

## 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?

The proposals look broadly reasonable – our worry is that rural areas and smaller local authority areas will lose out if they do not have the resources available to invest in these initiatives.

Skills and apprenticeships are a big issue in our area, so would like the focus on ‘advanced’ apprenticeships to be broadened to all types of apprenticeships as studies in our area show that we have many more young people wanting to do apprenticeships than there are places available or businesses able or willing to take them on.

Next generation broadband is also a much needed tool in our area, but we are unclear here of the overlap with the SRDP and their investment in rural broadband. Will there be demarcation or clarification of the different types of activity to be funded (is one capital infrastructure and the other more revenue related activities for example?)

**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

It is helpful that you have listed some of the more grey areas between the Structural Funds and Rural Funds, such as the distinction in types of training to be funded under each.

Our question relates to the areas not listed and the linkages that will be required to ensure consistent and comprehensive cover across Scotland, and particularly the rural areas that traditionally lose out. For example, most of the Structural Fund activity will by its nature be targeted at large(r) urban settlements, but how will (for example) rural areas wanting to stimulate apprenticeship type training access the Structural Funds? This type of activity won't be eligible under SRDP, so there will need to be a mechanism in place that allows these targeted pockets of activity to be supported.

In our view there is much to support the Community Led Local Development approach, but we note that there is no mention of this at all in the Structural Funds consultation document. Should we assume that the Scottish Government has decided not to progress this as an option despite EC encouragement to do so?

**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?

There is a great risk that there will be increased polarisation of the Scottish economy between urban and rural, in terms of support and resources available. The proposals here, in terms of the detail provided, look like they would heighten that risk.

**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.

Our preferred option would be for a facility to allow Community Led Local Development to happen within the Structural Funds – even if it were just as a pilot to start with. CLLD is a proven model to encourage inclusion and participation.

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

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

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