies in terms of how they play out at the local level provides a valuable assessment of how 'distant' policy rhetoric plays out in 'local' practice.

In so doing, we aim to control the scale and scope of the enquiry, whilst responding to the practical experiences of a range of organisations. The next section of the paper sets out in more detail the analytical process adopted, before, in the following section, setting out the review findings in terms of key European policies that can in some way be seen to influence sustainable food provisioning in the Bristol city-region and more widely in the urban milieu. The analysis usefully raises the question of the *perceptions* of European policy rather than solely the intention or letter of policy statements. European policy so far has not had the transformative effect it could have on urban agriculture, at least in part because such policy resolutely conceives of food production as a rural activity.

2. Materials and Methods

This paper offers an assessment of EU level policies focusing on three elements of urban food provision.

A. Closing the cycles of organic waste, water and nutrients;

B. Shortening of food chains, and

C. The multifunctional use of land in urban and peri-urban areas.

It has an emphasis on the policies of the European Commission (EC) but makes reference to other policy statements where appropriate. The paper has made an assessment of the 'grey' literature of policy statements, found mainly on web sites, and web references have been made where appropriate. This has taken the form of an assessment, through key word searches consistent with the key words in the framework outlined below, of web sites of all Europa institutions who commission policies, all Directorates General relevant pages and some commentary from relevant OECD sites. Over 50 such sites were accessed in all. Academic literature also has been consulted in relation to policy evaluations and policy critiques. Policies of the European Commission that can be considered to have a relevance to urban food were divided into 9 areas, consistent with the European Commission's Directorates General policy structure:

- Agriculture fisheries and food
- Business
- Sustainable Development
- Climate action
- Employment and social rights
- Energy and natural resources
- Environment, consumers and health
- Regions and local development
- Science and technology

Policies in general are promulgated by 33 Directorates General and so the policy landscape for those areas of interest to urban agriculture inevitably is complex. We have considered the full breadth of these policies, ranging across 36 discrete sub-areas, elsewhere; but in this paper we present a table and assessment of the policies most relevant to urban agriculture (see Table 1) (Reed *et al.*, 2013). The table, which summarises the principal outcomes of the review, is organised to identify the three policy elements of urban food provisioning stated in A - C above.

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We have then further categorised each policy by a domain code to focus on six specific features impacting on urban agriculture, as follows:

1. food production and consumption
2. rural development (this is an important area in European agricultural policy and needs to be identified here to emphasis its *lack* of relevance to urban agriculture).
3. waste management
4. water resources management
5. multifunctional land use
6. sustainable land use.

In this way we have identified the most salient policies relevant to urban agriculture and the specific ways in which they relate to each specified aspect of urban agriculture.

Whilst the principal policy areas of interest to this study are stated in A – C above, there are other areas of EU-level policy that may serve the *incidental* purposes of urban food projects. In particular, the use of food projects to address social problems, urban deprivation and to contribute to healthy lifestyles, are highly relevant and need some accounting for. In this regard they fall into the jurisdiction of an even broader range of policy areas than is considered here. Despite these areas of potential relevance of EU level policy to urban agriculture, Urban Agriculture Europe (2013b) claims that this is a neglected area in all European level policy (Urban Agriculture Europe, 2013a).

In addition to these policy areas, there is a host of 'Regulations' (in relation to plant health, animal welfare, environmental impact, food quality and so on) that have not been included in this broader policy analysis in terms of a systematic literature search. Although the Bristol case study has focussed on the wider EU policy perspective, the Regulatory framework is important, because it is susceptible to being interpreted quite differently in different EU member states. This means that in operation, their degree of influence might not be 'common'. It is at this interpretation of Regulations, that much criticism is levelled from people working on the ground. To help account for this Regulatory perspective at a ground level, interview data collected as part of the SUPURBFOOD project that relates to Regulatory interpretation has been incorporated where appropriate. This includes interviewees from civic food groups, corporations and municipal actors involved in urban agriculture, multifunctional land use and/or nutrient recycling in the Bristol city-region (Reed *et al.*, 2013).

The policy review was used to identify a set of issues, pertinent for discussion with urban food stakeholders noted above, on the ground in the Bristol sub-region. Some 22 semi-structured interviews were conducted with a range of stakeholders and salient issues from the policy review were used as triggers throughout the interviews. In this way, preliminary findings from the policy review are able to be supplemented by experiences of such policies, on the ground.

3. Results and Discussion

In this section we first discuss the influence of key policy statements in relation to the Bristol city-region before moving on to more generic issues at a European policy level and a discussion of what these might mean with regard to the development of urban agriculture.

3.1 Agriculture: who qualifies for CAP support?

A priori, European policy for agriculture and food has the greatest relevance to urban agriculture (see Table 1, policies 1 – 11). Urban agriculture meets most of the legal preconditions of being 'agriculture'. It is on the agenda of most European cities and it meets most of the Europe 2020 Strategy's aims for viable food production, sustainable management of natural resources, climate action, and balanced territorial development.

But, as Urban Agriculture Europe (2013b) notes, it is almost entirely neglected by the Common Agricultural Policy (CAP). Within the CAP urban agriculture is doubly marginalized. Firstly, it is small and diffuse and therefore ineligible for Pillar I funding. Secondly, it is not rural and therefore ineligible for Pillar II funding. The Agriculture DG is clearly about rural development. This is despite the fact that urban agriculture is highly multifunctional, a clear priority in the CAP, and could offer good practice to mainstream farming. As one of the interviewees in the SUPURBFOOD Bristol city-region case study (a senior manager in a state organisation) noted:

> CAP is European rather than local which means that it offers little opportunity for flexibility and discretion. The CAP is not well adapted to local circumstances. CAP is also rural in terms of funding rules and philosophy and this does not fit at all well with the urban food philosophy (Interviewee X).

It is the size of holding (a minimum of an hectare) that excludes most urban agriculture from being eligible for CAP support (Article 10, 1(b))(Urban Agriculture Europe, 2013b). But this unnecessarily debars urban agriculture from being within the jurisdiction of the CAP. Widening the scope of CAP (but not increasing its budget) to

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include it would allow a fuller understanding of the complex nature of food chains and the fuller integration of food production into a wider range of social and economic policies at the EU level.

Resistance to the incorporation of urban agriculture into the CAP may well derive from its original purposes, firstly, to support rural areas, and secondly to manage food markets. Both of these purposes still endure. Clearly, urban agriculture does not directly support rural areas and, secondly, it is not yet of large enough scale to influence food markets. Whilst import and production quotas and export refunds are of little relevance to urban agriculture, the social, cultural and environmental benefits of food production and consumption are.

This detachment of urban agriculture from the CAP was seen in the interviews for the Bristol city-region case study. There was a general view from respondents that the CAP had no relevance to urban food. One interviewee (a banker specialising in organic food and community investments) felt that there was a current imbalance in the relative levels of support between Pillar I and Pillar II of the CAP and that Pillar II offered the most potential for embracing urban agriculture.

> [The most important thing in] EU policy for me would be sorting out CAP reform. Pillar II aimed at, ideally, aimed at (both urban and rural) communities, taking ownership and things. That would be a nice wish list. Yes, better use of Pillar II (Interviewee Y)

Another (a state planner with special responsibility for high value landscapes) considered that Pillar I of the CAP was predominantly concerned with food supply rather than food demand or consumption, which steers it away from local markets:

> the real problem with the CAP is that agricultural policy is simply not designed to cater for local markets but rather large scale economies of scale production that actually favours non-local markets through specialization (Interviewee Z).

3.2 The CAP and Innovation

A number of authors have noted that Pillar I of the CAP (see Table 1, policies 1 and 2) supports farmers through both supported prices and direct payments This support actually discourages both efficiency and innovation (South West Regional Development Agency, 2008; Curry, 2012). The CAP, then, by its form of support can work against innovation in food systems. This is unfortunate, given the primacy of innovation as a driver to EU policy, and is not lost amongst those interested in urban food. Amongst the interviewees, a state worker expressed the following view:

> Ironically, a lot of urban food programmes tend to be quite innovative in what they do to the extent that they innovate themselves out of more traditional funding streams and support mechanisms. Thus, if you can innovate in food production on very small areas of land, you render yourself ineligible for any form of agricultural support. If you innovate in producing food through aquaponics or biotechnology you innovate out of CAP support because you are no longer using land, but other factors of production. Why should agricultural support be based on land ownership rather than the ownership of other factors of production? (Interviewee A)

3.3 LEADER mainstreaming

The LEADER policy strand is part of Pillar II of the CAP (Table 1, policy 5) and was 'mainstreamed' under the last round of CAP reforms in an attempt to spread more bottom-up processes that had been shown to work well in the past. Budget increases went with mainstreaming (Shucksmith *et al.*, 2005). In reality, this has not really happened (Oedl-Wieser *et al.*, 2010). At its inception, LEADER was originally about localised rural development that was prepared to take a few risks and to be innovative. After mainstreaming, it has become much more 'agricultural', bureaucratised and risk averse (Convery *et al.*, 2010).

Within this context, in the interviews in the Bristol city-region case study, a number of urban food workers felt that the Rural Development Programme (RDP) in which the LEADER approach has been situated offered some potential for urban food support (Dax *et al.*, 2013). The 'rural' nature of LEADER however has hitherto thwarted this line of support. There is a feeling however that this might change in England in the 2013 CAP round as the RDPE funding and responsibility has been given to the Local Enterprise Partnerships (LEPs) and these are undeniably urban in their outlook. As one voluntary sector worker suggested:

> [The LEPs] may have a more relaxed view of these differences between urban and rural. Whilst there is a lot of competition for LEP funds, the RDPE funds will have to be related to food or the environment in some way (Interviewee B).

3.4 Business: regulation and the small businesses

A range of business policies also influences, and is of relevance to, urban agriculture (Table 1, policy

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12). Important here is policy for small businesses, which are considered to be the key vehicle for economic in the EU. The Small Business Act for Europe was introduced in 2008 to cover all independent companies of fewer than 250 employees. This covers 99% of all European businesses (European Commission, 2013a). Invariably nearly all businesses working in the domain of urban food (with the exception of water and waste companies) fall into this category and are susceptible to this legislation.

The Act enshrined the 'think small first' principle into regulation and generally "tackle remaining problems that hamper their development" (European Commission, 2013b). But by January 2012, the Commission introduced steps to reduce regulatory burdens further, in response to a 2011 review of the 2008 Act. At the time of writing the perception of the EU small business regulation is that it still does unhelpfully constrain the development of urban agriculture by requiring conformity to a significant number of rules that are felt to have little relevance to micro-businesses.

In terms of these perceptions of the whole of the EU policy and Regulatory framework (interviewees invariably did not draw a clear distinction between these two), one of the interviewees in the Bristol city-region study (a self-employed food consultant who had had a role in producing the sub-regional food strategy and services the Bristol Food Council in a voluntary capacity) felt that EU policy for SMEs was a barrier to progress:

> It [European SME Policy] has been an issue around viability of smaller scale production. So the legislation that came in around dairy and cheese making and abattoirs make it much harder for a small business, an SME, to be viable because of all of the costs that they have to pay and the hoops that they have to go through and all of the paperwork that they have to do. And that, I mean, that was highlighted as an issue, you know, 14, 15 years ago by a lot of small producers that I had contact with through the Soil Association (Interviewee C).

In the case of food businesses there were also regulations in relation to food quality, food safety and consumer safety (see Table 1, policies 13 and 14) that were reported to provide an additional burden.

On the other hand, some private organisations (for example utility companies) see the regulatory framework of the European Commission as a critical foundation for their work. It sets out the requirements and standards that provide a guide for what they do. As one UK utility company in the survey noted:

> We don't see regulation as a burden. ……. I don't anticipate any threats coming out of Europe ….. that will prevent us doing what we want to do (Interviewee D).

This suggests that the burden on SMEs linked to compliance with regulations has not been the same challenge for larger corporations working in markets with more limited competition.

3.5 Business: competition policy

Within the business category too, competition policy (Table 1, policy 13) is seen as having an unhelpful influence over the development of local procurement. Whilst the legislation is designed to protect, and does protect, consumers, it is effective at preventing restrictive competition and there are particular measures to stop the State favouring some companies over others on grounds other than competitiveness, as a means of ensuring 'best value' for taxpayers. This can inhibit and even prevent local procurement, where it is not 'best value' in a narrow commercial sense.

This makes it difficult in the realm of public procurement, for example, to favour local food producers. In the Bristol city-region, a state employed land use planner with a particular interest in health noted:

> In terms of the overall European Project about liberalisation and deregulating markets and encouraging competition, this does not allow us as the local state to intervene in local food procurement (Interviewee E).

Such competition regulation also can have impacts beyond the supporting of local businesses economically. A state sustainability officer in the Bristol city-region case study suggested that is can also create a loss of trust between local suppliers and public authorities. In their experience, this had led many local producers to avoid even bidding for local public contracts because the criteria used in contract allocation militated against the expansion of local food procurement, especially where this was likely to be delivered through SMEs.

3.6 Deregulation

A manager of a street market in the Bristol city-region case study noted the difficulties in EU policy between removing bureaucratic barriers (Table 1, policy 12) that would otherwise restrict local development and yet retaining some levels of standards or control. He specifically mentioned the European Services Directive in respect of removing the barriers so that someone in another

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part of Europe can easily apply and become a trader in the UK:

> in terms of trading and licensing, the EU Directive is looking to make it easier for traders/street traders to apply and gain permission. But they are almost removing all the necessary checks and balances so it could become a complete free for all and you've got no control whatsoever which could be detrimental for existing traders/shopping areas…you could have a large number of pedlars turning up (Interviewee F).

3.7 Policies on health and environmental standards

Food safety policy (Table 1, policy 11), agricultural product quality (Table 1, policy 12) and consumer rights and safety (Table 1, policy 14) amongst other polices, have ensured high standards of both health and food safety in food consumption and, in particular, food production and processing. This provides disadvantages for local urban food production. One interviewee (a local government worker) noted that to achieve such standards (he used the example of slaughter houses) significant economies of scale were required to remain competitive:

> This leads to larger more distant production and processing units which militate against local food production and processing (Interviewee G)

3.8 Where does 'urban food' sit in European policy?

Eckley and Selin note that most policy portfolios in Europe (and indeed elsewhere) are shaped according to specific, and often deep seated, value systems rather than any holistic logic (Eckley and Selin, 2004) . Thus, the dominant view of 'food' and 'agriculture' in European policy is a productivist one born of an historical need for food security after the Second World War. In other contexts the food policy portfolio might be differently shaped. This value system, they claim, leads to the under-consideration of food and agriculture in other policy contexts, including waste and land use, despite the important role that it has to play in other spheres.

In this context, John, for example, sees food security as falling largely outside of the CAP which can lead to the downplay of urban food production for security and resilience (John, 2006). Healthy food and food safety also are largely all beyond the remit of CAP according to Levi-Faur, with responsibility falling more squarely on the European Food Safety Authority (Levi-Faur, 2011). The role of urban food specifically, on urban regeneration, too, is not high on the European policy agenda (Weingaertner and Barber, 2010) and neither does it feature strongly in cultural policy despite its common use (particularly in the Mediterranean regions) in reasserting local identity through local and regional food marketing (Lazzeretti *et al.*, 2010). Romero-Lankao also charts the potential importance of urban food in climate change adaptation policies that remains largely under-considered (Romero-Lankao, 2012).

This policy neglect of 'food' in other policy spheres also relates to the strength of the CAP according to Princen (2011), because it is one of the few fully integrated European policies. The policy position of food and related issues at the national, regional and local levels has been weak, he suggests, other than in the implementation of EU level policies. This has choked more radical innovation and policy differentiations at the local level. Evidence from Switzerland, too, suggests that without the 'inflexible' policy infrastructure that comes with a pan-European level policy, agriculture polices of a smaller scale (for example in Switzerland), not fettered by significant political negotiation can move more quickly to multifunctional policy precepts (Curry and Stucki, 1997).

3.9 Urban food, sectoral and territorial policy.

The ambiguity of where urban food and associated impacts might lie in European policy is exacerbated by the sectorial, rather than territorial, nature of such policies. Within the EU this is reflected in the organisation of governance into 33 sectorial Directorates General. European NGOs and social movements, too, tend to have a sectorial dominance often because they are 'single interest' groups and this reinforces the sectorial nature of policies. Sectoriality inevitably leads to policy conflicts because there is no underlying policy design that allows for policy integration (Sutton, 1999). Conflicts often ensue, for example, between environmental and economic development policies in general, as each is based on separate precepts (Golub, 1999).

It is certainly the case that this sectoriality is ameliorated by an increasing territoriality in certain policy strands at the EU level. Regional policies have long since championed a more integrated territorial approach, and the precepts of the Integrated Mediterranean Programmes of the 1970s provided the foundations for the subsequent LEADER approach to endogenous development still driving Pillar II of the CAP today (Midmore, 1998). Indeed Watts and colleagues suggest with the growth in Pillar II of the CAP relative to Pillar I, the CAP has become more territorial than sectorial (Watts *et al.*, 2009).

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But the rationale for this more integrated endogenous approach has been essentially about the peripherality of rural areas. Competition policy will never put such places at the forefront of the growth agenda, so a more integrated socio-economic approach is deemed appropriate instead (Shucksmith *et al.,* 2005). Such principles are by and large not transferred into the policy domains surrounding urban food.

Even where there are attempts at integration, these can have limits. Different EU policies for instance, in relation to soils (on water, waste, chemicals, industrial pollution prevention, nature protection, pesticides, agriculture) are contributing to soil protection. But as these policies have other aims and other scopes of action, they are not sufficient to ensure an adequate level of protection for all soil in Europe, according to the European Commission, itself (European Commission ,2013b).

3.10 Policy interpretation

3.10. 1 Different country interpretations

Policy interpretation can have both advantages and disadvantages for the development of urban food, but undoubtedly such interpretations add complexities to policy implementation. Assessments of the way in which different countries interpret different strands of EU policy are common. Cosijns and D'haeseleer, for example, report on the 25 significantly different interpretations of EU energy policy by the member states in 2005 (Cosijns and D'haeseleer, 2006). Da Roit and Sabatinelli examine six clearly distinguishable policy models for the interpretation of policy on childcare within the 25 member states (Da Roit and Sabatinelli, 2007). Lowe and Ward's work on the implementation of the CAP in England notes how the significantly different national interpretations of the second pillar of the CAP, even as a common policy, shape the face of rural Europe significantly (Lowe and Ward, 2007). In some countries this funding is spread across the rural economy widely and in others it is retained almost entirely within agriculture.

Two counterpoising consequences follow from these interpretations, which impact on urban food. There are measures that can be invoked to remove the flexibility of national interpretation, were these interpretations are based on legal precept. Alter (2001) notes, for example, that any individual in the European Court of Justice, which can instruct national courts to apply European law strictly, invariably can challenge differing national interpretations of EU policy.

More flexibility, a number of authors (for example, Richardson, 2012) have suggested that these interpretations allow different member states to fit European policy to local circumstances, spatially, (possibly, therefore offering a territorial dimension to policy), culturally and economically. This kind of interpretation was evident in the case study. Whilst there were frustrations in the way that business competition policy (see section 3.5 above) was felt to dampen aspirations for local food procurement, others felt that they offered adequate flexibility for creative interpretation.

The Improvement and Development Agency for local government in England (set up by the Local Government Association to improve the performance of municipalities) ran a number of regional workshops on creative interpretation in 2006-08 aimed specifically at local government officers (though not exclusively for food). Their position was that competition barriers exist prominently in the perceptions of procurement officers, especially where they have limited time, money, know-how and political support to invest in creative (but valid) interpretations of the regulations. If there is a political will, they asserted, under certain circumstances, local procurement could be negotiated. Good practice can result here, especially when the arguments for local procurement are made in tandem with social, health, cultural and environmental objectives. Again, policy integration (in one territorial place) can serve the needs of local interest in the context of local urban food and short food chains.

3.10.2 The interpretations of politicians

Such policy interpretations that allow policy flexibility at the member state and more local level then become interpretations more to do with political will and values than the law or regulatory framework. Policies are interpreted, both strategically and in terms of implementation, to best suit local ends. But here again there can be shortfalls between local policy development and implementation for local urban food.

Firstly, local 'state' politicians tend to be risk averse because of, amongst other things, public liability and public accountability (Corfee-Morlot, 2011). Such risk-aversion may be entrenched in both the realities of collaborative decision-making and in the hierarchies of accountability. NGOs, who might put pressure on local politicians, tend to offer policies that can be more radical but also more risky as ultimately they do not take the same responsibility for their successful implementation as the local state does. Within this risk aversion, local politicians tend to consider incremental change more politically acceptable than radical change: they are more strongly moderated by political compromise than radical ideas.

Secondly, local politicians tend to make decisions on partial or simplified knowledge that, in 'complex' situations such as sustainable

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development, is often inadequate or indeterminate (Peck, 1999). It is not sound, for example, to claim that global warming arises as a result of burning fossil fuels, or indeed that it does not (Boykoff and Boykoff, 2004). These are not 'observations' but hypotheses, un-testable because there are too many variables at work. In any event, as Polyanin notes, boundary conditions mean that one set of evidence can 'objectively' lead to a number of different solutions: there is no necessary unique interpretation of one set of 'facts' (Polyanin, 2002).

Haas suggests that in these contexts, information to make local political decisions has a limited influence over policy because it may be neither wisdom nor true, it may have significant and negative equity consequences and: "politicians don't want science, they want justification for political intentions" (Haas, 2004).

3.11 Rural urban dynamics

The sectorial organisation of EU level policy gives some policies a spatial fix because some pertain specifically to urban areas and others (for example the CAP) specifically to rural places. Thus, as has been noted in section 3.1 above, agricultural policy tends to be seen as rural. Economic growth policies, too, tend to be driven across Europe from urban centres (Curry, 2012). Shucksmith (2010) suggests that such urban rural dualities have been exacerbated by the political project in Europe relating to governance subsidiarity and localism (Shucksmith, 2010). In this context, he claims, decision-makers tend to perceive themselves as having a rural or an urban constituency, rather than one that has elements of both. Localism tends to polarise perceptions of place into either urban or rural, as it often engages with a 'defensiveness' regarding existing communities (Winter, 2003).

Scott *et al.* (2007) extend this bifurcation to planning policy – throughout Europe there are land use policies that are broadly resistant to development in rural areas with a different set of policies for the urban context that are designed to steer development within the growth agenda (Scott *et al., 2007*). Cheshire also suggests that local empowerment retrenches people into a particular rural or urban identity, further marginalising the notion of a city region (Cheshire, 2006). Academic work, too, tends to focus on urban or rural interests rather than their interrelationships or intersections (Hodge and Monk, 2004).

As the OECD (2011) notes, this dualism does much to underplay the value of the peri-urban fringe, for a range of different enterprises, but for local food systems in particular (OECD, 2011). Governance arrangements tend to be entrenched and polarised between the built (urban) and natural (rural) environment within what Shucksmith (2010) has termed 'disintegrated' policy that is at variance with the notions of local food systems, city regions as integrated entities

4. Conclusions

From the foregoing results of the analysis of policy statements and interviews with stakeholders in the Bristol City sub region, it is clear that influences over the development of urban agriculture are complex and multi-faceted. Whilst European level policies exert a strong 'baseline' framework for action, national regional and local polices also have to be accommodated. To add to this complexity, projects are commonly developed through the voluntary sector where the 'sanctions' for enforcing particular policy behaviour are often difficult.

In addition, in the multifunctional context within which urban agriculture operates, policies from a range of other sectors (including waste, health, environment, and so on) have to be accounted for simultaneously. Given that the policy framework is invariably not as holistic (either by level or policy type) as many of the urban agriculture projects are trying to be, it is perhaps not surprising that developmental paths can remain uncertain. In this context, too, it can be difficult to identify clear lines of governance responsibility in such urban agriculture developments.

From the interviews in particular, there is perceived detachment of those who formulate EU policies at a 'distance' in Brussels, from those who are responsible for implementing and policing them at the local level. This chain of responsibility becomes more complex in multi-level policy settings where responsibilities can be passed up and down the levels with a resultant ambiguity of responsibility, particularly where national interpretations can lead to a departure from the original EU level policy thrust. The lack of accommodation of local circumstances in EU policy, also was felt by stakeholder interviewees to be problematic.

Interviewees felt , too, that there are weak links in European policy between food production and urban areas and between agriculture and food consumption and distribution. Because of the way EU food policy is constructed, too, it can stifle innovation – a perceived cornerstone of urban agriculture.

There are dangers, of course, in setting policies (and in particular, regulations) at a supra-national (European) level where they are required to meet the needs, customs and cultures of 27 different countries simultaneously. This would suggest that different countries might legitimately interpret such policies quite flexibly to accommodate local circumstances. But where this does not happen, EU policy can sometimes be used to legitimate

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action (or inaction) for political ends ("we can't do this because EU policy will not allow us to"). An even where it does, departure from stated policy, ostensibly to meet "local circumstances" can lead to volatile policy interpretations and at the extreme, a policy vacuum (Renting *et al*, 2012).

In this context, there is a clear need for more local policies, set to provide greater detail to the principles of a European policy frame, but both adapted to local circumstances and integrated with other policy frameworks. This allows both place-based policy integration and, in undertaken in a consultative way, local voices to influence local policy. And flexibility should be sustained. Currently, interviewees felt that business regulation tends to work against microbusinesses (which have no economies of scale) and local public procurement and special measures might be introduced to override this should local circumstances dictate.

Undoubtedly, one of the more 'visible' policy disjunctures for urban agriculture resides in the Common Agricultural Policy. Not only does pillar 1 by-pass urban agriculture because of the 'size of holding' criterion, but pillar 2, which has all of the rubrics that chime with urban agriculture, is clearly reserved for *rural* development: the second pillar also manages to by-pass the urban context. But the weight of finding for CAP, too (pillar 1) also has a strong sectorial emphasis (on agriculture) and is not naturally well-disposed by being integrated or 'shared' with other policy fields (such as health). The dominance of sectoralism in EU level policies does not suit the holistic temperament of urban agriculture. Even in England, where responsibility for pillar 2 has been given to the urban-focused Local Enterprise Partnerships (economic development agencies at the sub-regional level introduced in 2010 to replace the disbanded regional tier of government) they have tended to set up 'rural' sub-groups to look after this portfolio: it is seen as not being part of their urban focus.

In this context, the impact of continuing CAP reforms on urban agriculture must remain largely speculation. On the one hand the CAP still provides the largest volume of state support of any European policy and as long as urban agriculture remains excluded from access to these funds it can be seen as an opportunity lost. And the road to incorporation will not be easy as many of the farming community do not see urban agriculture making any contribution at all to 'world food shortages' and therefore not eligible for state funding (Curry and Kirwan, 2014). The right to keep CAP funds in the rural milieu will be strongly defended.

On the other hand, the precepts of sustainability held by most urban agriculture groups would eschew dependency on state support as it bodes against notions of independence and resilience. The multifunctional nature of urban agriculture might suggest that it is not best placed to be identifying with 'agricultural' policy but rather to embrace the full panoply of policies in which it has an interest. In this context, it is a shift in policy conceptualisation at the European level that will benefit urban agriculture most. The benefits of moving from a mind-set based on sectorial policies to a more holistic policy approach based on integrated policies tailored to particular places is likely not only to benefit urban agriculture, but the development of sustainable polices in general (Pretty, 2008).

Overall, Lindblom's (1959) classic characterisation of public policy as "muddling through" still holds good today in much European policy (Lindblom, 1959). He maintained that the development of policy was inevitably incremental in its progress and strongly seated in historical precedent because anything more rational and comprehensive was impossible for complex and multi-faceted policy problems (Low *et al.*, 2012). Policy builds incrementally out of the past and the present, in a step-by-step fashion and in small degrees.

This 'inevitable' process is increasingly out of step with the need for radical policy reform in the face of climate change and sustainable development, in which new roles for food have an important role to play. In this more radical context, Woodhouse and Collingridge, suggest that the citizenry never really expect policymakers to achieve their goals, or achieve them only partially (Woodhouse and Collingridge, 1993). Richardson charts this incrementalism, for example, in EU energy policy from the European Coal and Steel Community of 1951 and the European Atomic Energy Committee of 1957 through a long range of development to 2012, when:

> EU energy policy is certainly far from having achieved its key objectives: for example significant obstacles to an EU energy market remain even after a third legislative package was approved in 2009 (Richardson, 2012).

Cockfield and Courtenay Botterill suggest that such incrementalism is particularly the case in agricultural policy where large levels of state support lead to active resistance to change on the part of those in receipt of such support (Cockfield and Courtenay Botterill, 2013).

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Table 1. EC policies relevant to Urban Agriculture

Name and weblink	Policy Area/Domain	Policy Statement	Originator
1 - CAP Direct Payments http://ec.europa.eu/agriculture/direct-support/direct-payments/index_en.htm	B - Shortening Food Chains, 1 - food production and consumption	Direct payments are income support payments granted directly under support schemes (CAP Pillar 1). Cost €40 billion per annum.	EC DG Agri
2 - CAP Cross Compliance http://ec.europa.eu/agriculture/direct-support/cross-compliance/index_en.htm	B - Shortening Food Chains,	From 2003 these are compliance measures in return for EU support. Aimed to ensure environmental standards regarding soil, water and biodiversity management. For registered farmers only under CAP Pillar 1.	EC DG Agri
3 - CAP Free Food for Most Deprived Persons in the EU http://ec.europa.eu/agriculture/most-deprived-persons/index_en.htm	B - Shortening Food Chains, 1- food production and consumption 5- Multifunctional Agriculture	Food distribution to the most deprived persons. In 2010 18 million people benefit from the scheme, phased out during 2013.	EC DG Agri
4 - CAP Fruit and Vegetable Regime http://ec.europa.eu/agriculture/fruit-and-vegetables/index_en.htm	B - Shortening Food Chains, 2 - Rural development 5 - Multifunctional agriculture 6 - sustainable land use	Promotes consumption of fruit and vegetables, including some free distribution to public and charitable kitchens. Some promotion of environmentally friendly production.	EC DG Agri
5 - CAP Rural Development Policy http://ec.europa.eu/agriculture/rurdev/index_en.htm	A - closing the cycles of organic waster, water and nutrients B - shortening of food chains C - multifunctional use of land in peri/urban areas 2 - rural development	Pillar II of CAP with 3 axes: improving competitiveness of agricultural sector, improvement environment and countryside, improving quality of life in rural areas and diversification of rural economy. Use of LEADER approach within	EC DG Agri

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Table 1. Continued

Name and weblink	Policy Area/Domain	Policy Statement	Originator
6 - CAP Agriculture and the environment http://ec.europa.eu/agriculture/envir/index_en.htm	A - closing the cycles of organic waster, water and nutrients B - shortening of food chains C - multifunctional use of land in peri/urban areas *1 - food production and consumption* *2 - Rural development* *3 - Waste management* *4 - Water resource management* *5 - Multifunctional agriculture* *6 - sustainable land use*	3 Priority areas: Biodiversity and preservation and development of 'natural' farming systems, including traditional agricultural landscapes, water management and use, dealing with climate change. Mechanisms: promoting environmentally sustainable farming practices for example agri-environmental schemes, enhancing compliance with environmental laws, sanctioning reduction in support payments.	EC DG Agri
7 - CAP Agriculture and Bio-Energy http://ec.europa.eu/agriculture/bioenergy/index_en.htm	C - multifunctional use of land in peri/urban areas *1 - food production and consumption* *2 - Rural development* *5 - Multifunctional agriculture* *6 - sustainable land use*	The Directive (Renewable Energy Directive 2009/28/EC) requires members states to plan their development of each type of renewable energy via National Renewable Energy Action Plans. Provisions for co-operation between member states help this to be achieve cost-effectively.	EC DG Agri
8 -CAP Agriculture and Climate Change http://ec.europa.eu/agriculture/climate-change/index_en.htm	A - closing the cycles of organic waster, water and nutrients C - multifunctional use of land in peri/urban areas *5 - Multifunctional agriculture* *6 - sustainable land use*	Agriculture is vulnerable to climate change but also contributes to it. Policy is about improving resilience of agriculture through adaptation and cooperation. Cross compliance (above) and Biogras (above) and farm modernisation important. Likely to be an important element of future CAP reforms.	EC DG Agri

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Table 1. EC policies relevant to Urban Agriculture

Name and weblink	Policy Area/Domain	Policy Statement	Originator
9 - CAP Organic Farming http://ec.europa.eu/agriculture/organic/eu-policy/legislation_en	A - closing the cycles of organic waster, water and nutrients C - multifunctional use of land in peri/urban areas *1 - food production and consumption* *2 - Rural development* *3 - Waste management* *4 - Water resource management* *5 - Multifunctional agriculture* *6 - sustainable land use*	Council Regulations on organic standards came into force 2009. It covers principles, rules and labelling. The notion of 'sustainable agriculture' is considered key here.	EC DG Agri
10 - CAP Agricultural Product Quality Policy http://ec.europa.eu/agriculture/quality/index_en.htm	A - closing the cycles of organic waster, water and nutrients C - multifunctional use of land in peri/urban areas *1 - food production and consumption* *5 - Multifunctional agriculture*	EU law lays down stringent requirements guaranteeing the standards of all European products. The main schemes are: PDO - Protected Designation of Origin PGI - Protected Geographical Indication TSG - Traditional Speciality Guaranteed	EC DG Agri
11 - CAP Food Safety http://ec.europa.eu/food/food index_en.htm	A - closing the cycles of organic waster, water and nutrients B - shortening of food chains C - multifunctional use of land in peri/urban areas *1 - food production and consumption* *5 - Multifunctional agriculture*	The Commission's 'White Paper on Food Safety' is to apply to an integrated approach from farm to table covering all sectors of the food chain, including feed production, primary production, food processing, storage, transport and retail sale.	EC DG Agri

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Table 1. Continued

Name and weblink	Policy Area/Domain	Policy Statement	Originator
12 - EU Small and medium enterprises http://ec.europa.eu/small-business/index_en.htm	A - closing the cycles of organic waster, water and nutrients C - multifunctional use of land in peri/urban areas *1 - food production and consumption* *2 - Rural development* *3 - Waste management* *4 - Water resource management* *5 - Multifunctional agriculture* *6 - sustainable land use*	The Small Business Act for Europe (2008) reflects the Commission's political will to recognise the central role of SMEs in the EU economy. It puts in place a comprehensive SME policy framework in the EU for the first time. Policy covers standardisation, technology partnerships European Enterprise Network, EU Venture Capital for SMEs, EU Loan Guarantees for SMEs and ERSASMUS for young entrepreneurs.	EC DG Enterprise and Industry.
13 - EU Competition Policy http://ec.europa.eu/competition/consumers/what_en.html	A - closing the cycles of organic waster, water and nutrients C - multifunctional use of land in peri/urban areas *1 - food production and consumption* *2 - Rural development* *3 - Waste management* *4 - Water resource management* *5 - Multifunctional agriculture* *6 - sustainable land use*	This Policy is designed to protect consumers against restrictive competition by businesses that constitute anti-competitive behaviour. It relates to dominant positions in particular markets, mergers and state support for particular companies. It promotes trade liberalisation.	EC DG Enterprise and Industry.
14 - Consumer protection and rights http://ec.europa.eu/consumers/index_en.htm	B - shortening of food chains *1 - food production and consumption*	490 million consumers have common rights for buying goods in all sectors. There are bans on misleading advertising, aggressive selling and rights relating to financial services. dolchetta.eu contains all of these rights and how they can be protected. Consumer safety is part of consumer rights.	EC DG Health and Consumers (SANCO).