

Lancashire Pennine Moors Local Development Strategy



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Department
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The European Agricultural
Fund for Rural Development:
Europe investing in rural areas



Lancashire
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1. Introduction

The Lancashire Pennine Moors Local Action Group is a new area with particular characteristics that differentiates it from other parts of Lancashire and Greater Manchester, in particular its fragmented population and challenges and opportunities resulting from it being bordered by significant urban populations. This new area includes parts of rural North Greater Manchester in a Local Action Group for the first time.

The Strategy focuses on the specific issues in this area and seeks to address them utilising DEFRA's national priorities for delivery.

The Pennine Moors Local Action Group is seeking £1,708,000 of resource to deliver the LEADER programme, this is based upon our understanding of the area and its ability to create jobs and growth. The allocation requested is the optimum level to be able to make a significant impact upon the local economy and effectively manage the programme to address a range of economic issues.

The priorities for delivery are based upon the LEADER methodology of a bottom up approach and by analysing the information gathered during consultation we have been able to identify the particular needs / priorities of the Pennine Moors area. This is supported by an independent economic analysis of the LAG area

We have also reviewed data from the previous programme including processes, procedures, past performance and promotion to identify areas of strengths and weaknesses.

The proposed budget is based upon the maximum level of funding available as indicated by Defra:

- Total - £1,708,000
- Direct to business / organisation grants – £1,451,800
- Management and animation – £256,200

The proposed outputs will be:

- 54 jobs
- 78 jobs safeguarded
- £3.5 million total investment
- £1.5 million increase in GVA
- 53 projects supported

The Strategy has been produced by the Economic Development Service, Lancashire County Council, on behalf of local partners.

2. Geographic and Economic Summary

The Pennine Moors Local Action Group covers the rural populations of Chorley, Blackburn with Darwen, Rossendale, Hyndburn, Burnley and Pendle (part) in Lancashire as well as adjacent rural populations in Bolton, Bury, Rochdale and Wigan in North Greater Manchester. The Pennine Moors Local Action Group proposal means rural areas in Lancashire will be linked to adjacent rural areas in North Greater Manchester for the first time under the LEADER initiative.

The area is inclusive of the Lancashire Valleys and Southern Pennines (part) National Character Areas, linking areas such as the West Pennines to densely populated urban areas.

The Pennine Moors Area plays an important role as part of the rural hinterland of the M61/M65 and Greater Manchester urban conurbations. The very nature of the Pennine Moors places it close to significant urban markets which provides an ideal base upon which to continue to develop and diversify the rural economy and support employment growth in the rural population, as well as providing a high quality of life location. It is characterised by a patchwork of uplands, reservoirs, wooded valleys and historic villages with a rich variety of natural and cultural heritage which is highly accessible to surrounding towns and cities with good access to the markets in those areas.

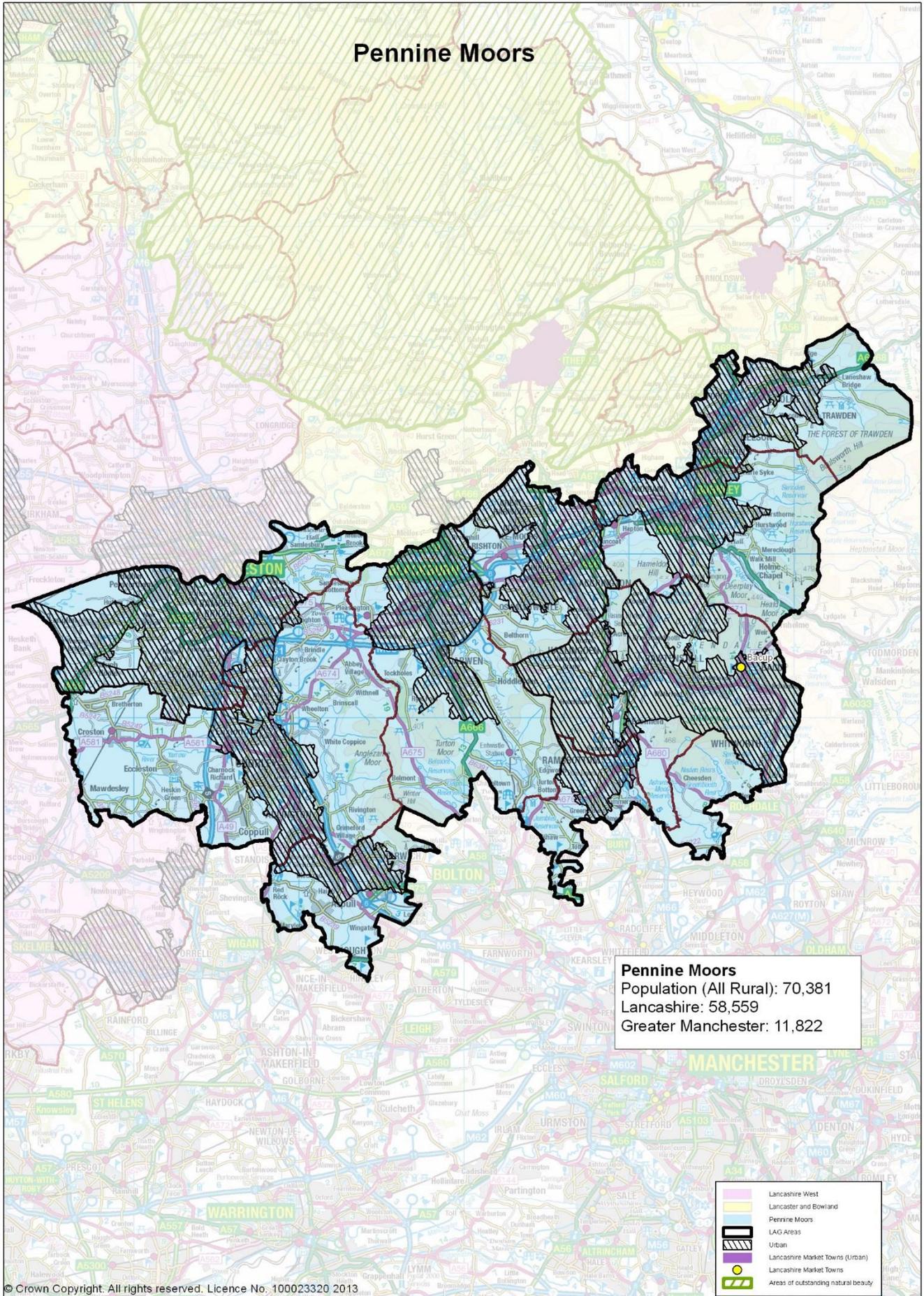
Over the past years the rural population has declined placing; two of the authorities in the area have lost 20% of their rural population and two other have lost 90% and 70 of their respective rural populations. In conjunction with changing farm and land management practices this has resulted in increasing pressure on the rural business and employment base. However, the close proximity of urban populations provides significant opportunities for economic growth linked to recreational activities and sizable markets for local products. This is recognised in both the Lancashire and Greater Manchester LEPs priorities for rural activity.

Demographically the area is characterised by a fragmented and reducing, rural population, with intermittent upland and moorland areas and settled foothills and valleys. The majority of the agricultural land is Grade 5 and 4 with some Grade 3 in the West of the area with agricultural income declining as part of the make-up of the local economy. The area has a significant industrial heritage, with the legacy of which is still present, and can be seen today in the close proximity of rural and contemporary industrial areas. This is different to the coastal plains in Lancashire, with their much higher grade agricultural land and the north of Lancashire, into Ribble Valley and Lancaster. However, this does indicate the need for close working and joint project development, as appropriate, with the South Pennines LAG

This geography presents its own challenge with the landscape an economic asset, as well as dictating the settlement of the areas, supporting farming businesses. It also supports diversification into other areas, such as developing a sustainable Visitor Economy based upon increasing access from local urban populations. Initial research indicates that traditional farming is no longer the economic mainstay of the area and diversification into their businesses all important. Previous experience of LEADER and other related economic development activity indicates that the costs of job creation in this area are likely to be higher than indicated in the DEFRA guidance especially in self-employment and enterprise promotion.

The LAG area tends to be classified as more Rural Town and Fringe/Village partially as a result of declining rural populations and also as urban areas expand and become more densely populated. This sets it apart from other rural areas as in some ways it resemble urban areas in terms of economic make up and socio economic issues. For example some parts of the area (Chorley and Blackburn) over 45% of residents are qualified to NVQ 4, significantly above the national average. However, unlike other rural areas self-employment rates are not quite as high as they could, and are more like urban areas, which also reflects the areas role as a home for those commuting to jobs in Manchester, Liverpool and Preston and Leeds.

The Strategy aims to build upon these opportunities to enhance the economic impact of the area .The SWOT analysis contained in the Strategy provides more detail on the specific issues to be addressed.



3. Priorities for Activity

3.1 Alignment with Local Enterprise Partnership activity

The priorities set out in this Strategy complementary to and will support the rural priorities of both the Greater Manchester and Lancashire Local Enterprise Partnerships.

Lancashire

The draft Lancashire Rural Growth Strategy identified key opportunities for rural growth and prioritises them in the context of the Lancashire Growth Plan. It will provide the context for LEADER and will influence the direction of the Lancashire European Structural and Investment Funds

The European Structural and Investment Fund (ESIF) Strategy prepared by the LEP for prioritising activity and investment has been drafted as a basis for negotiations with Government. The strategy is required to be based upon the themes of the Common Strategic Framework and support the national Growth Programme. The Strategy has been drafted to support the objectives of the LEP's Growth Plan and sets out the LEP's key aims and objectives for funding over the period. It will provide investment to deliver key activities as part of an integrated approach to developing Lancashire's economic potential.

Lancashire's priorities for European Structural and Investment Funds are set out as 6 key themes:

- Investing in strategic infrastructure, development and environmental resilience
- Boosting business growth and innovation
- Promoting growth sectors and supply chains
- Encouraging inward investment and marketing
- Driving the skills for growth
- Creating opportunities for disadvantaged communities/groups.

Rural Lancashire hosts a number of indigenous features which will help maintain current activity and support further sustainable growth. Priorities for growth in rural Lancashire link across the LEP Growth and ESIF Programme, the Rural Growth Strategy and LEADER. It is intended that projects and activities will be commissioned strategically and will be mutually supporting to maximise the total potential investment available across the full range of funding streams.

Sector Development	LEP Growth Programme/ESI Priorities	Rural Growth Strategy Priorities	LEADER Priorities
Food and Drink			
	Promoting growth sectors and supply chains	Focus on food clusters & key markets	Supporting and growing local food producers and food networks
		Growing food exports	Supporting diversification Supporting high quality products and local provenance
	Smart specialisation	Agri-tech smart specialisation	Supporting technology to increase primary production Supporting precision farming
Visitor Economy			
	Increasing productivity and value. Attractions, accommodation and infrastructure. Key priorities being identified by Marketing Lancashire	Marketing Lancashire Key rural and cross cutting visitor economy priorities	Supporting diversification Supporting rural tourism Support for cultural and heritage activity

Meeting Business Needs

Business Need	LEP Growth Programme/ESI Priorities	Rural Growth Strategy Priorities	LEADER Priorities
Skills Development and Business Support			
	Lancashire Boost	Based on Boost, identified tailored rural support	Not directly eligible but led by other programmes, and linked where relevant to LEADER Enterprise and Rural Services priorities
		Roll out of virtual business support network following Wyre example	Not all activity directly eligible, but led by other programmes and linked where relevant to LEADER Enterprise and Rural Services priorities. Sustaining Lancashire Farmer Networks (if eligible).
	Superfast Broad Band business support services	Specific support for rural areas aligned with Lancashire's Strategic Framework for Digital Inclusion	Not directly eligible, but led by other programmes and linked where relevant to LEADER Enterprise and Rural Services priorities
Premises and Sites for Employment			
	Strategic sites for employment	Establish viability of rural business hubs to support business needs	Incubator premises for new start businesses if need and viability established.
Natural Capital, Land Management and Building Natural Resilience			
	Energy and Environment	Land management to build resilience. Management of energy resources	Land management schemes Support forestry businesses and forestry management schemes

Greater Manchester

The Greater Manchester LEP has agreed the following priorities to support rural areas and which will be supported through the Local Development Strategy where eligible;

• Support for agri-food businesses to exploit the local supply chain and access the local urban marketplace
• Initiatives to support the distinctiveness of rural places and landscape character specifically to enhance the tourism product
• Support the marketing of the Tourism offer to link the urban areas to Greater Manchester's Countryside and Greenbelt
• Complementary services to and support of the work of the GM Business Growth hub

The Local Action Group will work with the LEP to ensure complementarity and maximise impact with Greater Manchester ESIF resources.

3.2 SWOT Analysis

During the consultation events and the focus groups a number of local issues were identified, which resulted in the following SWOT analysis:

Strengths	Weaknesses
<u>Enterprise:</u> - <ul style="list-style-type: none"> Proximity to urban centres & large urban populations Established and growing business support base in Lancashire and Greater Manchester High levels of business presence including major, high quality brands Entrepreneurial culture and high self- sufficiency Good transport links M6/M61/M65M66 Strong manufacturing sector including food production Higher than average skills 	<u>Enterprise</u> <ul style="list-style-type: none"> Unable to attract younger workforce due to poor public transport availability Access to finance for business growth Access to business support and advice for 'non industrial' businesses Access to training/Leadership and Management support Lower than rural average self-employment
<u>Farming:</u> - <ul style="list-style-type: none"> Some Class 3 land in the west of the area Lancashire & Greater Manchester Farmer Network 	<u>Farming:</u> - <ul style="list-style-type: none"> Lower GVA farming than in other parts of Lancashire and Greater Manchester
<u>Tourism:</u> - <ul style="list-style-type: none"> West Pennine Moors Developing recreational sport attractions e.g. Lee Bank Quarry Mountain Biking, 'Playground' for residents of urban areas 	<u>Tourism:</u> - <ul style="list-style-type: none"> Seasonality Few high profile tourism attractions Lack of appropriate accommodation for overnight visits Lack of 'brand' awareness
<u>Forestry:-</u> <ul style="list-style-type: none"> Natural capital e.g. Pennine Edge Forest initiative 	<u>Forestry:</u> - <ul style="list-style-type: none"> Limited forestry offer due to coverage
<u>Rural Services:-</u> <ul style="list-style-type: none"> Proximity to urban areas and services 	<u>Rural Services:</u> - <ul style="list-style-type: none"> Increasing isolation increasing as non-commuting rural population declines Population 'on the edge' of urban services
<u>Culture & heritage:</u> <ul style="list-style-type: none"> Strong heritage traditions and particularly with the canals & industrial heritage which are common across Lancashire and North Greater Manchester. Part of area priority for Heritage Lottery Funding 	<u>Culture & heritage:</u> - <ul style="list-style-type: none"> Limited awareness of what the area has to offer outside of local/adjacent areas
Opportunities	Threats
<u>Enterprise:</u> - <ul style="list-style-type: none"> Start-up companies and expansion of existing small enterprises Spin off effect of local urban markets for products Support for the business base will require increased utilising local HE/FE knowledge transfer support Linking local businesses, producers, suppliers, etc. into the urban markets on their doorstep. Local business co operation 	<u>Enterprise:</u> - <ul style="list-style-type: none"> Access to finance Business support & marketing Access to markets Uncompetitive traditional rural businesses
<u>Farming:</u> - <ul style="list-style-type: none"> Local food & drink supply chain supporting stronger connections between food production and retailers Diversification. e.g. 'horsiculture' 	<u>Farming:</u> - <ul style="list-style-type: none"> Foreign imports Feed / fuel / energy prices Pressure from other land uses and changing farm practices
<u>Tourism:</u> - <ul style="list-style-type: none"> To enhance the tourism offer in terms of quality and provision Marketing of attractions linking to urban areas Significant heritage and recreational assets e.g. Pennine Bridleway (Mary Townley Loop) 	<u>Tourism:</u> - <ul style="list-style-type: none"> Overlooked because of proximity to other Tourism clusters Unmanaged visitor impact
<u>Forestry:</u> - <ul style="list-style-type: none"> Unmanaged woodland opportunities including sustainable management opportunities 	<u>Forestry:</u> - <ul style="list-style-type: none"> Lack of management Impact of Disease
<u>Rural Services:</u> - <ul style="list-style-type: none"> Development of not for profit/social enterprises 	<u>Rural services:</u> - <ul style="list-style-type: none"> Unmet demand resulting in loss of business opportunities
<u>Culture & heritage:</u> - Development of local attractions to attract nearby populations, e.g. Panopticons, Turton Tower, Industrial Heritage	<u>Culture and heritage:</u> - Lack of inward investment and promotion

3.3 Local Priorities for intervention

On the basis of the SWOT analysis, consultation with local partners, economic research and utilising LEADER's six Priorities we have identified the following local interventions

Enterprise

Priority	
1	Support for Business Start Ups and Scale Ups especially to build upon local urban markets
2	Support for businesses in growth sectors in rural areas including supply chains
3	Capital investment to support expansion
4	Availability of appropriate premises and Infrastructure
5	Marketing support including the development of e-applications and social media
6	Leadership and Management Support
7	Access to appropriate Finance
8	Networking and Knowledge Transfer

Farming

Priority	
1	Increase productivity through investment in new technology and knowledge transfer linked to adding value, i.e. precision farming
2	Joint production and marketing activity
3	Leadership and Management
4	Tailored business support including succession planning
5	Services to farmers – based upon local need , i.e. Lab testing for soil and slurry linked to reducing fertiliser use and run off effects to water course
6	Bio Security

Consultation Summary

A number of common themes arose at each of the events particularly around increasing and improving productivity, business support/training/knowledge transfer and marketing activity linked to both enterprise and farming. However, other issues raised included;

- Investment in flood defence and drainage
- Support for precision farming and related knowledge transfer
Grants and project development support for those businesses falling outside other initiatives/funding
- Improved broadband / mobile coverage
- Animal welfare and nutrient management programme for Lancashire farmers
- Support to meet best practice standards for the diary sector – i.e. stocking rates – links to possible export markets
- A mobile phone text service to get key information to the farming community as they tend not to use IT/email but are used to using mobile phones.
- Support to development and extend the Lancashire Farmers Network
- Apprenticeships in horticulture

Forestry

Priority	
1	Investment in equipment to support the growth of the processing sector
2	Leadership and Management support for Forestry development
3	Support for cooperation between small woodland owners to develop joint management and felling
4	Support to develop and extend supply chain demand for timber from woodlands
5	Support for planting new and re-planning felled woodland

Consultation Summary

Cooperation and supply chain were common discussion points. Unmanaged woodlands could be better utilised if cooperation activity were encouraged and promoted. Capital investments to support extraction and processing were also topical as was skills training. Other ideas included:

- FSC registration and affiliation
- Transport
- Advisory service – advice on support
- Access to finance, with relationship management support
- Communication and transport links into rural areas
- Routes to market – disconnect, connections
- Case studies, demonstrations
- Technologies
- Issues around certification, registration
- Facilitation
- Replanting →restocking
- Mapping and engagement at school level and beyond, bringing young people into the sector, apprenticeships programmes

Tourism

Priority	
1	Marketing and Promotion support linked to increased numbers from outside area
2	Networking and cooperation opportunities
3	Accommodation development linked to increased overnight stays
4	Spread of accommodation provision (presume in terms of quality?)
5	Support for local Visitor Economy initiatives including events and festivals
6	Development of sustainable transport initiatives linked to recreational activity
7	Limited capital investment for identified attractions

Consultation Summary

Again marketing and promotion were a common theme and was mentioned as a priority at all four consultation events. Training and advice is another common issue as Marketing Lancashire no longer provides the same level of support and advice to tourism businesses. Capital investment was one of the key priorities mentioned at two of the events.

Rural Services

Priority	
1	Support for Community Infrastructure
2	Building on and fully utilise Super-Fast Broadband resource
3	Capacity building support for accessing and drawing down match funding
4	Capital funding for voluntary and community based buildings
5	Sustainable Transport initiatives supporting access to services
6	Community renewable/affordable energy schemes

Consultation Summary

The rural services theme encouraged the most discussions and the most diverse range of issues and ideas. Some of the discussion points not captured within the top five priorities above are captured below:

- IT advice centre – drop in facility where villagers can access support to complete online forms or access online information
- Visiting services e.g. banks, NHS services
- Community activities
- Access to renewable energy
- Shared and community transport initiatives
- Collaboration between community assets
- Fostering good relations between recent residents and families who lived in the area for generations
- Transport within areas to more major shopping, transport hubs
- Combatting social isolation – older people, children and families
- Mixed Community services – benefiting whole communities
- Funding not retrospective
- Rural workspace
- Delivery of IT - Access / Maintaining & support
- Modernisation of Community buildings – and conversion e.g. closed schools
- Improved facilities for young people in rural areas
- Improved access to funding to enable community cohesion - many village inhabitants use it as a place to sleep not a place to live.
- Bigger share of funding to voluntary organisations
- Easier controlling funding (cash flow)

There was a discussion around the kinds of benefits which can be brought about when communities get to know each other and the benefits that can accrue by getting people to "care" about each other. Improved communication – possibly through the "support workers" detailed above – could be one way of achieving this, but need not be the only way.

Signage – to facilities, services and businesses was also discussed with the feeling that take-up would be increased if it was easier to get permission for signage within rural areas.

Rural energy generation was also discussed. The benefits of ground source heat pumps were the main area of discussion as well as other sources which reduced the reliance on coal and oil.

Culture and Heritage

Priority	Culture & Heritage
1	Events linked to existing cultural and heritage attractions
2	Improved signage and information
3	Interpretation and protection of rural historic features

Consultation Summary

Much of the discussion in this theme was related to improving the Visitor Offer and supporting local business growth related to culture and heritage assets.

Outputs and Costs

The following targets are based upon previous experience of the delivery of economic development and

These are scalable according to final budget settlement (M&A currently 15% but would increase to up to 18% should the allocation be reduced)

Leader Policy Priority	RDPE expenditure per FTE job created	Average grant size	RDPE	Relevant output indicators for application	CMES LDS	End of programme forecast (by December 2020)
Support for increasing farm productivity	£61,011	£50,000	<i>Average Pennine Grant in the previous programme was £102,002. This has been halved in order support increased performance of the programme)</i>	Total expenditure Number of projects supported Jobs created FTE	RDPE	£217,770 4 3.5
Support for micro and small enterprises/farm diversification	£17,500(<i>Average Pennine Lancashire - Average in previous programme was £19,570 per job created. This has been reduced in order to support the increased performance of the programme)</i>)	£19,951		Total expenditure Number of projects supported Jobs created FTE	RDPE	£653,310 32 37
Support for rural tourism	£32,477	£40,000	<i>(the average Pennine Lancashire Average grant in previous programme was £68,255 and this has been reduced to reflect increased programme performance)</i>	Total expenditure Number of projects supported Jobs created FTE	RDPE	£290,360 7 8
Support for culture and heritage activity	£55,991	£28,165		Total expenditure Number of projects supported Jobs created FTE	RDPE	£72,590 2 1
Provision of rural services	£33,272	£30,000	<i>(the average Pennine Lancashire grant in the previous programme was £45,704 and this has</i>	Total expenditure Number of projects supported Jobs created FTE	RDPE	£145,180 5 4

		been reduced to support project performance)		
Support for increasing forestry productivity	£77,045	£21,788	Total RDPE expenditure Number of projects supported Jobs created FTE	£72,590 3 1
Total Programme			Total RDPE expenditure Number of projects supported Jobs created FTE	£1,451,800 53 54

Percentage split between themes

It is proposed that LAG resources are split along the following lines

Theme	Percentage	Rationale
Enterprise	45%	Based upon previous experience the Enterprise Priority will have the highest demand and a 45% allocation will enable us to achieve a high proportion of the jobs and growth targets via direct to business grants. Discussions at the consultation events have supported this approach.
Farming	15%	Previous experience and local issues indicate that this Priority will not require as much resources as others especially as farm diversification related activity can be supported under other priorities.
Tourism	20%	The nature of the area, its strengths and opportunities, indicate that support for Tourism/Visitor economy will be important. This is a high priority area the Lancashire and Greater Manchester LEPs
Rural Services	10%	In the previous programme the allocation for rural services across Lancashire was approximately 10%. Discussions at the consultation events indicated that this was an acceptable allocation
Forestry	5%	The majority of forestry projects could potentially be eligible to apply for funding via the Enterprise theme therefore it was felt that a 5% allocation specifically was adequate
Culture and Heritage	5%	A 5% allocation was deemed appropriate for the Pennine Moors LAG area as Visitor economy related activity could also be supported under the Enterprise and Tourism priorities if appropriate.

4. The Local Action Group Partnership

4.1 Membership

Building upon the lessons learned from the evaluation of the 3 previous Lancashire based Local Action Groups we have already started to engage with partners and develop interest in being a member of a Local Action Group from the outset of the development of the programme. We believe that in previous programmes one of the reasons membership may have declined is due to the lack of effective communication between the Delivery teams and the wider LAG members as well as too much of focus on administration instead of achievement of Local Development Strategy objectives.

We have already implemented more effective lines of communication by identifying a wider range of stakeholders and issuing a quarterly newsletter, which has been positively received. We have also asked

local recipients of LEADER grants to become involved as this will help with the spread and level of expertise in the LAG. This has been supported by the consultation process.

Whilst we would like to retain the knowledge and expertise of some of the previous LAG Executive members we need to be mindful that the Pennine Moors LAG is based upon a new geography and needs to be inclusive of different partners including those in North Greater Manchester. We would also like to recruit new members according to the skills and knowledge required to deliver the priorities within each theme. For example the Lancashire and Greater Manchester Farmers Network would be a mechanism for engaging with new local partners.

4.2 Structure and decision making process

Local Action Group

It is proposed that the LAG will meet once or twice a year and that the role of LAG members will be to:

- Set the strategic vision and direction of the Programme
- Enable a locally led approach to rural development
- Consider, oversee the implementation of and review the Local Development Strategy
- Promote and raise awareness and understanding of issues affecting the rural economy
- Promote the funding to their wider networks

LAG Executive Group

The LAG Executive will usually meet 4-6 times per year although this may be more frequent at the start of the programme. The role of the LAG Executive will be to:

- Initiate calls for projects to delivery LDS objectives and where appropriate develop project ideas
- Recommend projects for approval – personal and prejudicial interests of any LAG Executive member will be noted prior to any decision being made using a written policy based on that used previously under the 2007-2013 RDPE Programme
- Ensure spend and output targets are achieved and scrutinise all elements of LDS delivery
- Report to the LAG on progress of the RDPE programme and individual projects on a regular basis.
- Assist the Development Officer with technical knowledge and expertise

All activity will of course be in accordance with the National Operational Manual, which is due to be produced by DEFRA prior to the new LAGs becoming operational. At Executive meetings in the previous programme LAG Executive members were provided with an Investment Decision form for each application presented, which was a summary documents of the full application. It was agreed at the outset that members did not need to view the full application, business plan and associated documentation. We already have processes and procedures in place from the previous programme covering Terms of Reference, a Conflict of Interest Procedure (including a Declaration of Interest form) and Quorum.

These procedures will be built upon and/or amended using the results of a questionnaires that Executive Members in the previous programme were asked to complete. The questionnaire focused on their assessment of what worked well and what areas could be improved upon in the delivery of the programme. A key issue arising from this was the fact that LAG members preferred to meet to discuss applications rather than having to consider them in isolation via Written Procedure (which was used either for urgent applications or when LAG Executive meetings had not been quorate). We have also undertaken a skills audit of previous LAG Executive members and this will be refreshed when the new Lag Executive is formed. The majority of existing LAG Executive members have expressed their interest in remaining on the LAG Executive

It is proposed that the LAG Executive Membership consist of:

- 5-6 public sector
- 4-5 x community / voluntary sector
- 5-6 x private sector
- Non-voting members – Accountable Body and DEFRA

In establishing the Executive we will be mindful of the Public Sector Equality Duty and seek to ensure that it is reflective of the local residents and businesses re that there is a balance of age and gender.

4.3 Training requirements

As previously mentioned all Executive members were asked to complete an online questionnaire. One particular question related to the training requirements and many of the current members are keen to renew their knowledge on the decision making process and the application and appraisal process. Once Defra have confirmed that we have been awarded funding we will organise training workshops to address this. We anticipate that workshops will be held in early 2015 once we have received the confirmation of funding.

We are currently reviewing the National RDPE website and if any appropriate events come up we will notify LAG members so that they are able to attend if they wish, however this was not a real priority. We have already arranged two joint events in 2014 involving the three Lancashire LAGs and plans are underway to host a joint LAG events with a number of Northern LAGs in early 2015 , which meets with members requirements to undertake further networking activity. The proposed training activity is as follows:

Lancashire County Council – Internal training

Appraisal Training - All staff undertaking project appraisals will be required to undertake appraisal training. The training will be delivered by an experienced LAG Officer and will include a detailed breakdown of the appraisal questions using projects from the previous programme as live examples.

Project Development - Any new staff members will undertake training by shadowing an experienced Development Officer on site visits.

Claims Processing and Monitoring - Anyone undertaking the processing of claims or monitoring visits will also receive training and support via an experienced Project Officer.

Local Action Group Training - External

Decision Making Process including appraisal and approval – LAG Executive Members

All new LAG Executive members will be required to undertake training regarding the decision making process. Some existing members have also expressed an interest in this training. As previously mentioned the Lancashire LAGs do not provide members with the full application details. At the Executive meeting members are given an Investment Decision form, which is a summary document of the full application and appraisal. The aim of this workshop will be to:

- Discuss the application process step-by-step;
- Go through the appraisal questions using a live example from the previous programme to demonstrate how rigorous a process it is;
- Highlight the queries that might arise from the appraisal and the steps we put in place e.g. special conditions;
- Detailed discussion around their role at the Executive meetings. The aim is to approve the project rather than re-appraisal;
- What happens following approval e.g. offer letter issues, offer letter accepted, claims, outputs etc.

Applicant Business Planning and Application Training – External

In the previous programme we found that the business plans varied immensely in quality. Also, if applications were prepared by external consultants we found that in some cases applicants were not clear on what they had signed up to in terms of record keeping, outputs and special conditions. Although there will be some applicants who will recruit a consultant we believe that all applicants should be provided with the opportunity to put together their own business plan and application. Although each applicant is provided with one-to-one support and advice from the Development Officer it would be impossible to go into this level of detail with each applicant therefore we propose to hold business planning and application workshops. The workshops will be held bi-monthly or quarterly depending upon demand. If possible, to minimise costs, the Development Officers will run the workshops. However, if workload dictates that this is not possible we will follow due process and recruit externally. The workshops will include:

- How to complete an application form
- Information to be provided within the business plan
- Procurement
- The types of questions asked at appraisal
- What happens at the LAG Executive Meeting
- The offer letter including milestones, special conditions etc.

Claims Workshop for applicants – external

- How to complete a claim form
- When to submit claims
- Audit trail and record keeping
- Monitoring visits
- Exit reports

4.4 Equal opportunities statement (Public Sector Equality Duty)

In order to understand the impact of the Local Development Strategy on the community, we will be undertaking a full equality analysis using the principles of the Lancashire County Council Equality Analysis Toolkit. The toolkit has been devised to ensure that due consideration has been given to groups sharing certain protected characteristics such as age, race, gender etc. when strategies are developed. The analysis will consider, for example, the information gathered to support the development of the strategy, stakeholder engagement and consultation and the impact, positive or negative, of the strategy on various groups within the community. As part of this, consideration will also be given to any activity required to mitigate the potential negative impact of strategies.

4.5 Involvement of the community and consultation activity undertaken

We have undertaken a wide range of consultation activity and from this 'bottom up approach' we have determined the priorities for spend in the new programme. In partnership with existing stakeholders we identified a further list of new potential stakeholders and will continue to do so as the LAG develops. We have now been in contact with over 300 individuals and organisations, as well as a number of partner organisations who are able to share the information through their networks. All our events have been promoted via:

- NW Livestock Programme
- Creative Lancashire
- National Farmers Union
- Lancashire County Council mail out to 90 Commercial Agents

- CVS Central Lancashire and West Lancashire
- Myerscough College

Theme Specific Consultation

Although the consultation events provided an excellent opportunity to engage with all sectors and identify issues which are relevant to the rural areas we felt that further sector specific engagement was required to enable us to come up with some specific priorities that we are able to fund in the new programme.

Therefore focus groups were arranged for each of the themes. Where possible we asked lead organisations from each sector such as Myerscough College and the National Farmers Union representing the farming sector to arrange a meeting and invite attendees. The focus groups were then provided with the relevant information relating to their sector from the consultation events, as well as a list of potential activity that we might fund. The aim of providing the list of potential activity was to act as a starting point for discussion.

Enterprise

Attendees were asked to consider the following and comment on the following:

Suggested activities / priorities

- Encouraging new business start ups
- Assisting existing enterprises to make significant investment in expanding the business leading to job creation and increase in turnover
- Use of redundant buildings to create 'incubator' type premises for new start businesses
- Social enterprises especially those providing essential rural services
- Projects linked to food and food processing / drink / tourism / digital and creative / knowledge economy / renewable energy / environmental technology / manufacturing /
- Projects creating jobs or increasing productivity

Farming – 10-12.30pm, 30th July 2014, Myerscough College in partnership with the National Farmers Union

Much of the discussion focussed around training, in particular ICT, broadband and marketing including social media. Continued support for the Lancashire and Greater Manchester Farmer Network was also discussed. It took about four years to get the networks off the ground but the funding used to support these networks finishes in December 2014 so we need to explore whether this could be funded via Leader. Research has highlighted that it takes between 5-7 years for the networks to become sustainable therefore support for the networks is crucial. Additional research material relating to the farmer networks is available on request. The networks are something we may seek to explore as part of our cooperation activity by looking at other more experienced networks to learn from best practise. At the AGM of the Lancashire and Greater Manchester Farmer Network the development of the Pennine Moors Local Development Strategy was welcomed as a step forward in linking rural areas with common issues.

Suggested activities / priorities

- **Investment in technology to increase primary production** – *including support for precision farming*
- **Adding value to produce** – *this came out as a key priority at the wider consultation events*
- **Projects which seek to reduce the business impact on the environment / reduce energy consumption** – *need to ensure that we do not duplicate what is already in existence. Further exploration is required to see what can already be funded.*

- **Projects creating jobs or increasing productivity** – *whilst job creation should be considered it was noted that investments in technology often resulted in the replacement of jobs therefore productivity was perhaps a more important focus.*

Forestry – 10-12pm, 7th August. Forestry Commission

In addition to the theme specific consultation and general events FC have kindly provided a research paper to assist the LAGs to develop the forestry sector in Lancashire. As a result the following priorities have been identified:

- **Business start-ups** – *woodland owners need the services of reliable and professional contractors to undertake operations in their woods*
- **Capital investment in and out of the wood** – *LEADER groups to consider supporting the capital investment in machinery appropriate to the woodland types and terrain of the local area. Individuals whose machinery will be deployed across many land ownerships have the potential to deliver greater economic impact.*
- **Supporting the construction of access points, stacking areas and loading bays particularly where these can serve several woodlands** – *consider supporting the construction of access points, stacking areas and loading bays particularly where these can serve several woodlands.*
- **Invest in developing local venison markets through support of the transport, handling, processing and marketing of venison** – *invest in developing local venison markets through support of the transport, handling, processing and marketing of venison.*
- **Development of commercial tourism offers through investment in infrastructure, structures and equipment** – *development of commercial tourism offers through investment in infrastructure, structures and equipment.*
- **Helping services that deliver co-operative working, such as woodland associations and timber marketing groups** – *consider helping services that deliver cooperative working, such as woodland associations and timber marketing groups.*

Tourism – Marketing Lancashire were asked to lead on the tourism theme inviting accommodation providers, attractions and eating establishments across Lancashire. Attendees were asked to consider the following:

Suggested activities / priorities

- Signage and interpretation
- Capital grants for new tourism accommodation where there is a proven demand
- Capital grants for new tourism attractions
- Capital grants for quality improvements to existing tourism attractions and accommodation
- Collaborative marketing – need to confirm whether Defra view this as eligible activity

Rural Services – 10-12pm, 29th July at Community Futures

A wide range of discussion took place reiterating some of the common issues that arose at the general consultation events including broadband, mobile phone coverage and access to skills and training. One of the main issues related to capacity building and a communities ability to recognise a need and access funding to address the need. Whilst we cannot fund training per se we may be able to offer more of a hand holding role to these groups once the funding is launched.

In terms of potential priorities that fit within the Defra identified criteria, please see below:

- **Capital grants for community buildings especially where the project benefits the whole community** – a number of village halls are seeking investment with a view to becoming more sustainable. In addition to capacity building we may seek to work in partnership with Community Futures to develop additional support following completion of the project including how to market the facilities, target marketing, social media, managing bookings, pricing structure etc. Also interested in multi-use facilities including bringing back services into rural communities including shops, post office, library etc.
- **Supporting young people – provision of services / facilities for younger people** – in particular around after school care and holiday provision
- **Support for services for more vulnerable members of the community e.g. over 50's** – looking at the way health services are delivered. Key change to deliver in community venues i.e. District Nurse outreach services. Many community buildings not fit for purpose so this also links back to the capital grants for buildings.
- **Provision of IT support** – offering ICT support to rural communities particularly to those seeking to start their own business
- **Community activities** – especially aimed at younger members of the community

Culture and heritage – The Forest of Bowland AONB were asked to lead on the culture and heritage theme. This theme has tended to be discussed in conjunction with Tourism and Enterprise and many of the suggested activities under those themes will also support Culture and Heritage. Detailed information was provided by the Ribble Trust, Browsholme Hall, Hoghton Tower, Forest of Bowland AONB and Bowland Revealed. Key priorities around the preservation of our historic houses, the quality improvement of our waterways and preserving the AONBs within Lancashire were identified.

4.6 Programmes of activity

It is envisaged that the following programme of activity will be undertaken once we have received confirmation of LEADER funding. If required activity can be undertaken earlier utilising resources from the Transition Project allocation.

Timescale	Activity
January (or as soon as possible after this date depending upon offer letter) 2015	Launch event to invite an open call for projects for the Enterprise and Farming grants
April 2015	Launch event to invite applications from the tourism sector
January 2016	Call for projects within a defined period for rural services projects
January 2016	Open call for forestry projects
March 2016	Launch of heritage and culture funding

4.7 Sustainability appraisal

Lancashire County Council is committed to ensuring a better quality of life by providing, developing and promoting a healthy, safe, diverse, clean and attractive environment for residents and businesses. This will be achieved by a focus on legislation, climate change, natural resources and waste, landscape, wildlife and heritage and education implementation and monitoring. Activities under each of these strands include ensuring LCC meets its environmental legislative and regulatory requirements, monitoring and minimising the Council's use of energy, minimising the amount of waste produced by the Council and encouraging greater reuse and recycling. Other activity includes the conservation, restoration and re-establishment of habitats and wildlife on land managed by the County Council and also a number of initiatives around education and implementation including the consideration of environmental factors in County Council decisions and activities and the development of environmental objectives and targets to reduce environmental impacts. .

Based upon experience of the previous LEADER programme, and feedback from partners and from DEFRA, the Pennine Moors LAG has been designed to ensure that the programme is managed effectively over the full life cycle of the project, is able to maximise the impact of LEADER resources by leveraging other funds and encourages and sustain partner engagement in both project development, approval and monitoring.

4.8 Proposed cooperation activity

In anticipation of the new programme Lancashire has undertaken joint discussions with a number of other English Local Action Groups to discuss potential cooperation activity.

On 30th April and 1st May the LAG Officers attended an event in Clapham, North Yorkshire hosted and organised by Rima Berry. The purpose of the event was to engage with other LAGs, share best practice and discuss cooperation ideas. The event was attended by 19 Local Action Groups including Cumbria Fells and Dales, Solway Borders and Eden, North Pennine Dales and more. The event was excellent and a number of cooperation ideas came forward. The Lancashire LAGs were asked to present on business engagement as a large proportion of those in attendance have not yet delivered direct to business grants.

A further meeting was hosted by Lancashire on 12th June and some key ideas coming forward related to visitor payback schemes, strengthening of the Lancashire Farmer networks and food trails. However, as the Leader ethos is very much about a 'bottom up' approach the decision was made that in the New Year Lancashire would host another event inviting the 19 LAGs involved so far in addition to the Norfolk LAGs to attend a workshop to discuss the ideas and to agree cooperation activity. The event is planned for early 2015. Obviously any cooperation activity needs to be bid for therefore the initial exploration activity will be funded through the M&A budget.

5 Management and Administration

5.1 Accountable body

Lancashire County Council has agreed that will it will put itself forward to be the Accountable Body of the Lancashire Pennine Moors LAG based upon its previous LEADER experience and financial capacity/experience as a County Council. The county Council, in addition to experience of managing LEADER programmes, has extensive financial expertise and supporting system. However, this offer is contingent upon a clear understanding of the functions of the Accountable Role including operational and financial delineation between DEFRA/RPA and the County Council. As a result this offer is dependent upon further detail of the functions to be undertaken by a LEADER Accountable Body.

5.2 Local Action Group staff, numbers and job descriptions

Staffing support for the Local Action Group will be based upon a shared administrative and financial service within Lancashire County Council delivering efficient and effective programme management. This service will

support all three Lancashire based LAGS (the others being Lancashire North & Bowland and Lancashire West). The service will be based upon the model used successfully in the previous LEADER programme in Lancashire. The shared service will comprise a LEADER Programme Officer and a LEADER Finance Officer (FTE). We have a strong track record in delivering not only RDPE funding but also a wide range of other funding streams, such as the European Regional Development Fund and the Growing Places fund and as a result we have robust financial and programme management systems in place. Lancashire County Council also has its own internal audit capacity which will be used to ensure that the systems used to support LEADER are as effective and efficient as possible.

In order to support the Local Action Group itself, undertake project animation/marketing and support for businesses the Local Action Group will be allocated a dedicated member of staff at Senior Project Officer. Previous LEADER experience has indicated that this is the most effective way of ensuring the correct level of support for the delivery of the programme. The implementation of Local Development Strategies and management of LEADER resources across the three Lancashire based Local Action Groups will be overseen by a Head of Service within the County Council.

In addition training will be undertaken for Lancashire County Council staff and partners in order to undertake appraisals and provide expert advice, such Business Planning or in specific sector, as appropriate. This will be separate from LAG membership in order to manage conflicts of interest (in support of previous recommendations from the North West RDT) and release capacity to support project and LAG development.

The County Council is currently undergoing a restructure process and as a result the Job Descriptions for the posts indicated above will not be available until later in the year. However, it is envisaged that job and salary levels will be at a level to those currently delivering the LEADER Transition projects across Lancashire

5.3 Project Development and Assessment Procedures

The proposed process for developing, approving and managing projects will be;

Initial Enquiry – interested parties telephone or email to check eligibility in terms of location and type of project. We have already started to encourage potential applications to complete an online enquiry form in anticipation of the new programme, and where appropriate we are visiting those potential applicants to encourage them to begin activity which will aid their application e.g. market research, competitor analysis, obtaining planning permission, thinking about procurement.

Expression of Interest – as stated above we have already begun to invite expressions of interest but once Defra release the documentation for the new programme all future applicants from that point on will be required to complete an Expression of Interest form which will enable us to formally assess eligibility. The EoI is assessed internally and an EoI assessment form is completed and placed on the applicants file. On completion of the EoI applicants are invited to proceed to full application. Note that the initial enquiry sifts out non eligible applicants and activity.

Development Officer Visit – all applicants benefit from a one-to-one support visit to discuss the project in more detail, discuss the application procedure and to answer any questions the applicant may have.

Full application and business plan - we will create a pack of support to assist applicants to complete their own business plan and application. A Business Planning information pack already exists from the previous programme however we can add further value to this to create a useful toolkit with templates for the following:

- Cash flow forecast
- Procurement strategy
- Risk assessment
- How to write a tender document / written specification of requirements
- How to present the information e.g. in a ring binder with file separators

Development Officer Feedback – the applicant provides a draft copy of the application usually electronically but occasionally a site visit will be required. The Officer reviews the information and makes appropriate recommendations. The applicant then amends accordingly and submits a final application.

Appraisal – the application will be appraised by a team of appraisers from Lancashire County Developments Limited. All appraisers will be chosen for their business support experience and they will also undergo rigorous training. The appraiser will direct any queries resulting from the appraisal to the Development Officer who will liaise directly between the applicant and the appraiser. Once all queries have been addressed the appraiser will make a recommendation, which will be to approve, defer or reject the application. The application can then be presented to the LAG Executive.

LAG Executive – the meetings are usually set at the beginning of the year. An Investment Decision Form for each applicant is usually emailed to the Executive 1-2 weeks before the meeting along with an agenda and other appropriate documentation. The Executive considers each application using their knowledge of the area and also any specialist knowledge or expertise relating to a particular application. Normally decisions are made on the day however in some circumstances we may be required to go back to the applicant for clarity.

Minutes and offer letter – following the meeting minutes and an offer letter are produced. The offer letter contains detailed information regarding milestones, outputs, amount offered, special conditions and legal obligations.

The applicant is sent two copies of the application, one to retain and one to return to the LAG within 30 days of receipt.

Claims workshop – all applicants are required to attend the claims workshop. At the workshop they are provided with a file with file separators detailing the documentation they need to retain for audit purposes.

Monitoring visit – all projects receive at least one monitoring visit prior to the processing of their final claim. However, the number of visits depends upon the financial risk associated with the project. Therefore the higher the grant awarded the higher the financial risk.

Exit and evaluation report – the exit and evaluation report is usually conducted at the point where the applicant has stated they will have reached all their targets and outputs. For example, a self-catering business may be physically built by January 2016 but it will take a further twelve months for them to obtain accreditation, build up their bookings, and have their first annual set of accounts. In order to evaluate the success of the project we need to have all this evidence in place.

5.4 Claims and payments

Businesses will need to submit their individual claims as per their timetables in their contracts. It would be envisaged that the claims be on a quarterly basis so the finance team can plan this work into their timetables. The claims are submitted to a dedicated RDPE finance officer who has extensive RDPE experience. Original invoices/evidence needs to be submitted and verified. Also each invoice is clearly marked with the following statement: ' This invoice has been used for RDPE purposes, date and signature' this is to ensure that the same invoice is not submitted twice, thus causing confusion and double funding. All original evidence is then copied and certified and returned to the business.

There will be a two way checking process of the claims. A first check will be carried out by a finance officer who will ensure all evidence is eligible and can be verified and the claim actually adds up: and a second check will be carried out by the RDPE finance officer to give assurance that all finances are eligible and accountable. Once these second checks have taken place the claim will be signed off by the second officer and submitted to the RPA for payment. Copies of the claims are held in the individual business file.

The M & A claim is completed by an experienced finance officer within the shared LEADER service. These claims will be submitted as per the contract on a quarterly basis. All evidence is pulled together and a financial claim is built on all eligible defrayed expenditure. All original invoices and bank statements are seen, copied, and certified. The County Treasurer will sign off all M & A claims. The finance officer will keep all M & A claims together and once the project is completed an independent audit will be arranged by the finance officer who will then issue a certificate of verification.

The M & A claims file will be archived within the finance archive but is always readily available for inspection. Previous RPA inspection on the last programme was very complementary on our systems, hence the same system will be followed for the new programme.

5.5 Communications and publicity

Activity	Timescale
LAG Meetings including joint LAG events	
A meeting of all the Lancashire LAGs was held to provide members with an update of the 2009-2013 RDPE programme.	4 th Feb 2014
A meeting of all the Lancashire LAGs was held to provide an update on the transition period	11 th June 2014
A meeting of all the Lancashire LAGs to be held including all new LAG members to discuss the proposed LDS before final submission	w/c 1 st Sept 2014
A meeting of the local LAG to formalise Executive membership and discuss next steps	Early 2015?
Consultation	
North Lancashire – Old Holly Farm	19 th June 2014
Pennine Lancashire – Grindleton Pavilion	19 th June 2014
Lancashire West – Mere Sands Woods	26 th June 2014
All Lancashire - Brockholes	3 rd July 2014
Tourism specific consultation	31 st July 2014
Forestry specific consultation	7 th August 2014
Enterprise specific consultation	5 th August 2014
Rural Services specific consultation	29 th July 2014
Farming specific consultation	30 th July 2014
Culture and heritage consultation	
Newsletters	
Issue 1	April 2014
Issue 2	July 2014
Issue 3	September 2014
Issue 4	December 2014
Issue 5	March 2015
Web site	
Online enquiry form – has been actively promoted via our newsletter, at all our events and via partner organisations. All enquiries are assessed and, if appropriate site visits are conducted to discuss potential applications for the new programme	Ongoing from March 2014
Update on the previous programme – summary document highlighting the types of activity funded via the 2009-2013 RDPE programme	Ongoing from March 2014 Quarterly

<p>Newsletters – added to the website once they are published</p> <p>Consultation events – promoted prior to the events taking place. The results of those consultation events and also the theme specific consultation will be added to the web site following completion</p> <p>Tweeting – the consultation events were tweeted on the LCC web site. Further tweets will follow when we launch the programme</p>	<p>August 2014</p> <p>Ongoing from March 2014</p>
Press releases	
<p>Good news stories from the previous programme will be used to promote the good work undertaken from 2009-2013, which will also generate interest in the new programme e.g. Box Tree Farm – Trip Advisor Certificate of Excellence. Will also promote the new projects as and when appropriate</p> <p>Launch events – to be held in the New Year to promote the programme.</p> <p>Call for projects – not all the themes will be launched at the same time. Some may be open calls whilst others may be called within a specific timeframe. All calls will be promoted via the press.</p>	<p>Ongoing</p> <p>July 2014</p> <p>Early 2015</p> <p>Ongoing 2015</p>
Networking & events	
<p>Networking – working with stakeholders to identify any networking opportunities where we can promote RDP funding.</p> <p>Events/meetings – presentations at appropriate events and meetings to promote the programme. Or if a presentation is not possible having a presence by way of a stall/stand. E.g. Farmer Network meetings, NFU meetings, Made in Lancashire etc.</p>	<p>Ongoing 2014</p> <p>Ongoing 2014</p>
Launch events	
<p>A high profile launch event will be held early in the new year to launch the following themes:</p> <ul style="list-style-type: none"> • Enterprise • Tourism • Farming <p>The following themes will be launched in 2016:</p> <ul style="list-style-type: none"> • Rural Services • Forestry • Culture & heritage <p>The events will be promoted via our stakeholders, press releases, via appropriate networking opportunities and via our web site. We have already begun to take enquiries from all sectors and some applicants are in the process of developing their applications in preparation of the new programme.</p>	<p>Early 2015</p> <p>Early 2016</p>
Training	
<p>LAG Member Training – workshops looking at the appraisal and approval process and the decision making process need to be arranged</p> <p>Internal Training – for LCC staff involved in any of the processes e.g. LAG Development Officer, Appraiser, Finance (Claims)</p> <p>External Training – for project applicants e.g. business planning workshop, claims workshop</p>	<p>Early 2015</p> <p>Early 2015</p>

	Early 2015 and then ongoing
Project Visits	
Site visits to projects that have benefitted from RDPE funding. Available to LAG members and potential project applicants. Minibus to be arranged from County Hall to one or more projects over a half/full day. Also invite members of the press if appropriate.	Annual or bi-annual dependent upon demand

6. Financial plan

Pennine Moors allocation £1,708,000 however we should be allocated a lesser amount the programme will be scaled down accordingly.

6.1 Expenditure for each year, by measure

Policy Priority	2014/2015	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	Total
Enterprise - 45%	£0	£100,000	£150,000	£150,000	£100,000	£100,000	£53,310	£653,310
Farming - 15%	£0	£50,000	£50,000	£50,000	£50,000	£17,770	£0	£217,770
Tourism - 20%	£0	£50,000	£75,000	£75,000	£50,000	£25,000	£15,360	£290,360
Rural Services - 10%	£0	£0	£25,000	£50,000	£50,000	£20,180	£0	£145,180
Forestry - 5%	£0	£0	£12,500	£25,000	£25,000	£10,090	£0	£72,590
Culture & heritage - 5%	£0	£0	£12,500	£25,000	£25,000	£10,090	£0	£72,590
M & A	£21,350	£42,700	£42,700	£42,700	£42,700	£42,700	£21,350	£256,200
Total	£21,350	£242,700	£367,700	£417,700	£342,700	£225,830	£90,020	£1,708,000

6.2 Overall funding profile

6.3 Use of grants, procurement or other type of financial support

In order to enhance the flexibility of the Local Action Group to maximise the impact of resources it would wish to allocate resources through a mixture of direct grants and , where appropriate, direct commissioning of activity on key activities. As part of the project appraisal process the LAG Executive will be encouraged to seek to the appropriate level of match funding and other levered funding when considering project proposals.

References

Draft Rural Growth Strategy, Lancashire Local Enterprise Partnership (2014)

Rural priorities, Greater Manchester Local Enterprise Partnership (2014)

Economic analysis of Lancashire North and Bowland, Lancashire West and Lancashire Pennine Moors Local Action Group Areas and Strategic analysis of Lancashire's Rural Areas, EKOSgen (2014)

National Characteristic Areas Summaries (Natural England)

Consultation input from over 140 organisations and individuals (list available upon request)