

CONSULTATION RESPONSE FORM

Question 1 – Are there other areas you think the Partnership Agreement should address?

Archaeology Scotland welcomes, in particular, the commitment to ‘make the economy environmentally friendly and resource efficient’ and believe this should be linked more specifically to a commitment to sustainability. We note recent initiatives by the Reid Foundation to promote the concept of the [Scottish Common Weal](#) supporting public wellbeing rather than the limitations of the mis-named concept of ‘sustainable economic growth’ (recently demolished in [debate](#) in the Scottish Parliament) and believe the Partnership Agreement should focus much more clearly on environment and social outcomes.

Question 2 – Do you think these thematic objectives will best address Scotland’s short-term and long-term challenges?

We welcome the proposed thematic objective ‘Environmental protection and resource efficiency’ and the specific mention on page 9 that ‘Scotland is recognised for its high value..... cultural heritage.....This strengthens the opportunities for sectors which depend on that reputation..., but only if it is well protected and managed.’ We would take issue that this is limited ‘to minimise soil and water pollution and to protect species diversity’. Given Scottish Government policy as set out in the SHEP ([Scottish Historic Environment Policy](#)) Archaeology Scotland would hope that the Scottish Government is more explicit in making linkages between Scotland’s historic environment and the social and economic (as well as environmental) benefits that accrue from investments in this sector. The economic benefits of protecting and enhancing heritage resources are made explicit in HEACS’s 2009 [Report and Recommendations on the Economic Impact of the Historic Environment in Scotland](#) and are also apparent in the visitor statistics from VisitScotland. The social benefits are also implicit in the former study and can also be studied in the [Scottish Historic Environment Audit 2012](#), but are also obvious in the use of heritage, the 300,000+ members of the Natural Trust for Scotland, the 100,000+ Friends of Historic Scotland as well as the 300+ heritage societies operating in Scotland and the wider appreciation of heritage through the Curriculum for Excellence and other educational initiatives. It is therefore important that the Scottish Government sets out firm policies to make sure that historic environment interests are fully integrated into funding decisions made through the ESI (European Structural and Investment) Funds programme. The Scottish Government is increasingly committing itself to an ecosystems approach and we welcome this. It would just be good to see this more reflected in practice.

Question 3 – Do you think there are any other thematic objectives which should be addressed?

If the Scottish Government continues to integrate a holistic view of Environmental Protection that includes cultural heritage as a key aspect of this objective (in line with the National Indicator ‘Improve the state of Scotland’s historic sites’) then we are happy to support the objectives as set out here.

However we remain surprised, given Scottish Government commitments and policies elsewhere, that Climate change adaptation, Sustainable transport and Capacity building are specifically excluded.

Question 4 – Do you think the Scottish Themed Funds will address Scotland’s key challenges?

We welcome the integration strategy and the objective ‘to collectively support genuine long term change in the skills base, in the growth ambitions of Scottish SMEs, in energy consumption, in land use, and in the well-being and resilience of all of Scotland’s communities’. However we do not feel the summary of proposed activities is sufficiently explicit about addressing landscape and heritage concerns.

Question 5 – How do you think the governance and delivery arrangements will impact on your sector?

Archaeology Scotland works with colleagues in [BEFS](#) (Built Environment Forum Scotland) and [Scottish Environment LINK](#) to promote actions that support historic and wider environmental outcomes. We believe there should be greater integration across sectors, as already identified by the Scottish Government through initiatives like the [Scottish Land Use Strategy](#). We hope that a greater reliance on integration will allow heritage improvements to be more centrally involved in funding decisions in line with the [SHEP](#) and the evolving Scottish Government’s [Historic Environment Strategy](#).

Question 6 – How do you think the governance and delivery arrangements will impact on your organisation?

Archaeology Scotland supports existing ESI funding particularly through the current SRDP programme. We have experience of both LEADER and to a lesser extent Rural Priorities/ Land Manager Options actions under the SRDP. What is noticeable has been different audit requirements between different schemes and this has included significant differences between separate LEADER Action Groups. When this is allied to differing audit requirements from other matched-funding sources (*e.g.* HLF) and generally essential as most funding is proportionate to the full costs, it creates considerable bureaucratic difficulties for individuals and community groups managing schemes. We realise that part of the audit difficulties are caused by accountability back to the European Commission and hope that the new arrangements in linking funding streams will simplify the audit trail and therefore create more efficient use of EU and SG funds. One issue we would be keen to see is transparency of funding awards to individuals and organisations. These are public funds being disbursed and despite data protection issues, we believe all funding awards should be covered by a requirement for the recipient to sign an agreement that the award should be made public. It is nearly impossible to find out where funded schemes are taking place and this is inconsistent with public scrutiny of actions affecting the environment (as defined by the [Aarhus Convention](#) and [Environmental Information Regulations \(Scotland\) 2004](#) – see also [Guidance](#)). This also means that positive developments cannot be easily identified and reliable impacts of the separate funding streams adequately assessed.

Question 7 – Are there any unidentified governance or delivery arrangements that could aid simplification of the future programmes and ensure that the Structural Funds complement each other?

We note that Leader Action Groups (LAGs) and their Local Development Strategies are not seen as part of the Delivery Partnership. Given EU objectives that LEADER should be central to the decision-making process and commitments to Community Planning Partnerships listed at the base of the decision hierarchy, we would urge greater integration between LAGs and Community Planning Partnerships, particularly in the production and progress of Local Development Strategies and Plans.

We have concerns that the SG Lead Partners E & CC, A, F & RC, MS and Digital (it would have helped to have the directorate abbreviations spelt out in this consultation document!) do not include Strategy & External Affairs, as this directorate is responsible for cultural heritage policy (though not explicitly set out within the [SG Directorate website map](#) – an issue that should be addressed!). We understand that Historic Scotland are involved in some internal SG workstreams but this should be made more explicit in the Delivery Partnership and with any partnership agreements made with local authorities (LA), it should be made explicit that the latter need to have adequate cultural heritage service delivery to support ESI funding programmes.

Question 8 – What other delivery options do you think would be feasible for delivering youth employment initiatives?

We believe the Youth Guarantee is a positive development supporting an age group across Europe seriously disadvantaged by the current economic crisis. As an organisation Archaeology Scotland are not directly involved in employment though we have an important educational and advisory role that benefits our sector and the wider economy by promoting Scotland's cultural heritage. There is scope for developing skills in this sector through training initiatives and skill sets that will support local and national economies and it does require new entrants to maintain and expand the job opportunities arising within this sector. The evolving SG Historic Environment Strategy could contribute to this, though timetables may not fit here.

Question 9 – What other measures could be taken to reduce the audit and control pressures?

As discussed above we have had problems with existing CSF funding programmes and any simplification such as shifting to unit costs rather than a requirement for receipted actual costs may reduce some of the audit complexity. However if it remains that each ESI fund has its own audit trail we are unsure that there will be any significant benefit, especially if projects are only allowed to draw from a single fund.

Question 10 – Do you have any further comments on the proposals?