## 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?

It is difficult to comment on whether the investment priorities are the most appropriate ones for the activity suggested with the limited information provided. As the consultation advises proposals will be developed and refined over the coming months, the Orkney Island Council would like to request that island issues are taken in to consideration when developing further the Strategic Interventions.

The Council is concerned that addressing island issues may be lost in this strategic approach which is focusing on 'greatest impact'. The Council is however encouraged that the Scottish Government recognises Scotland's territories bring diverse challenges; however we are concerned that 'insularity' is not listed as a characteristic. Insularity has additional territorial challenges which will require tailored interventions. Orkney is an archipelago of 17 inhabited islands, many of which have to be self-sufficient small communities after the last boat or flight leaves for the day.

The Council requests that the evaluation of needs and opportunities of Scotland's islands is included within the Scottish Programme, eg youth unemployment is not an obvious issue for Orkney, however this is because our young people leave the island for further education and due to the lack of quality jobs do not return for employment. Also the lack of employment opportunities for women is a concern for the sustainability of many of our smaller islands as families will not settle or return to the outer islands if there are limited or no employment opportunities for women.

Digital connectivity and even mobile coverage continues to be an issue for Orkney. Access to digital connectivity could go a long way to reducing social exclusion on our islands by opening up employment opportunities.

The Council is concerned that under SME Competitiveness only Scotland's cities are mentioned. Businesses in peripheral island areas must also be assisted to exploit digital technology, innovation and develop leadership capacity. The Council is concerned that there is too much focus on growth of companies. Companies employing small numbers of skilled people can make a huge impact in smaller communities, resulting in vibrant, sustainable island communities where schools, shops, village halls, ferry and air services can be retained and provide employment for others.

With regards the Scottish Regeneration Capital Grant Fund, the Orkney Islands Council requests that Scottish Government considers island issues in the delivery of this fund and once again does not dismiss island projects due to the perception that funding to our towns will not delivery large scale transformational change.

With regards Low Carbon Travel and Transport, the Council requests that Transport Scotland liaises with HITRANS and ZETRANS in order to focus delivery on appropriate transport solutions for island areas. As the local inter- island ferry companies are run by the Local Authorities in Orkney and Shetland, the Council request that delivery of the Low Carbon Travel and Transport Strategic Intervention is not limited to delivery through Scottish Government owned ferry companies.

Orkney's islands also have many opportunities and, as recognised by Commissioner Hahn on his visit to Orkney in 2013, we have built on our strengths and taken advantage of EU funds to be a world leader in marine renewables research. Orkney is an ideal location to develop a Smart Specialisation Innovation Centre, as Orkney has an excellent university and research sector which has grown up around the European Marine Energy Centre (EMEC). Future development of the university and research sector should not be curtailed to central Scotland. Currently plans are being developed for a Marine Renewables campus in Orkney, building on the strengths of Heriot Watt, EMEC and the local SMEs, which Orkney wishes to develop as a Smart Specialisation Innovation Centre.

**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

The Orkney Islands Council asks that clarity is available at the beginning of the Programme regarding which Fund funds which activity. Duplication should be avoided. The integration between funds should be at Programme level with streamline application process/delivery, as which Fund funds which activity is usually of no relevance to the final beneficiary.

The audit requirements of each Fund should be made clear at the start of the Programme.

The Council strongly supports that all Programme guidance must be ready at the start of the Programme and changes should be kept to a minimum during the lifetime of the Programme

**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?

The Council wishes to stress that inclusion and participation is much wider than the protected characteristics listed in the consultation document. Those living in peripheral island locations in the far north of Scotland should not be disadvantaged by their location.

The Council has concerns that it will find it difficult and time consuming to engage with all the relevant lead partners delivering Strategic Interventions in Scotland. Delivery of a Highlands and Islands Programme with one point of contact for all ERDF/ESF interventions, as for the 2007 to 2013 Programme was more cost effective for the smallest Local Authority in Scotland. The new proposals may therefore have a negative impact on issues of inclusion of the smaller Local Authorities

**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.

The Orkney Island Council requests Island Authority membership of the PAMC to ensure that the Strategic Interventions are 'Island proofed' during development and delivery.

As detailed at Question 1 Island Authorities have additional issues to address with regards inclusion and sustainable development and these have to be taken into consideration in the design and delivery of the Strategic Interventions.

With regards the proposal for simplified costs there has to be recognition that it costs more to deliver in an island location where transport costs have to be included and numbers benefiting will be limited. Projects must not be penalised due to additional costs of delivery.

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

Issues addressed in Question 4.		

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

The Council is very supportive of the Highlands and Islands ITI and suggests that not only is this a vehicle to enable appropriate delivery of the Strategic Interventions within the Highlands and Islands, but also that there is funding available within the ITI to deliver priorities, such as cultural heritage, which are of significance to the area and have been omitted from the Scotland wide Strategic Interventions.