

Mclsaac C (Cathy)

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Subject: Consultation Response

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Future European Structural Funds Programmes in Lowlands & Uplands Scotland 2007-2013**RESPONDENT INFORMATION DETAILS**

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Questions and Answers

Foreword: East Dunbartonshire Council is grateful for the opportunity to respond to the Scottish Executive consultation on the future European Structural Funds programmes for Lowlands and Uplands Scotland (2007-13). In preparing this response, Council officers have attended events such as the Scottish Executive Priority Workshops and the Engaging in Discussion event hosted by Strathclyde European Partnership, and have liaised with other West of Scotland local authorities through membership of the West of Scotland European Consortium (WoSEC). Q1 response: While it is accepted that there is a reduction in the level and scope

Question 1: Are there any additional socio-economic factors to be considered – and which Structural Funds can address – in assessing the strengths, weaknesses and opportunities of Lowlands & Uplands Scotland?

of the next round of Structural Funds, derelict and vacant brownfield land remains a significant deterrent to the regeneration of many parts of the West of Scotland, and in particular parts of East Dunbartonshire. The Council, along with its partners, has succeeded in drawing down ERDF support to bring brownfield sites back into use in Kirkintilloch, Lennoxton and Milngavie. These projects have created employment opportunities, training facilities and business units, thereby making a contribution to the economy of East Dunbartonshire. The opportunity to create further economic benefit in areas of need remains, and if properly targeted, future ERDF funding could address these instances of market failure. However, with the constraints imposed by Lisbon earmarking along with the apparent lack of spatial targeting, it is likely that Structural Funds will not be able to address such a constraint on the economic development of East Dunbartonshire and the wider West of Scotland area. ERDF funding has acted to kick-start this regeneration, and it is important that the Scottish Executive ensures that this legacy is capitalised and maintained through domestic expenditure.

Question 2: Do the proposed priorities for the 2007-2013 ERDF programme in Lowlands & Uplands Scotland address the strengths, weaknesses and opportunities of the region?

We do not consider that the proposed priorities achieve this. In particular, the priorities do not reflect the geographic distribution of economic need in the Lowlands and Uplands Scotland area. Other areas of our response deal with these issues in more detail.

Question 3: Do the proposed priorities for the 2007-2013 ERDF programme in Lowlands & Uplands Scotland show appropriate coherence and concentration?

East Dunbartonshire Council would emphasise the response made by WoSEC in relation to this question. Analysis presented within the consultation document outlines that the areas of greatest socio economic disadvantage are located in the West of Scotland. In addition, the size of the business base is lower in the West of Scotland than in the East. Both of these factors act as major challenges to economic development. Why then, is there no spatial targeting proposed for the new ERDF Priority 1? Analysis carried out by WoSEC into the SMART and SPUR programmes indicated that funding from these went mainly to the more successful regional economies in the East of the LUPS area, and there is a danger that the same could happen to ERDF Priority 1 if spatial targeting is absent, causing serious implications for the West of Scotland.

Question 4: Do the proposed priorities for the 2007-

There are some prominent issues which should be addressed by the ESF priorities. Within East Dunbartonshire, there are groups of economically inactive people who are not engaging with the services designed to equip them with the motivational and soft skills they require for progression. This is compounded by the availability of job-ready EU nationals moving into Scotland who enter roles which traditionally would have been taken up by these disadvantaged groups. This is reflected in the following statistics for our local authority area. Incapacity claimant levels within East

2013 ESF programme in Lowlands & Uplands Scotland address the strengths, weaknesses and opportunities of the region?

Dunbartonshire are relatively high, while wages of those working locally are relatively low (SLIMS, November 2006). In addition, participation rates at FE colleges by Dunbartonshire residents are below the national average at both full- and part-time levels (Scottish Further Education Funding Council, April 2005). Priority 1 ESF is targeted at getting these hard to reach, disadvantaged groups into employment. However, previous Structural Funds programmes have failed to address this growing problem. It is therefore imperative that, with a reduced pot, the ESF resources for 2007-13 are targeted at achieving sustainable results in terms of the economically inactive.

Question 5: Do the proposed priorities for the 2007-2013 ESF programme in Lowlands & Uplands Scotland show appropriate coherence and concentration?

East Dunbartonshire is satisfied with the content of the proposed ESF priorities, notwithstanding the above answer to Question 4.

Question 6: What are your views on the proposed balance of funding between priorities for the future ERDF programme in Lowlands & Uplands Scotland?

East Dunbartonshire Council is in agreement with the views expressed by WoSEC in response to this question. Structural Funds are designed to reduce regional economic disparities. If almost half of the ERDF funding for the new programme is allocated to a priority which does not favour spatial targeting (Priority 1), there is a real danger that this could result in the reverse effect. This is particularly worrying in the context of N+2 and the delay to the start of the new programme, which could ultimately result in projects which demonstrate the ability to spend quickly being favoured over those which meet a genuine need. Where we find it very difficult to comment as an authority relates to the balance of funding between ERDF Priority 2 and Priority 3. East Dunbartonshire is an area comprising suburban areas on the border of the Glasgow metropolitan area, small and medium-sized towns and villages which are remote to those who do not have access to private transport. In assessing where Structural Funds could make most difference in future within East Dunbartonshire, and where they would contribute to a reduction in economic disparities, this could easily be split between what we would consider to be urban and semi-rural areas. However, with no classification of the 'urban' and 'rural' areas which would be covered by the new programme, commenting on the split of funds between these two priorities would be pointless. Clarification of the criteria which will be used to determine urban, rural and semi-rural areas, in addition to which priority they belong, would be helpful in the final version of the Operational Programme and subsequent Programme Complement.

Question 7: What are your views on the proposed balance of funding between priorities for the future ESF programme in Lowlands & Uplands Scotland?

We would advocate a split of 50%/40%/10% for Priorities 1, 2 and 3 respectively.

Question 8: Do the proposed priorities outlined in the draft Operational Programmes focus sufficiently on the right priorities in Scottish domestic policy?

The Council is in agreement with WoSEC that account should be taken of localised economic development strategies across the Lowlands and Uplands Scotland area.

<p>Question 9: What are your views on how the principle of environmental sustainability has been integrated into the Operational Programmes?</p>	<p>The document refers to new environmental techniques and resource efficiency within Priority 1 ERDF. Commitment to this should be maintained in the final programme documents. In addition, some funding in Priority 1 could be set aside for pilot schemes which would be particularly important under this theme.</p>
<p>Question 10: What are your views on how the principle of equal opportunities has been integrated into the Operational Programmes</p>	<p>No comment.</p>
<p>Question 11: What are your views on how the Operational Programmes will ensure complementarity between Structural Funds and other EU funding streams?</p>	<p>The Council does not consider an annual meeting as the most effective way to ensure complementarity between Structural Funds and other EU funding streams. This activity would be better carried out at a more localised level, for example by the Advisory Groups. Complementarity between Priority 1 ERDF and the Seventh Framework Programme would seem appropriate, and further guidance on how this can be achieved would be helpful from the Scottish Executive and the incoming IAB.</p>
<p>Question 12: How can the challenge-fund approach be improved to make it more effective in delivering outcomes and more efficient in operation?</p>	<p>The current challenge fund model within Scotland is widely admired, and therefore the Council does not consider that any major improvements are required. In fact, the European Commission has identified our challenge fund model as an example of best practice. In an attempt to simplify the application process in terms of time incurred by applicant organisations, it might be appropriate to consider a pre-application proforma or rigorous project synopsis, as is currently a requirement of the Objective 1 programme in Merseyside. This allows issues such as eligibility, fit with relevant strategies and availability of match funding to be determined at the outset without the need for a full application, thus saving resources of both the IAB and the applicant organisation.</p>
<p>Question 13: What would be the most effective approach to using Community Planning Partnerships and other local partnerships for the delivery of elements of the programmes?</p>	<p>East Dunbartonshire Council is keen to support elements of the new Structural Funds programme being targeted via Community Planning Partnerships, linked to the appropriate policies and targets. However, this should be done at a strategic, West of Scotland level. The most effective approach would be to award this proportion of the funding to the Clyde Valley Community Planning Partnership, from which local authorities (in partnership with other organisations) can bid for funds for relevant projects.</p>
<p>Question 14: What are your views on spatial targeting for community regeneration under ERDF Priority 2 and ESF Priority 1?</p>	<p>East Dunbartonshire Council considers some form of spatial targeting to be imperative under these two priorities. However, under the current West of Scotland Objective 2 Programme, experience of targeting support to the 15% most deprived data zones has meant that some projects experience difficulties in attracting beneficiaries from these specific areas while beneficiaries who meet the criteria of need are excluded owing to their place of residence. There could therefore be an argument for some form of thematic targeting</p>

	especially with reference to ESF Priority 1. CPP's may also be well placed to identify areas of particular need in each local authority area.
Question 15: What are your views on spatial targeting for rural development under ERDF Priority 3?	As with the other priorities, East Dunbartonshire Council considers it important for the rural priority to be targeted towards areas of most need which exhibit market failure. In this context, the Council can see no justification for allocating a portion of the funding under this priority to the South of Scotland. While it is accepted that this is a mainly rural area with associated problems, there is no evidence that these problems are more acute than those of rural communities elsewhere in the Lowlands and Uplands Scotland area. In addition, clarity over what constitutes a rural area would be helpful before issues of spatial targeting can be addressed.
<i>Question 16: Do you have any additional comments on the draft Structural Funds Operational Programmes for Lowlands & Uplands Scotland?</i>	We have no more comments.

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