



Department for
Communities and
Local Government

European Regional Development Fund Operational Programme 2014-20 Consultation

Summary of Consultation on European Regional
Development Fund Operational Programme 2014-20



European Structural and Investment Funds
Growth Programme for England (2014-2020)

August 2014
Department for Communities and Local Government

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Department for Communities and Local Government
Eland House
Bressenden Place
London
SW1E 5DU
Telephone: 030 3444 0000

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Introduction and purpose

1. In May 2014 the government held a consultation on the England 2014 to 2020 European Regional Development Fund (ERDF) Operational Programme. This report summarises the responses received.
2. The government sent its draft Partnership Agreement to the European Commission (EC) on 17 April 2014. That document described the current economic situation in the United Kingdom and set out the principles for using European funding to promote growth and inclusion.
3. The European Regional Development Fund is one of the three separate funds, alongside the European Social Fund (ESF) and part of the European Agricultural Fund for Rural Development (EAFRD), which form the single European Structural and Investment Funds Growth Programme for the 2014-2020 funding period. Each of the three European funds will have a separate national programme document which sets out the priorities and activities each fund will support. This describes how the government will use the relevant Fund to promote growth in England in line with the principles set out in the Partnership Agreement. These documents are known as Operational Programmes, which have to be agreed with the European Commission.
4. Prior to submitting the European Regional Development Fund Operational Programme, government ran a public consultation to invite views in response to set questions on how to make the most effective use of European Regional Development Fund funding in achieving its purpose of driving growth and jobs. The consultation document explained the key elements of the Operational Programme that will be submitted to the European Commission. The responses to the consultation have informed the Operational Programme submitted to the European Commission in July 2014.
5. The public consultation ran from 1 May to 28 May 2014. There were 50 responses received and details of the respondents are at Annex A. In addition to the public consultation there were two events held by the Department for Communities and Local Government (DCLG) as Managing Authority in which partners discussed aspects of the Operational Programme. The discussion notes from these events are included in this consultation response summary.
6. DCLG asked for comments in respect of five questions:
 - Question 1: What priorities and activities should the European Regional Development Fund focus on to deliver local growth and jobs?
 - Question 2: What are the key needs and opportunities that should underpin the Operational Programme to meet what is needed locally?
 - Question 3: How can the European Regional Development Fund be used alongside other European and national funds to achieve economic growth?
 - Question 4: How do you think we could effectively promote and demonstrate the performance of the Programme and impact of the European Regional Development Funds?

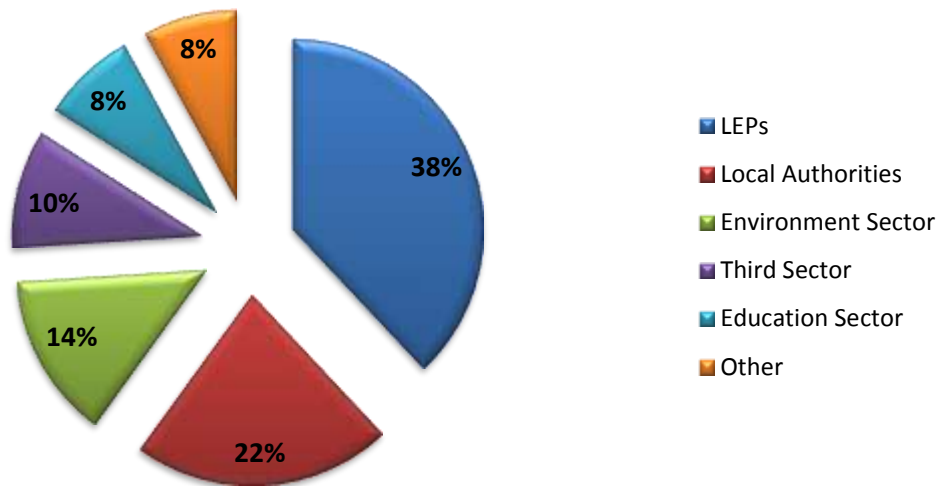
- Question 5: How do you envisage implementing the cross cutting themes locally?

Overview of responses

Comments received

7. In total 50 replies were received. Over a third (38%) of the responses were from Local Enterprise Partnerships, 22% were from local authorities, 14% from the environmental sector, 10% from the third sector, and 8% from the education sector. A further 8% were from organisations that do not cover the sectors above.

Consultation responses by type of organisation



Responses by question asked

Q.1 - What priorities and activities should the European Regional Development Funds focus on to deliver local growth and jobs?

8. In general respondents were supportive of the proposed approach to the use of European Regional Development Funds to support local growth and jobs. Other themes that came out of the received responses were:
 - 8.1. There was a general request for greater flexibility within the Operational Programme to provide the opportunity to shape development locally and target intervention to better meet local needs. Respondents also requested greater flexibility to enable support across different sectors and European Regional Development Fund funded interventions to draw funding from more than one Thematic Objective or investment priority.
 - 8.2. The need for greater flexibility was also expressed by respondents in defining the geographical boundaries of particular interventions (such as Community-Led Local Development) that acknowledge the pockets of deprivation that exist in some rural communities.
 - 8.3. Many respondents expressed the need for the European Regional Development Fund Operational Programme to enable cross-cutting linkages particularly in the horizontal sustainability theme where linked to on-site development, which requires single application under different Thematic Objectives to include both flood alleviation and green infrastructure.
 - 8.4. A number of respondents requested the use of targeted support for Green Infrastructure based on local priorities to help reduce the barriers to business investment such as flood risk and poor environmental quality, including the restoration of derelict land.
 - 8.5. A number of respondents requested the inclusion of actions to support investment in cultural heritage and to recognise the importance of the tourism sector in many local economies.
 - 8.6. Some respondents felt the document did not adequately cover the needs and challenges of social economics and also request reference to the wider forms of finance that support the social economy.
 - 8.7. There was an overall desire to recognise the significance of problems associated with water quality such as contamination from phosphate and nitrogen, which was seen as a method for supporting wider local economic development objectives.
 - 8.8. Overall greater clarity was requested with regards to the type of activity that is eligible and some respondents asked for clarification that eligible activity will be based upon European Union regulations and European Structural and Investment Fund priorities.

- 8.9. There was a general perception that the administrative aspects of European Regional Development Fund projects negatively impact on the effectiveness and efficiency of project delivery. The respondents view the inconsistent interpretation and changing guidance as a considerable risk and cost to engaging with European Regional Development funding.

Government response

- The programme has been designed to give flexibility across objectives and geographies. It is entirely open to local partners to seek common areas of interest with other parts of the country and combine projects if they think that would deliver growth most effectively. Government would welcome such approaches and is keen to engage with local partners on how best to encourage them. Local partners are encouraged to make the most of the synergy with the European Social Fund. It is equally open to local partners to decide the areas in which community led local development would be of most use provided they can show it is the most effective option for delivering growth and is within European Union legislation. And it is for local partners to decide to what extent a socially economic approach is the best way to meet local needs.
- A particular theme in responses was the ability of respondents to use European Regional Development Fund on green infrastructure and water quality. The draft Operational Programme to be submitted to the European Commission will include these themes under Thematic Objective 6. Tourism and cultural heritage are not in themselves a key objective of the programme, but it is open to local partners to support projects which promote them provided they are within the objectives of the Programme.
- The government notes the comments made about the complexities of administering the European Regional Development Fund. It is for this reason that the Programme will be administered centrally by the Managing Authority using a standard set of procedures and a single system. Guidance will be made available on GOV.UK. The government will continue to raise the case for simplification with the European Commission.

Q.2 - What are the key needs and opportunities that should underpin the Operational Programme to meet what is needed locally?

9. Overall respondents reiterated the need for greater flexibility within the Operational Programme to better meet local needs and in particular that sufficient flexibility was needed to enable Local Enterprise Partnerships to respond to changes in the local context.
 - 9.1. Many respondents again expressed a desire for the European Regional Development Fund Operation plan to enable cross-cutting linkages and to provide a strategic approach and the structure required to support this activity. They asked for a more joined up approach both across and within Local Enterprise Partnership areas to encourage integrated projects and so that initiatives can come forward.
 - 9.2. A desire was also expressed for opportunities for cross Local Enterprise Partnership area collaboration to be highlighted, particularly for the use of financial instruments and opportunities for match funding that need to operate at significant scale. A number of respondents requested that European Regional Development Fund could be used as a source of match funding for some projects which Local Enterprise Partnerships areas propose to fund through local growth fund.
 - 9.3. A reoccurring theme was for widened activity under numerous Thematic Objectives so the type of activities they were able to provide were not restricted e.g. incubation space under Thematic Objective three broadened to cover business space.
 - 9.4. A number of respondents felt that, with regards to Community-Led Local Development, resources should be focused on areas of greatest need to assist lifting communities out of deprivation and helping them access job and career development opportunities.
 - 9.5. There was a desire for further clarification on the nature and scale of technical assistance and programme management functions that are expected of the Local Enterprise Partnerships and local partners, and some respondents requested that Technical Assistance is available to both local and national partners.
 - 9.6. The following are the key priorities and issues that the Local Enterprise Partnerships would like Department for Communities and Local Government to respond to in developing the Operational Programme. The views are those of individual respondents, unless otherwise stated. Key priorities were to ensure scope within the programme to:
 - a. Give flexibility for the use of European Regional Development Fund funding to deliver more wide spread innovative sustainable urban development projects which will respond to changes to the local context, open up new sites for development, facilitate job creation and support local residents to access new employment opportunities

- b. Enable locally driven decision-making and project selection to allow the programme to be responsive to specific local needs and support localised development. This was viewed as critical in achieving the aim of an accessible, participatory programme that attracts applications from all sectors and enables a range of local partners to engage with the process, including those new to European funding but with specific and appropriate skills
- c. Support infrastructure (including transport facilities to enable access to employment sites), flood risk mitigation (the high standards required for European Regional Development Fund -supported capital proposals are warmly welcomed), housing and place development, business support (enhancing the overall competitiveness of Small and Medium Enterprises in particular their ability to participate in low carbon and renewable energy industries was seen as key in supporting a number of Local Enterprise Partnerships priority sectors)
- d. A desire to ensure the prospects and aspirations of local communities are raised through Community-Led Local Development. A number of respondents felt resources should be focused on areas of greatest need to assist lifting communities out of deprivation and helping them access job and career development opportunities
- e. Ensure that the Local Enterprise Partnership and local partners have a meaningful role in programme management including design of calls, approval of interventions, and monitoring of delivery

Government response

- As set out on page 7 of this document, the programme is already designed to provide thematic and geographical flexibility. The government encourages local partners to use to the full the flexibilities already provided under the thematic objectives although European Regional Development Fund cannot be spent on areas not included in the relevant investment priorities as defined by European Union legislation. It is for local partners to decide what linkages best meet their needs. However as set out above the government notes requests for support to local partners in making such linkages and will work with delivery partners on how this might be done in a way which supports local delivery.
- Government entirely supports the use of the Local Growth Fund to provide match funding for projects provided they meet the eligibility criteria for European Regional Development Fund.
- Technical Assistance will be available to local partners to support the administrative costs of delivery in line with what is set out in European Union legislation. Local partners will be expected to work closely with the Managing Authority on the timing of calls and the appraisal of projects. Decisions on how the programme is to be spent will be taken by the local area's European Structural and Investment Funds Committee which is responsible to the national Programme Management Committee.
- Further guidance on match-funding and technical assistance eligibility are expected to be provided to Local Partners over the summer.
- A minimum of 5% of the programme must be spent on Sustainable Urban Development. Whilst London's programme in itself already accounts for around 5%, the government has in addition invited core cities to submit proposals for up to 10% of their programmes to be delivered in line with the principles on sustainable urban development set out by the European Commission.

Q.3 - How can the European Regional Development Fund be used alongside other European and national funds to achieve economic growth?

10. A wide range of responses were also provided to this question, in particular from the Local Enterprise Partnerships and local authorities. The key points are summarised briefly below:

- 10.1. There was a general desire for better alignment of European Regional Development Fund, European Social Fund and European Agricultural Fund for Rural Development, as well as the Local Growth Fund. Although various views were expressed, this integration covered aspects of programme design (e.g. outputs and results), bidding and selection (e.g. aligning calls and bidding processes) and delivery (e.g. combining different funds to deliver specific activities).
- 10.2. However, various respondents were concerned that the consultation documents did not provide enough information to enable them to assess the opportunities to align different funding sources and that this was delaying the progress which they can make with their planning activity.
- 10.3. A request for more guidance and support in developing Financial Instruments, including working with potential partners such as the European Investment Bank.
- 10.4. A desire for more information on the manner in which the opt-ins will work as part of European Regional Development Fund and alongside other sources of funding.
- 10.5. A need to examine the opportunities and challenges further of aligning European Regional Development Fund with other sources of European Union and national funding which might be particularly important to sectors (e.g. skills an education funding) or areas (coastal community funding).
- 10.6. A number of respondents requested that European Union funds were fully incorporated into their wider Growth Plans and emerging single appraisal/prioritisation framework.
- 10.7. Due to the perceived practical difficulties of aligning calls for projects in the European Regional Development Fund and European Social Fund programmes with others, particularly in the earlier phases of both types of funding programmes, it was suggested that Local Enterprise Partnerships could work with the managing authority to look at how wider European Union funding can be better aligned with wider European Structural and Investment Funds interventions.
- 10.8. A desire to facilitate strategic co-operation through Local Enterprise Partnership area European Structural and Investment Funds sub-committees to allow for a greater co-ordination between projects that that

align European Social Fund , European Regional Development Fund and European Agricultural Funds for Rural Development.

- 10.9. A number of respondents requested that European Regional Development Fund could be used as a source of match funding for some projects which Local Enterprise Partnership areas propose to fund through local growth fund. In particular they requested that UK Trade and Investment, Manufacturing Advisory Scheme and Growth Accelerator could be used as sources of match funding from government for proposed Small and Medium Enterprises competitiveness investments.
- 10.10. A view that a combination of funds to provide holistic support should be feasible, such as a mixture of European Regional Development Fund and European Social Fund to fund a route out of “worklessness” and for business start-up coaching support and potentially small grants.
- 10.11. Greater clarity was requested that European Regional Development Fund activity, and its delivery mechanisms support and add to European Social Fund / European Agricultural Funds for Rural Development activity; this is expressed as paramount to ensure the maximum impact of investment.
- 10.12. A request to allow European Regional Development Fund and European Social Fund Technical Assistance funding to be used to encourage and facilitate access to other European Union funds, as set out in their European Structural and Investment Funds.
- 10.13. A number of respondents stated a desire to align the processes and timescales between European Regional Development Fund with other European Union funds and domestic funds from central government and Opt In organisations as far as possible. However, one respondent noted that in practice it may be problematic to seek greater integration given that each source of funding will be subject to different rules and regulations.
- 10.14. A number of respondents pointed to the scope to align the application process and outputs and results being measured across different economic development programmes in order to avoid duplication.
- 10.15. There was some wish for Local Growth Fund, Regional Growth Fund and DEFRA-funding to be brought together with European Regional Development Fund, in order to address the flood risks which relate specifically to employment sites (existing and planned).

Government response

- The European Structural and Investment Funds Growth Programme is designed to coordinate the European Regional Development Fund and the European Social Fund as well as part of the European Agricultural Fund for Rural Development. Local Enterprise Partnerships have been asked to put forward strategies agreed with local partners for the use of all three programmes. The local sub-committees which will oversee the delivery of the Structural Funds at local level will provide a forum for ensuring that the Funds complement each other.
- The European Investment Bank is already a major co-financer of financial instruments in the 2007-13 European Regional Development Fund Programmes. The government intends to continue to work with the Bank on the provision of finance for JEREMIEs, JESSICAs and energy efficiency in social housing and is working up proposals with the Bank and delivery partners.
- European funding must be matched by domestic funding. The government envisages this coming from a range of sources. The Local Growth Fund, which comes on stream from April 2015, will provide a source of funding. Match funding is also available from United Kingdom Trade and Investment, the Manufacturing Advisory Service and Growth Accelerator. Further guidance on Opt-In organisations and how they will work in the programme will be disseminated to partners this summer.
- Government is also keen to see maximum leverage of private match funding, and initial indications from European Structural and Investment Funds strategies confirm that this should be a significant match funding component.
- Further guidance on match-funding and financial instruments are expected to be provided to Local Partners over the summer.

Q.4 - How do you think we could effectively promote and demonstrate the performance of the Programme and impact of the European Regional Development Funds?

11. A wide range of responses were also provided to this question, mainly from the Local Enterprise Partnerships and local authorities. The key points are summarised briefly below:
 - 11.1. A desire for more guidance on suitable benchmarks/unit costs for the full range of outputs, in order to help project sponsors to develop their projects.
 - 11.2. An approach to evaluation of the project which enables the emerging lessons to inform the delivery of the programme on an on-going basis.
 - 11.3. A request for a more rigorous and comprehensive approach to the measurement of economic impact, including both gross and net additional measures, both as part of the appraisal and evaluation of projects and programmes.
 - 11.4. In addition, a desire for more qualitative assessment of project progress, the learning of lessons and assessment of impacts which are harder to measure qualitatively. This should provide information on an on-going basis, to help ensure it is factored into the on-going design of projects and changes to the programmes.
 - 11.5. A number of respondents suggested the provision of metrics that would allow consistent definition and measurement of outputs for the allocated resource (i.e. units cost benchmarks) and which would allow a meaningful comparison of costs/benefits at the design and appraisal stage.
 - 11.6. One respondent suggested a need for the quantitative measurement of performance to systemically include the additionally of European Regional Development Fund support through the monitoring the deadweight, leakage and displacement associated with all European Regional Development Fund projects, as well as understanding multiplier and supply chain impacts.
 - 11.7. The opportunity to adopt more qualitative assessments of project performance, through for example case studies to highlight where European Regional Development Fund funding has benefitted business and localities (illustrating softer evidence of harder to measure impacts). Another respondent also suggested the need for the Performance Management system should also be able to recognise the impact of 'soft' outcomes on individual skills and employment progression.
 - 11.8. Monitoring and performance management was seen to be important to be undertaken at the European Structural and Investment Funds level. It was noted that European Structural and Investment Funds Strategies have been designed to maximise outputs and outcomes through joint and

complementary activity between European Social Fund / European Regional Development Fund /European Agricultural Funds for Rural Development funds.

- 11.9. A suggestion that result indicators need to be designed so that they can set out and monitor progress towards wider strategic aims set out in the Operational Programme and not just be considered under silo Thematic Objectives.
- 11.10. The use of Technical Assistance by a range of stakeholder groups to enable them to promote the programme to their target groups, in order to ensure high levels of participation. Various methods of doing this in an effective way were suggested.
- 11.11. A number argued that Local Enterprise Partnerships should have a central role in the promotion and co-ordination of European Regional Development Fund at a local level, alongside their strategic roles in strategy development. Ways of doing this might involve a detailed communications plan, regular newsletters, social media and events such as awards ceremonies and dedicated websites to provide information about the programme.
- 11.12. The design and implementation of a single accessible IT system holding all relevant project information and operating on the principle of “collect once, use often” was viewed as an effective monitoring and promotion tool. Lessons from the development of the IT system for the current programme needed to be incorporated into the development of the new system.

Government response

- Government strongly agrees with the points made about the need to evaluate the impact of the Fund. It will produce an evaluation strategy which will be overseen by the Programme Monitoring Committee, and local partners will need to work with the Managing Authority to ensure that evaluation is designed in from the start.
- Government also supports the points made about consistency of unit costs and outputs. Further guidance will be issued to partners and the government will want to work closely with them on the development of proposals.
- The government agrees on the need to share best practice on the design and implementation of projects and will seek views from local partners on how this can most effectively be done.
- The government agrees that it is for local partners to use Technical Assistance to develop and bring forward projects. Ensuring a strong pipeline is an important part of delivering the Programme. Further guidance will be issued to local partners in over the summer.
- The Programme will be delivered through a single Information Technology system to which local partners will have access. They will be expected to upload information in the format specified by the European Commission and will have real time data on the progress of their programmes.

Q.5 - How do you envisage implementing the cross cutting themes locally?

12. In general, the respondents were supportive of the proposed approach to cross-cutting or horizontal themes. The main points raised were:
 - 12.1. A desire for clearer guidance to project applicants and consistency in the interpretation of this advice amongst the local delivery teams.
 - 12.2. A request for training in the implementation of the cross-cutting themes to project applicants.
 - 12.3. A desire for fuller information to be included in the Operational Programme on the specific actions which were being proposed under the cross-cutting themes.
 - 12.4. Cross cutting themes were requested to be genuinely built into initiatives whilst they were being developed and not just “bolted on” to meet appraisal requirements. A number of suggested actions to facilitate this were: include cross cutting themes as a gateway criteria and not just part of the appraisal criteria; ensure this is fully incorporated into calls and commissions; provide guidance to Local Enterprise Partnership areas on a consistent approach to cross cutting themes including definition of outputs and methodology to calculate/attribute.
 - 12.5. One respondent reported the following proposals to implementing the cross cutting themes locally: Set specific quantitative targets on cross cutting themes to demonstrate their importance to the programme; ensure indicators are observable, and sufficiently focused on actions to be supported; appointing cross cutting theme managers within the Department for Communities and Local Government European Regional Development Fund team to assist the Local Enterprise Partnership areas; Local Enterprise Partnership areas to organise and run cross cutting theme training sessions and awareness raising events across the region.
 - 12.6. A respondent outlined its desire for a common and aligned process so that the delivery of projects that address a number of themes, including the cross-cutting principles, will remain manageable.
 - 12.7. One respondent expressed the need to show a balance between social, economic and environment issues, including references to resource efficiency within a finite resource base, in the definition of sustainable development.
 - 12.8. A respondent emphasised the importance that the cross cutting themes are not assessed on an individual project basis but seen as being delivered by a wider portfolio of activity that will deliver the cross cutting themes at an European Structural and Investment Funds strategy level.
 - 12.9. A number of respondents noted the concept of social innovation and the contribution it can make to achieving the cross-cutting themes. It was also

noted that this should be applied in a practical and meaningful way across all of the Thematic Objectives.

- 12.10. Ensuring cross cutting themes form part of the strategic fit assessment and monitoring of outputs and outcomes was stated an important action, as well as the requirement of project leads in providing evidence of their commitment to sustainability and equality of opportunity.
- 12.11. One respondent carried out an independent sustainability and equality impact appraisal of their European Structural and Investment Funds, to ensure their strategy took into account both sustainable development and equality and those they are embedded within their evidence base and activities. They ensure that the principles that they set out for these cross cutting areas are embedded within the implementation plan for the funds.
- 12.12. Learning from past implementation of cross cutting themes was reported as an important action for Local Enterprise Partnership areas, however they also noted that they must not hamper the delivery of local priorities or add significantly to the burden for project delivery partners.
- 12.13. A request to strengthen the draft European Regional Development Fund Operational Programme by adding more detail on cross cutting themes particularly in relation to equality issues.

Government response

- The United Kingdom Partnership Agreement sets out the overall approach to the cross-cutting principles of sustainable development and equal opportunities within the funds. These are required by European Union regulations. Sustainable development means economic growth that is inclusive and environmentally sound to build shared prosperity, deliver immediate and long-term benefits, and meet the needs of future generations. Decarbonising the economy is key to long-term sustainable economic growth. Businesses need to address increasing costs of energy, water and raw materials, and harness opportunities within the low carbon goods and services sector. Businesses also need to reflect in their planning the resilience of their assets and operations to severe weather events - flooding, droughts, and heat waves.
- A Strategic Environmental Assessment has been carried out as part of producing the Operational Programme. It found that in some areas such as low carbon technologies the Programme would have a positive effect. There may be some effects from development, but these would be dealt with through the normal mechanisms in the planning system.
- All European Structural and Investment Funds will promote equality in accordance with European Union and domestic legislative and regulatory requirements. The 2010 Equality Act provides a framework to effectively tackle disadvantage and discrimination.

Annex A: List of organisations that responded to the consultation

Action on Disability and Work UK

Back on Track

Barnsley Council

Coast to Capital Local Enterprise Partnership

Cheshire and Warrington Local Enterprise Partnership

Cleator Moor Youth & Community Centre

Cornwall and Isles of Scilly Local Enterprise Partnership

Cornwall College

Coventry Local Enterprise Partnership

Cumbria Local Enterprise Partnership

East Anglia Local Enterprise Partnership

English Heritage

Environment Agency

Environmental Sustainability Technical Assistance

Federation for Small Businesses

Greater Cambridge and Greater Peterborough Enterprise Partnership

Greater London Authority

Heart of South West Local Enterprise Partnership

Higher Education Funding Council for England

High Value Manufacturing Catapult

Humber Local Enterprise Partnership

Lancashire Local Enterprise Partnership

Leeds City Region Local Enterprise Partnership

Local Government Association

Lincolnshire County Council

Liverpool Local Enterprise Partnership

Marches Local Enterprise Partnership
National Trust
Natural England
North East Local Enterprise Partnership
Network for Europe
New Economy Manchester
Norfolk County Council
Northamptonshire Local Enterprise Partnership
Northumberland National Park
Northwest Universities
Nottingham City Council
Nottinghamshire County Council
Plymouth City Council
Royal Society for the Protection of Birds
South East Midlands Local Enterprise Partnership
Sheffield Council
Somerset County Council
Stoke on Trent & Staffordshire Local Enterprise Partnership
Tees Valley Unlimited Local Enterprise Partnership
Torbay Development Agency
University of East Anglia
West of England Nature Partnerships
Worcestershire County Council
Worcestershire Local Enterprise Partnership
Yorkshire West Local Nature Partnership