

## 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?

### In general

- we feel there is a lack of explicit recognition of the need for “tailored intervention” to address the “territorial challenges” that face rural areas. Each of the investment priorities should be rural proofed.
- it is noted that to “build on high value land and marine nature and the Scottish Brand requires significant investment in protecting and improving in terms of biodiversity, water, soil quality” However, this continues to be the focus of EAFRD – this fails to make the fundamental connection to thriving businesses, enterprises and employment in the realisation of the Scottish Brand in advanced hospitality, food and drink sectors.
- There is only limited cross reference made across the themes, with scant acknowledgement that environmental sustainability underpins economic development.
- There is a presumption that “born global” businesses and growth is always good. This does not take appropriateness nor environmental sustainability into consideration.
- There is little focus on ‘community’ and community-led development with only passing reference to the community angle. It is our experience that community led (demand led) programmes engender engagement, ownership, and solution-focussed programmes.
- There is little involvement of environmental sustainable development interests (public or NGO).

### Smart Growth

In general there would appear to be limited acknowledgment of the needs of rural communities – especially in relation to skills and training.

1. Investment Priority c(iv) This theme is absolutely key to supporting sustainable economic development in rural areas. We note however, that it is an intervention which is largely provision-led and for greater effectiveness it should emphasise the business partnering necessary – not just for advanced apprenticeships. Equally there should be a focus on raising aspirations of people for employment and enterprise opportunities. There is not a lack of provision!

Investment Policy c(iii) Innovative investments are required to ensure equal access for rural and remote communities for example through IT and outreach programmes. There is a significant cross-over with access to transport services and cost of transport. All important to break the cycle of rural de-population and the “to get on you have to get out” attitude.

2.

Business Competitiveness. Welcome the involvement of Visit Scotland but there are other key NDPB delivery partners as stakeholders – eg. Creative Scotland, NPAs as well as the Third Sector which is poorly represented throughout.

3. Innovation. We welcome the inclusion of social innovation and eco-innovation.

4. Broad Band. We welcome this investment priority.

Sustainable Growth

5. Sustainable Travel. This is recognised to have an urban focus but is probably the most significant barrier for rural and remote communities. Investment in some innovative approaches is needed. This approach will almost certainly involve local community support.

6. and 9. Welcomed but lacking detail.

7. Strong link with 1. Welcome this continued support for youth employment opportunities but we believe there should be a focus on engagement/ aspiration raising. Pipelines are not very inviting!

8. Note that this is to be developed. There will be a clear link to lifelong learning, social capital, social enterprise and community-led development.

9. Requires rural proofing.

10. This is not very clear either and appears under-developed. Perhaps there should be additional lead partners eg. NHS Scotland, Third Sector including Housing Associations, Transition Towns?

**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

Not at all clear. Distinction between non-formal vocational skills directed through EAFRD and formal rural sector qualifications, modern apprenticeships through ESF is not helpful. What defines the rural sector? Agriculture, horticulture, forestry, equine?, what about eco-tourism, food tourism, rural crafts, design or any form of SME or micro-business operating in the rural sector.

Worrying that ERDF maintains its urban focus but includes the kind of provision which has equal access across geographical territories. Here we would be looking for explicit tailored interventions supported by ESF.

However, it is noted and welcomed that rural micro-business/SME support is maintained through EAFRD.

**LEADER is referred to as an add-on required by regulation. This is disappointing as the LAG approach has much to commend itself particularly where it is able truly to respond to local needs. LEADER has help to fund innovative approaches in local economic development, skills development and service provision and it would be hoped that good pilot projects delivering on key priorities would find further support through an appropriate ERDF or ESF route. For example the Loch Lomond and the Trossachs Community Partnership's Skills Partnership.**

It was our understanding that the review of structural funds was to recommend that access to ESF and ERDF were to be made possible through LEADER, thus enabling training and skills development interventions to be funded through a single door with all the wires hidden! The local development strategies developed by the LAGs would provide the strategic

partnership ensuring that regional priorities were being met.

**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?

Not clear what 'protected characteristics are, but the lack of community focus would imply that participation will not be enhanced. Indeed the focus on large scale strategic interventions managed by national lead partners does not fill one with confidence that regional priorities will be preserved nor opportunities for community – led participation will be encouraged. The investment in the charrette approach by SG nor the Community Action Planning spear-headed by the LLTNP Community Partnership will have a strategic place in the funding arrangements.

The formation of the Partnership Agreement Monitoring Committee to monitor progress of the Strategic Delivery Partnerships will be challenged to respond to regional priorities. Membership being from national public bodies one would assume.

**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.

Perhaps there should be much more of a community-led focus with a number of regional PAMC's as per the SRDP committees. Greater use could be made of the existing LAG structures perhaps.

Linking up SG investment in community planning/vision making through charrettes and locally delivered community action planning to provide a more community-led focus.

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

Sustainable development should be at the heart of all strategic interventions.  
Connectivity between urban and rural needs and issues.  
Acknowledgement that innovation equally applies, if not more so, to a rural setting where strategic priorities require innovation in design and application.

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

Concern over lack of strategic and structural investment in innovation at a rural community level.

Concern over ESF strategic funds being accessible through LEADER for formal skills development and training i.e. where a LEADER strategic priority being young people in rural areas accessing skills and training provision will a LEADER LAG have access to ESF funding?

Whilst it is recognised that the burden of audit, monitoring and managing these large structural funds are best handled by agencies with the administrative capacity it is difficult to see how the delivery will be enabled at an appropriate level.

We welcome the concept of 'hiding the wires' but we are not convinced that sufficient consideration has been given to effective use of funds to delivery real change on the ground and particularly in rural areas..