

## 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?

We note that culture and heritage have been dropped from the list of Strategic Interventions. We would submit that this is an oversight that should be rectified. Culture and Heritage are extremely important to the tourism industry of Scotland and the Highlands and Islands in particular and this should have been recognised and celebrated within the document.

There is provision within the ERDF Regulation 2014-2020 to offer support for this important sector, namely,

Article 3 (1) (e): small-scale cultural and sustainable tourism infrastructure.

Article 5 (6) (c): conserving, protecting, promoting and developing natural and cultural heritage.

Article 5 (8) (b): enhancement of accessibility to and development of specific natural and cultural resources.

We would also draw your attention to **Regulation on the European Territorial Cooperation Goal**, Recital 17 which states “fostering high employment that results in social and territorial cohesion, including through activities supporting sustainable tourism, culture and natural heritage as part of a territorial strategy aimed at achieving employment friendly growth”

The position adopted in this draft document is contrary to that of the European Commission who, over the last few years, has strenuously attempted to maintain Europe as the world’s number one heritage tourism destination. Successive European Communications published by the European Commission,

‘Agenda for Sustainable and Competitive European Tourism,2007’

‘Promoting Cultural and Creative Sectors for Growth and Jobs in the EU,2012’,

‘ Europe: A New Political Framework for Tourism in Europe, 2010.

have consistently emphasised the importance of heritage and culture and their impact on tourism and associated ancillary industries.

It is a matter of record that even in these difficult financial times tourism and heritage continue to be successful growth areas creating new job opportunities. We should be investing in that success and not ignoring it. In 2010 HLF produced an extremely useful document entitled ‘Investing in Success’, which clearly set out the value to the UK economy of heritage tourism.

The President of the European Commission has stated that the preservation of and promotion of cultural and natural heritage should be seen as a sound investment in a more sustainable, fair and creative future. This is directly in line with the 2020 Strategy which is the European blueprint to get the economy back on track over the next ten years.

Furthermore the contribution of the NGO’s to developing this sector in an innovative and creative manner needs to be recognised. Current European thinking wants to see Arts, Culture and Heritage working more closely with other, more traditional industries in a positive manner so that some of that innovation may be transferred. This European thinking is not apparent in this document.

**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

**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?

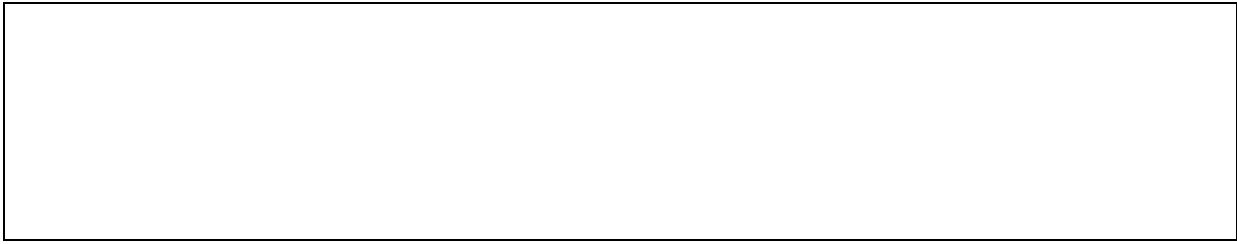
There is a very real risk that the abandonment of regional programmes will result in the new Scotland-wide programme being skewed to favour a particular area. As a result areas such as the Highlands and Islands will suffer because their particular needs will not be properly addressed.

The dropping of heritage and culture from the list of Strategic Interventions is a case in point. Heritage and culture are intrinsically linked to the tourism industry in the Highlands and Islands.

Any perceived unfairness could be addressed through the development of an ITI for the Highlands and Islands.

**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.

See above



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

Roles and responsibilities must be clearly understood from the outset. Eligibility criteria must be clear but not overly prescriptive. It is important that the programme retains enough flexibility to allow innovation. We wish to avoid, at all costs, the risk of future audits deeming the project to be ineligible.

We would like to see more scope for innovation and collaboration between different sectors. We welcome the concept of integration between programmes although we would anticipate that it might take a while to sort out any teething problems which may arise.


Monitoring is an important part of project management; however we see proper evaluation of projects as being extremely valuable. Proper evaluation of any project is critical in determining future actions or for that matter, future projects. Whether a project is successful or not, it has to be evaluated in order to learn from it. A negative outcome is just as important as a positive one.

There was a perception that in the last programme monitoring and auditing was perhaps a little over-zealous, particularly in the case of LEADER. This coupled with redefining eligibility criteria well into the life of the project was particularly unhelpful.

Project assessment of potential projects must be fair and transparent, with different geographical areas getting a fair crack of the whip.

We took part in the EU funded 'TALL' project conducted by the Highlands and Islands European Partnership. This report is extremely valuable and the information contained therein, particularly in relation to 'lessons learned', should be taken into consideration by the authors of the final report.

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

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