

**Mclsaac C (Cathy)**

**From:** david.greaves@westlothian.gov.uk  
**Sent:** 08 January 2007 17:38  
**To:** Structural Funds Consultation Mailbox  
**Subject:** Consultation Response

\*\*\*\*\*  
This email has been received from an external party and  
has been swept for the presence of computer viruses.  
\*\*\*\*\*

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

**Name:** David Greaves  
**Organisation:** West Lothian Council  
**Address:** Economic Development the Enterprise Centre  
Almondvale Boulevard Livingston  
**Postcode:** EH54 6QP  
**Email:** david.greaves@westlothian.gov.uk  
**Telephone Number:** 01506 - 777943  
**Responding as:** on behalf of a group or organisation  
**Individual Permission:**  
**Confidentiality:**  
**Group or Organisation:** Yes  
**Share Response Permission:** Yes

**Questions and Answers**

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?

The socio economic factors considered are comprehensive. Our main concern relates to the over emphasis placed on the SIMD as a measure of economic need and for determining targeting of resources. Identifying and targeting hard to reach and excluded groups is one we would support. However, the targeting of resources, both ERDF and ESF using SIMD data zones is not appropriate in much of rural and non-city urban Scotland where a much more dispersed pattern of deprivation is evident.

The overall scope of the ERDF Priority themes and balance of funding allocations are broadly acceptable.

***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?***

There are however a number of points of concern at the detailed level. Priority 1 Enterprise Growth - We are still concerned that this priority will be too narrowly focused on RTD and high growth enterprise start-up and development in a limited number of sectors (which may or may not have real growth prospects). This allied to the split between challenge and commissioned funding could lead to resources being concentrated on a limited number of high profile projects and initiatives linked to universities and favouring city locations. SMEs with growth and innovation potential in wider metropolitan regions and local economies outwith the cities could be sidelined. Priority 2 Community Regeneration – The likely focus on SIMD areas (in the worst 15%) will be problematic for many parts of Scotland where the pattern of multiple deprivation is more dispersed. This is an issue that has bedevilled area based targeting over many years and can see inappropriate targeting on incoherent “archipelagos of disadvantage” which are totally impractical for design and management of community economic development initiatives. As with P1, we are concerned that the allocation of resources will inappropriately favour city localities (albeit for different reasons) whilst local economies and communities with real development needs characterised by industrial and post industrial small towns and villages will miss out. Priority 3 - Rural Development – Our main concern is the split of funding between that allocated to South of Scotland on a commissioning basis and the challenge fund element and how this to be targeted.

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

As stated above, the main concern is that the funding might be too concentrated. Flexibility to support sectors of regional significance and to support SMEs with jobs growth and innovation potential in a diverse range of sectors is essential. Similarly for Priority 2, the use of SIMD could be as much a barrier as an aid in targeting those most in need with suitable projects. Finally the concentration on certain rural areas over other should not result in technically eligible projects in other rural areas losing out.

Like ERDF coverage appears comprehensive, covering all the main employment and skills development areas. Priority 1 – Progressing into Employment – the priority description covers all the relevant client groups, issues and barriers. However, we are concerned that the proposed alignment with Workforce Plus (which might be interpreted as targeting those Local Authorities already receiving extra funding under Workforce Plus) and targeting of resources based on SIMD analysis which favours large urban areas. Employability and training to promote access to sustained employment should primarily be client group targeted rather than area focused. A number of priority target groups including people with disabilities, ex-offenders, NEET youngsters, care leavers and homeless people are not

***Question 4: Do the proposed priorities for the 2007-2013 ESF programme in Lowlands & Uplands Scotland address the strengths, weaknesses and opportunities of the region?***

restricted to the worst 15% of SIMD data zones. The proposed focus on SIMD areas for Priority 1 does make it difficult for many areas including West Lothian to develop coherent support packages for target groups. Whilst the model proposed of integrating ERDF P2 and ESF P1 is laudable there needs to be realistic and coherent area coverage to enable this to happen in practice. ROA areas are simply too restrictive. Priority 2 – Progressing through employment – the priority covers this theme well. The coverage proposed and suggested targeting is generally welcome. We note that this coverage may include activity to support school student pre-leavers to prepare for the world of work and activities to engage the NEET group. It is helpful that these groups are included under Priority 2, not least because of the area based limitations being proposed under Priority 1. Although migrant workers are mentioned, it is likely that this group will continue to grow and will form an important segment of the workforce with specific training needs. Priority 3 – Access to lifelong Learning – this priority and its activities could be integrated within Priority 1 and 2. However, if such a Priority is to exist then the focus of activity suggested is generally acceptable.

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

Again our main concern is in respect of the proposed area targeting of Priority 1 ESF through SIMD analysis and ROA areas.

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

The balance of the funding between the priorities does not seem to be a problem. The priorities should focus on SME's and job creation, which we feel, is covered in the proposed allocation. However our main concern is that there seems to be a lack of clarity as to what areas will be categorised as urban and which as rural. This causes immense concern in terms of de-industrialised areas in particular ex coal mining areas as a lack of clarity may lead to these areas falling between the two categories.

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

We have no real concerns with the proposed balance of funding. We do feel that there is a case for the exclusion of life long learning, priority 3 as this could be incorporated into both priority 1 and 2. The exclusion of this priority would free up additional resources without jeopardising the programme content.

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

Yes the draft programme seems to be aligned with Scottish domestic policy.

**Question 9: What are your views on how the principle of environmental sustainability has been integrated into the Operational Programmes?**

No substantive comment to offer.

***Question 10: What are your views on how the principle of equal opportunities has been integrated into the Operational Programmes***

No comment to offer, seems fully covered

Question 11: What are your views on how the Operational Programmes will ensure complementarity between Structural Funds and other EU funding streams?

It is difficult to be precise as other EU programmes are at a similar stage in development for the 2007 to 2013 programmes. At an operational level we feel the new programmes can best achieve complementarity and integration with other EU programmes through local authority lead community planning arrangements and local partnerships. This should provide the means by which structural funds are more effectively managed to deliver more efficient project activity in Scotland and would extend to include no EU funding streams

***Question 12: How can the challenge-fund approach be improved to make it more effective in delivering outcomes and more efficient in operation?***

It is difficult to be precise as other EU programmes are at a similar stage in development for the 2007 to 2013 programmes. At an operational level we feel the new programmes can best achieve complementarity and integration with other EU programmes through local authority lead community planning arrangements and local partnerships. This should provide the means by which structural funds are more effectively managed to deliver more efficient project activity in Scotland and would extend to include no EU funding streams

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?

We recommend the role of Community Planning Partnerships and similar local partnerships in the delivery of elements of the programme. We feel that Community Planning Partnership have the capacity for bringing together key agencies, colleges, voluntary bodies and the private sector. This should enable on the ground organisations to develop a framework that will develop local solutions to the strategic challenges set out in the NSRF. A bottom up approach based on working with local and community partnerships to identify challenges, develop solutions and implement programmes is already a well-established method of delivery. We are strongly in support off this approach provided it demonstrates linkages between strategic direction and community needs. West Lothian Council would welcome the opportunity to work as a pilot Community Planning Partnership area for the new programme.

***Question 14: What are your views on spatial targeting for community regeneration under ERDF Priority 2 and ESF Priority 1?***

We are again concerned that the use of SIMD and ROA's will lead to ring fencing as the boundaries are too tightly drawn and do not provide coherent geographical areas for project implementation. Priority 2 is to support enterprise and growth development but tightly drawn SIMD zones will in practice not be able to provide the development opportunities for these actions. In addition their remains an area of uncertainty over the gap between areas that are neither urban or rural, the post industrial and ex mining villages. On paper the deprivation is not evident, but locally the need within these area it is quite clear. A more flexible approach to SIMD zones would ensure these areas aren't missed out.

Question 15: What are your views on spatial targeting

Under priority 3 we are concerned about the definition of the word rural. The issue that are faced in small towns come in a variety of functions. In particular post industrial and ex coalfield areas that although are in

for rural development under ERDF Priority 3?

rural locations have urban social problems. These areas will miss out by default under the proposed spatial targeting.

***Question 16: Do you have any additional comments on the draft Structural Funds Operational Programmes for Lowlands & Uplands Scotland?***

West Lothian Council welcomes the opportunity to comment on the future of Structural Funds in Scotland, specifically the draft operational programmes and management arrangements for Lowland and Upland Scotland 2007-13. West Lothian Council has had many years experience in managing ESF and ERDF projects, delivering project outcomes and participating in the design, development and management of Operational Programmes. Council recognises that reduced levels of ESF and ERDF funding require a revised and more targeted approach to programme management and project delivery – to maximise the impact and outcomes of Structural Funds over the next 6 years. Activity that has been funded under previous programmes will no longer be eligible or prioritised. We generally welcome the focus on Growth and Jobs that stems from EU policy. This emphasis needs to be translated into practical actions through the two operational programmes. Our concluding remarks would be: 1. The new ERDF programme should continue to provide practical support for growth orientated and innovative SMEs and should not be restricted too narrowly on for example university spin-outs 2. Both ESF and ERDF programmes need to be sensitive to the needs and opportunities in areas that have experienced industrial change – not just remote rural or deprived urban areas. We have argued in particular that tight targeting of Priority 2 ERDF and Priority 1 ESF on SIMD eligible areas will not work in many areas across central Scotland 3. Community Planning partnership arrangement can provide the mechanism by which ERDF and ESF is targeted and prioritised at a local level – and the means by which European and national and regional strategies are delivered on the ground 4. The management and administrative arrangements for the new programmes need to be structured to reflect the reduced levels of funding and provide simplification where possible

PLEASE NOTE: THE ABOVE MESSAGE WAS RECEIVED FROM THE INTERNET.

On entering the GSI, this email was scanned for viruses by the Government Secure Intranet (GSI) virus scanning service supplied exclusively by Cable & Wireless in partnership with MessageLabs.

In case of problems, please call your organisational IT Helpdesk.

The MessageLabs Anti Virus Service is the first managed service to achieve the CSIA Claims Tested Mark (CCTM Certificate Number 2006/04/0007), the UK Government quality mark initiative for information security products and services. For more information about this please visit [www.cctmark.gov.uk](http://www.cctmark.gov.uk)