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(Un)local development – the dynamics and dissonances of Multi-level governance in the case of Leader in England.

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This thesis is a case study of the European Union's community-led local development programme Leader in England during the 2014 – 2020 programme period. The focus of the examination is governance, and in particular how the structural arrangements within a multi-level governance system present conditions for the emergence of hierarchy between local and national actors in the programme. This hierarchy is shown to be incompatible with the Leader ethos, a neo-endogenous form of rural development that should be driven by local actors.

For the analysis of governance, Dion Curry's multi-level governance theory is adopted to understand the relationship of structural and relational arrangements in the programme. In addition, this thesis provides an in-depth look at Leader, examining the programme through the lense of Christopher Ray's Culture Economy typology. In order to provide a dynamic and practical analysis of Leader, the Culture Economy typology is connected to the theoretical tools of Curry's multi-level governance theory.

The materials for the thesis include EU legislation on Leader and interviews conducted with Leader's local action group staff and fund beneficiaries in the summer of 2018. The findings suggest that the structure of the programme has allowed for hierarchy to emerge between the local and national actors, which is incongruent with the community-led objective of the programme.

Key words: LEADER, Multi-level governance, Local Development, EU, Local Action Groups, Culture Economy

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1 Prologue

It might not be an overstatement to claim that the European Union suffers from an identity crisis. This crisis has, in part, originated from the contradictions of co-operative ideals and the reality of member states with individual interests and motivations. When considering the rather vocal criticism the EU has faced, a lack of clarity and visibility seem to be the central issue. The lack of transparency has undoubtedly led to individual citizens feeling unattached to a union that is often difficult to understand. This is especially true on the level of governance.

How does governance (and multi-level governance specifically) operate in the policy of the European Union? The following thesis provides one way to examine this monster of a question. To attempt to answer broad and nuanced problems (which are mostly the norm with the EU), it is often useful to find a well-framed focal point where policy can be assessed on its own terms - how it achieves its objective, and how implementation is organised. Luckily, such a focal point is found in cohesion policy and regional development, where actors from all relevant levels of multi-level governance (supranational-national-regional) operate with a specific, often measurable agenda (regional development). One such cohesion policy undertaking is the rural development programme Leader.

Before the discussion on questions related to multi-level governance, a brief contextual summary of Leader is in order. In the following sections, a history of Leader is provided along the basic principles behind the programme. In addition, the specifities of Leader in England (the geographical context for the thesis) are discussed in further detail.

So, what exactly is Leader?

1.1 The Leader programme - Community-led Local Development

Leader is a European funding programme designed for the purpose of rural development as a part of the regional policy of the EU. Launched in 1991, Leader has experienced multiple programme periods, the 2014 – 2020 programme being the fifth iteration. The programme has

grown from a total European wide budget of €442m in the first period to €5.500m in the last. Leader is implemented under the national and regional Rural Development Programmes (RDPs) of each member state and is co-financed from the European Agricultural Fund for Rural Development (EADRD) (https://enrd.ec.europa.eu/leader-clld_en). For example, in England a total of £138 million was available for projects through Leader in the 2014 – 2020 programme period (https://www.gov.uk/guidance/rural-development-programme-for-england-leader-funding=.).

Leader is a locally-oriented network approach to rural development - the LEADER acronym ("Liaisons entre Actions de Développement de L'Economie Rural – Links Between Actions for the Development of the Rural Economy") reflects this key role of networks. According to the EU Common Agricultural Policy agenda, Leader is "a 'bottom up' approach, in which farmers, rural businesses, local organisations, public authorities and individuals from different sectors come together to form local action groups (LAGs). LAGs prepare their own local development strategies and manage their own respective budgets" (https://agriculture.ec.europa.eu/common-agricultural-policy/rural-development_en#ruraldevelopmentprogrammes). The Leader approach is often described as neo-endogenous development, something beyond purely endogenous (development driven from within a territory) or exogenous (development driven from outside the territory) approaches. For Leader, local actors are essential, but extra-local factors are accounted for as an emphasis point. (Ray, 2001) Christopher Ray discusses Leader as a laboratory of RDP, describing it as a novel form of intervention that includes "the design of general guidelines for the use of funds… but within an ethos of much latitude for local discretion in implementation (Ray 2001 p.13)".

The main instrument of Leader funds are Local Action Groups (LAGs), comprised of public and private local actors. LAGs are the core local element of Leader. According to the principles of the programme, they should be in charge of the implementation of Leader, with duties including for example devising a Local Development Strategy (LDS), choosing projects that receive funding, and serving as local representatives of the programme. LAGs should, according to the key features of Leader, define the strategy and the implementation of the programme concerning the funded projects. The LAGs are chosen by a national committee and are required to contain a certain percentage of governmental and non-governmental members.

The key characteristics of the Leader approach are:

1. Area-based local development strategies

2. Bottom-up elaboration and implementation of strategies

3. Local public-private partnerships: Local Action Groups (LAGs)

4. Integrated and multi-sectoral actions

5. Innovation

6. Co-operation

7. Networking

(European Commission 2006)

The idea is to move from hierarchical intervention towards a more elaborate policy that is both endogenous and territorial but also based on a network of relationships between actors (Kovách 2000, Bosworth DEFRA report p.10). By empowering local actors in dealing with local problems, the approach attempts to further commit actors to rural development all the while considering that rural development must acknowledge extra-local realities.

What began as Leader 1 Community Initiative has evolved extensively in the past 30 years. In the 2007 - 2013 programme period, Leader was "mainstreamed" into the EU rural development programmes, a turn which seems to have paved the way for some of the changes in the implementation of the programme (Dax et al. 2016) that are examined in this thesis. The adoption of Leader into a larger framework of the rural development programs of the EU meant that Leader was truly positioned under the umbrella of multi-level governance; EU originated policy coordinated via national actors (=member states) and implemented on a regional level by local actors (LAGs).

The future of Leader is somewhat unclear. The next programme period will commence in 2023, though scant information on the future of the programme is currently publicly available.

To keep local development afloat, transitional programmes have been adopted by some LAG areas in for example Ireland (https://www.gov.ie/en/press-release/c44cc-minister-humphreys-announces-details-of-transitional-leader-programme/). The latest CAP update claims that the Leader approach has been adopted by other EU development programmes: "the LEADER approach has been adopted by the European regional development Fund (ERFD), the European social fund (ESF) and the European maritime and fisheries fund (EMFF) as part of wider community led local development (CLLD)" (https://agriculture.ec.europa.eu/common-agricultural-policy/rural-development_en#ruraldevelopmentprogrammes). Thus, the CLLD approach in regional development seems quite prevalent, and considering the wider application of the Leader principles examining and evaluating the program is all the more relevant. A recent Policy Insight publication highlighted that "LEADER's flexibility continues to make it an ideal tool for helping Local Action Groups
(LAGs) deliver valuable local contributions to high-level objectives
of the Common Agricultural Policy (CAP) in the coming years." (https://eu-cap-network.ec.europa.eu/publications/leaders-potential-policy-perspective_en#section--resources)

1.2 Leader in England

For this thesis, the Leader programme in England provides a regional context for a rather interesting case study. Throughout different programme periods, the coverage of Leader in England has expanded significantly. The programme has grown from 64 Leader areas in the 2007 – 2013 programme period to 79 Leader areas in the 2014 - 2020 programme, with new LAGs such as Wool Town, East Kent, Cotswolds, Real Devon and Wensum & Coast added to the programme. The new areas cover some market towns, but the maximum population of a Leader area (152 000) has remained the same.

According to the Rural Development Programme of England, the 2007 - 2013 Leader programme resulted in over 2,600 new jobs created, with support for over 700 previously existing small enterprises and 200 new small enterprises created. Additionally, it provided over 21,000 training days and an extra 115,000 overnight stays and 800,000 day visits for rural tourism. (RDP England). The current official funding priorities for Leader in England

include farm productivity, micro and small enterprises, farm diversification, rural tourism, rural services, culture and heritage and forestry production. (RDP England).

1.3   Exploring EU governance

How is the success of EU policy affected by governance structures? What are the implications of multi-level governance on the implementation of policy? For the rather complicated relationships and structures present in multi-level governance systems, the latest iteration of a single development program (Leader) with a specific regional context (England) is analyzed to provide one possible answer.

This thesis reveals how certain governance structures can be conducive to shifts in the relational arrangements between national, regional, and local actors. These inadvertent changes in governance explore the contradiction at the heart of the union: the virtuous ideals of the EU and the prosaic nature of its challenges.

In a post-brexit EU, understanding the regional policy of the European Union is critical. Brexit, along with the sudden rise of nationalism and euroscepticism in Europe has revealed the extent of the communication gap between EU politics and EU citizens. This gap is perhaps most pronounced in less developed rural areas, where the EU is viewed as both a cultural threat (Mclaren 2002) and an oppressional force against national sovereignty. What the EU actually does for rural areas is often unclear. In the effort to provide a clarification, this thesis is one piece of the puzzle.

2 A Laboratory for Development

"In order to pursue its external strategic objectives (e.g., securing Structural Fund money, establishing a strong presence within state and regional policy-making structures or joining networks of local initiatives), a local development group may portray itself as being founded upon a territory that is coherent and distinctive, and which would be more effective in the pursuit of local needs than existing politico-administrative/policy areas."

Christopher Ray. Culture, Intellectual Property and Territorial Rural Development. Page 7. Sociologica Ruralis.

2.1 Introduction

This thesis will evaluate multi-level governance in practice, in the context of the rural development policy of the EU with a focus on the 2024 -2020 Leader programme as well as the changes that have taken place between programme periods within England. The analysis will include both the governance of Leader as well as the program's capability to help valorise local resources and account for local territorial culture in different LAG areas within England. The analysis will approach multi-level governance in practice with Dion Curry's MLG theory introduced in Network Approaches to Multi-Level Governance: Structures, Relations and Understanding Power Between Levels (Curry 2015) and link this theoretical tool into the policy objective of achieving "locally-led rural development" which is further defined with Christopher Ray's Culture Economy Typology (Ray, 2001) as a conceptual framework.

The primary purpose of this thesis is to examine the relationship of multi-level governance and the policy objective of locally-led rural development within the implementation of the EU rural development programme Leader. The objective is to produce a clearer image of both multi-level governance (hence referred to as MLG) as a theory and a practical policy network arrangement by examining how policy is implemented in MLG systems and in local cultural contexts. With the case of Leader in England, it appears that the programme has lost sight of its locally-led development objective. This is partly due to a vulnerability that is inherent to certain types of MLG systems - a flexible structural arrangement has allowed for a change in

the dynamics of relations within the programme, which has in this context led to policy that is in many ways blind to varied territorial resources, needs and priorities.

 The research questions that organize this thesis are:

1. How does the structure of governance of the Leader program affect the policy of locally-led development in England? Specifically,

2. Is the Leader program conducive to hierarchical shifts between actors from different levels of governance due to its flexible design?

The qualitative analysis of Leader in England suggests that with the current structural arrangement, the Leader programme is vulnerable to changing relational arrangements that can defy its core objective of locally-led development. In order to understand the objective of the Leader programme, locally-led rural development policy is analysed with cultural considerations for regional policy based on Christopher Ray's conceptual approach to rural development introduced in Culture Economies (2001).

The secondary aim of this research is to assess Leader as a programme affecting local/territorial culture, specifically in the context of projects in England. How can Leader empower local actors to engage in turning local cultural resources into local development? What does locally-led development actually entail? In its current form, is Leader true to its ethos of bottom-up development?

As a theoretical framework, multi-level governance began as a method of explaining European cohesion policy (Hooghe, 1996). Its theoretical base has strengthened with further definitions and conceptualizations, such as Type 1 and Type 2 MLG systems (Marks, 2005) and spheres of authority (Rosenau, 2005). MLG theory has been criticized for vagueness resulting from overreaching of the concept (Rhodes, 1997), which has resulted in further conceptualizations and definitions (Piattoni, 2015). Its effects on democratic accountability are continuously debated in academia (Curry 2015). Dion Curry emphasized the importance of deploying MLG in both theoretical and practical level within different contexts (Curry 2015). This thesis is an attempt at such deployment, using MLG theory to analyze policy networks in both novel (culture economy) and practical contexts.

Leader provides an interesting case for study. Often described as a "laboratory" of rural development policy (Ray 2001), Leader has been examined from multiple perspectives

ranging from the role of local/expert knowledge (Adamski & Gorlach, 2005) to game theory (Petrick, 2011) and all the way from the level of community facilitation activities (Vidal, 2009) to mainstreaming EU policy (Dax et al. 2016). Previously, implementation of Leader has been examined on the written/unwritten rules of project selection in Poland, where nepotism has caused issues (Furmankiewicz et al., 2021). Together, Leader and multi-level governance has been previously examined during the Leader+ period, with a focus on Finland and Germany (Kull, 2005) as well as the governance of Leader on the LAG-level within the context of tourism promotion activities (Ballesteros et al. 2019).

Other previous Leader evaluation has emphasized economic output (Pocol, Moldovan-Teselois, Cavicchioli, Codrea 2017) and innovation (Navarro, 2018, Dax et al. 2016), as well as the social roles different actors within the programme adopt and their effects on innovation (Vercher, 2022). Measuring the value of Leader can be difficult - the limited nature of an economic perspective of the programme has been noted in the case of England, as the value of the programme is perhaps not best judged solely based on spend or value for money (Annibal et al. 2013). Instead of approaching the success of the programme with an economic perspective, this thesis attempts to introduce a cultural and territorial perspective that is tied to the objective of the policy itself. Leader has been previously examined from a territorial perspective by Oliver Müller, who conducted an ethnographic study examining the different bio-cultural heritage preservation strategies in the programme (Müller, 2021).

This thesis places the culture economy inherent in Leader into the framework of multi-level governance. Was the latest Leader programme implemented in a manner congruent with its ethos of community led local development?

2.2   Justification for the thesis

Insights into the Leader programme are important for both rural development and the regional policy of the European Union. Even though the budget of Leader is small compared to other RDP allocations (in England for example, €174 million is allocated for Leader compared to €3 420 million for other RDP measures), the programme represents a unique approach to development issues that will serve to inform future regional policy of both the EU and a post-brexit UK. The way governance is both legislatively organized as well as produced in

networks is particularly interesting when examining the Leader approach, which is why the theoretical focus of this thesis turns to MLG systems.

However, in my opinion, it is not constructive to discuss Leader solely on terms of an of multi-level governance. As a unique endeavor in regional policy, Leader is an attempt at an innovative network approach that is oriented around both territorial variety and a multitude of tools for implementation for the purposes of rural development. The focus is on capacity-building and empowerment of local actors to commit and develop their areas. In order to assess whether this innovative approach is actually adopted in the programme, the core concepts require detailed attention. For this purpose, Christopher Ray's culture economy typology is adapted to MLG systems and operationalized to discuss the projects in receipt of Leader funding in the current programme in England. While Curry's Multi-level governance theory provides the theoretical base for the analysis, Ray's work introduces key concepts and the "language" that further connect the theory into real-life policy and outcomes.

England was chosen as a case study for this thesis due to the fact that the programme experienced profound change between the 2007 - 2013 and the 2014 - 2020 programme period. A vital dynamic of Leader, the relationship between local and national actors, experienced a radical shift. This change is particularly interesting, as it can demonstrate vulnerabilities inherent in the governance of the programme. In addition, the United Kingdom's separation from the EU means that the 2014 – 2020 Leader period was the last of its kind in England, and as such it provides the final chance to examine the programme (and supranational-national-local relations) in this particular context. This thesis was narrowed to England (instead of the United Kingdom as a whole) due to the fact that in other parts of the UK, different approaches to the implementation of Leader have been adopted.

2.3   Theoretical framework: premilinary remarks

In Network Approaches to Multi-Level Governance: Structures, Relations and Understanding Power Between Levels, Dion Curry both developed Multi-level governance theory and mechanized it to practical use with two case studies. Curry's expansion of Type 1 and Type 2 MLG systems into a two-way axis consisting of structural factors and relational factors is particularly conducive – it accounts for both relational and structural arrangements within

MLG systems and allows these factors to influence each other dynamically. The two-way axis can create four types of governance arrangements systems. The argument of this thesis is that the types of governance systems with a flexible structural arrangement make Leader conducive to hierarchical and "top-down" dynamics to relations and operations, thus creating a rather stark contradiction of the implementation of the policy and its general "ideal" objective.

However, as stated above, governance alone is not sufficient when examining a development programme with ideals rooted in local value. To avoid an oversimplified approach, a conceptual tool is required to discuss Leader in a nuanced manner. Christopher Ray's Culture Economy provides a resourceful conceptual framework for the examination of the objectives and idea of Leader. Culture Economy describes the ways local areas can take advantage of their distinct characteristics to strengthen the development of rural areas, whilst considering the effects of extra-local actors on local economies. This is essentially the "neo-endogenous" approach to rural development that constructs the core of Leader. The culture economy perspective is appropriate, as it can be used to describe what motivates local actors to drive cultural projects and the types of development paths and strategies localities can adopt in pursuit of bottom-up development. To further link Multi-level governance & locally-led development policy, the concepts and development paths presented in Culture Economy are infused to Dion Curry's two-way axis to demonstrate how different types of governance structures can affect implementation & outcomes on a practical level.

2.4   Methodology & Empirical materials

In order to examine MLG systems and the Culture Economy in practice, this thesis adopts a qualitative approach to the analysis with a case study of Leader in England. The main focal points are the structural arrangements of Leader present in legislation and the hierarchical changes in the relational arrangements on the implementation phase and the outcomes of the policy process. In order to comprehensively discuss the effects of the changes the programme has experienced, the analysis will also consider funded projects and the challenges applicants faced in the final Leader program in England.

The material used to analyse Leader includes:

1. EU Legislation on Leader

2. Interviews with LAG personnel and fund beneficiaries

3. ENRD European wide LAG Survey

In order to analyse the structural arrangement of the programme, "how the rules of the game are written", EU legislation concerning Leader is examined alongside the rural development programme of England. Additionally, a European wide LAG survey conducted by the European Network for Rural Development in 2017 is examined briefly.

The relational arrangements (the hierarchy/heterarchy axis) are analysed based on semi-structured interviews conducted in the summer of 2018 with LAG personnel & Leader beneficiaries in England. The interviews coupled with the survey findings will provide insight into the changes in relations and power between the 2014 – 2020 and the 2007 - 2013 programme periods, and whether implementation of Leader is led by Local Action Groups or national authorities.

2.4.1 Multi-level governance in practice

After further defining the theoretical and conceptual frameworks adopted in this thesis in the next chapter, the analysis will begin with structural arrangements. The thesis will first establish the position of the programme on the structural spectrum of Curry's two-way axis. The structure of Leader is assessed through Curry's four factors related to the rigidity/flexibility of the structural arrangements: *jurisdictional/legal arrangements*, *operational rigidity*, *disintermediation* and *financial capacity*. These concepts are operationalized in the context of written legislation and empirical evidence. Analyzing the programme through this theoretical framework will allow us to confidently place the programme on the flexible end of Curry's spectrum.

The second analysis chapter discusses the aforementioned change with special regard to the relational arrangements between different actors: Defra officials, LAG personnel and beneficiaries of Leader funds. Co-operation and networking between LAGs is discussed as alongside the role of the Local Development Strategy (the main strategic tool of Leader) within the final program period. In accordance with Curry's proposal of the possibility of hierarchy in policy networks, this analysis chapter will discuss Leader as a network of a

multitude of actors where operational freedom has been narrowed quite extensively. This hierarchical shift has had profound effects on practically all aspects of the program.

Throughout examining Leader and especially in the second analysis chapter, the implementation of the programme takes the center stage. The focus on the implementation of the policy process contributes ample evidence of a shift in the relational arrangements between the previous and the final programme periods. As Curry describes, placing implementation at the forefront of policy analysis opens up the possibility to examine MLG from a bottom-up perspective (not to be confused with bottom-up approach to development) that is more suitable for the purpose of understanding how policy turns into action. According to Curry, implementation is the part of the policy process where MLG and networks are the most prominent (Curry 2015, p. 44). However, to avoid leaving the analysis solely on an operational level, part two of the second analysis chapter will discuss what was accomplished with Leader funds and exemplify how the emergence of hierarchy has not only affected operational aspects but the outcomes of the programme as well. In this part of the analysis, MLG theory is brought into a practical context with the help of the Culture Economy typology.

2.4.2 LAG & fund beneficiary Interviews

To examine the changing relational dynamics of Leader in England, in-depth semi-structured interviews with Local Action Group personnel (chosen via snowball sampling) are used to provide insight into implementation and operational matters of the programme. Local Action Groups (LAGs) serve as the primary instrument of the fund allocation, and they decide which projects to support (under priorities set by EU and national authorities) and devise a Local Development Strategy (the main strategy tool of the programme) for Leader funds. LAGs are the main instrument of Leader, which is why LAG members are the primary interviewees for this thesis. The interview questions for LAGs consider governance, operation and changes in the Leader programme between different programme periods (e.g."What kind of reporting arrangements does your LAG have with DEFRA or other national authorities?") as well as questions derived from Ray's culture economy theory (e.g. Do you think your Leader area represents a common cultural identity?"). Discussing the changes that have taken place between different periods of the programme allows this thesis to show how flexible structural

arrangements can invite relational changes. A third empirical source comes from interviews with Leader beneficiaries.

The interviews (8 in total) were conducted with a grounded exploratory approach and took place between June 2018 and August 2018. LAG staff and fund beneficiaries from all Leader areas in England were approached via email and rural researchers from the University of Lincoln provided help with reaching contacts and organizing an interview. Five LAG members were interviewed from the Northern Lincolnshire, Yorkshire Dales, Coast, Wolds, Wetlands and Waterways, South Nottinghamshire and North York Moors, Coast and Hills Leader areas. The 3 beneficiaries of Leader funds who were interviewed for this thesis come from East Kent, Peak and Making It Local Leader areas – these interviews provide material concerning both how Leader is performing from the perspective of projects in receipt of Leader funding, as well as the importance of locality in the projects themselves. Once the interviews were finished, it became apparent that significant changes have taken place as Leader had moved to the 2014 - 2020 programme period.

The interviews where conducted via recorded telephone calls which were later transcribed. The interview questions (attached in appendix) relate to the implementation of Leader and the relationships within, with themes such as funding priorities, reporting, evaluation and the use of the Local Development Strategy (the main strategy tool for locally-led development) in practice, as well as definitions of local cultural resources and development paths.

In addition to changes in governance, the interviews also focus on local cultural assets and territorial development paths. Rather than comprehensively consider the economic output of the program, these interviews serve to demonstrate both what can be achieved on-the-ground locally with Leader and what type of challenges applicants faced during the 2014 - 2020 funding period. The questions for beneficiaries of Leader revolve around the motives and aims of the projects in relation to the local area, for example "What makes this type of project important for your area?", as well as questions related to the effects of Leader on their locality. On par with the culture economy typology, the questions will also consider the intended consumers/audiences of the projects and the sensibility to territorial variation with the funding restrictions.

2.4.3 A Case study of Leader & Potential challenges

Methodologically, this thesis will adopt a qualitative approach: a case study conducted by examining legislation, in-depth interviews and survey results. The interviews and survey results reveal both the context and dynamics of the relational arrangements in Leader in England, and legislation and the Rural Development Programme demonstrate the structural environment in which a hierarchical shift was possible. A case study is appropriate here because the research is focused on a "how" question about a contemporary set of events (Yin, 2014). This qualitative examination of Leader will explore the possibilities and challenges of regional policy in the EU and will also reveal how multi-level governance functions in a practical context, specifically in the case of development policy. The emphasis of the examination is on the implementation stage of the policy process, as this is the phase where policy tools turn into action (Curry, 2015).

For the analysis, only actors from the local/regional-level were interviewed. This was in part due to the scope the thesis as well as the fact that no DEFRA official was reached for an interview on the subject. As no national/supranational actors were interviewed, the perspective is quite obviously limited. However, as LAGs are meant to serve as the main tool of implementation for Leader, their perspective on the programme is arguably the most relevant. The explored evidence points to a similar conclusion from both interviews with LAGs and beneficiaries (as well as LAGs from different regionalities who were not aware of each other) which presents a rather strong case for the arguments and findings. However, the LAGs might have some motivation to downplay their own influence in order to exaggerate the issues. Equally, the beneficiaries are likely skewed towards a more positive response to Leader to the fact that interviewees were recipients of the funds.

When the changes in the way Leader was implemented are contrasted against the structural design of the programme, the conclusion that one enabled the other is quite compelling. However, as Leader has never been implemented with a clear-cut rigid design, it is not feasible to state that formal written rules would absolutely prevent a national hierarchy from surfacing in the programme. National actors could find ways to ignore or circumvent the written rules in favor of a more controlled programme, though these factors could (and indeed should) be considered if the design of a renewed programme.

2.5   Structure of the thesis

In order to provide a theoretical background for the analysis, chapter 3 will outline Dion Curry's network analysis approach to MLG. The background for Multi-level governance theory is discussed briefly, and Curry's dynamic two-way axis is introduced. Following MLG theory, the theory section moves on to Christopher Ray's Culture Economy framework, with emphasis on concepts and ideas relevant to Leader and Neo-endogenous development. The theory chapter will conclude with a practical combination of Multi-level governance theory and the development paths present in the Culture Economy typology.

The remaining chapters are dedicated to the analysis of the Leader programme. The analysis chapters move from structure to relations & projects funded, all the way from EU legislation to the on-the-ground realisation of the programme. Chapter 4 is an examination of the structural arrangement of Leader – how legislation and guidance inform the different actors of their rights, roles and responsibilities. In this part of the analysis, EU legislation and the RDP of England are of particular focus. The legislation is assessed through Curry's theory, with focus on factors related to the flexibility/rigidity of governance structures.

In the second analysis chapter (Chapter 5), the focus is two-fold. First, the changes between the 2014 - 2020 and the 2007 - 2013 programme period are discussed with emphasis on the changing dynamics in the relational arrangements in the implementation of Leader in England. These changes are analysed through the policy network analysis present in Curry's MLG theory as well as the objective of Leader and concepts of Ray's Culture Economy. The second point of analysis in Chapter 5 will examine some of the projects that are funded in the current programme in relation to the culture economy - is Leader funding endeavors that contribute to a thriving culture economy in England? This part of the analysis will provide a on-the-ground perspective to Leader, focusing on interviews with projects in receipt of Leader funding. Finally, Chapter 6 will serve as a conclusion to the thesis.

3 Model for Governance & Language for Local Value

The theoretical and conceptual basis of this thesis involves both Curry's approach to multi-level governance to analyse the system in which the Leader programme operates, as well as Christopher Ray's Culture Economy typology to describe the objective of the programme and the concepts central to Leader and locally-led development. This type of theoretical & conceptual approach is appropriate because in order to understand how MLG systems work in practice, it is not adequate to examine governance in a vacuum. The context behind the policy, the agenda and the objectives should be well defined and understood. In the case of Leader, the objective is not completely straightforward – what does successful "locally-led rural development" actually entail?

This theory chapter is divided into three sections. The first section considers Dion Curry's Network approach to multi-level governance. The section begins with a brief overlook of the concept of MLG and then continues with a theoretical background for the analysis of structures and institutions in MLG systems – the "rules of the game". Next, the network/relational perspective to MLG (with a focus on networks of actors) will be discussed. After exploring these aspects of MLG theory, the fourth part will discuss Type 1 and Type 2 MLG systems which serve as a background for the discussion on Curry's two-way axis for MLG in the final part of section one.

Section two focuses on Christopher Ray's Culture Economy typology. Again, the section will begin with a general background into the concepts and will then move forward to discuss the central details of the framework, beginning with the culture economy typology. The typology is concerned with local development paths and the "revalorization" of cultural resources, which connects quite closely with the Leader ethos. The final part of section two will discuss the term neo-endogenous rural development coined in Ray's work.

Finally, this theory chapter concludes with the combination of Curry's governance theory and Ray's Culture Economy concepts. The development paths available to localities presented in Ray's Culture Economy typology will be positioned into Curry's two-way axis of

governance, which will exemplify exactly how different types of Multi-level governance models can produce different policy within the context of development. Binding governance together with the conceptual "language" of Leader allows us to examine how theoretical governance models can in part explain real-life effects of policy and changing relations in implementation. This practical application of theory is necessary for a well-grounded discussion on policy choices and the benefits and drawbacks of different governance models.

3.1   Multi-level governance

Multi-level governance as a concept was introduced to explain and examine the dynamics of the structural policy of the European Union, where power was dispersed upwards to a supranational organization (EU), downwards to regional governments and outwards to non-governmental actors (Marks and Hooghe 2004). In Network Approaches to Multi-Level Governance: Structures, Relations and Understanding Power Between Levels, Dion Curry arrives at a definition for MLG that is perhaps illustrative of how far the theoretical base of the concept has evolved, describing MLG as "The confluence of political actors and structures operating at various political, institutional and geographic levels, resulting in political steering processes that operate and disperse power and accountability in an intertwined way (Curry 2015 p.23)" . Curry's theoretical conceptualization presents MLG theory as a method of reconciliation for the "seemingly contradictory notions of networks and hierarchy, actor relations and political structures and power and legitimacy" (Curry 2015 p.10). Through this approach, MLG can be used to examine the relationship between structural and relational factors – it constructs horizontal coordination with emphasis on networks, all the while considering the vertical realities of intergovernmental relations (Curry 2015 p. 21). MLG considers a broad range of actors (both governmental and non-governmental) at different levels of government (Curry 2015 p. 21).

Governance itself, while conceptually muddied, is quite readily able to accommodate both relationships between actors and the structures of institutions within which they operate (Curry 2015 p.10). Curry's theory follows the somewhat agreed upon characteristics of governance, beginning with Rosenau's definition of governance as "any collectivity, private or public, that employs informal as well as formal steering mechanisms to make demands, frame goals, issue directives, pursue policies, and generate compliance" (Rosenau, 2004,

p.31), and moving through political (Rhodes 1997) and normative (Klijn 2008) underpinnings of the term. Essential for Curry's theory is that governance "allows for separate consideration of those who steer politics and policy through decision-making, and those who 'row' by implementing policy (Curry 2015 p.13)" and the fact that the concept "acknowledges that different governmental and non-governmental actors may play either of those roles (Curry 2015 p.13)".

EU cohesion policy and development programmes such as Leader are deeply connected to a vision of a functioning Multi-level governance. Ideally, decision-making is taking place on the different levels of governance and by governmental and non-governmental actors. In Leader specifically, it is the local actors who steer development activities for their area, leaning on the strengths and character of what defines and differentiates their home region. The underlying assumption feels quite intuitive. If a locality's economy and culture is deeply rooted in, for example fishing, wouldn't it be the local fisher who knows best how to drive development for the area? Regions are not all the same – why should development be?

3.1.1 Structural arrangements – the base of power

Examining the polities and policies of governance reveals the structural base of MLG systems. (Curry 2015, p.13). Discussing this structure Curry adopts a neo-institutionalist view, focusing on the way institutions and institutional structures shape political action. Political institutions are divided by binding and non-binding forms and formal/informal rules and procedures, with the acknowledgement of the role of actors and networks shaping the processes. (Bulmer, 1998 Curry, 2015 p.14). Between formal and informal institutions, three relationships exist: complementary, substitutive and conflict/incompatible. (Lauth, 2000. p.25) (Curry 2015, p. 14).

Arrangement turns into action through the use of hard or soft policy tools. These tools (e.g. information=nodality, authority=regulation, treasury=incentive) act as a "mediator of sorts between governance institutions and governance actors", with the key distinction being how they inform actor behaviour – as binding and compulsory, or non-binding and persuasive. (Curry 2015, p. 14)

In a practical context, Curry divides four factors that influence the structural flexibility or rigidity of governance: *jurisdictional/legal arrangements*, *operational rigidity*, *disintermediation and financial capacity*. (Curry 2015, p.93)The combination of formal and informal types of institutions affects the flexibility or rigidity of the structure, which in turn affects how conflict is resolved. (Curry 2015, p.14) In rigid structures, formalized institutional rules are used to resolve conflict. In the case of flexible structures, conflict resolution is more ambiguous – the way incompatibilities are resolved can be determined by the relationship of actors and the power structures inherent to this relationship. (Curry, 2015 p.15).

The ambiguity of conflict resolution within a flexible governance structure can accentuate the relational arrangements within a MLG system. If for example, a local government actor is tasked with finding projects for the allocation of funds, and the requirements and guidelines presented by a national level actor don't match the projects that are applying in the area (i.e a list of equipment for funding that has no use for the area in question), how conflict is resolved can highlight the level of hierarchy or heterarchy within the system. Does the local actor have the power to influence the guidelines and requirements? Will the national actors threaten punishment for breaking the rules and funding "forbidden" projects? Where there is ambiguity in the rules, the significance of the relational arrangements grow.

3.1.2 Relational arrangements – the form of power

The relationships of different actors in MLG systems are best examined as networks i.e. the connections between individuals in the policy process. (Curry 2015 p.16) According to Curry, if a network framework is adopted to the analysis of governance processes, it can "illustrate the degree to which institutions coincide with actor relations (Curry 2015 p.20)" which can serve the purpose of bridging the gap between actor-centric and institutional approaches. A variety of tools and approaches are available to study these networks. The most relevant concepts regarding this thesis are policy networks and network governance.

Adapting from previous research by Rhodes (1981), Wilks and Wright (1987), and Marsh and Rhodes (1992), Curry identifies factors that must be present in policy networks: recognizable membership, interdependence and regular interaction of actors, mutual interests and preferences and resource exchange. Differences in discretion are a product of both the

objectives and the power of interacting organizations (Curry, 2015 p.17). Context matters – the national style of policy making will affect how these networks evolve. Policy networks are also shaped by the resources being allocated (less developed if actors ar self-sufficient as opposed to interdepended in the resources being allocated), the policy area in question, the stage of the policy process and the amount of aggregation of interest (more shared interests will increase the existence of networks). (Curry 2015, p.17).

Undoubtedly, Leader is by design an example of a policy network. All the factors Curry identifies as necessary for policy networks are present in Leader: recognizable membership (clearly defined LAG personnel and participants), interdependence and regular interaction of actors (LAG members and staff interact vertically and horizontally), mutual interests and preferences (development) and resource exchange (Leader funds). Arguably there is a high level of shared interest among the different level of actors, with the aim of regional development as a common goal.

Moving beyond policy networks, the concept of *network governance* is essentially the way the interests of interdependent actors is "translated into policy choices to 'allocate values'" (Kohler-Koch 1999) (Curry 2015, p.18). In this type of system, the state serves the role of a mediator and an activator (Curry 2015, p. 18). Network governance assumes that policy derives from the complex interaction of actors in a managed form of co-operation. According to Curry, this interaction tends to be hierarchical. While actor-centric, network governance does not ignore the role of institutions and institutional rules but rather allows them to govern which actors access the arena as well as the rules of the interaction. (Curry 2015, p. 17-18).

Curry's "network approach" challenges the basic assumption (in network governance research) of networks as a non-hierarchical structure of governance. Rather, Curry acknowledges the "possible, and very probable existence of networks within hierarchical structural constructs" (Curry 2015, p.20). Allowing hierarchy in networks is vital for Curry's theory, as without it MLG systems could not be examined with consideration to relational factors. (Curry 2015, p.21). As this thesis will demonstrate, it is vital to analyse multi-level governance in both structural and relational terms. In order to gain a comprehensive understanding of policy networks such as Leader, the relational arrangements are equally important to the structural composition of the programme.

3.1.3 Type 1 & Type 2 Multi-level Governance

Recognizing a lack of agreement on how multi-level governance should be organized, Gary Marks and Liesbet Hooghe identified two contradictory visions of MLG (Marks and Hooghe, 2004 p. 16). These visions, type 1 and type 2 MLG relate to jurisdictions, membership and purpose of multi-level governance.

Type I	Type II
General-purpose jurisdictions Non-intersecting memberships Jurisdictions at a limited number of levels System wide architecture	Task-specific jurisdictions Intersecting memberships No limit to the number of jurisdictional levels Flexible Design

Table 2.1 Marks and Hooghe 2004

Type 1 represents a vision of MLG that is somewhat based upon the ideas in federalism.

(Marks and Hooghe p.17) In type 1 systems authority is dispersed to non-intersecting jurisdictions on a limited number of levels. These jurisdictions are general-purpose. Citizens in type 1 systems are "located in a Russian doll set of nested jurisdictions, where there is one and only one relevant jurisdiction at any particular territorial scale". (Marks and Hooghe p.16). Though perhaps difficult to distinguish from federalism, type 1 MLG has received attention from EU scholars because "while governments [remain] formidable participants in EU policy-making, control has slipped away from them (Marks and Hooghe p.17)". Hooghe and Marks define type 1 systems through a few basic characteristics: general-purpose jurisdictions, non-intersecting memberships, limited number of jurisdictional levels and system-wide, durable architecture.

Type 2 MLG systems are in direct opposition to type 1. In type 2 systems, a potentially huge number of specialized jurisdictions come and go as the needs and demands for governance change. (Marks and Hooghe, 2004 p.16-17) These systems are lean and flexible – jurisdictions provide services and solutions to specific needs and problems that arise territorially. Ideally, they are a sort of "dispersed self-rule on the part of diverse voluntary

groups (Marks and Hooghe 2004, p.22)", where "collective action problems are dealt with in heterogenous arenas mobilized by many kinds of groups (Marks and Hooghe 2004, p.22). The defining characteristics of type 2 systems are: task-specific jurisdictions, intersecting memberships, many jurisdictional levels and flexible design.

Type 1 and type 2 represent a spectrum. In the case of type 2 systems, pure examples are difficult to find. (Curry, 2015). Curry recognized a lack of nuance in the categorization: "difficulty comes when the boundaries between the two types are not clearly defined, which is becoming increasingly common as governments and governance evolve (Curry 2015, p. 32). Within one system different stages of the policy process may resemble either type, for example with clear-cut roles in policy formulation but fluidity and policy-specific bargaining in the implementation process. (Curry 2015, p.32)

The lack of nuance of such a categorization is present when examining Leader in terms of Marks and Hooghe's framework. It is difficult to pinpoint exactly where to place Leader on the spectrum. The community-led aspect of the programme is arguably an attempt at "dispersed self-rule", where a diverse local action group attempts to drive development collectively in cooperation with national actors. However, there are no intersecting memberships between LAGs, development action is driven regionally rather than with a task-specific jurisdiction and LAGs have no influence in policy formulation. To move further from Marks and Hooghe's categorization, a more dynamic descriptive tool is required to describe the complexities of modern multi-level governance.

3.1.4 Two-way Axis

Recognizing the limited nature of the spectrum in the framework by Marks and Hooghe, Curry develops a more nuanced approach to MLG. Curry proposes that there are structures with differing levels of flexibility that can operate with varying levels of hierarchy, which leads to the conclusion that "institutional structures and relative levels of hierarchy may in fact operate as independent factors in governance practice" (Curry, 2015, p.32-33). Actors can, for example, work within a flexible system of informal and non-binding rules, and yet their power may be contingent on other actors who wield their power hierarchically. (Curry, 2015 p.32-33) This hierarchy need not be explicit but may be present as long as there is a

possibility of control that is deemed legitimate by the actors involved (Curry, 2015 p.34). Thus, in order to explain multi-level governance systems, the relevant factors to examine are structural and hierarchical – the rules of engagement and the relationships and power dynamics of the actors involved. (Curry, 2015 p.33).

For this purpose, Curry suggests a two-way axis of structural and relational arrangements (see table 2.2). Structural factors include legally binding actions/soft law, fixed/malleable norms, rigid/flexible approach to implementation and institutionalized/non-institutionalized actor interactions. Hierarchical factors consist of presence/absence of sanctions, actor role, hierarchical/market forces, centralized/decentralized loci of authority. (Adapted by Curry from Treib et al., 2007). (Curry, 2015 p.33). Both axes represent a spectrum and create a kind of two-way loop" where "the axis of structural rigidity allows governance processes to affect power, the axis of hierarchy allows power to affect governance processes (Curry 2015, p.34).

Rigid Structural Design

Sanctioned Authority	Structured Delegation
Discretionary Control	Mutual Responsibility

Hierarchy

Heterarchy
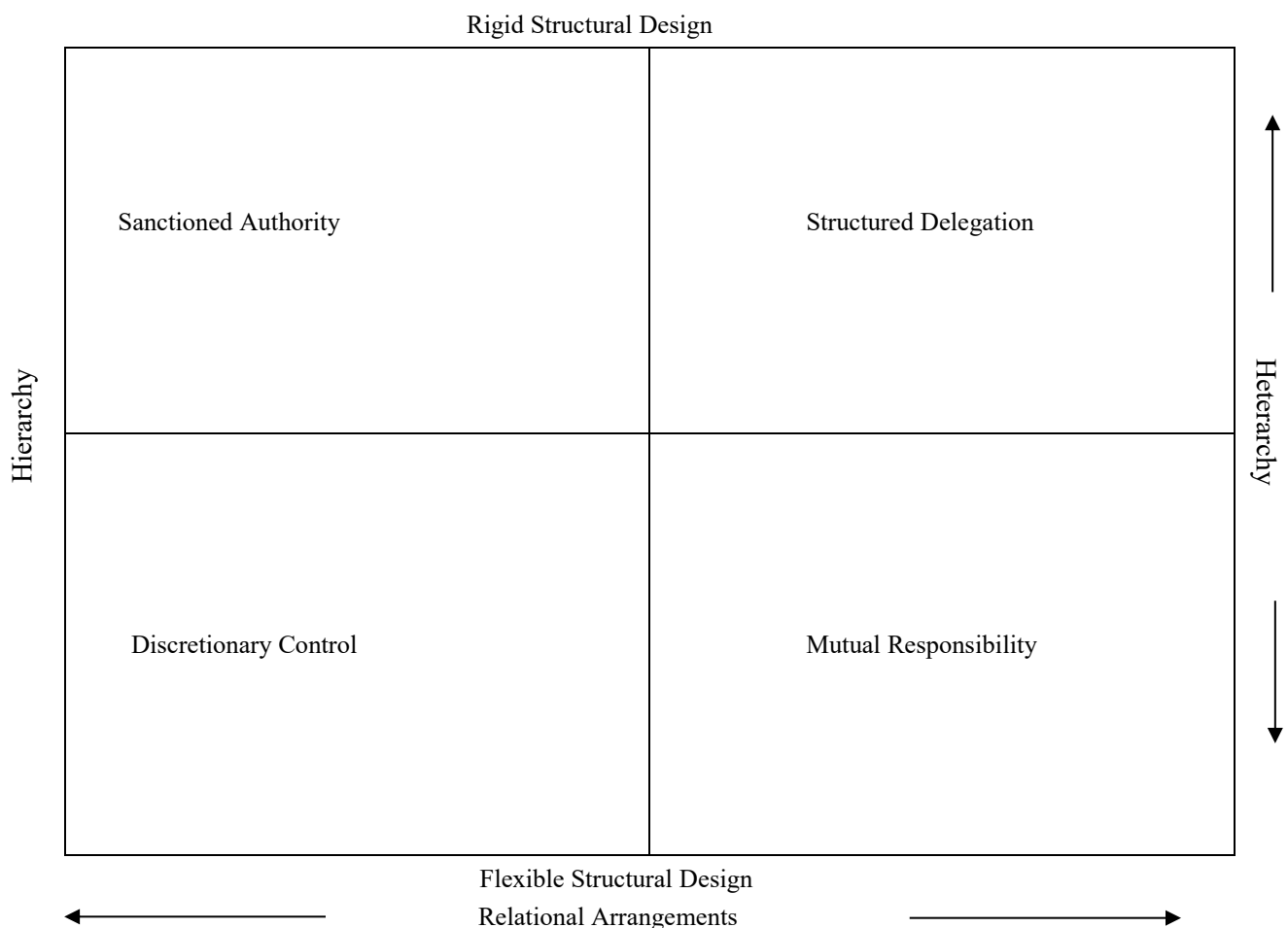
Flexible Structural Design
Relational Arrangements

Table 2.2 Curry's framework for Multi-level Governance, (Curry 2015, p.34)

Four type of MLG systems emerge from Curry's framework. Discretionary control, where the structural design is flexible, but relational arrangements operate under hierarchy creates conditions where subordinate actors might be able to respond to issues how they see fit but only at the discretion of a controlling actor. Sanctioned authority exists where the power of the controlling actor originates from a legal or statutory basis. In Structurally delegated systems, the structure is rigid, but actors operate with strengthened autonomy and less oversight. Mutual responsibility exists where "no actor holds clear power over another" and issues are dealt with in a flexible manner. (Curry 2015, p.35)

For the assessment of Leader in terms of Curry's axis, we may rule out Sanctioned authority and Structurally delegated systems as not descriptive of the formulation of the programme. As the analysis in the following chapters will indicate, the existing legislation on Leader does not provide a rigid, binding structural arrangement with fixed roles for actors between different levels of MLG. Rather, the actual amount of autonomy and discretion available for different levels of governance is left determined by the fluctuating relational arrangements within the governance of the programme. Therefore, for the purposes of this thesis, two (flexible) MLG types remain relevant: systems of Mutual responsibility and Discretionary control.

Curry's approach offers insight into both the structures in place and the relationships involved. These measures are both separate and complementary and they allow for an examination of hierarchical and heterarchical processes in multiple structural contexts (Curry, 2015 p.34 and p.36). These underlying factors are essential when examining power in MLG systems, as they "provide a clearer idea of how and when different governance approaches are used (Curry 2015, p.27)". Rather than focusing on either actors or structure, the framework incorporates both into a dynamic frame of multi-level governance.

3.2 The Culture Economy

Having discussed the multifaceted evolution of Multi-level Governance theory, we next examine what is to be governed and to what end in the context of the Leader programme. Where is locally-led development aiming at and how should its central ideas be defined?

The concept of a Culture Economy is essentially built around rural development that is achieved by the revalorization of local cultural resources. These resources are not necessarily similar between different territories. Further, development itself is best defined by the needs of the locality in question: localities should strive to find their own development paths. The Culture Economy is both a vision of the strategies different local areas can adopt for the purposes of development as well as a description of the relationship of actors that are present in rural development. These actors represent local, national, supranational and non-governmental interests. (Ray, 2001)

According to Ray, the idea of a culture economy originates from three sources: the changing nature of post-industrial consumer capitalism, the trajectory of rural development policy in the EU and the growth of regionalism as a European and global phenomenon. (Ray 2001). These sources relate to the need for more diversity in products, the territorial turn in the regional policy of the EU and a new regionalist agenda looking both outwards and inwards to "redefine the meaning of development according to values within the regional culture (Ray 2001 p. 18)". In this part of the chapter I will discuss the main components of Culture Economy, focusing on aspects of the conceptual framework that are most relevant for my research topic.

The culture economy framework is a conducive approach for the analysis of locally-led rural development and thus the Leader programme. Instead of rigidly framing the only possible development approaches as endogenous (from within) or exogenous (from the outside), it provides an explanatory tool that highlights the possibilities that arise from the relationships of local, national, intranational and non-governmental actors, while still considering the varied priorities and resources of different territories. Essentially, it develops *a culture approach* to development. The definition of culture here is one closely associated with territory: "the way in which humans create, and then perceive, the differentiation of space (albeit on overlapping layers) and which can differ from the mosaic of politico-administrative boundaries that exist at any moment (Ray 2001, p.16)".

The Culture Economy framework is structured on the dynamic interrelationship of local, national and international actors working in pursuit of development that is locally defined. The focus of the theory is territorial and places emphasis on the process of development. The valorisation of culture can raise political awareness, and thus, the Culture Economy provides

"invitations to local people to reflect on the nature of socio-economic development and its possible impacts on their cultural capital (Ray 2001, page 45)".

Conceptually, the model is built around the organization of development, the interrelationships of the actors involved and the connectivity between different local areas. The hypothesis is threefold. First, as previously stated, development approach should be territorial, rather than sectoral. Development policy should first and foremost consider the area it is trying to develop, rather than specific sectors of the economy. Second, development activity should be reoriented based on local resources. Third, development should be contextualised: the needs and perspective of the local people, the process of local participation should be emphasized when development is implemented. Thus, an ethical dimension is assumed in the model. (Ray 2001.)

3.2.1 Culture Economy Typology

Central to the model is the theoretical typology that presents 4 modes of strategy relating to development initiatives. Ray creates a typology to describe the strategies and development paths territories can adopt, which is broad enough to include different types of cultural resources but still concise as a strategical tool. Additionally, the typology is useful as a way

Typology of the Culture Economy (Ray 2005, Figure 1)

```
Territorial                              Cultural
Identity                                 Markers
   |                                        |
   v                                        v
Product                                  Constructed
Identity                                 Territorial
  /  \                                    Identity
 /    \                                    /    \
Territory      Territory        Promotion       Promotion
controls       controls         of territory    of territory
economic       socio-           to extra-       internally
impacts        cultural         local
               impact

   Mode I              Mode II          Mode III

                  Mode IV

Instrumental                      Normative
ends                              ends
```
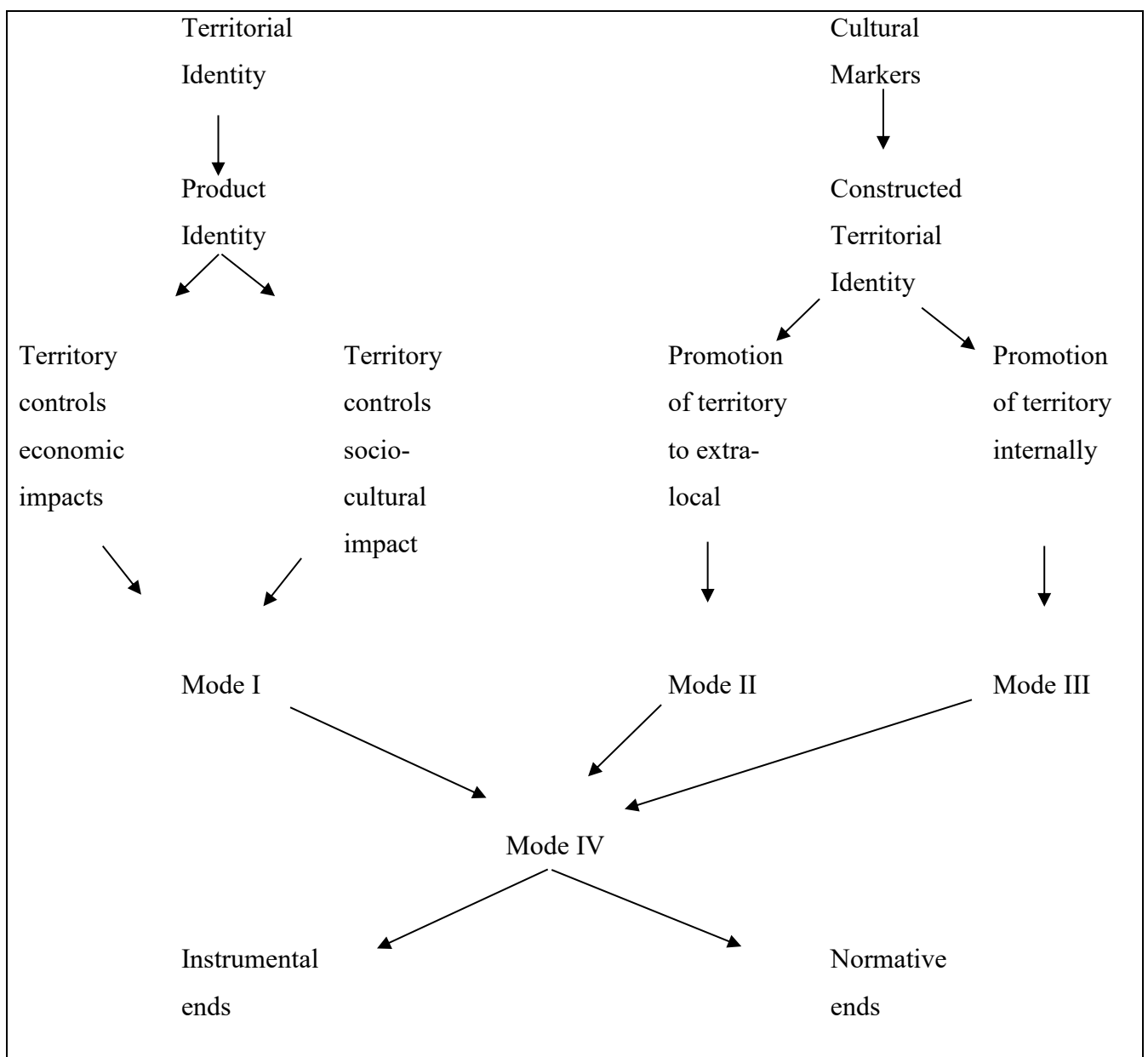
Table 2.3 Ray 2005 Culture Economy

of describing tensions between different modes of strategy. In broad terms, the first three modes present different "repertoires of strategic action" (Ray 2001, p.23) that local actors can adopt.

These repertoires are closely related to the territorial features and resources of different localities – adoption of a specific mode is dependent on the locale, the type of actors and resources that are specific to the locality. The final fourth mode, a sum of the first three, illustrates the variation of successful development in different territories, where "development can mean many different things" (Ray 2001, p.22).

In figure 1, the relationship of the different modes is presented. The typology presents that where the territorial identity of the area can be turned into a product, localities end up with strengthened control over the socio-economic and cultural development of their area. Mode I presents the commoditization of culture that is specific to the area. Territorial identity is transformed into a product identity, and the area itself controls both the economic and cultural impact of development activities. Mode II concerns "the construction and projection of a (new) territorial identity to the outside" (Ray 2001, page 20), where key resources, described as cultural markers (food, languages and dialects, crafts, folklore, art, drama etc.), are turned into a corporate identity, which can be used for promotional purposes. Mode III is essentially the same, only this time the territory is promoted internally. Finally, Mode IV is the outcome of modes I-III: development path that is defined by the local culture. Here the strength of the typology is apparent. Different development strategies (Modes I-III) lead to different development paths, and as territories decide to adopt one or several different modes based on the key resources of the area, development reflects the needs and values of that local area.

Essentially, Ray's typology of the Culture Economy is a vision of what the process of successful, locally-led development would look like. A local area valorises its' identity via tangible and intangible resources and turns them into a driving force for development. This process is more or less what Leader aims to spark – area-based, bottom-up elaboration of local strengths that leads to a unique path for development.

3.2.2 Neo-Endogenous Development of the Culture Economy

In Culture Economies, Christopher Ray coined the term neo-endogenous development. Ray describes neo-endogenous development as "an attempt to influence the nature of socio-economic change in a locality (Ray 2001 p. 51)". Neo-endogenous development is a concept that the Leader programme is often examined through. The purpose of the term is to avoid a rigid division between endogenous (development from within) and exogenous (development from the outside) approaches to development by devising a method that is bottom-up but incorporates the vital interaction between local and extra-local forces. Bosworth identified the key principles of neo-endogenous development as both maximizing the value of local resources and generating competitiveness based on local assets, which is possible through the network of local actors connected to external influences and with the state adopting a facilitating role (Bosworth et al. 2016).

To understand neo-endogenous development, the animation of development itself needs to be defined. Ray suggests three different directions on that can work separately or together in pursuit of development. Development can be animated from below (local level), above (national governments/EU) or through an intermediate level by nongovernmental organizations who find opportunities to pursue their interests. (Ray 2001). Neo-endogenous development is the "result of various combinations of the from above and intermediate level sources interacting with the local level (Ray 2001 p. 9)". The local level is the essential part, as neo-endogenous development is still bottom-up: the networks of empowered local actors are the key driving force for development.

	Exogenous development	Endogenous development	Neo-Endogenous development
Key Principle	Economies of scale and concentration	Harnessing local (natural, human, and cultural) resources for sustainable development	Maximising the value of local resources Competitiveness based on local assets
Dynamic force	Urban growth poles (drivers exogenous to rural areas)	Local initiative and enterprise	Networks of local actors connected to external influences
Functions of rural areas	Producing food and primary products of urban economies	Diverse service economies	The state is a facilitator Diverse production and service economies interdependent – urban demand remains critical for services and traditional sectors alike
Major rural development problems	Low productivity and peripherality	Limited capacity of areas/groups to participate in economic activity	Low service provision Unbalanced communities – ageing and inequality Remoteness, isolation and lack of critical mass
Focus of rural development	Agricultural modernization;	Capacity-building (skills, institutions, infrastructure); overcoming exclusion	Holistic approach to include local empowerment, capacity building, overcoming exclusion, adding value to local resources, enhancing connectivity, and promoting innovation

Table 2.4 Bosworth et al. 2015

Table 2.4 illustrates how neo-endogenous development is essentially "beyond" endogenous and exogenous approaches to rural development. The focus of neo-endogenous development

is on capacity-building where the networks of local actors (connected to external influences) serve as a dynamic force for development. State is depicted in a facilitating role – the focus is on the empowerment of local actors.

3.3   Culture Economy within MLG Systems

Dion Curry's Multi-level governance theory answers "How" governance can be organized with policy involving local, national & supra-national actors. The Culture Economy typology describes the ways development can occur when territorial variation is accounted for. Thus, it is worthwhile to hypothesize how different multi-level governance types can affect the development paths of local actors, account for different development priorities between Leader areas and yield different results when it comes to development strategy.

3.3.1 Different Governance types, different development paths

As previously stated, for Leader in England, the relevant MLG types are Mutual Responsibility (flexible structure & heterarchical relational arrangements) and Discretionary Control (flexible structure & hierarchical relational arrangements). Understanding the relationship of MLG & Culture Economy begins with a visualization of these two governance structures alongside the different modes of strategy provided by Ray's typology.

The chart below indicates how different forms of governance affect the strategies areas can adopt for local development. The relational arrangements are discussed in terms of discretion/operative freedom. The modes represent the different aspects of the Culture Economy development strategy.

Mode IV relates to instrumental ends and normative ends of the strategy. For Leader, these can be best divided in terms of different type of development objectives. Reflecting back on the key characteristics of Leader (Area-based local development strategies, Bottom-up elaboration and implementation of strategies, Local public-private partnerships: Local Action Groups (LAGs), Integrated and multi-sectoral actions, Innovation, Co-operation, Networking), the normative ends of the policy can be summarized roughly as "Area-based multi-sectoral local development implemented bottom-up, based on networking and

innovation". The instrumental ends equate to economic output, which is measured in terms of funds allocated to different projects

Type of governance	Relational arrangements & Culture Economy	Mode I	Mode II & III	Mode IV
Mutual Responsibility	Policy specific relations: Local actors have freedom in service delivery General purpose relations: Utilization of both local knowledge (via the Local Development Strategy) combined with national resources Contextual factors: Territorial differences can be accounted for, as local actors can adopt different type of implementation of policy and fund different projects	No actor holds clear power over the other - issues dealt with in a flexible manner. Territorial identity translated into product identity by local actors, who hold expertise over the area. Economic/ socio-cultural impact considered on the level implementation (local actors have agency).	Local actors may have agency with regards to promotion of territory. Cultural markers are turned into a territorial identity construction.	Instrumental ends (economic output) & normative ends (local development) equally emphasized
Discretionary Control	Policy specific relations: Service delivery on the local level limited by top-down conditions ("this is what you fund"). General purpose relations: different actors' resources (knowledge of local areas) not combined/utilised ("Local Development Strategy irrelevant") Contextual factors: Differences in areas not accounted for, implementation the same for everyone ("The same list for everyone")	Subordinate actors have limited freedom in implementation, only at the discretion of controlling national actors. If the response of the actor is not deemed suitable, discretionary authority may be revoked. Policy objective can be defined differently between actors, as no legal/statutory basis for power exists. Strategy for development does not originate from territorial identity but from an outside source. Local actors unable to affect socio-cultural/economic impact through implementation.	Cultural markers are most likely neglected. Objective/implentat ion is defined top-down, where knowledge of localities is limited. Constructed territorial identity irrelevant to promotion to the extra- local/internal stakeholders.	Instrumental ends (economic output) emphasized over normative ends (local development).

Table 2.5 Examining the relationship of different MLG types & Culture Economy

Table 2.5 elaborates to what extent the modes in Ray's typology can operate within different MLG systems. Different types of governance allow for differing levels of variation in terms of both the freedom for devising a development strategy and the level of discretion on the implementation of policy. As the table demonstrates, a system of mutual responsibility allows for the possibility of local development according to the Culture Economy typology, though this type of system does not necessitate a successful adoption of Ray's development paths. Within a system of discretionary control, such paths are however improbable or impossible.

The chart is an attempt to provide a specific policy context for MLG theory, and to highlight the extent of the influence governance can have over development strategy designed to be driven (and by the least, account for) local identity. In the last analysis chapter, the chart is operationalized for the purpose of analysing the funded projects of Leader in England in the 2014 – 2020 programme period. The analysis indicates how the different modes were affected by a system of discretionary control.

3.4   Conclusion

After discussing the multitude of interrelated aspects of Multi-level governance, having mapped out the key concepts related to the Culture Economy framework and finding common ground with the theory of governance and the practical nature of policy, it is time to discuss Leader from the perspective of governance of the culture economy. The analysis in the following chapters will provide a real-life example of Multi-level governance in action, as well as demonstrate the contradiction between ideals of local development and the nature of power between actors in charge of policy.

First, our analysis will scrutinize the structural arrangements within the program. While flexible (and open to interpretation), the relevant structures of Leader have remained unchanged between the lifetime of the program. As we will reveal that these arrangements are open to invite unwarranted hierarchy between the actors involved, it is worth questioning whether flexible governance model is best suited for policy that includes actors with differing levels of expertise and financial capacity.

4   The Legislative Framework: "The Leader Way of Doing Things"

The first analysis chapter of this thesis will focus on the structural design of Leader. In order to properly assess "the rules" of the Leader program, EU legislation & the Rural Development Programme of England are analyzed through the framework of Curry's Multi-level governance theory on the flexibility/rigidity of structural designs. Following the empirical evidence, we can quite confidently place Leader towards the flexible end of the structural spectrum.

4.1   Structural Arrangements

In his practical approach to the analysis of structural arrangements, Curry separates four factors that influence the structural flexibility/rigidity of governance: *jurisdictional/legal arrangements, operational rigidity*, *disintermediation* and *financial capacity*. (Curry 2015, p.93) In this first analysis chapter, these concepts are operationalized through an empirical analysis of EU legislation on Leader and community-led local development, the Rural Development Programme of England as well as ENRD LAG survey results and interview material where relevant.

4.1.1 Legislative control

Legislation and legislative control over policy quite obviously determines the relative flexibility of governance structures. As Curry states, legal control includes legislation that "aims to establish jurisdictions and policy control for various actors" (Curry 2015 p.56). However, as these rules often come from a single specific group, that "may unduly hamper certain groups of actors (Curry 2015 p.56)". According to Curry, legislation over policy "forms the base structure upon which multi-level governance is built", with either constitutional models or the gradual decentralization of legislative control. (Curry 2015 p.56).

In the case of rural development and Leader, the legislative backbone comes from the European Union, specifically articles 42-44 of Rural Development Regulation (EU) No 1305/2013 and Articles 32-35 of Common Provisions Regulation (EU) No 1303/2013 for the European Structural and investment Funds. This legislation sets the stage for Leader and defines for example the roles and tasks of Local Action Groups (LAGs) and member states. According to article 32 section 2, Leader is:

> "(b) led by local action groups composed of representatives of public and private local socioeconomic interests, in which, at the decision-making level neither public authorities, as defined in accordance with national rules, nor any single interest group represents more than 49 % of the voting rights;
>
> (c) carried out through integrated and multi-sectoral area-based local development strategies;
>
> (d) designed taking into consideration local needs and potential, and shall include innovative features in the local context, networking and, where appropriate, cooperation.
>
> (Common Provisions Regulation, EU, 1303/2013 Article 32)".

The extent to which LAGs actually lead the implementation is left at the hands of member states who are left to define the roles and powers of actors, as article 34 states:

> "Member States shall define the respective roles of the local action group and the authorities responsible for the implementation of the relevant programmes, concerning all implementation tasks relating to the community-led local development strategy.
>
> (Common Provisions Regulation, EU, 1303/2013 Article 34)".

It is somewhat unclear as to exactly how LAGs are meant to lead the programme since their role in implementation /and relationship with national authorities is defined by the Member States themselves. Arguably, LAGs are placed at the forefront of Leader, but with the ever-looming possibility of a rather narrow spectrum of operative freedom. The legislation seems to take a non-binding form to the practical application of LAGs leading the programme – while it is stated outright that LAGs should lead, national authorities (through Member States)

are left with the opportunity to decide how they do. As is discussed later, it is quite inaccurate to project that the current programme in England is led by LAGs.

The role of area-based local development strategies (LDS) is described as essential in legislation as LAGs are meant to refer to this strategy when implementing Leader, allocating funds based on its priorities. Article 34 section 1 stipulates:

> Local action groups shall design and implement the community-led local development strategies (Common Provisions Regulation, EU, 1303/2013 Article 34)

However, national authorities have a role to play concerning these strategies, as is expressed in Article 33 section 3:

> 3. Community-led local development strategies shall be selected by a committee set up for that purpose by the managing authority or authorities responsible and approved by the managing authority or authorities responsible
>
> (Common Provisions Regulation, EU, 1303/2013 Article 34)

According to article 34, national actors, i.e. "managing authorities" arguably have the final say over local development strategies, though there is room for interpretation. Whether the managing authority serves as a rubber stamp for the LDS (Local Development Strategy) that is effectively at the hands of the LAGs or if the LDS is defined by the expectations and requirements of national actors is undoubtedly dependent on the relational arrangements of the actors. Thus, legislation in this regard points towards a flexible structural arrangement – the rules of the game regarding the implementation of Leader are not set in stone.

Additionally, the ENRD LAG survey suggests a certain level of fuzziness when it comes to the LDS. According to the survey, LAG personnel in the United Kingdom feel considerably less confident about the extent to which they are able to implement area-based LDS as an element of Leader compared to European wide results (36 % feel fully able to implement this element of Leader in the UK compared to 51 % in the European wide survey). While present legislation, an argument could be made that in some cases the LDS is not practically

important for the current Leader programme in England at all. The practical application of the LDS is discussed in further detail in the chapter that examines the relational arrangements of Leader.

4.1.2 Operational Rigidity

The way legislation is practically realised can also affect the flexibility of governance structures. Curry presents this factor as "(operational rigidity)", the arrangements that can be used to "either allow for flexibility between relationships or to entrench relationships through rigid adherence to structure" (Curry 2015, p. 67). In Leader, these operational arrangements are expressed in national Rural Development Programmes, RDPs. This section will discuss whether the RDP of England allows for flexibility in operation.

The RDP of England describes Leader in familiar terms:

> "LEADER, in line with Community Led Local Development under the Growth Programme will operate in a 'bottom up' way where local communities and businesses will write and deliver a Local Development Strategy for the area. Strong relationships at a local level will ensure a coherent offer across the two delivery models. We do not propose to create hierarchy in terms of governance and accountability: LEPs1 and LAGs each have their roles, responsibilities, structures and local accountability (Rural Development Programme of England, p. 722)"

The nature of the roles and responsibilities of LAGs, arguable the most important aspect of the implementation of Leader is contrasted with how a larger strategic direction of the programme is implemented:

> "The LEADER approach will retain its founding principles of community led, bottom-up development – delegating powers of strategy and decision making to the local level. However, a successful LEADER approach also requires a clear strategic direction to be set by the Managing Authority (DEFRA) along with on-going support from the local Accountable Body and also Paying Agency staff

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[1] Local Enterprise Partnerships

responsible for supporting implementation (Rural Development Programme, England, p. 585)

The role of the Paying Agency (Rural Payments Agency) is further detailed (emphasis own):

"The RPA, on behalf of the Managing Authority, will take all formal funding decisions and will enter into funding agreements directly with beneficiaries. The Managing Authority remains responsible for ensuring compliance of operations; undertaking *verification and control activities*; and reporting to the European Commission.) (Rural Development Programme, England, p. 721). "

For operational matters, the extent to which these "verification and control activities" are understood is quite important. On par with EU legislation on Leader, there seems to be leeway in the interpretation – to what extent should the managing authorities (in this case, the RPA and Defra officials) control implementation? How far-reaching and encompassing should these control activities be? Similar to EU legislation on Leader, the RDP seems to suggest that the programme should aspire to a bottom-up approach to development, but with implementation that ultimately allows for top-down approach defined by national authorities. The way this apparent contradiction should be resolved is unclear, as legislation does not provide any direct way to resolve potential discrepancies between national perspectives for development and local priorities that might differ quite a lot.

4.1.3 Disintermediation & Cooperation

In the context of the structural arrangements of Multi-level governance, disintermediation refers to the possibility of localities to "bypass" the governmental level to deal with regional and even cross-borders/international issues (Curry, 2015, p. 76). As we have demonstrated, the relevant legislation (while allowing for disintermediation) is not likely to translate into freedom for localities to address issues without the discretion of national authorities. The Leader philosophy as a whole could be described as a type of disintermediated local development activities.

For a practical perspective on disintermediation within the structure of Leader, it is worthwhile to examine the relevant core objectives of Leader, mainly increased networking, local public-private partnerships and cooperation between regions and LAGs. Ideally, LAGs should be capable of cross-the-borders learning of best practices for local development and Leader. The programme does not indicate that innovation and networks should be distinctly limited only to within the LAGs and not between them, and cooperation is mentioned in the legislation as "designed taking into consideration local needs and potential, and shall include innovative features in the local context, networking and, where appropriate, cooperation. (Common Provisions Regulation, EU, 1303/2013 Article 32)". It is reasonable to assume that LAGs stand to gain from such cooperation, as while territorial priorities and challenges might differ, a pool of connected actors is more likely to produce beneficial innovation compared to isolated regions only looking within. Additionally, LAGs will no doubt face similar issues when working with the same development programme and same actors from levels outside the local.

While the possibility of disintermediation for local actors is left within the legislation, in the case of already ambiguous freedoms and responsibilities divided between the actors, it is arguably the case that no such action is likely to emerge on its own. As will be demonstrated in the following analysis chapter, the cooperation necessary for disintermediation was not encouraged or even allowed by national authorities.

5 Relational arrangements & local development: "We don't need robotic milkers"

Structure alone does not completely determine how governance functions. Even between rigidly designed governance systems, the relationships between different actors can vary considerably as some systems allow operational freedom among actors while others adhere to a perfected chain-of-command. Additionally, the presence of a strict hierarchy within a system does not necessitate exact, formal rules written in ink. In the first part of this analysis chapter, the nature of networks and relational arrangements in Leader are examined, and the analysis reveals a change the programme has experienced: a move towards hierarchy. The analysis is concept driven - the relevant theoretical concepts are operationalized in practical contexts.

After the type of the networks and relational arrangements present in Leader in England have been established, the analysis proceeds to explore on-the-ground effects of the programme, specifically individual projects receiving Leader funding. Utilizing in-depth interviews with Leader project entrepreneurs, changes and the effects of the new-found hierarchy are considered when examining the way funds were allocated and spent.

5.1 Changes in relational arrangements

Policy networks and the idea of network governance are essential to the Leader approach and lie at the center of the relational arrangements of the programme. As was detailed in the theory chapter, Curry described four factors that should be present in policy networks: *recognizable membership*, *interdependence and regular interaction of actors*, *mutual interests and preferences, and resource exchange*. When differences in discretion occur, they are typically the result of both the objectives and the power of interacting organizations (Curry, 2015 p.17). Policy networks are also shaped by the resources, the policy area, the stage of the policy process and the amount of aggregation of interest (more shared interests will increase

the existence of networks). (Curry 2015, p.17). Equally, the context (the national style of policy making) will affect how networks occur and develop.

Network governance is in essence the way the interests of interdependent actors is "translated into policy choices to 'allocate values'" (Kohler-Koch 1999) (Curry 2015, p.18), while the state serves the role of a mediator and an activator (Curry 2015, p. 18). In network governance, policy derives from the complex interaction of actors in a managed form of co-operation.

On the level of LAGs, Leader is a programme framed as an example of network governance. Ideally, the mediator/activator role is placed on both the EU and the national authorities of member states that help empower a governance network of interdependent local actors for the common interest of locally-led rural development. According to the key features of the programme, Leader should be area-based and empower actors with differing priorities across different regions. It should not be discussed solely in terms of single policy, but rather a policy network, where resources change hands in the regular interaction of interdependent actors with mutual interests. While the objective of the programme can be described in terms of network governance approach, the actual role of the state seems to have moved from that of a mediator/activator,and the program has taken a hierarchical turn towards national discretionary control. Consequently, the real-life scope of network governance has narrowed, which has had a detrimental effect on the variety of the funded projects and territorial sensibilities that should be inherent to the Leader.

In the first part of this analysis chapter, the change in the relationship of actors in the implementation of the programme is examined through interviews with LAG personnel. This analysis will consider several of Curry's factors related to the relational arrangement axis, including *actor role*, *hierarchical forces and centralized/decentralized loci of authority* and *the presence of sanctions* (Curry, 2015 p.33). Factors affecting the relational arrangement are operationalized in concrete terms. What is the role of national/local actors? Where is authority positioned? Who decides the strategy and scope of the funds? In other words, is Leader operating as a system of mutual responsibility or discretionary control?

The most insightful perspectives came from LAG members who were employed during multiple programme periods and were thus well acquainted with the Leader approach and how it has been implemented in the past. These members were able to identify various changes in the governance and monitoring of the programme between different periods and

how they relate to the idea of locally led development. The governance network/relational arrangement analysis is divided into the following sections: the actor roles, strategy & criteria of funds, co-operation & networking, and evaluation & reporting. Changes in the processes of Leader, the use of the LDS, and the cooperation and networking capabilities of LAGs are analyzed throughout. The role of structural arrangements as well as the possible motivations behind this hierarchical turn are also discussed. Finally, the evaluation and reporting are briefly examined.

5.1.1 Actor Roles (Defra, the Rural Payments Agency and Local Action Groups)

Perhaps the most striking differences between the current and the previous programme relate to the interaction between national authorities and LAGs. According to those interviewees who worked during both programmes, the current programme has taken a more strict and prescriptive national approach to fundamental processes within Leader. A LAG member described reporting as more difficult and stricter than in the last programme - everything from applicant handbooks to project appraisals need to be signed off by Defra or the Rural Payments Agency, creating a significant amount of paperwork and slowing the funding process down. The reporting arrangements are experienced as a limiting factor on the capacity of LAGs to function as independent bodies. Another LAG member describes the nature of the process: "There is nothing key in this programme being devised by our LAG – everything's signed off by Defra and the Rural Payments Agency".

It is doubtful that Leader in England was ever a system completely based on mutual responsibility. However, through the interviews it became apparent that the programme has, between periods, moved quite drastically towards hierarchy. This approach to implementation points heavily toward a system of discretionary control – subordinate actors (LAGs) are able to perform their duties, but only at the discretion of national authorities. This discretion is expressed through strict controlling activities that were not present in the previous programme. While the structure behind the programme is flexible, hierarchy is quite present – compliance is assured through reporting arrangements which ultimately leave the control of the implementation in the hands of Defra and the Rural Payments Agency. As a LAG member describes it: "In the last programme we kept our running cost to about 14% with very few issues - we devised our own calls for projects, we had our own paper processing. We had a

framework, but it was down to the local area what we could fund… This time all the arrangements are signed off by Defra.". According to the interviewee, LAGs have lost power as independent bodies, stating "There is a very narrow margin for LAGs to be involved – they make all the decisions".

While the level of national control (expressed with strenuous reporting, monitoring and the profound narrowing of funding criteria) in the implementation of the programme might suggest that the structure of the programme itself is rigid, I would argue that it is more a case of hierarchy that has been introduced by national actors in the RPA and Defra. The structure of Leader is flexible, as according to "the rules of the game", there is potential room for mutual responsibility in development activities. However, during the 2014 - 2020 period, the rules have been interpreted differently by Defra officials with more emphasis placed on compliance rather than outcome. This compliance is achieved through both resource dependency and the possibility of sanctions LAG members refusing these guidelines would certainly have to worry about their job security, and even if LAGs managed to fund projects that break the guidelines, auditing would create problems for the beneficiaries. While it might seem counterintuitive, flexible structures can result in less independence among some actors in policy implementation - there is clearly a centralised loci of authority that is deemed legitimate in the current Leader programme. This national authority ultimately has the power to determine the level of discretion enjoyed by the LAGs as its objectives shift. This is possible due to the flexibility of the underlying structure – if the rules explicitly placed LAGs as the main authority, this national discretion would not be legitimate.

The effects of a more top-down approach to Leader are described as harmful for the overall capacity of LAGs to perform their duties. A LAG member describes it as following: "We had a very well-run local application process and it just doesn't seem to have happened that way now that it's gone to a national programme". An important part of the funding process relates to continuing measurement of the impact of potential projects. When assessing the impact of projects, the current programme is focused on prescribed economic outputs. While this part is consistent with the previous programme, measuring the wider impact of the projects is described as difficult during the 2014 - 2020 programme period due to staff changes and delays in the programme. A common complaint among the LAGs is that the more bureaucratic and tedious reporting processes have slowed down the programme, resulting in a lack of time to assess the wider impact of projects. Even though the programme is on its fourth year (during the time of the interviews), it has progressed at such a pace that a proper

assessment of impacts is not yet possible. One LAG member describes the current situation in the following way: "the focus is getting projects approved rather than thinking about what they are doing".

5.1.2 Strategy and Criteria for Funding (LDS)

The Local Development Strategy (LDS) is essential in order to make Leader funds contribute to development locally. As mentioned in chapter 4, the LDS is devised by LAGs and meant to serve as the guiding document that is sensitive to local needs and thus different in each area. In the cases of LAGs interviewed for this thesis, this strategy was made largely irrelevant by the new criteria that was put into effect by national authorities in the 2014 – 2020 programme period.

The local development strategy (LDS) seems to have lost its significance as a defining document for the implementation of the current programme. One LAG member explained that the LDS was "a good document that became irrelevant due to changes in the programme", and a new LAG member was not even sure what an LDS was (though when questioned further, the interviewee did seem to recall making some updates to a document that could have been the LDS). As the programme has narrowed its criteria for funding, the LDS seems to have lost much of its potential as a guiding strategy tool that sets the local priorities for Leader. Multiple LAG members describe the programme as essentially a "capital grant scheme". The LAGs are given a list of equipment they can fund and aren't permitted to fund outside that list, making detailed local priority plans seem irrelevant: "It was a gradual realization [that things have changed]. Certainly, once we started to see the list of equipment we could fund, and told if it's not on that list, were not funding it. And that's been hard, certainly for our area. We haven't got a lot of cattle, we don't need robotic milkers. Were deeply rural upland, farming cattle is not a big feature here. We have got a lot of mobile sheep handling equipment now."

The narrow approach is quite contradictory to the concept of locally led development – territorial differences are not taken into account, and areas end up seeking funds for equipment that is not necessarily appropriate for their area. Further, limiting grants to capital

equipment reduces the potential of Leader as a development fund, as one beneficiary phrased: "the programme suffers from the idea that a tractor will sort people's problems out".

Narrowing the scope of the programme to strict one-size-fits-all funding projects is arguably the result of the newly adopted hierarchical approach. The national authorities undoubtedly lack the necessary knowledge and insight to smaller localities. Additionally, DEFRA as an institution is not incentivized to allocate resources to study each Leader area thoroughly if the economic outputs are the sole measurement of success for the programme.

5.1.3 Cooperation & Networking

Based on interviews with LAG personnel working on a variety of roles (Chairman, Programme Coordinator, Advisory Member), there is no requirement or incentives from national authorities for co-operation between different LAGs within England or in a transnational context. Most LAGs interviewed suggest that cooperation is not encouraged or even authorized by Defra and that compared to the previous programme, the amount of knowledge exchange has either diminished or disappeared completely.

Cooperation experiences in the previous programme are described as valuable by all the interviewed LAG personnel and are thought of as an essential part of the Leader programme. Networking and cooperation are core principals within the Leader approach. The lack of budget for cooperation seems to contribute to the "top-down" nature of the current programme, as LAGs do not have a proper forum for sharing good practice. It is not hard to conceive that in a top-down approach, cooperation between subordinate levels is not a priority.

At the beginning of the programme, all the LAGs were informed about the possibility to apply for a transnational cooperation budget of around £200 000 later during the programme. At the time of the interviews, no budget for cooperation within the LAGs was available. The only opportunity for cooperation was in a joint training session for all LAGs that was arranged by Defra, but according to a LAG member, the session only served the purpose of setting the new guidelines of the process for LAGs.

5.1.4 Top-down implementation

In its current form, the Leader programme in England is arguably a top-down approach to rural development. Local action groups, the key delivering mechanism of a Leader, have a significantly marginal role in implementation and decision-making when it comes to projects that can be funded. Strict measures have caused delays and staff changes at the expense of cooperation, networking and project monitoring. According to a LAG member, at its final formulation the programme is Leader "in name only".

Further, the narrow criteria for funding has meant that the programme is essentially unable to support a variety of projects that would undoubtedly fit the Leader ethos. The stringent nature of the criteria is insensitive to differences between Leader areas and undermines the bottom-up principle central to the programme.

The changes that have taken place were possible due to the flexible structure of the programme. The rules of the game allow for some interpretation, which opens the door for states to move from the role of the mediator towards national hierarchy in network governance approach. Actors in all levels, be they local, national or supranational, have a role to play when it comes to producing development policy, but their level of discretion is vulnerable to changes in actors' interests. In the case of England, this structure is clearly quite poorly suited for the idea of locally-led development policy.

One possible explanation for the changes in the programme is derived from problems related to expansion: throughout different programme periods, the coverage of the Leader programme in England has expanded significantly. The programme has grown from 64 Leader areas in the previous period to 79 Leader areas in the current programme, with new LAGs such as Wool Towns, East Kent, Cotswolds, Real Devon and Wensum & Coast added the programme. A LAG member described the expansion of Leader as a sort of "land-grab", where each LAG area was encouraged by Defra to include as much population as the scheme would allow. Thus, in order to receive more finance every Leader area went as big as possible. This expansion process did not involve competition between neighbouring LAGs, though the efforts for the expansion required some skills in diplomacy from the LAGs when dealing with local authorities and accountable bodies. According to long-running LAG members, as Leader expanded in the previous programme some issues of compliance were reported especially among the new LAGs. It is possible that as the programme expanded

further this time around, stricter guidelines were introduced in order to avoid this type of non-compliance. These measures have certainly simplified the programme but have also contradicted with key principles of Leader and fundamentally changed the local character of the programme.

5.1.5 Evaluation of Leader

For future of rural development activities, the evaluation methods used to assess the success of the programme are quite obviously important. "The Leader approach" is already adopted to other EU development programmes. Even in a world where the UK is not part of the European Union, the way development policy is evaluated will inform future programmes both in the UK and in the EU.

An annual implementation report for the Rural Development Programme in England mentions Leader briefly, stating outright the number of projects funded each year and total cumulative spend of the program (https://www.gov.uk/government/publications/rural-development-programme-for-england-2014-2020-annual-implementation-reports-and-citizens-summaries/rdpe-annual-implementation-report-for-2017-citizens-summary#where-can-i-find-more-information). The report describes Leader:

> "LEADER funding supports jobs and growth in rural areas, mainly through small grants. Funding includes help for farming and forestry businesses as well as other types of business and communities in rural areas. LEADER Local Action Groups (LAGs) deliver the funding to meet locally identified priorities."

The way policy is implemented can have a backwards effect on the policy objective itself via reframing and refocusing the original objective to fit into the adopted implementation styles and arrangements. Such seems to be the case here, as Leader is discussed as a mechanism to "help farming and forestry businesses as well as other types", with no mention of local resources or capacity-building vital to the programme. This seems to mean that as the relational arrangements shifted and funding was unified, the original goal seemed to experience an equal simplification.

The Annual Implementation reports that were mentioned as a more thorough source have no mention of Leader. For the 2014 - 2020 programme period, a Leader-specific evaluation for England was not available at the time of writing this thesis.

Based on assessments of the LAG members, if the evaluation of Leader is based on the obligatory parts of the CLLD evaluation guide (European Commission 2017), the programme could probably score well as the mandatory measures only concern outputs and compliance. However, if the optional parts (wider impacts) of the guide are considered, it would quite obviously not fare as well.

5.2   Leader & The Culture Economy

Leader funds are categorized under the funding priorities of farm productivity, micro and small enterprises, farm diversification, rural tourism, rural services, culture and heritage and forestry production (RDP 2014 – 2020, England). During the interviews conducted with the LAGs, it became apparent that difficulties arose most often with funding projects specifically under the Culture & Heritage priority. A new, simplified approach to Leader funding meant that LAGs could for the most part only fund capital equipment and building renovation. Further, matched funding rules meant that projects could not match public funds with Leader except in very specific circumstances (for example non-profit organizations) which complicated the application of funds for cultural projects during the 2014 – 2020 programme period.

The limitations, put into effect by national authorities, very clearly defy Ray's conception of territorially defined development as many territorial resources available for localities are not best supported by simple grants for specified equipment or renovation. The limitations introduced might prove helpful when auditing projects, but when examining Ray's typology, they simply contradict the variety of development paths that should be supported by the programme. Commoditization of cultural markers is a complex process and turning key resources such as local arts into a strategy of development requires elasticity in what can be funded. The fact that the funds were limited makes this process challenging and reduces the variety of projects which in turn is harmful for both the innovative aspect of Leader as well as the territorial-over-sectoral approach of the programme. Stricter limitations can both

homogenize local economies and even introduce inequalities due to providing advantages to certain types of applicants or areas while leaving others behind.

In spite of these limitations, some projects within the culture economy typology managed to grow successfully with Leader funding. In order to discuss Leader through a culture economy perspective, three beneficiaries of Leader funds from the Culture and Heritage priority that had a territorial/cultural connection to their locality were interviewed. While other priorities also experienced difficulties(e.g having to fund from a list of impractical farming equipment), the Culture and Heritage priority was chosen as it is quite obviously most straightforwardly relevant to the typology of Ray's Culture Economy – finding cultural & heritage markers to valorise for development purposes and growth of the local economy.

The beneficiaries had acute observations about the Leader programme but more importantly they revealed how enterprises that are committed and connected to their local culture can sometimes find ways to maneuver within a more restrictive framework. They also serve to highlight how restrictions can stifle innovation and result in less-than-ideal outcomes. Most of the beneficiaries interviewed here had previous experience in applying for grants which undoubtedly had an effect in their ability to work around the new, stricter funding requirements.

Three projects are studied here, all of which received Leader funds during the 2014-2020 programme period. The beneficiaries include a single-person glass studio enterprise, an arts charity theatre group and a 40-year-old opera festival. The projects are examined through the chart (introduced in the theory section) combining Multi-level Governance types with the different development paths in Ray's Culture Economy theory (Table 2.5), which effectively reveals the on-the-ground effects of discretionary control on Leader.

With Leader funds, these projects were still able to develop and grow within the framework of their respective local economies. However, the more restrictive approach to Leader meant the projects interviewed here all had to find ways to adjust their priorities in order to fit their projects into the scheme. It is quite difficult to describe this sort of approach to development as policy that is locally-led or sensitive to the needs and character of different territories. Rather than lead, local actors and beneficiaries had to adjust and compromise.

5.2.1 The Common Players

The Common Players is a theatre company and an arts charity that has been working in the southwest of England for 25 years. The core principle of the company is to connect people with the culture and germane subjects of the area by using the means art and entertainment.

The project in receipt of Leader funding is a play involving "The Ancient Mariner" which is a work of Samuel Coleridge, a poet born in the area. The poem and the play are connected to sea-faring, which is another important part of the history of the Southwest of England. Sea-faring is present in the project in a practical sense: the venue of the play is a life-boat, which is moved around beaches in the Leader area. The play offers an experience of a local poets' work that will provide the audience (tourists, local people and theatre enthusiasts) with a new perspective to the past.

A wider theme of the play relates to the environment. The poem and the play are closely connected to people's relationship to the environment, and a part of the play even involves the audience cleaning the beach of plastic waste.

Throughout the years, the vision of the project has remained intact, though the way to get there changed due to the constraints of Leader. The fact that Leader would only really fund capital equipment meant that the company needed to define the equipment before spending time creating the project. In some cases, these definitions were ended up being ill-suited for the project. The challenge was to find financial support for more than just the equipment.

The Common Players Theatre is an apt example of a locally-rooted project that aims to turn a territorial resource into something profitable for its area, Devon. It is a pursuit in taking a cultural marker (the works of a local poet) and turning it into a resource/product for both local and external audiences. Devon is a holiday destination, so visitors to the region are the largest intended audience though the project has sparked interest locally as well. A representative of the theatre acknowledged the effects of the restrictive nature of the funds, stating that "I found it disappointing that the fund was so restrictive and would only support capital costs. Because that presupposes a certain kind of organization that can apply and that presupposes that they have other sources of income and are perhaps a bigger organization than we actually were. I think that conflicts a little with Leaders stated aims of supporting small enterprises". Whether Leader is able to combat the challenges faced by the community is questioned: "I'm not sure

how much Leader funding is frankly able to address many of the challenges communities in rural areas face because the application is simply a lump of money to buy some equipment". The programme suffered from the idea that "a tractor will sort peoples' problems out".

In order to examine how the restrictions on funds affect the strategies available for the funded project, we return to the table adjusting Ray's Culture Economy typology with specific multi-level governance types:

Type of governance	Relational arrangements & Culture Economy	Mode I – Product Identity: Local poet, "The Ancient Mariner"	Mode II & III Developing audiences internally & externally	Mode IV Development Path
Discretionary Control	Service delivery on the local level limited by top-down conditions: beneficiaries (The Common Players) had to define the use of funds too early, which is not ideal for the project type	LAGS have less control on the impact, as they are forced to implement heavy restrictions on the use of funds. Presupposition of project type. Supported projects adjust to rules and regulation.	The project (The Common players) unable to develop/address the target audience with the funds.Capital cost requirement made territorial context & project type largely irrelevant; same list for every area.	Economic output (money spent) prioritized over the development of the local economy and innovation. Focus on instrumental ends.

Table 5.1 The Common Players

Leader certainly supported the Common Players and arguably spending Leader funds on capital costs meant that resource for other (perhaps more innovative) spending was freed because of the program. However, forcing to spend funds on equipment with a restrictive time frame is hardly an innovative example of how local development can be arranged. As such, the service delivery on the local level was limited by the restrictions imposed by the national actors and as a result, project was unable to use the funds for the development of the target audience or innovation.

5.2.2 Creative Retreats and Holidays

Creative Retreats is a glass moulding studio in East Kent run entirely by one person. The business applied for a Leader grant to convert a garage base into a teaching studio for glass classes. The idea was to grow a small-scale business into something financially sustainable.

The area has a history of stained glass, but the project is also bringing in a new and creative opportunity both for people living in the area and tourists. Creative Retreats has a lot of knock-on benefits for the area, which is deeply rural. For example, visitors come and stay in the local bed and breakfast and self-catering accommodations and eat in the local pubs. Additionally, the business also brings value to the local residents who are provided with a chance to "come together and learn something new and socialize" without having to commute far. About two thirds of the customers come from the local area.

The biggest challenge throughout the process was having to submit costs of the project before employing and architect and a building surveyor, which meant that the whole process was done backwards. The costs ended up being a lot higher than what was put in the grant application, which meant that the applicant received a smaller percentage of the costs than what was originally agreed.

The interviewee believes that Leader has made people more aware and active concerning the challenges faced by the community. Regarding her business, she is now able to provide an opportunity for local people to socialize and learn new skills in an area where "there is very little opportunity for people". With the help of Leader, she can contribute more to the local area. However, the process for applying for the funds is described in less amicable terms: "[It was] very difficult. It took me a whole month to deliver forms. The instructions to the forms were 36 pages… I understand that a lot of big companies pay other people to fill the forms in. I could not afford it".

It is again quite clear that restrictions on how to spend the funds have a negative effect on the development of projects. The regulation can even lead to lessened economic output, as is the case with Creative Retreats & Holidays. Additionally, the rather heavy and detailed application process favors applicants from larger organizations who can allocate sufficient resources to produce the required documents.

Creative Retreats and Holidays

Type of governance	Relational arrangements & Culture Economy	Mode I Product identity: Glass-making	Mode II & III Develop internal audiences	Mode IV Developemnt paths
Discretionary Control	Service delivery on the local level limited by top-down conditions: Heavy regulation and application process too resource-demanding for the project (Creative Retreats and Holidays). Defining costs early led to discrepancies.	Development of product identity aided by funds but hampered by restrictions and heavy regulation process. Heavy application process is especially difficult for the applicant, a small business owner. The programme favors larger organizations (unintended impact).	With the funds, the project was partly able to develop internal audiences. More contributions to internal audiences and the local economy made possible.	Regulatory requirements has a negative effect on economic output – less than ideal spend, favoring some business types (large businesses) over others (small businesses).

Table 5.2 Creative Retreats and Holidays

With Creative Retreats and Holidays, Leader was able to support an innovative idea of turning a product (stained glass) into a service based small business (teaching studio). However, the regulation and strict application and auditing measures had a negative impact on the economic output (spend) as well as took valuable resource away from developing the business towards bureaucracy in the application process.

5.2.3 Buxton International Festival

The Buxton International Festival is an established opera, music and arts festival that began 40 years ago. The inspiration for the festival comes from an old opera house in the city, designed by the architect Matcham. The building had experienced hardship and was not used for opera. Wishing to put the opera house to good use, Malcolm Fraser and Anthony Holmes decided to bring together an opera festival in the town. As wells as producing two operas from start to finish, the festival also does co-productions, other music, literature and arts related events.

The bid for Leader concerned the Spiegeltent, a new venue for the festival that is hoped to develop and diversify audiences. The average age of the audience is 65, so for the future of the festival, it is paramount that it begins to attract audiences from a wider spectrum. The festival was able to attract new and local audiences - normally around 12% of the audience are local, this year the percentage was 27%. The Spiegeltent helped improve the festival's engagement with local people. Some outreach work was also done in the Spiegeltent. "The Leader programme has given us the money to take a few more risks with things, try some things out".

Local businesses were both directly involved in the festival (brewery providing alcohol) and benefitted from increased tourism in the area. Funding is described as essential for Buxton, a town in the middle of redevelopment. According to the interviewee Leader has been "really good for small businesses" and for the festival to be able to try things they normally wouldn't dare to try. Additionally, a visitor economy strategy is being written at Buxton, and the experience with Leader can inform that process well.

When compared to the other projects interviewed for this thesis, the Buxton International Festival was the most successful in making use of Leader for development activities. This is perhaps not surprising, as the festival has resource and experience available for the application process. Buxton was quick to adapt to the funding requirements and found a way to emphasize Mode II and Mode III strategies with capital costs.

Type of governance	Relational arrangements & Culture Economy	Mode I Product identity: Festival rooted in the area's history	Mode II & III Grow audience base	Mode IV Development paths
Discretionary Control	Service delivery on the local level impacted by national authority	Larger project (Buxton International Festival) with adequate resource able to use funds innovatively; product identity that leads to control of economic impact	Promotion to new internal customers/target groups made successful by the funds	Innovative development of an established local resource; measurable impact

Table 5.3 Buxton International Festival

The Spiegeltent represents an innovative way to tackle challenges related to developing the target audience of the festival. Having the organizational capacity to assess and plan the capital costs, along with experienced staff to work during the application process meant that the Buxton International Festival was able to yield good results with Leader. With Leader, Buxton was able to develop their local audience and secure future visitors for the festival, which likely has a major influence on the area in the future.

5.3   Contributions to the Culture Economy

The three examples analysed above represent quite a different scale of Leader funded projects. Obviously, a larger organization such as an established opera festival is able to meet the challenges of the application process more efficiently than a single-person enterprise. Bigger organizations are also more readily able to adjust to more restricted funding options, as there are often multiple funds and sponsors to begin with. It seems intuitive that more restrictions hurt smaller enterprises quite profoundly and can end up favoring larger organizations which can contribute to inequalities within regions. Further, auditing requirements are more commanding to smaller enterprises where time and expertise are less readily available, as one beneficiary stated: "We can just about do it, partly because I'm in a position to give the time for nothing. But I'm not sure that's the same for all of the potential organizations that apply to Leader". LAG support is mentioned positively in all the interviews, suggesting that LAGs are still able to perform some of their duties as Leader officials in the areas in question.

Local cultural resources are present in all the projects, whether is a particular way of making class or a festival tied to the history of an area. However, it does seem that the funds are not targeted optimally in taking advantage of these resources. All the projects that were interviewed could have been served better, had the scheme allowed for more leniency in funding measures. Funding capital equipment is certainly not the most compelling method to help build networks of local actors and support innovative projects. It does, however, prove efficient if the focus is principally on compliance and simplicity.

5.4 Neo-Endogenous Development?

As was discussed in the theory section of the thesis, Neo-Endogenous development is something more than a combination of endogenous and exogenous development activities. At the core of Neo-Endogenous development are local resources and capacity building among local actors. The approach is holistic, with the idea being that the state is a facilitator for both connections between local actors and external forces and the empowerment of local actors in driving development in their respective area. The key principle is maximizing the value of local resources and creating competitiveness based on local assets (Bosworth et al. 2016).

Ideally, projects such as the Common Players and Creative Retreats and Holidays should be able to apply for funds that serve to strengthen their efforts to make use of a territorial heritage resource to develop the local economy. An exercise in Neo-Endogenous development in this case would mean for example that the beneficiaries would be able to define the costs as the projects move on, be able to fund outside capital costs and perhaps receive an application process that would would be less demanding than for larger enterprises. The LAGs, making use of their expertise of the local economy, would play a key role, defining the funding requirements and auditing and influencing the way the application process is conducted.

Examining some the projects in receipt of Leader funding suggest that Leader in England during the 2014 – 2020 programme period was certainly not an example of a Neo-Endogenous development effort. State imposed conditions and rules to funds in a manner that did not serve the capacity-building of local areas. Instead, the character of local resources was often neglected in favor of a unified approach. Projects had to adjust to the restrictions imposed on the funding which (coupled with the arduous application process) led to reduced innovation and an imbalance. Larger businesses which were able to allocate resources to the funding process and plan ahead to maneuver the restrictive frame of the fund where in a favored position. It would seem intuitive to suggest that if the LAGs had increased discretion with the allocation of funds, individual projects could have yielded both increased economic output as well as a more innovative use of funds for their businesses. Therefore, if the objective of Leader is to produce Neo-endogenous development, such governance issues should be taken into account in the future design of the programme. Specifically, structural arrangements should be revisited with considerations to the effects of the rules to the relational arrangements.

As it stands, the national approach and a top-down focused implementation has had a stifling effect on innovation and development potential of projects funded. As the funds were tied to capital costs, projects were either unable to develop their business in innovative ways with the funds (the Common Players) or gain sub-optimal amounts of funding due to restrictions (Creative Retreats and Holidays).

6 Conclusion – "We had a well-run programme…"

When it comes to policy, one could argue that flexibility invites change. Informal practices and undefined roles between different actors are inherently more vulnerable to change compared to legislative & structural arrangements written in ink. Assuming different actors within a multi-level governance system wish to maximise their own level of influence and power, one could suggest that the direction of change (in relational arrangements) is more likely to move towards, rather than away from, hierarchy. This change is all the more sinister as it can happen without any significant alterations within the structural arrangements and legislation.

This thesis has argued that flexibility in structure can allow for the emergence of hierarchy in relational arrangements, even when the vision of the policy is in a stark contrast with such a hierarchy in the first place. For future policy drafting, understanding these relational power dynamics and the conditions where unintended hierarchies can emerge is quite important. Drafting effective policy within a multi-level governance system requires knowledge of how the structure can affect the relational arrangements present in all governance systems.

Policy should not be blind of governance. Leader (in England) provides a convincing example of the risks involved with a kind of idealistic blindness: a case of a policy originally drafted with a grand vision and a loose structure, caught in power dynamics. With nuanced and complicated systems of multi-level governance, it is essential to understand when the policy being drafted operates well under a flexible system and when it requires more formal structures.

Further, the objective of the policy should determine the structures put into place and how implementation is organized. With Leader in England, it seems that the opposite has happened. While it might seem counter-intuitive to suggest that objectives are affected by the implementation phase, but without a more rigid structural arrangement that clearly define expectations and processes, policy objectives can always be re-interpreted in novel ways by actors should the relational arrangements within policy change. In the case of Leader, the dynamics between governance types and development strategies suggest that over time, as the relational arrangements change, the focus of policy shifts from area-based development to a

nationally uniform model. In such a model, the economic outputs end up dictating the policy, which represents a sharp turn in the emphasis on the strategic ends of the programme.

Therefore, governance affects policy not only on practical strategies available for actors, but also on the way the initial objective is eventually redefined and repurposed. Once the implementation of the policy becomes the subject of discretionary control by the national authorities (and thus area-based development paths become unavailable), the focus of the objective shifts from both a normative and instrumental end to a purely instrumental goal of allocating a specific amount of funds in a strict rule-abiding manner. As was suggested in Chapter 5, it seems that with Leader, the focus towards the immediate economic output rather than a more nuanced evaluation of the outcome represents such a redefinition of the objective: what matters is how much, rather than how.

The case with Leader in England demonstrates that if the policy objective is to create development that originates from territorial-cultural identity (cultural markers, territorial identity and the valorization of local resources), a heterarchical governance structure is preferrable over a hierarchical one. Governance with a strong hierarchy is ill-suited to serve the key principles of Leader. In England, within a system of discretionary control, area-based local development strategies have become wholly irrelevant and the bottom-up elaboration and the implementation of strategies is impossible with the reduced role of the Local public-private partnerships, the Local Action Groups (LAGs). Integrated and multi-sectoral actions, Innovation, Co-operation and Networking are neither encouraged or necessarily even allowed.

If development is to be driven locally, decision-making power and discretion should undoubtedly be dispersed across different regions. If the window of opportunity is open for hierarchy, it is quite obvious that national actors (with better resources and knowledge of the EU) are the ones who'll end up on top. Equally, it does not seem advisable to suggest that localities or LAGs should have complete control over the programme. Rather, national actors should mediate the programme based on a clearly defined framework provided by the EU and leave as much operative freedom as possible to the LAGs to drive development based on their respective local resources.

In the case of local development, in order to preserve a dynamic closer to heterarchy, it seems necessary that the structural governance arrangements should have strong legal/statutory basis (a.k.a "rigid structure") as flexibility in strcture can clearly allow a heterarchical system to

turn into hierarchy. As it turns out quite counterintuitively, [in the context of multi-level governance] operative freedom requires rules.

In Culture Economies, Christopher Ray described Leader as a potentially game-changing approach: "LEADER is in many ways a postmodern form of intervention. A child of the European Commission (DGVI), it had an apparent anarchic element pervading the design and implementation of development activity in localities. The hardening of State/regional bureaucratic control that emerged in the second phase of LEADER only partially tamed the essential anarchy of the intervention (Ray 2000 p.13)". Almost twenty years later, after significant expansion and multiple programme periods, the anarchic element of the programme seems to have been tamed at least in the case of England.

This thesis points towards the conclusion that while flexibility in structures can no doubt serve development policy in many phases of the policy process, it runs the risk of control being hijacked to a point where the objective of said policy is repurposed and obscured. In England, this has created a situation where the current programme is 'Leader in name only', according to a LAG member. This is obviously harmful in quite many ways, as it allows those in charge to appear to adhere to certain type of development whilst actually producing a wildly different programme. This kind of incongruency can then, through selective methods of evaluation, be presented as effective intervention, or worse yet, used as an example that "the Leader way of doing things" is ineffective in capacity-building and empowering local actors. Whether that is the case with the actual Leader approach is up to debate, but muddying the waters by calling a hierarchical system (where national actors hold power) "bottom-up" is no doubt counterproductive for future development programmes.

7   Appendix – Interview Questions

7.1   LAG interviews

1. What is your current role in your LAG?

2. Were you involved in any previous Leader programmes?

3. Has the geography of your LAG area changed compared to previous Leader programmes? If it has changed, why?

4. Have you funded any cultural projects in this Leader programme? If yes, what kind of projects, if no, why not?

5. Do you think cultural projects can bring value to your area? What kind of value?

6. Thinking about your Leader area, how would you define successful development?

7. Do you think your Leader area represents a common cultural identity?

8. What kind of reporting arrangements does your LAG have with DEFRA and/or other Leader officials?

9. Are these arrangements different compared to the previous programme period?

10. Does your LAG measure the economic, social and environmental impacts of the programme? If so, how?

11. Are the monitoring and evaluation methods different compared to the previous Leader programme period?

12. Has your budget changed compared to the previous Leader programme?

13. Do you think the budget you received was appropriate?

14. Would you describe the relationship of your Leader area as neighbouring Leader areas as co-operative or competitive?

15. Does your LAG engange with: other LAGs elsewhere in the UK and/or other trans-national projects elsewhere?

16. Is this co-operation required or encouraged by DEFRA/National authorities?

17. Has the co-operation been valuable? In what ways?

18. Has the amount of knowledge exchange increased/decreased compared to the previous programme?

19. Are there any cultural activities/traditions specific to your area (e.g. arts, crafts)? Are they present in your LDS?

20. What are the reasons behind the main themes/priorities of the current LDS?

21. In hindsight, do you think the LDS has been appropriate in your area?

22. Is there something you'd like to say about the issues we've discussed that I haven't thought to ask?

7.2   Beneficiary Interviews

1. Could you describe your project?

2. What is your role in the project?

3. Where did the inspiration for this project come from? (a similar project elsewhere, a certain need in the community, strengthening the local community etc.)

4. Has your vision of the project changed throughout the application process?

5. What have been the successes so far?

6. Have some things not gone as you would have hoped?

7. Are there additional aims and benefits to the project that you haven't mentioned?

8. Are the primary consumers/audience of this project local people?

9. Are the people working on this project resident to your Leader area?

10. Is your project connected to the heritage of your locality, or is it bringing something new and innovative to your area?

11. What have you used the LEADER funding for/ planning to use it for?

12. Did you combine this with other sources of funding?

13. Do you think that you would carry out this activity without the funding in the future?

14. How do you think the funding has made the most difference?

15. Have you sought/received other funding before?

16. Compared to your expectations, was the process of applying Leader funds easy or hard?

17. Do you think LEADER has made local people more aware/active concerning challenges faced by your community?

18. Has applying for LEADER made you/your business more invested in your local area?

19. Did you have enough guidance and support in the process?

20. What recommendations would you make to improve the process?

21. Where did you find out about LEADER?

22. When did you first make an enquiry? To whom and how?

23. How do you have to report to the funders about how the grant has made a difference to your business?

24. What sort of things do they look at – is it just jobs and business growth or is it about wider impacts too? Is this information easy to provide?

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