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Wales and the EU: Partnership for Jobs and Growth Consultation on European Structural Funds 2014–2020: West Wales & the Valleys

We greatly welcome the opportunity to provide our views on the Consultation on European Structural Funds 2014–2020: West Wales & the Valleys.

These comments were prepared and are submitted by Denbighshire County Council. These comments also reflect and complement the views and comments made by North Wales Economic Ambition Board and the Welsh Local Government Association.

We welcome the work of the Welsh Government to seek opinions through this consultation document. We have provided our response to the questions outlined within the consultation document below.

In presenting our response to the specific questions raised within the Consultation Documents, we would also wish to highlight the following key points as being the main issues which merit detailed consideration and further consultation if we are to maximise positive impacts of future delivery of EU investments in Wales

Strategic Aims and Objectives - In terms of a strategic definition and the principles for the selection of projects, a balance should be struck between utilising EU intervention to address market failure, against targeting investments to capitalise on opportunity where economic drivers exist. The emphasis for strategic planning and projects must be counter-balanced with local and regional needs if interventions are to achieve their intended aims. The scope for part of the programmes to be delivered at sub-regional / regional levels through Integrated Regional Action Plans and Community Led Local Development should be explored fully with local and regional authorities.

Geographical Concentration – Intervention has historically been justified on the basis of market failure, as this provides the underlying justification for Economic Development intervention by the public sector. Where activity is justified on the premise of “opportunity” (e.g. significant private sector investment or key sectors), intervention must also address underlying market failure to support the structural economic change required.

Matched Funding – There is considerable pressure on matched funding across the public sector. Given this and the poor engagement of the Private

Sector during this programming period it's imperative that WEFO / WG provide project sponsors from the third and private sector with expert procurement and specialist help to access funding opportunities directly. We would also welcome a review of Article 55 which is felt to be a barrier to engagement for the private sector within the current round of programmes

Simplification – In order to streamline and simplify delivery of the new programmes DCC would welcome the Integrated Regional Framework approach to project delivery. It would allow stakeholders to work together & with other service providers to deliver packages of activities & interventions funded by CSF funds. It could build on existing structures both regional and sub regional and build also on existing regional projects and spatial programmes delivering in the region.

Project and Programme Evaluations - Linked to the comments above we would suggest that there is a lack of a co-ordinated approach to learn the lessons from current experiences to help inform the characteristics of successful projects in future rounds. Due to a lack of planning, there is a lack of information available to help guide the design of new EU programmes (i.e. no mid-term Evaluation deadlines set for WEFO to take stock of existing interventions).

Outputs, Outcomes and Indicators

We would welcome the move towards an Integrated Regional Framework of projects, it would be an opportunity to allow projects to contribute towards overall programme aims based on local need and potential outcomes rather than setting unrealistic targets. We would urge WEFO to adopt a more flexible approach to indicators, allowing a project to respond to local need whilst still complying with Programme objectives.