

By Email to: wyconsultation@ipsos-mori.com

29 July 2020

FAO: West Yorkshire Combined Authority

West Yorkshire Combined Authority Devolution Deal: Public Consultation

Thank you for allowing the opportunity for interested parties to provide observations on the devolution deal for West Yorkshire.

The Home Builders Federation (HBF) is the principal representative body of the house building industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational public limited companies, through to regional developers and small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year. Recent research by the Government has estimated that housebuilders have made a significant contribution to the nation's infrastructure, providing some £21 billion towards infrastructure of all types including affordable housing since 2005. In 2018/18 private sector housebuilders provided 49% of all affordable housing including 57% of all socially rented homes.

The HBF welcomes the decision to progress a devolution deal for West Yorkshire, including the decision to elect a Metropolitan Mayor to represent collectively the people of the five constituent local authority areas. Representation through an elected Mayor will increase the visibility of the region politically and improve and enhance planning for investment and growth.

We have considered the details of the devolution deal as set out in the Devolution Deal signed with Government and in the document titled *Scheme setting out proposals for changes to the governance and functions of the West Yorkshire Combined Authority*. The following response focuses on the areas of land use planning (a Mayoral power) and housing and adult skills training (Non-Mayoral powers exercised by the Combined Authority) as these areas are the ones that interest chiefly the HBF and its members. These areas will have a bearing on the business of housebuilding.

Mayoral functions:

Housing and planning

The Devolution Deal confers upon the Mayor:

- I. Housing and land acquisition powers to support housing, regeneration, infrastructure and community development and wellbeing
- II. Power to designate a Mayoral Development Area and then set up a Mayoral Development Corporation
- III. Statutory spatial planning powers to produce a Spatial Development Strategy

HBF welcome the conferral of these powers. We would like to make the following observations.

Statutory spatial development strategy

The ability to plan for, and deliver, enhancements and improvements to the regional transport network through, for example, HS2 and Northern Powerhouse Rail, and to attract public and private investment to enable this, depends upon the city region having a clear plan for the longer term. A statutory spatial plan will provide the practical blueprint to deliver the objectives of the transport strategy. It will help considerably to underpin economic investment decisions in the region. HBF has worked previously with Barnsley Council (a member of the Sheffield City Region Combined Authority) about lobbying Government for a parkway stop on HS2 between Sheffield and Leeds in Barnsley and we understand that Wakefield Council is interested in something similar. Both these local authorities have made significant contributions to increasing housing supply to meet the needs of local people.

A statutory spatial plan will enable growth areas / corridors to be identified on a key diagram. These growth areas / corridors will correspond to the transport strategy. Financial resources can then be directed to these areas.

A statutory spatial plan will enable housing needs to be met in full within the combined authority area, especially if there are any local authorities that are underbunded and are confronted with a difficulty meeting their housing needs in full. A spatial plan will also allow the Mayor to deliver against possible manifesto pledges.

We agree that the plan should be a statutory spatial plan. A non-statutory plan would represent a waste of time and resources as it would place no binding commitments on the constituent local authorities. By contrast, a statutory spatial plan will become part of the development plan for the authorities of West Yorkshire.

It is the HBF's hope that the new Mayor will not delay in preparing a statutory spatial plan. This could be prepared, examined and adopted within the first Mayoral term subject to securing the necessary political agreement. This is currently the ambition of Liverpool City Region with its own spatial strategy. HBF would be very happy to assist with this process as we have extensive experience with the preparation and examination of spatial development strategies elsewhere in England. The successful preparation of a statutory spatial plan would send a firm signal to Government that the combined authority and the constituent local authorities are taking devolution seriously and such combined authorities are likely to attract further investment.

In common with other mayoral combined authorities with spatial plan-making powers, the scheme of governance requires the unanimous agreement of the constituent council representatives to allow the spatial plan to progress to examination and before adoption. HBF recommends that the West Yorkshire Combined Authority reconsiders this approach. This condition may make it extremely difficult for the Mayor progress a spatial strategy. Since the Mayor will already have a mandate from the people of West Yorkshire, we think this is unnecessary. The Mayor should be able to advance a strategy without the unanimous agreement of the five constituent councils. Instead we recommend that only a majority should be required, which is the case with the Greater London spatial plan.

The ability to progress a spatial plan by the Mayor and the combined authority may depend on the availability of resources – staff and a budget. If this is an obstacle, HBF would be happy to support the Mayor in seeking resources from Government to enable progress to be made.

If the Mayor chooses to assert this power and progress a spatial plan, this should not cause any delay to local plan preparation. Local plans will need to be reviewed and updated every five years so by the time the spatial plan is adopted it will be necessary to replace the local plan to bring this into line with the West Yorkshire spatial plan.

Mayoral Development Corporations

HBF supports the conferral of power on the Mayor to be able to make Development Corporations. To ensure that these have the support of the public, HBF considers that these should be indicated in the spatial plan before they are made. The examination of the spatial plan will ensure that the objectives of any development corporations complements wider land use planning objectives.

For the moment, the ability to make a Mayoral Development Corporation (MDC) requires the agreement of the local authority or authorities within which it will be located. In due course, HBF, considers that it would be more effective if the Mayor had the same powers as the Mayor of London and is able to make MDCs without necessarily securing the agreement of the local authority. The Mayor will have a mandate from the people of west Yorkshire to do so. Proposals to make an MDC should be signalled through the spatial development strategy.

Housing and land acquisition powers to support housing, regeneration, infrastructure and community development and wellbeing

HBF welcomes the conferral of these powers. Decisions on which regeneration projects to pursue will be better supported and justified if these are set out in a spatial plan that establishes a higher rationale for these proposals. This will show how the regeneration initiatives will complement the wider development objectives.

Non-Mayoral functions

Strategic Infrastructure Tariff

Like some other combined authorities (e.g. West of England and Greater Manchester), the devolution deal allows West Yorkshire to make a Strategic Infrastructure Tariff (SIT). HBF welcomes the conferral of this power on the combined authority. This would allow the combined authority to levy monies to contribute towards strategically important infrastructure projects, such as transport infrastructure improvements. Improving transport connectivity within city regions through new road and rail building and modernisation is widely acknowledged as being key to improving productivity. Such investment could assist greatly with regeneration and open new growth areas.

Whether this will need to have the backing of all of the constituent authorities is unclear from the scheme of governance. We assume it will need the unanimous support of all five local authorities. This could be an obstacle to establishing a SIT. We note that outside of Greater London (and its Mayoral Community Infrastructure Levy), no SIT has so far been established even though the ability to levy one is a power conferred upon several mayoral combined authorities.

Strategic Place Partnership

We note the ability of the Combined Authority to establish a Strategic Place Partnership through working with Homes England. This is intended to identify opportunities for housing delivery. HBF considers that this will need to be articulated through the spatial development strategy to demonstrate how this partnership will contribute to meeting the wider housing requirements of the West Yorkshire area. The success of the Strategic Place Partnership should not be pursued to the exclusion of other planning objectives and maintaining housing delivery across the whole West Yorkshire sub region area.

HBF would welcome the opportunity to discuss with the Combined Authority its proposals for planning and regeneration in connection with housebuilding. Recovery planning will also be essential. The Combined Authority may want to consider establishing a housing advisory

panel to help shape thinking in this area. HBF would welcome the opportunity to advise the Combined Authority on policy ideas and proposals.

Adult skills

The Devolution Deal allows for the devolution of functions relating to adult education and the devolution of the 19-year old plus adult skills budget.

HBF supports the devolution of this powers and functions in this area. However, any activities by the combined authority relating to supporting the development and acquisition of construction skills for housebuilding should ideally be informed by a conversation with the HBF Skills Partnership. This is necessary to ensure that any interventions proposed are targeted at addressing the skills needs of employers operating in the region and that policies are informed by an understanding of the availability, content and quality of local courses. We would welcome this at the earliest opportunity as apprenticeships are under threat as the CITB scales back its training programmes owing to covid-19 emergency.

We advise the creation of a Construction Skills sounding board by the Combined Authority that is made up of representatives of the construction sector, including housebuilders, to discuss skills needs and review the availability and effectiveness of local construction skills courses. This is an important stage in developing policy responses to skills provision.

HBF would welcome the opportunity to discuss skills training and apprenticeships in the housebuilding construction sector with the Combined Authority.

I hope these comments are useful. HBF would be very happy to meet with the Combined Authority to discuss any aspect of these representations.

Yours faithfully

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