CONSULTATION RESPONSE FORM

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

VisitScotland is supportive of the broad principles set out in the Partnership Agreement and particularly the emphasis on delivering Operational Programmes which will support strategic Scottish Government investment priorities.

The focus on increasing business competitiveness and the concentration of resources on national policy areas, which can demonstrate future growth potential and genuine job creation opportunities, is welcomed by VisitScotland.

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

VisitScotland is pleased to note the strategic approach where all funds will support the 3 Scottish Themed Funds and are aligned to key National policy areas

We agree that 3 thematic objectives outlined in the consultation are sufficiently broad in scope to meet the current economic challenges and provide a flexible framework to enable the Operational Programmes to adapt to changing economic circumstances.

It is essential though that the thematic objectives are reviewed on a regular basis to ensure that these remain aligned to economic needs and opportunities as we move through the Programme period.

VisitScotland supports the Scottish Government view that these thematic objectives should be seen as complementary to other EU Funds such as the European Territorial Programmes (INTERREG), Horizon 2020 and LIFE etc, tackling issues which cannot be supported under these Funds and not duplicating activity.

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

While VisitScotland is of the opinion that additional thematic objectives are not required, it is essential that all potential business growth opportunities are explored as part of the 3 proposed thematic objectives and that no sectors are excluded from support, regardless of size or sector, as long as the potential for growth exists and these contribute towards the employment and growth objectives of the Programme.

VisitScotland, as one of the key economic development agencies in Scotland, supports the Scottish Government's Economic Strategy, which informs the national Tourism 2020 Strategy, and the vision in the National Planning Framework to secure sustainable economic growth and the transition to a low carbon economy through support for businesses within the wider visitor economy.

The Scottish Visitor Economy is composed of more than 37,000 businesses, is currently valued at £11bn with growth projected at 3.5% to 2020. Support for businesses within the visitor economy can contribute to the objectives of all 3 thematic funds cutting across priorities such as internationalisation, exports, food and drink, culture and heritage, local development opportunities.

In VisitScotland's view, support for the business growth within the visitor economy can be achieved through the existing proposed thematic objectives

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

VisitScotland welcomes the development of the 3 themed funds outlined the consultation and supports the view that, in principle, these should be able to deliver the key challenges facing the Scottish economy over the next 6 years assuming that these are sufficiently flexible to respond to changing economic circumstances. However we would draw attention to the following points where greater clarity or emphasis is required.

- There is currently a lack of detail on the sub text beneath these broad theme headings and in some case, there may need to be clearer definitions on a number of points. ie The section on Low Carbon, Resource Efficiency and the environment (p9) refers to "brand Scotland" VisitScotland research has highlighted that Scotland's cultural and historical icons are strong and distinctive and that the scenery is a core expectation. The environment, outdoor activities, history, culture and food and drink all contribute to the Scotland Brand. There is a need for clearer definitions of these broad statements and more explicit links to the activity examples provided on p12 of the consultation for each of the 3 themed funds.
- VisitScotland is concerned about the suggestion within the consultation that some activities such as the culture and heritage sector are linked to specific funds such as SRDP or EMFF and would be restricted to rural areas. The national Tourism Development Framework identifies key development opportunities in cultural and heritage sector including arts, screen and creative industries, events and festivals across in urban and rural areas.

Similarly the growth potential of the Food & Drink sector is national priority and the initiatives which would deliver growth in the sector over the programme period should be driven by a strategic and national priority and not just a rural priority.

There is perhaps the opportunity to address this question of urban and rural using scale of development with smaller localized projects being funded through SRDP and EMFF and the larger, strategic /national projects through ERDF.

Given that greater additional growth will be achieved through increased exports and the generation of foreign currency receipts VisitScotland is of the view that greater emphasis should be placed on exporting and internationalisation under the Competitiveness, Innovation and Jobs theme

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

VisitScotland broadly welcomes the development of a more strategic approach to the governance and delivery of the 20014-20 programmes which should ensure that the Programme achieves greater alignment with national policy objectives and facilitate the delivery of national initiatives. It is clear that a number of activities proposed under all 3 Scottish Theme Funds will potentially have an impact on the growth of the visitor economy and cut across all the 4 main funding streams. However there are a number of issues which require further consideration to ensure the best possible outcomes are achieved such as:.

- 1 It is unclear at this time from either this or the SRDP consultation papers, how the national priorities under the Tourism 2020 Strategy will be applied in what could be a potentially fragmented approach under the Social inclusion and Local Development theme. With possibly 32 CPPS and 20 plus LAGs involved in the delivery of this theme, questions remain around the effective delivery of national policy priorities and the National Tourism Development Framework.
- 2 With activities relating to the visitor economy featuring across all 3 Themed Funds it is not clear what level of interaction will exist between the Shadow Strategic Delivery Partnerships particularly in the early development phase, to ensure co-ordination and the prevent duplication .
- 3 The SRDP has an important role to play in the delivery of the certain proposed activities which will have an impact on the visitor economy however there is a concern over the synergy between this Programme and SRDP particularly in relation to the implementation timescale, the potentially differing priorities of SRDP and the proposed delivery structures.

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

VisitScotland agrees that the governance and delivery structures outlined could offer significant opportunity to develop a more strategic approach to the planning and delivery process.

The development of the SDPs is broadly welcomed however their overall effectiveness will depend largely on the engagement of the key stakeholders in the development, delivery and monitoring of the operations, It is essential that these key stakeholders are engaged in detailed discussions going forward however it is not clear within the consultation how this is to be achieved and there would appear to be significant gaps in the key stakeholders identified in the consultation.

Given the range of activities identified within the Consultation document across all 3 Scottish Themed Funds which could have a significant impact on the visitor economy, there is a need to ensure effective co-ordination across all 3 Themed Funds and a consistency in terms of the priorities and delivery across the 4 contributing Funds.

As one of the key national economic development agencies and a potential source of match funding, VisitScotland has a strategic role to play in the shaping of the operations for each of the 3 Themed Funds. We would therefore suggest that VisitScotland involvement is essential in all 3 Strategic Delivery Partnership discussions to ensure that programme captures all opportunities to support businesses and that relevant operations can provide significant and additional contributions to the 2020 targets.

In general there are a number of other issues which require clarification including

- The relationship between the Strategic Delivery partnerships and the Delivery Agents
- The terms of reference for the Strategic Delivery Partnership lead partners
- Commitment of match funding
- The ability of Delivery Agents to bring their own match funding
- Identification of key outcomes and objectives
- The relationship between Leader/LAGs and the CPPs under the Local development Theme

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?

Effective mechanisms need to be put in place which will ensure co-ordination between the 3 Themed Funds and the SDPs to avoid duplication and achieve the degree of synergy which will ensure that the Programme achieves its targets.

Consideration needs to given to the co-ordination between the CPPs and the LAGs/FLAGS it is not clear from the consultation how national priorities will be delivered across these areas or how national stakeholders interact within potentially a large number of Delivery Partnerships. Until these strategic issues are clarified it seems premature to start preparations of local strategies.

The potential overlap of SRDP and other Funds needs to be addressed in relation to business support services, food and drink, culture and heritage etc,

Question 8 – What other measures could be taken to reduce the audit and control pressures?

VisitScotland welcomes the commitment from both the EU and the Scottish Government to reduce audit and control measures and the introduction of simplified costs which should reduce the burden on lead and delivery partners.

Further information is awaited on the development of simplified cost models particularly in relation to ERDF where the outcomes are likely to be achieved over a longer period of time

Clear guidance on eligible expenditure rules needs to be provided for Strategic Delivery partners at the development stage of the process to avoid any future audit and compliance issues.