

CONSULTATION RESPONSE FORM

Question 1 - The table in part 5 provides an overview of the proposals under each of the EU 2020 headings – Smart, Sustainable and Inclusive – matched against the relevant thematic objective and investment priorities. Do you think the investment priorities are the most appropriate ones for the activity suggested?

To determine whether the investment priorities are correct would assume that the initial proposal itself is correct. The strategic/national approach which has been taken towards the proposals mean that in most cases the investment priority has little or no territorial focus because the proposal takes a much broader national approach. This approach appears to be led from the top down approach of aligning national and EU funds/priorities. There is a danger in doing so that EU funds are used to deliver pre-planned activity and not new innovative ideas which demonstrate true partnership working.

The logic behind the selection of interventions furthers this concern. A list of interventions has been drawn up however these appear to be in isolation rather than as part of a strategic objective. Any strategic objective has followed the identification of interventions for which match funding is available.

For Local Authorities this puts us at a significant disadvantage, because we cannot confirm match funding that far ahead. Where projects are already able to confirm the match funding for their activity there may be questions raised about the actual additionality which EU funds will offer and whether it is merely an extension of core activity. This is hugely important because of the risk of funding being recovered by Europe if the activity is not additional.

Many of the areas which have been identified do appear to offer a role for local authorities within the delivery of these strategic objectives. However, there is a real fear that local authorities will be stifled in their attempts to be innovative due to the nature of projects being “commissioned” by the SDP’s which will mean that the geographical variances may not be well acknowledged.

Over the years Local Authorities have taken a lead on the delivery of projects part funded by structural funds and other EU programmes. This has enabled local authorities to develop the expertise required to comply with the audit requirements as well as ensure delivery of outcomes. Local Authorities are largely seen as delivery bodies within the new programme and it is hoped that those organisations which will take the role of Lead Partner will have the knowledge and capacity to fully undertake this role. The provision of clear guidance will be an absolute minimum to aid them.

In terms of the selected objectives and the proposed priorities, it is acknowledged that these are proposed with an over commitment of funds and that some will have to be removed. That being the case, our response shall outline the main interventions which we would not wish to see removed, or any areas where we would like the activity broadened.

Business competitiveness

Alignment of the support would improve the offering to SMEs however it would seemingly require a national agency to take a lead on this to coordinate the support. The theory of aligning support is great, but putting it into practice may be more problematic. The needs of business in different local areas can vary significantly and therefore the support may also require to be tailored. For this area to succeed it must be clearer in the description exactly

which type of activity is to be supported. If alignment of local and national support is the intention then the areas of focus must be those which are not affected by local conditions.

Scotland's 8th City – The Smart City

We fully support the role of the Scottish Cities Alliance in leading on this work. The existing partnership can be utilised to ensure that the work undertaken is transferable across the cities and that the ERDF funding will enable additional activities which will ensure a transformation of City services. This is one of the few areas within the new proposed programme where there is a genuine bottom up approach which will encourage innovation across public and private sectors.

Low Carbon Travel and Transport

Active Travel Hubs – *Aberdeen City Council could play a role here as a delivery partner, helping to integrate cycling into a multi-modal transport offering in the city with public transport.*

National Smart Ticketing Scheme

Aberdeen City Council could play a role here as a delivery partner looking to increase the uptake of public transport through improved access to smart ticketing features.

Low Carbon Transport Hubs

Aberdeen City Council would be interested in this. It would support implementation of our Strategic Infrastructure Plan and also our Sustainable Urban Mobility Plan.

Low Carbon Infrastructure Transition Development Fund

Aberdeen City Council could play a role within this proposal; however from the description it is not clear what type of activity would be funded. If physical infrastructure/renovation/installation is eligible then measures to generate renewables for use within buildings and transport would fit well with our existing Hydrogen Framework Strategy as well as our Carbon Management Plan.

Demonstration projects which deploy new technologies would be a great example of how to make these types of activity work more effectively from an economic point as well as the environmental side.

Scottish Regeneration Capital Grant Fund

In Aberdeen there are a number of pockets of deprivation which are earmarked for regeneration within the recently published Strategic Infrastructure Plan. The use of ESIF grant to accelerate the regeneration of these areas would help to provide greater social and economic conditions within those areas. It is hoped that this fund is not just open to the regeneration of large urban areas, but that small pockets of deprivation are acknowledged and supported also.

Green Infrastructure

Aberdeen City Council would have an interest in working with SNH to ensure that areas outside of the identified “central Scotland environment network” are not excluded from this opportunity. On the basis that we are not aware of any ERDF being geographically ring fenced for central Scotland we would welcome the opportunity to participate in this proposal, particularly if 9B goes ahead.

*9b – “support for physical, economic and social regeneration of deprived communities in urban and rural areas.

Question 2 – Section 6 sets out the linkages between Structural, Rural and Fisheries Funds as well as linkages to other EU Funding Programmes. We would

welcome stakeholder comments on these linkages in order to help us develop this thinking further

The move away from individual programmes to a single framework programme has caused some complications because naturally there are overlaps between some of the programme.

It is a concern that the EMFF appears to have progressed slower than for example the ERDF. The risk is that we can only move at the pace of the slowest and so we now are in the position where programmes are not open and we are not entirely clear when they will be open or even how they will properly function.

The rationale behind the linkages makes sense, but in practice it has added layers of complexity to the development of the objectives and proposals because they are dependent upon a number of factors.

The distinction between the activities and the funds will need to be clear, and this will have an impact upon the allocation of the funds. The work of the SDP's to identify strategic objectives means that the operational programmes will end up being a top down approach rather than a bottom up approach towards the use of structural funds.

Question 3 - Do you think the new proposals will have a positive or negative impact on the protected characteristics and wider issues of inclusion and participation?

It would be very hard to spend this amount of money and not have a positive impact on inclusion and participation.

The question is really whether the proposals will have the greatest impact. To that extent there is an argument that in order to enable those who are most vulnerable you need to work at the local level to identify and provide them with support. Local Authorities have been consistent in their message that the proposals are very national driven, and whilst in many cases this may be beneficial, it must be highlighted the role of local authorities to provide support at the local level. Local Authorities have shown an ability to work in partnerships in the past and it is widely expected that this will be the case again. Key to having a positive impact on these issues will be to ensure strong partnership working so that the support is consistent and reliable for the end user and that they are not being passed for one body to another. In the 2007-13 programme CPPs have already shown how successful they can be in providing local support within a pipeline approach. This should not be thrown away, but should be seen as a foundation for the future delivery of such support.

Question 4 - If you think there will be a negative impact on the protected characteristics or inclusion and participation please provide suggestions as to what could be done differently to diminish this impact.

One area which may be missing – but possibly just down to a lack of detail – is the role of local authorities in demonstrating innovative service provision. The technology exists to help improve the options for delivery of homecare, but these may need to be further tested to determine the success or otherwise of these.

Question 5 - Please provide your views for improving the process for design, procurement, delivery, monitoring and evaluation to strengthen delivery of sustainable development.

Design

There has to be clear guidance which will outline the level of responsibility of the PAMC and the SDP. At present it is not clear the responsibility of each of these bodies. Given the level of those involved within each of the bodies, is it realistic to expect them to be able to commit the anticipated amount of time required to hold these positions. Also, there is a risk over conflict of interest which must also be considered.

Similarly The role of Lead Partner has not been fully defined. How much responsibility do they have for managing the audit trail in particular and what financial risk does that carry to them as an organisation. Will there be any criteria as such to qualify as a lead partner, given the responsibilities which they may have. Complying with an EU project audit burden is not an easy task!

Procurement

The procurement of services is anticipated and in many ways may help to reduce some of the audit burden with the focus more on delivery of outcomes. However, structural funds and not just about achieving outcomes, they are intended to create structural change. This tends to require partnership working and therefore it is important that this aspect is not lost within the programme. As mentioned before, the programme must be flexible enough that it does not stifle innovation or the development of partnerships which will enable and deliver structural reform.

Delivery

The determination of funding stability for a 7 year programme period seems somewhat rigid when previous programmes have shown a need for flexibility. Local Authorities cannot provide match funding many years in advance and so therefore we are limited in our opportunities to commit to contributing towards the strategic objectives on this basis.

The Lead Partner role is briefly summarised and included verification of financial claims. This previously was a role undertaken by Scottish Government. There is a risk that having each Lead Partner undertake such activity that there will be a lack of consistency, and it places a much greater level of responsibility on a lead partner than was previously the case. It is therefore vital that lead partners are aware of what is required, and have the capacity to provide this level of service.

Monitoring

The consultation suggests that members of the SDPs will be responsible for the day to day monitoring of the progress of strategic interventions. It seems unlikely that day to day monitoring would be required for strategic interventions to be delivered over a number of years. In addition, it is unlikely that members of the SDP would have the resources to allocated time on a day to day basis.

The consultation also suggests that the PAMC will understand progress within an array of strategic interventions; and challenge the organisations leading them on their performance. Is this not overlapping the role of the SDP in monitoring the progress of these interventions. Again, it is questionable as to whether members of the PAMC will have the resources available to be so heavily involved in the programme that they will challenge the performance of organisations.

Question 6 – Do you have any further comments on the proposals outlined in this document?

Governance arrangements:

The consultation document mentioned that the governance arrangements for the SDP and PAMC are not settled yet the PAMC is to meet for the first time in shadow format soon. When and how will representation be settled? How will challenge partners be identified for representation on the SDPs and will this be done in a transparent and inclusive manner?

There are no details on the decision-making structures for 'applications'. When will this be resolved?