

CONSULTATION RESPONSE FORM

Question 1 – Are there other areas you think the Partnership Agreement should address?

Question 2 – Do you think these thematic objectives will best address Scotland's short-term and long-term challenges?

Question 3 – Do you think there are any other thematic objectives which should be addressed?

Question 4 – Do you think the Scottish Themed Funds will address Scotland's key challenges?

Question 5 – How do you think the governance and delivery arrangements will impact on your sector?

Question 6 – How do you think the governance and delivery arrangements will impact on your organisation?

Question 7 – Are there any unidentified governance or delivery arrangements that could aid simplification of the future programmes and ensure that the Structural Funds complement each other?

Question 8 – What other delivery options do you think would be feasible for delivering youth employment initiatives?

Question 9 – What other measures could be taken to reduce the audit and control pressures?

Question 10 – Do you have any further comments on the proposals?

East Dunbartonshire Council would wish to comment on three issues not explicitly raised in the consultation questions.

First, East Dunbartonshire Council would suggest that with respect to employability and social inclusion, **the CPP model is refined and enhanced to become the main mechanism for funds allocated under this theme.** In some cases adjacent CPPs may wish to come together for this purpose as has happened in the current programme but the presumption should be against forced amalgamations of CPPs in the name of (superficial) simplicity. A needs based formula would be used to derive the budget available and each partnership would then prepare in effect a business plan based on local priorities which in turn would be backed by evidence. This would give flexibility across all Scotland regarding the stages in the pipeline on which to focus activity and ensure a minimum level of spend in each area within Scotland. (This would represent a significant improvement on the current situation in which ESF interventions in non designated areas are limited to the latter stages of the pipeline). The plan would have to demonstrate cross sectoral partnership working at both strategic and operational levels.

A broadly similar approach could be taken with regard to business support activities delivered through the Business Gateway network. This would allow for example support to be given to sectors that are not featured in national frameworks but which are important to local economies.

Second, East Dunbartonshire Council welcomes the notion that the proposed arrangements appear to exclude any significant element of **spatial targeting.** In particular, East Dunbartonshire Council and its partners would welcome the opportunity to access European Regional Development Funds in order to support Physical Infrastructure Investment. Currently, East Dunbartonshire Council is excluded from access to such regeneration funds as JESSICA and SPRUCE. A change to a level playing field for local authorities would now be appropriate, given the significant challenges which face all of Scotland's communities. Accessing ERDF should be based on evidenced need for physical regeneration activities irrespective of geographical location. Moreover, such action would support physical land use designations contained within the Council's Local Development Plan (for example, the requirement to identify land for Industrial Development).

Third, East Dunbartonshire is an area where accessibility to effective transport links to facilitate access to employment opportunities are lacking. Support for sustainable transport initiatives would be welcomed through a fourth Scottish Themed Fund, bearing in mind that this objective is about the transition to the low carbon economy in all sectors aligned to the promotion of "sustainable urban mobility". As well as being a key facilitator of economic activity, transport accounts for a significant amount of Greenhouse Gas emissions. Explicit reference to actions within this sector is appropriate.