

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?

There are a number of themes identified with the potential to be of interest to rural towns. The selection of topics is less relevant than the eventual programme content. Under the previous programme support for Community Halls was specifically excluded in the Highlands and Islands Partnership Programme. Councils have divested control of these to communities and to charitable trusts. As the halls fall into disrepair over time the community groups and charities contact the council to assist with major repairs and upgrades only to be told it is nothing to do with them. "You took it on, you manage it" is the stock response. Unless upgrading facilities in community halls (including greening) is specifically stated to be essential councils will continue to abrogate all responsibility and communities will eventually have nowhere to meet. Please ensure Community Halls are specifically protected, greened and enhanced under themes 11, 12 and 13. Under theme 6 we would hope that access to PWLB money for Community Councils could be allowed to support investment in green energy schemes. This could be, as is suggested, via the medium of local authority loans in addition to the support given by the Scottish Investment Bank (SIB). PWLB rates are favourable at present and this will ensure returns for the community from green energy investments are maximised. This theme's energy section could be run by Community Energy Scotland either for the Councils or for the Scottish Government post 2015.

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

Eligible EMFF communities should have no restrictions on their access to the other funds arising from their use of EMFF monies. This EMFF money should be top-up funding to diversify away from the over-reliance on fishing which has blighted many coastal communities. Over many years it is clear that "bottom up" development of themes and programmes will nearly always give better end results than a "top down" programme of theme development. Any attempts to ban investment in marina facilities in areas where fishing is declining or has declined should be resisted at all costs. Such concentric diversification should be encouraged wherever a local community wishes to engage in it.

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?

We think the impact will be positive in rural areas.

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.

N/A

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

Greater clarity needs to be achieved over how LEADER funds are spent. It isn't clear how the people sitting on LEADER review panels are chosen. It isn't clear that objective criteria are set for review decisions and it isn't clear that decisions are taken based on the business cases & plans presented rather than on the subjective assessment of panel members. How long do such members serve? Should this be a fixed term or is their tenure indefinite? How are they replaced? Greater clarity should be provided, greater public contentment would result.

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

It is disappointing that at this pretty late stage there is still a lack of clarity over the Poverty and Social Inclusion theme. Programmes to allow access to smaller houses and better insulation of the existing stock of Council and Social Housing should be a key theme. A programme to tackle the affordability of energy in the home should be thought out. Often socially disadvantaged people pay in advance and at the highest tariff. Collective action by local authority area might be able to tackle this.

Many of the themes seem targeted more at cities than at towns and villages. Urban social deprivation is very serious but it might in part be tackled by activities in rural areas. The 10,000 ha target for tree planting will provide employment opportunities for young people around Scotland and might also be used to help people in urban areas find gainful things to do in other parts of our country. Businesses planning to use biomass for co-firing or to replace coal entirely in conventional power plants might be encouraged to plant still more trees as carbon offset. Clear-felling American woods & sailing them across the Atlantic is, to be extremely generous, a sub-optimal solution.

It would be interesting to see maps of SME participation in the existing programmes and to see if the participation rate in rural areas could be improved.

It would also be good to see a mention be made of the tertiary and charitable sector which has picked up much of the activity formerly done by councils. These are often major employers in rural areas. There is no mention of them in the plan. SME support in this document is targeted at a small number of private Account Managed and Growth Pipeline firms. This will exclude nearly every SME outside of a city. It also excludes all charities.

A number of very successful firms have been started in rural areas Gigha's "Dancing Ladies" and Eigg's island grid spring to mind. Many more could be developed with a bit of support. The things which prevent and delay development in an interminable fashion are often

government agencies such as SEPA, SNH, Council Planners or well funded Charities such as in particular, JMT with their “Wild Land” and “Search Areas for Wild Land” or “Things That Can Be Seen From Search Areas For Wild Land” taken to conclusions which mean almost no development is possible.

Can anything be done to help small communities overcome this?

Scotland needs to support high growth private firms, we fully support this. We also need to support firms which may never grow to take on the world but which can play a major role in sustaining rural communities in terms of jobs and social cohesion. Let’s see both clearly delineated and clearly encouraged.