

**MATTER 2 : SPATIAL VISION AND STRATEGIC OBJECTIVES****Key issue:**

***Is the Spatial Vision for Bradford justified, effective, locally distinctive and appropriate, reflecting the Sustainable Community Strategy, community views and issues raised during the preparation of the Plan, and are the Strategic Objectives appropriate, effective, justified and soundly based, and will they help to deliver the spatial vision of the Plan?***

**2.1 Spatial Vision:**

- a. Does the Vision set out an appropriate, justified, effective and locally distinctive Spatial Vision for the future development of Bradford over the plan period in a clear and positive manner, providing a sound basis for the strategic policies in the Plan and giving sufficient strategic direction for the area to 2030, with an appropriate balance between economic growth, sustainable development, infrastructure requirements, environmental and social matters, and between brownfield and greenfield sites;
- b. Should the plan period be extended beyond 2030?

**2.2 Strategic Objectives:**

- a. Does the Plan identify all the relevant Strategic Objectives, including those which have cross-boundary implications, and should any of the strategic priorities be amended to reflect the concerns of consultees?

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**2.1 SPATIAL VISION**

We conclude that the spatial vision set out at paragraph 3.3 is the appropriate vision for the plan and is justified by most of the evidence base and further supported by the evidence presented on behalf of the development industry. The vision does not align with many of the submissions of local community groups and representatives who are seeking to reduce the quantum of development proposed to be distributed to their sub areas. The community representations on Airedale and Wharfedale are particularly focussed on this aim and argue an implied re-distribution of growth to the urban areas beyond the high proportions already proposed in the CS.

We support the role of Bradford District as a key driver of the Leeds City Region (LCR) economy and its plan for growth which aligns with the Government's approach in the Framework and other policy documents and in their stated regional growth plan for Yorkshire and the Humber (presentation by the Prime Minister and the Chancellor to an invited business audience on the 5<sup>th</sup> February – see statement appended to this submission at appendix 1). The Local Enterprise Partnership (LEP) for LCR support Bradford as a growth centre and in their early work on the local economy and spatial policy approach agreed to adopt the spatial policy approach of the RSS with regard to the future role of Bradford as a key growth centre

in the LCR and regional economies. The stated policy in the RSS (LCR1:- Leeds City region sub area policy was to “transform the Regional City of Bradford with significantly increased growth in economic development, jobs, and homes through the renaissance of the city centre and development and regeneration elsewhere.” Realisation of this growth potential and the CS vision has been enhanced by the following key factors over the last couple of years:-

- The establishment of the West Yorkshire Combined Authority with current responsibilities for strategic transport delivery and funding in March 2013. Bradford have a number of key transport schemes included within the West Yorkshire Plus Transport Fund.
- The relative success of the LCR LEP in attracting growth funds from government having received the highest allocation in the most recent bids.
- The LEP, Combined Authority, constituent councils, and the newly expanded West and North Yorkshire Chamber of Commerce are pressing the Government for devolution of powers and funding in line with the agreements reached with Manchester and Sheffield City Regions. Agreement on this is expected very soon. The Chamber of Commerce has produced a report “Devolution in the Leeds City Region- A Manifesto for Growth”.
- Two major and related national initiatives are the plans for high speed rail (HS2 and HS3- the latter being the Trans Pennine route) and the coming together of the main provincial cities in “Connected-Cities “to argue for a re-balancing of growth and investment away from London and the south east allied to the connectivity benefits of high speed rail between Birmingham, Nottingham, Sheffield, Leeds and Manchester City Regions. In addition the Government have encouraged the formation of “One North” a transport authority which mirrors Transport for London.

The realisation of these changes are collectively transformational for LCR and Bradford as an identified growth area in the LEP plan. Sir David Higgins the Chair of HS2 has stressed the importance of getting local rail infrastructure improvements in place in advance of the arrival of HS2. The investment/construction start for HS2 in LCR is programmed for 2020 with the three year construction programme for the major Leeds interchange. Bradford will benefit from enhanced connectivity within the LCR and beyond.

The achievement of the 2030 vision stated at para 3.3 of the draft CS is welcomed. We recognise that much needs to be done by the Council, the LEP, Combined Authority and via public/private sector co-operation.

We agree with the Council that the socio-economic potential for growth in Bradford is considerable and that there are some key indicators, including that stated at para 3.8 with regard to the district having the fastest growing working age population of any district outside London over the last 20 years. We consider from our research and assessment of the plan evidence base that the higher levels of growth contained in the Further Engagement Draft of

## MATTER 2: Spatial Vision and Strategic Objectives

the CS can be achieved alongside the retention and enhancement of the environmental qualities of the District in terms of heritage, landscape, biodiversity and recreational opportunities.

While we deal with the area visions in our responses to subsequent matters we would make the following introductory comments with regard to the visions for the Airedale and Wharfedale sub areas.

**AIREDALE:-** We support the vision for Airedale and we consider that this continues the strategy which is fully articulated in the Airedale Master Plan (end date 2015). Airedale was identified as a growth area in the RSS and the Master Plan was produced in response to this strategic lead. Much has been achieved in relation to the specific aims and objectives of the Master Plan but much remains to be done. Airedale will continue to be a key contributor to growth in Bradford and its importance is identified in the LCR growth plans.

**WHARFEDALE:-** We support the growth vision for Wharfedale settlements but are very concerned that this vision is not translated into a set of positive policies which will allow that growth to be fully realised.

## **2.2 STRATEGIC OBJECTIVES:-**

We support all of the objectives 1-16. We note however that objective 1 of fully exploiting the towns along Airedale and Wharfedale as “dynamic locations of choice for housing and economic growth”. This objective is fully supported by the development industry but its realisation will be hampered by the proposed restraint policy SC8 based on a precautionary approach to protecting bird habitats which is not based on sound evidence. In this context we also note that objective 15 advocates a more positive management based policy to biodiversity enhancement. This aligns with the Framework policy content and our own and others submissions. Policy SC8 has a major direct disconnect with this objective and indirect disconnects with other objectives.

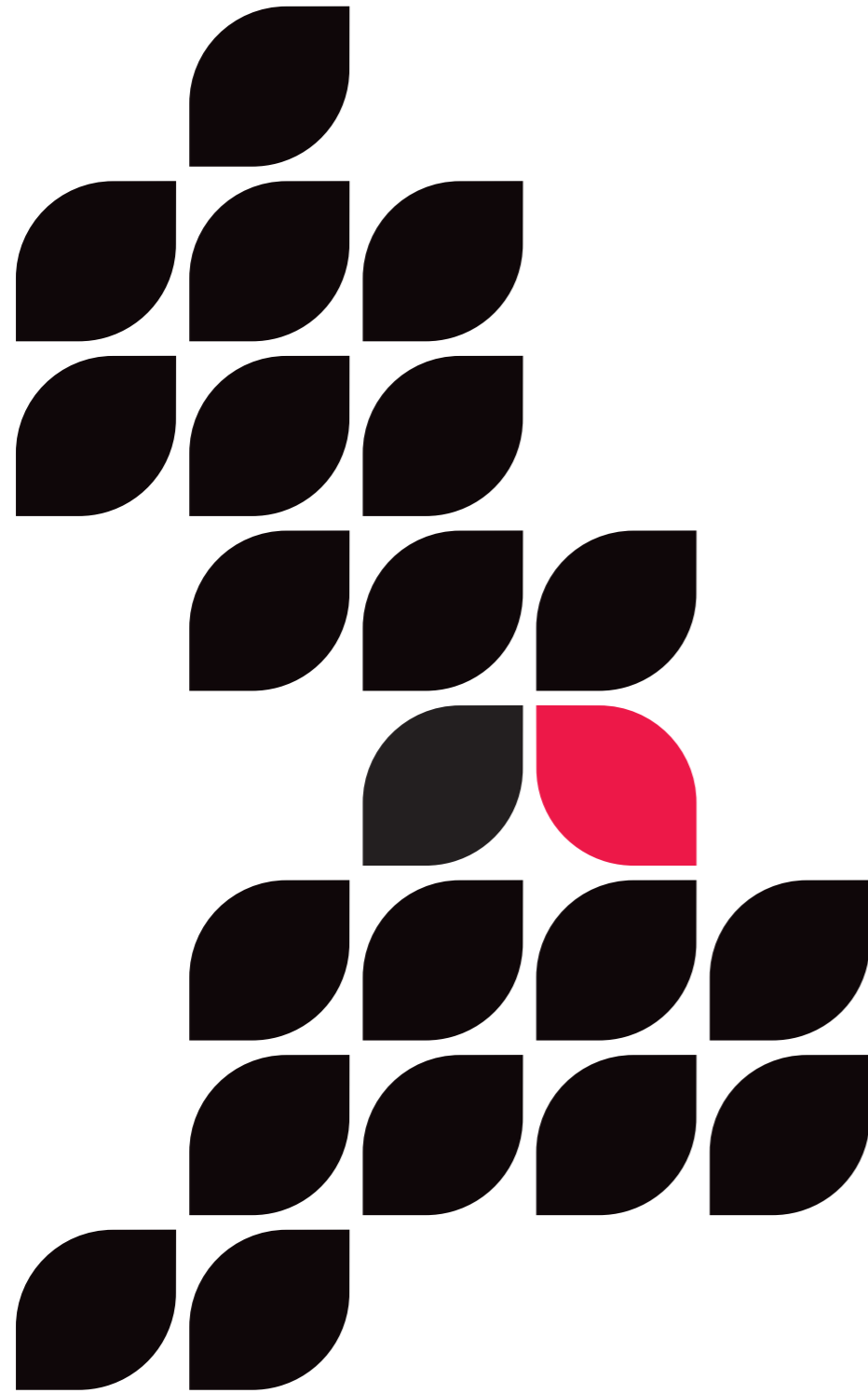
**APPENDIX ONE**



A MANIFESTO  
**FOR GROWTH**  
DEVOLUTION IN THE LEEDS CITY REGION



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# Devolution

## DEVOLUTION IN THE LEEDS CITY REGION - “A MANIFESTO FOR GROWTH”

The West & North Yorkshire Chamber of Commerce represents the interests of over 2,500 businesses in the region. Membership of the Chamber is diverse and reflects all sizes and sectors of organisation across services and manufacturing. Membership includes a large number of exporting businesses who collectively contribute over £504M<sup>1</sup> to this country's balance of payments. The Chamber's membership collectively employs over 270,000 people across our region with a very wide range of skills and expertise, including a large number of apprentices and graduates.

The Chamber supports the ambition that this region should aspire to be a net contributor to UK plc in turn playing its part in bringing down the national debt. Business owners recognise the need to ensure that income outstrips expenditure and that a company burdened with debt has limited options to grow.

Following the independence referendum in Scotland and commitments made to the Scottish Parliament, all the major political parties have agreed to discussions around decentralisation and devolution for the English regions. The Chamber believes that this is a once in a generation opportunity to create more powerful economies outside of the capital. The UK remains one of the most overly centralised countries in the developed world. As of 2011 the proportion of tax set at a sub-national—local or regional—level was at most 2.5% of GDP. This compared with 15.9% in Sweden; 15.3% in Canada; 10.9% in Germany; and 5.8% in France—often seen as a highly centralised state<sup>2</sup>. The Chamber believes that centrally imposed, ‘one size fits all’ policies stifle local creativity and that it is the institutions and organisations based in the region which are closest to the economy and which have the ability to create truly game changing interventions.

As the wealth generators and job creators in the region we believe that the views of business should be taken into account to collectively create the environment for economic success. The region has many strengths from which to build and implementing business friendly policies which facilitate growth will assist the Chamber's members to play their part towards the collective ambition of debt reduction.

In consultation with members the Chamber found the following themes have emerged which we would like to see addressed through devolution negotiations with Government.





# Principles

## DEVOLUTION PRINCIPLES

In order to inform the debate about devolution in Leeds City Region it is important that businesses understand some of the 'guiding principles to drive economic growth' (adapted from Centre for Cities<sup>3</sup>)

### MORE OPPORTUNITIES FOR EVERY PLACE AND ALL OF OUR COMMUNITIES

All tiers of government require more devolved powers and greater funding flexibility and certainty to drive growth. This is about empowering city-regions to respond to local economic needs and support the economy. Devolution policy and geography need to be flexible and adaptive to local circumstances.

### POWERS TO DRIVE GROWTH AT THE MOST EFFECTIVE SCALE

Devolution is about putting the appropriate governance, incentives and tools in place, at the right level, to stimulate economic growth. Some powers need to be devolved from Whitehall to local authorities. Others need to be passed down from Whitehall or passed up from authorities to city-regions, and some need to stay at national level.

### STRONG DEMOCRATIC ACCOUNTABILITY

Directly elected representatives at the scale of the city-region are necessary to ensure they are accountable to the public, and that local knowledge and preferences shape city-region policy for more effective and efficient governance for the city-region economy. It is not about creating unnecessary layers or new bureaucracy, although some positions or powers may shift to avoid duplication.

### SPENDING DECENTRALISATION OR FISCAL DEVOLUTION

Fiscal devolution and spending decentralisation are not synonymous. The relaxation of central Government's control over spending programmes (e.g. City Deal) on its own it is not fiscal devolution. This is the decentralisation of spending. 'Full' fiscal devolution involves the ability of Cities to have local tax and borrowing powers in order to create investment and requires much stronger governance and accountability arrangements<sup>4</sup>.

# Workforce

## CREATING A MODERN ADAPTABLE WORKFORCE

Talent is critical for economic success and is a key factor for companies making investment decisions about their businesses particularly growth and locational choices. With the economy strengthening across our region the Chamber has noted an increase in the number of companies citing recruitment difficulties (WNYC QES Q3 2014), a phenomenon which has been present since mid-2013.

The issue of skills is being compounded by the challenges of an ageing workforce with the UK Commission for Employment & Skills (UKCES: Working Futures Report 2010 -12020) suggesting that for every new job created across the country over the coming decade there will be ten jobs available to replace current workers as they retire. In the global race for talent this region cannot be allowed to fall behind. The Leeds City Region is home to ten universities, including two from the prestigious Russell Group, along with high quality FE colleges however retention of graduate talent remains a weakness with substantial leakage to other locations most significantly London.

According to the 2014 British Chambers of Commerce Workforce survey, when recruiting 76% of companies say "lack of work experience" is why young people are unprepared for the world of work, however less than half (48%) actually offer work placements. Just 39% of companies employ apprentices yet another 32% say they would consider offering these roles in the future.

### FOLLOWING CONSULTATION WITH MEMBERS, PRIORITY ACTIONS INCLUDE:

- a. Provision of a one stop shop for business- education engagement, which would facilitate
  - i. Work placement clearing house
  - ii. Promotion and recruitment of business governors for schools and colleges
  - iii. Universal, consistent, mandatory and independent careers advice across the city region
  - iv. Support for SMEs seeking apprenticeships
- b. Locally sourced and supported STEM subject teacher engagement programmes
- c. Capital investment and the development of innovative delivery models to support all age education and training in manufacturing, ICT and engineering
- d. Strategic level engagement with DFE
- e. Incentives to support companies providing work placements
- f. Student loan repayment grants to retain key graduate skills
- g. Funding for student transport to enable access to specialist provision across the region

The Chamber notes that provision already exists for some of the points mentioned above; we would expect to see a coming together and sharing of best practice to provide consistency across the region. We must aspire to provide the best education-business engagement in the UK.





# Infrastructure

## IMPROVING ECONOMIC INFRASTRUCTURE WHICH FACILITATES GROWTH

The North has the capacity to support much greater levels of economic activity. There is available land for development, at a cheaper cost, than many parts of the South. In addition, development can be delivered without putting the same pressure on environmental resources, such as water. Inadequate transport infrastructure must not be allowed to remain a constraint on this development. Our ports and airports also have capacity to expand their activity without the need for the scale of infrastructure development in the South – and can also take pressure off some such assets elsewhere. Road and rail connections should support this.

The Chamber has played an active role in lobbying for increased infrastructure investment and remains frustrated by the centralised nature of control. If the government is serious about rebalancing the UK economy then the north and the Leeds City Region in particular must have access and control over meaningful funds. The Local Growth Fund allocation and the creation of the LCR Transport Fund are both welcome and the programmes they are set to fund should contribute to growth, however the Chamber feels that there should be the opportunity for further financial freedoms to enable investment in infrastructure. For example, longer-term funding settlements for strategic capital spending, incentives for Local Authorities to pool income streams, powers to levy tax precepts and less restriction on borrowing and fund raising in the capital markets. These new fiscal powers for city region investments also need to be linked with national investment programmes to maximise the impacts and efficiency through better integration of major capital schemes.

High speed rail is a project of national significance, connecting the major northern regions efficiently with the midlands and the south will boost the UK economy. Whilst responsibility for delivering HS2 and HS3 lies beyond the fiscal control of the Leeds City Region, if this region is to capitalise on the improved and increased capacity this new infrastructure will bring then there must be significant local upgrades to current rail infrastructure.

Strategic town & country planning is crucial to the facilitation of growth and business would welcome a consistent approach across the region. The Chamber would like to see this function listed within the responsibilities of a regional body such as the West Yorkshire Combined Authority.

THE FOLLOWING PRINCIPLES SHOULD DIRECT DECISIONS OVER STRATEGIC TRANSPORT PRIORITIES FOR THE LEEDS CITY REGION:

- The focus should be on strategic routes connecting markets, with a medium-term plan to deliver upgrades needed. Too often, funding has been diverted in smaller packages to more localised schemes, for short-term advantage, that have not delivered transformative economic gains. This is an opportunity to ensure commitments to more complex, but ultimately more beneficial projects. These will centre around cross-Pennine road and rail links, and connections from this corridor to the major population centre of the North East.
- International links from the North should be prioritised. One of the great advantages the North has is the capacity to put more traffic through ports and airports without the need for major expansion of these assets, as would be required in the south. To ensure this can be maximised, road and rail connections to our ports and airports must be improved. This is essential to support the Government's ambitions for export growth.
- As implied above, this is an opportunity to break out of the London-centric nature of the UK's transport system, in which almost all major road and rail routes connect regional cities to London far more effectively than to each other. Connections between Northern markets should therefore be emphasised, as well as to other cities in the Midlands and, crucially, to Scotland.
- There should be sufficient attention paid to freight transport, particularly given the strength of northern economies in manufacturing and the key role they play in local, regional, national and international supply chains.
- Plans should complement delivery of the Y-shaped HS2 network, with scope for further extension of this network to the North East and investments in existing lines.
- The benefits of these investments must go beyond Leeds City Centre, other major population and industrial centres must be adequately linked in to improved transport networks.
- Through this process, the region working with other northern cities, should collectively establish a case for future investment decisions to shift from short-term relief of congestion to long-term expansion of capacity. The former approach, which has resulted in an obscene over-concentration of investment in the South East, merely creates a vicious cycle of more expensive investment for diminishing returns. The latter would lead to a better balanced economy and stronger long term returns for UK plc. This approach should be embedded beyond the lifetime of this individual strategy alone.
- Policy measures should support the value of these investments in Northern economies. These include reforms to air passenger duty which disproportionately hits connections to regional airports, and design of rail franchises to support investment in rolling stock.
- Support for the delivery of the above principles could be achieved through compulsory purchase powers where appropriate and if necessary divesting such powers within a city region development corporation







# Support

## POLICIES AND PROGRAMMES WHICH SUPPORT BUSINESS GROWTH

Dynamic regions create the environment for business formation and growth and this includes growth into overseas markets. Regions must also make themselves available and accessible to foreign direct investment by providing an efficient and effective marketing programme supported by regional advocates. Supporting business growth requires structures which are both consistent and have longevity, the region has too often seen well intentioned though ultimately unsuccessful short term programmes.

The public sector also has a significant role to play in supporting growth in the regional economy through its procurement activities and some good work has taken already place through the Yortender portal. The Chamber feels that more could be done to encourage smaller businesses to compete in this market; suggestions might include greater facilitation of consortia bidding in order to remove the substantial hurdles small businesses face when coming together to compete against larger providers. Freeing up the public sector to take greater account of local economic and social impact through its procurement activity so far as is consistent with European Law might facilitate further economic growth especially amongst smaller businesses.

### PRIORITIES INCLUDE:

- a. Support to develop and support manufacturing supply chains
- b. Export support and advice, continuity of funding for the 'We are international' programme
- c. Start-up business advice hub and enterprise support led by the private sector and working through Chamber network as set out in the Heseltine Report 'No Stone Unturned for Growth'
- d. Inward investment 'soft landing' package (including access to supply chain opportunities for regional businesses to support incoming investors)
- e. Support for SMEs to access public sector supply chains, e.g. consortia bidding
- f. Joined up approach to innovation support



# Delivery

## UNLOCKING THE REGION'S POTENTIAL

In order to deliver the themes above, sustainable for the long term and free from central control then this region needs to have the ability to manage or raise finance locally. However in order to do this the Chamber recognises that there must be appropriate and democratically mandated governance structures in place to ensure transparency and probity.

### FINANCE RAISING POWERS.

This falls into two categories, a) retention of existing business taxes e.g. business rates, development taxes and b) local tax raising powers such as business rate supplements. The Chamber would wish to see implemented a business ratepayers vote on the funding of local economic strategy including a vote on changes to local business taxation, ensuring that plans for the Leeds City Region's future have the support and input of the whole business community.

### GOVERNANCE.

There is much discussion on this subject and the Chamber feels that responsibility lies with our politicians to ensure a settlement which enables the delivery of the objectives listed in this document. What is clear from business is that they want to see strong and visible leadership with a commercial approach, supported by a strong board. This board should include representation from business.

The Chamber recognises the formation of the West Yorkshire Combined Authority but believes that its geography should mirror that of the Leeds City Region. With its establishment thought should be given to the passing up of some powers from local authorities, for example strategic planning policy.

Whichever model of governance is settled on the Chamber would wish to see greater scrutiny over decision making and a more inclusive approach to business engagement. The view currently is that the private sector is asked to support a short list of propositions developed by the public sector rather than be involved from the start to establish and agree outcomes.

The Chamber stands ready to play its part in articulating business views on proposals and helping to develop policy. We look forward to further meaningful engagement.





# References

## FURTHER READING

House of Commons Communities and Local Government Committee - Devolution in England: the case for local government, First Report of Session 2014-15 Report, together with formal minutes relating to the report Ordered by the House of Commons, HC 503, Incorporating HC 1018, Session 2013-14, Published on 9 July 2014

City Growth Commission - Powers to Grow: City Finance and Governance, September 2014

Phillip Blond and Mark Morrin, Respublica - Devo Max - Devo Manc: Place-based public services, September 2014

Centre for Cities - Economic growth through devolution, Towards a plan for cities and counties across England, November 2014

KPMG, Magnet Cities, 2014

AspinallVerdi, English-City Regions Devo Max, 17 September 2024

## REFERENCES

1 This figure does not include the value of exports to the European Union for which documentation is not required. 74% of Chamber members who export list the EU as one of their overseas markets so the true value will be significantly higher than the number reported here.

2 House of Commons Communities and Local Government Committee: Devolution in England: the case for local government, First Report of Session 2014-15 Report, HC 503 Incorporating HC 1018, Session 2013-14, Published on 9 July 2014

3 Centre for Cities: Economic growth through devolution, Towards a plan for cities and counties across England, November 2014

4 House of Commons Communities and Local Government Committee: Devolution in England: the case for local government, Published on 9 July 2014, page 7



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