Local Government North Yorkshire and York

5 October 2018

York, North Yorkshire and East Riding Local Enterprise Partnership Update

With regard to the LEP geography review:-

- the YNYER LEP's response is at Appendix 1;
- the Leeds City Region Enterprise Partnership's response is at Appendix 2; and
- the Humber LEP's response is at Appendix 3.

James Farrar Chief Operating Officer York, North Yorkshire and East Riding LEP

Annex B: Geography proposal response template

LEP Name: York, North Yorkshire & East Riding

Please outline the LEP's plans to address the geography recommendations below, noting the guidance provided by the Unit. In your response, you should outline any key milestones, risks and issues.

Proposals should be submitted to <u>LEPpolicy@communities.gsi.gov.uk</u> **no later than 28 September 2018**, copying in your Area Lead.

Geography

Recommendation:

As Local Enterprise Partnerships are central to future economic growth, Government will ask Local Enterprise Partnership Chairs and local stakeholders to come forward with considered **proposals** by the end of September on geographies which best reflect real functional economic areas, remove overlaps and, where appropriate, propose wider changes such as mergers. ... These proposals should be submitted by 28 September 2018. Government will respond to these proposals in the autumn and future capacity funding will be contingent on successfully achieving this.

Information required in geography proposal:

All LEPs should outline their response to the Government's recommendations on geography no later than **28 September 2018.**

Those LEPs proposing geography changes should provide detail of the proposed changes. In your response you should outline why these changes would be suitable for your local area. These proposals should include timescales for the transition to different geographies. LEPs should work with the LEP Network and neighbouring LEPs to ensure a shared understanding of the geography changes being proposed exists.

For LEPs who are proposing no changes you should respond briefly outlining why no change is required. For LEPs in MCA areas, these proposals should consider the current relationship between the MCA and LEP geographies. All LEPs should aim to have revised geographies (if required), by spring 2020.

LEP response

Please outline the LEP's response to the recommendation. The response should consider the information required, outlined above:

The York, North Yorkshire & East Riding LEP Board met on 14 September to consider the options and unanimously agreed that the geography that will deliver the best long term outcomes for the local area is to retain the current configuration of York, North Yorkshire & East Riding, including the overlaps with Leeds City Region and Humber LEPs. This arrangement is locally understood, is strongly supported by business and will deliver the best outcomes for the areas concerned.

Our parameters

In making this response to the LEP review we have carefully considered the following;

- LEPs must reflect functional local economies;
- the geography of the LEP must provide the most distinct compelling strategy to drive prioritisation of investment in the future;
- any proposals fit with future devolution and the geography of Combined Authorities;
- LEPs must have a transparent governance model which ensures independence of the LEP and supports decision making to reflect the geography of the area;
- LEPs should build on the successful partnerships that have been developed over the past few years and that are able to deliver from day one;
- LEPs must be able to deliver the best outcomes for local people, places and UK plc.
- the arrangements must be deliverable

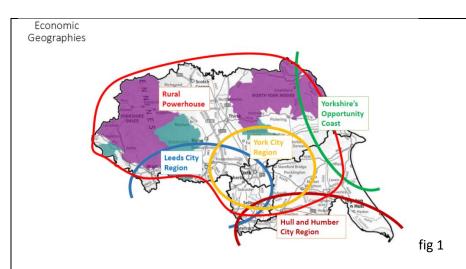
In addition we have been informed by the desired parameters set out within the LEP review, including:

- a. No overlapping geographies
- b. An optimal size of 1m+ population
- c. Ideally don't want a single county geography
- d. A move towards LEPs and Combined Authorities having the same geography.

Our current LEP Geography

The current LEP geography of York, North Yorkshire & East Riding comprises two unitary, one county and seven district councils. The LEP footprint overlaps with Humber LEP (East Riding of Yorkshire Council) and with Leeds City Region LEP (City of York Council, Harrogate Borough Council, Craven District Council and Selby District Council).

Whilst on the face of it slightly complex, this arrangement reflects the demonstrable economic geography of our area, works well and is especially sensitive to the needs of overlapping areas. Our functional economic geographies do not neatly follow Local Authority boundaries (which were constructed many years ago and do not, themselves, always reflect coherent economic entities). Put simply many Local Authorities (and especially the businesses they contain) genuinely look two ways when considering their role in the local economy. The map (fig1) below summarises the actual functional economies within York, North Yorkshire & East Riding demonstrating how invariably, the edge of one functional geography overlaps with another.



Boundaries creates impossible choices for local authority leaders when faced with the need to select one LEP with the possibility in future of reduced performance.

Our options

In making our recommendation, informed by the parameters set out above we have considered a number of options:

Hull, East Riding, York and North Yorkshire LEP area.

- If Government adheres strictly to its position that overlaps will not be allowed, then economically you cannot separate Hull and East Riding. City of Hull is circled by Humber estuary and East Riding of Yorkshire. That, however, potentially significantly underplays the role of East Riding in supporting and driving growth along Yorkshire Coast, in rural areas and within the City of York. This might suggest consideration of including Hull within the current York, North Yorkshire and East Riding LEP.
- However it is concluded that such a configuration would neither be economically desirable
 or politically deliverable. The importance of a Humber estuary/port economic area which
 is well understood with an area that is clearly very distinct. It is accepted that if a choice
 has to be made then East Riding would select to become a member of Humber LEP,
 leaving York and North Yorkshire.

York and North Yorkshire LEP area

- Such a configuration has its benefits and, assuming the move of East Riding described above, would reflect the fact that our current remaining overlaps with Leeds City Region LEP are themselves outside the non-mayoral West Yorkshire Combined Authority. A move towards coterminous boundaries between LEPs and Combined Authorities would suggest a West Yorkshire LEP with York, Harrogate, Craven & Selby remaining with York & North Yorkshire.
- However this would be difficult to deliver both politically and operationally with City of York a non-constituent member of West Yorkshire Combined Authority and a member of the West Yorkshire Plus Transport Scheme. Also York, Harrogate and Craven have expressed concerns about losing their connectivity to West Yorkshire and a strong preference for maintaining links to Leeds City Region. Consequently a York and North Yorkshire LEP may be difficult to deliver without some clear collaborative agreements between these areas and West Yorkshire.

North and West Yorkshire LEP area

- In order to address the above matters, we also considered a merger with Leeds City Region to create a Super LEP across North & West Yorkshire. This potentially delivers benefits of scale through bringing together rural, coastal and city region agenda's to create a large LEP covering 3.1m people, 3992 square miles and with an economy of £70bn LEP. However it also presents significant political and operation risks that might weaken both current LEPs.
 - Loss of local engagement: Local Enterprise Partnerships are most successful where they engage effectively with local partners, creating opportunities, attracting investment and delivering impact on the ground. The operating and business environment in a large rural area is very different to a metropolitan region and both York, North Yorkshire & East Riding LEP and Leeds City Region LEP have developed successful, yet very different, operating models to reflect their local environment. Indeed a criticism of the former Regional Development Agencies was their perceived concentration of decision making in a single urban centre remote from local places.

For example, York, North Yorkshire & East Riding have developed a strong private sector led and highly integrated model with local partners across the region. A series of secondments straddle the LEP and local authority partners, whilst private sector LEP Board members actively work with local partners to develop new opportunities and commercial and investable propositions. This public/private partnership approach has been significant in delivering a high performing LEP and real outcomes, locally across the region and its style of working has attracted national plaudits

There is concern a merger will undermine both these positions.

O Difference in scale resulting in risk to investment: The spatial priorities for Leeds City Region and York, North Yorkshire & East Riding illustrate this issue perfectly. 'Big' in York, North Yorkshire & East Riding would be considered small in Leeds City Region and this presents real challenges in ensuring investment in rural and coastal areas is not compromised through creating a Super LEP. The diagrams below (fig 2 and fig 3) show how major growth corridors for YNYER are in the overlapping geography and yet these are not considered spatial priorities for Leeds City Region.

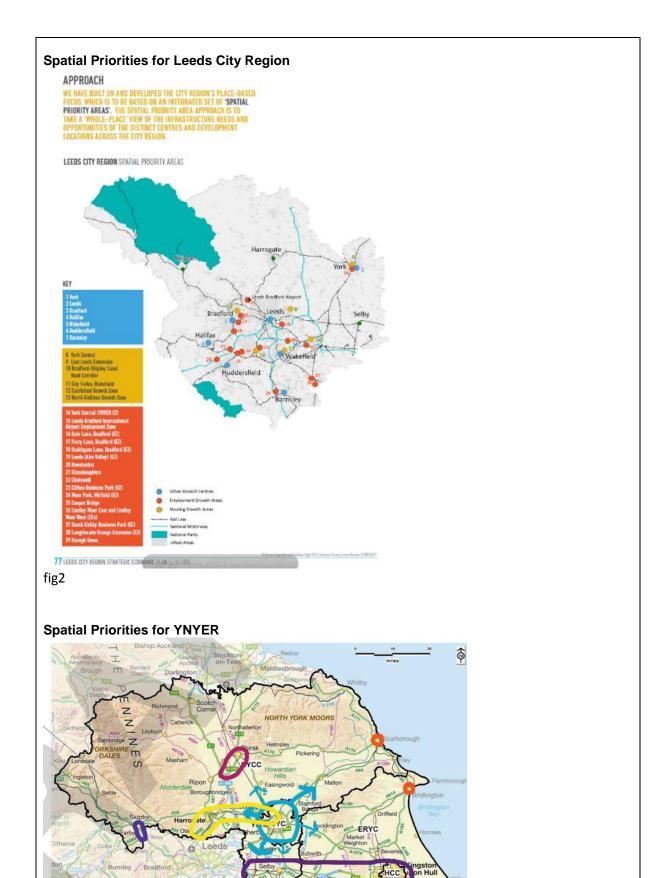


fig 3

- Complicated Governance reducing performance: The primary issues around governance is that West Yorkshire Combined Authority does not have jurisdiction over North Yorkshire and also Independence of the LEP Board.
 - Leeds City Region have moved to a model whereby the LEP is fully integrated within West Yorkshire Combined Authority (WYCA) and WYCA are the ultimate decision maker for investments.
 - A merger to create a North & West Yorkshire LEP would require a move away from this model reflecting that West Yorkshire Combined Authority does not cover York and North Yorkshire.
 - It would be unacceptable for WYCA to be the decision maker for investments in local authority areas outside their area of jurisdiction. In simple terms, the local authority where a place based investment is located, must be part of the decision.
 - There are currently no plans for a North & West Yorkshire Combined Authority.
 - Government have indicated they are not supportive of a federated model which would allow place based decisions to be geographically split.
 - The 2017/18 Annual Review of the York, North Yorkshire & East Riding LEP concluded the YNYER LEP have strong governance, robust project selection and investment decision-making processes in place.

Considering the above, and that 'LEP Decisions' are just one part of the business of West Yorkshire Combined Authority, merging the two LEPs could create a complicated governance structure which undermines performance of both areas.

Independence of the LEP in decision making has been at the heart of the successful model in York, North Yorkshire & East Riding. North Yorkshire County Council, as Accountable Body, have approved the Assurance Framework and provide the legal and financial checks as part of the due diligence; however the LEP and its sub-boards have full autonomy to make investment decisions. This transparent, streamlined governance has been at the core or our successful track record of delivery.

• Clarity around funding:

It is accepted that a driver in the LEP review is to provide greater clarity and transparency around funding. This move is supported and reflects the challenges for Local Authorities facing in two directions.

It is proposed a joint working group across overlapping LEPs to identify opportunities for greater collaboration and to provide clear proposals to government around allocation of funding.

Our preferred Option

York, North Yorkshire and East Riding LEP - the case for retaining an overlapping geography

After considering very thoroughly the options set out above, the LEP Board firmly believes that retaining the existing LEP boundary with overlapping boundaries is the option that will deliver the most successful outcomes for our economy. However, this is not to imply a case is being made for simply the status quo. Rather, it will use existing structures to deliver local strategic priorities whilst forging even stronger links with our neighbouring LEPs to achieve stronger collaboration in those activities where scale brings obvious benefit.

The case for retaining overlapping geographies is based on:

- 1. Economic Case
- 2. Operational effectiveness

Economic Case

Government has been clear. Local Industrial Strategies should be local, place based and distinctive.

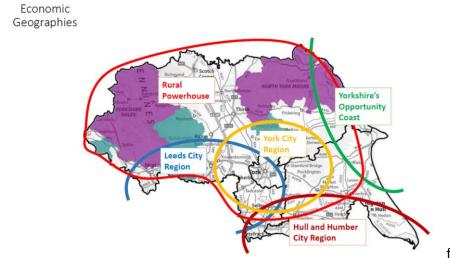
A core question is will this be best delivered through a large and diverse LEP or through smaller LEPs collaborating together and specialising in specific agenda's.

It's clear that with Brexit looming, the rural community is likely to face a period of dramatic change and upheaval, probably the greatest change it has seen in over 40 years. Our LEP has clear focus and expertise in this area and it would seem very poor timing to lose this capability now when it may be needed most.

It is our firm belief that overlapping LEPs with clear and distinctive specialisms accompanies by a formal collaboration around common agendas (a 'confederated' approach) will best deliver Local Industrial Strategies. These will be more compelling, distinctive and, importantly, will deliver local engagement, local investment and much greater return for public investment.

As explained above, functional economic areas do not follow local authorities in our geography and, therefore, drawing artificial boundaries based on local authority areas whilst looking neat would fail to reflect the reality of true economic areas.

Fig 4 below summarises the practical economic geographies in our LEP area.



For example, Harrogate Borough covers the key towns of Harrogate and Knaresborough which do have strong links to Leeds both from an economic and commuting perspective. However the borough also includes the market towns of Ripon, Masham and Pateley Bridge and a large rural economy whose economic footprint stretches into North Yorkshire and the Yorkshire Dales. The critical point is that Harrogate Borough Council, being in two LEPs with different functional economic geographies and specialities, is able to look both ways in addressing issues and looking to economic opportunities. i.e the Leeds economy in terms of where people commute to work, where (Leeds based) supply chain businesses might locate and then the North Yorkshire rural economy in terms of where agri tech, food production, tourism and rural isolation issues would be addressed. This works well.

East Riding of Yorkshire is another good example. The relationship between East Riding and Humber Estuary is undeniable and interdependent, however it is very focused on the geography around ports of Hull, Immingham and Goole. At the same time East Riding is also home to a vibrant coastal economy which alongside Borough of Scarborough forms the Yorkshire Coast. Equally, East Riding also supports and drives the City of York economy with key markets towns such as Pocklington and Market Weighton providing quality grow on space and housing which is lacking in City of York.

The complication this provides is recognised, however it reflects the reality of life in these areas and we are able to make overlaps work. Indeed, such overlapping areas have been the beneficiaries of some of our most successful investments

The ONS Travel to Work Areas, shown below, clearly demonstrate how our region fits together, mapped against our current LEP Boundary



Operational effectiveness

The above economic realities are reflected in very different operating models.

In simple terms, the successful model operated in a large rural economy, would be unlikely to work in a large metropolitan area, whilst the successful Leeds City Region model which is fully integrated with the West Yorkshire Combined Authority would struggle to deliver in a large rural area, increasing unit cost and reducing value for money.

The importance of local

Critical to the success of any model is the ability to engage *locally,* not just with Local Authority partners but with wider stakeholders to co-ordinate and influence priorities and attract investment.

A persuasive example is the work York, North Yorkshire & East Riding are leading with rural farming and food businesses to understand the impact of Brexit and the opportunity this presents to innovate and develop new income streams for farming and rural areas. This involves working across rural areas with rural partners around farming, local nature partnerships around natural capital and developing circular economy opportunities. The future growth and sustainability of rural economies is dependent on achieving this.

The close working across a range of partners is also demonstrated in the Dalton Bridge scheme. This flood alleviation scheme did not meet the property criteria for Environment Agency (GiA)funding, nor was it a highways priority for the County Council, yet it severely impacted on a local industrial estate. The businesses could not in isolation afford the investment to rebuild the bridge to protect against flooding. However the LEP working locally with Hambleton District Council, Environment Agency, North Yorkshire County Council and the Regional Flood and Coastal Committee were able to develop a business improvement district model to allow business to contribute over a period of time, whilst securing external investment. As a consequence over £20m additional private sector investment has been committed to the site, creating and safeguarding over 250 jobs in a rural area. It is an exemplar of how close partnership, pre-investment, and working on a very local level which makes such a significant difference in a rural area. There is a similar example underway in Skipton.

Real progress being made

The positive impact of this close partnership working can be evidenced in the local planning and housing agenda's. YNYER set itself an ambitious target of doubling house building rates. Working with Local Authority partners, not only has that target been achieved, but planning ahead, a York, North Yorkshire & East Riding Spatial Framework has been agreed, whilst a LEP wide housing proposition is in the final stages of development. Again demonstrating very local partnership working, a driving factor in this has been a shared post between the LEP and the cross local authority Housing Board ensuring a consistent message across the region.

Maintaining this momentum and progress must be a priority moving forward.

Private Sector leadership

A particularly important feature in our rural operating model is the pivotal role of the private sector. The private sector members of the LEP Board contribute significantly on the ground, both working closely with local partners to make stronger commercial cases. Our performance subgroup has been identified as national best practise. Through this group, private sector Board members provide challenge and support to the secretariat in delivering complex programmes, including bringing external partners in to identify and challenge progress and risks. Importantly,

this Board is not decision making - its role is purely to challenge and drive delivery in support of the secretariat. This is private sector leadership at its best.

LEP Independence

Trust is at the heart of the YNYER LEP operating model and we are proud that at the LEP Board Meetings public and private Board Members speak alike in the interests of the local area. They operate exactly as a successful private sector Board should. This is supported by the relationship with the LEP Accountable Body. North Yorkshire County Council (NYCC) provide Accountable Body functions, whilst recognising that they do not geographically cover the whole LEP area.

Consequently, NYCC undertake financial and legal checks as part of the due diligence process.

However, investment decisions are fully devolved to the LEP and its sub-boards. This good practice reflects the role of NYCC in ensuring LEP investments invest public money in a legal and financially prudent manner, whilst supporting a true private sector led approach and strengthening the trust and relationship with both districts and wider unitary authorities within the LEP geography.

Partnerships and Collaboration

As a LEP working alongside Leeds City Region and Humber LEP we have already demonstrated an ability to understand each others strengths and to collaborate together to remove duplication in key agenda's. Importantly all three LEPs also have a track record of delivery and have strong local partnerships developed.

For example, the City of York work closely with Leeds City Region around the transport agenda, including being a member of the West Yorkshire Plus Transport Scheme. We fully support York's membership of this transport scheme, reflecting the importance of addressing congestion around York Outer Ring Road.

York Central Enterprise Zone is a great example partnership working in an overlapping area. Two LEPs, City of York and Homes England are collaborating together with local partners to deliver a major scheme. This complex scheme is one of the largest city centre brownfield sites in UK, but with significant challenges and in need of major remediation.

York Central wasn't top priority for Enterprise Zone status within Leeds City Region, however the importance of York in driving growth across the wider North Yorkshire economy secured its priority status in YNYER. However the challenges for the site are significant and the devolution of transport funding to West Yorkshire and York through the West Yorkshire Plus transport fund forms a crucial part of the project.

Working collaboratively, York, North Yorkshire & East Riding LEP through the Enterprise Zone and Local Growth Funding are enabling upfront investment to remediate and decontaminate the site, whilst the West Yorkshire Plus transport scheme is investing to address transport access. Consequently, the masterplan for the site has now been approved, Homes England are investing and York Central is becoming a reality.

Equally, Leeds City Region have greater scale to offer a stronger Inward Investment proposal and we support our authorities to work with Leeds on these agenda's.

The business support agenda more generally is an area where through EU funded programmes, collaboration has been strongest and we would propose strengthening and building on this going forward.

As UK leaves EU, it is imperative that all parts of the Uk deliver to their full potential and building on existing momentum, local partnerships and specialisms will deliver greater results than simply building scale.

The real risk is that we move to a model driven by size and artificial neatness rather than one driven by effective functional economies and one that becomes remote from local areas, difficult for local partners to engage and lacks a real understanding of local issues and opportunities.

Considering the above factors, it was the unanimous decision of the LEP Board that the model that will deliver greatest growth across York, North Yorkshire & East Riding and will deliver greatest return to Government is to retain a York, North Yorkshire and East Riding geography, including overlaps with Leeds City Region and Humber but strengthening and formalising collaboration with neighbouring LEPs.

At the same time, it committed itself, to building on existing collaboration (through formal mechanisms) designed to strengthen and formalise the ways that it works with neighbouring LEPs in order that we most effectively address agendas such as business support, workforce skills and key sector opportunities. This would include, but not be limited to, supporting the development of a joint investment board.

Adopting this approach will, it is believed, enable to LEP to build on its successful track record of delivery, construct a powerful and appropriate Local Industrial Strategy whilst reaping the benefits where collaboration and scale is appropriate.

Key milestones

Please indicate any key milestones the LEP is required to meet to address the above recommendation:

Key Milestones

October 2018: Government confirm geographies

October 2018: Joint Board(s) created with Leeds City Region and Humber tasked with

formalising collaboration, governance and areas for more effective joint working and agreeing how government funding will be allocated in

overlapping areas.

April 2019: Formal Collaboration structure implemented

Key risks and/or issues

Please indicate any risks or issues that may prevent the LEP meeting the recommendation above. The LEP should also outline how it is mitigating these risks.

Key Risks

Risk 1: Failure to agree geographic boundaries

Mitigation: Whilst Leeds City Region and York, North Yorkshire & East Riding LEP have

submitted different proposals, both have proposed a cross LEP working Board to focus more effective working. This Board would work with

government to agree a solution.

Risk 2: Performance of existing programmes slip due to lack of focus and

changes

Mitigation: Discussions with all neighbouring LEPs have agreed that within any

changes, existing structures must be maintained to deliver out existing

programmes.

Risk 3: The final outcome marginalises York, North Yorkshire and East Riding

areas resulting in lost investment, lower growth and local areas

disengaging with opportunities.

Mitigation: The recommendation is driven by the above concern and a core role of

the cross LEP working Board will be to ensure these issues are addressed.

Recommendation:

We will encourage Local Enterprise Partnerships and mayoral combined authorities to move towards coterminous boundaries where appropriate in line with the wider discussions on Local Enterprise Partnership geographies. These proposals should be submitted by 28 September 2018. Government will respond to these proposals in the autumn and future capacity funding will be contingent on successfully achieving this.

Information required in geography proposal:

For LEPs in MCA areas, these proposals should consider the current relationship between MCA and LEP geographies.

LEP response

Please outline the LEP's response to the recommendation. The response should consider the information required, outlined above:

Local Authorities across York, North Yorkshire & East Riding are committed towards a One Yorkshire Combined Authority and Mayor and this proposal is compatible with that approach.

The economic analysis for such a model clearly identifies a series of sub-regional economies which overlap and are coherent at a Yorkshire level. This is particularly strong around the business support, sector and inward investment agenda.

Whilst not predicated on such an outcome, it would not preclude it, nor would it prevent alternative future governance structures.

There is currently a non-mayoral Combined Authority in West Yorkshire and a merge to create a North & West Yorkshire Super LEP would be a move away from coterminous boundaries. This in itself creates a governance barrier. The Combined Authority, covering only part of the geography has no jurisdiction over York and North Yorkshire, however the current model in Leeds City Region is fully integrated with the Combined Authority the final decision maker.

This would be unacceptable within a North and West Yorkshire LEP and there are currently no plans or dedicated appetite, for a North & West Yorkshire Combined Authority.

Key milestones

Please indicate any key milestones the LEP is required to meet to address the above recommendation:

N/a

Key risks and/or issues

Please indicate any risks or issues that may prevent the LEP meeting the recommendation above. The LEP should also outline how it is mitigating these risks.

N/a			

LEP Name: Leeds City Region Enterprise Partnership

Please outline the LEP's plans to address the geography recommendations below, noting the guidance provided by the Unit. In your response, you should outline any key milestones, risks and issues.

Proposals should be submitted to <u>LEPpolicy@communities.gsi.gov.uk</u> **no later than 28 September 2018**, copying in your Area Lead.

Geography

Recommendation:

As Local Enterprise Partnerships are central to future economic growth, Government will ask Local Enterprise Partnership Chairs and local stakeholders to come forward with considered proposals by the end of September on geographies which best reflect real functional economic areas, remove overlaps and, where appropriate, propose wider changes such as mergers.

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All LEPs should outline their response to the Government's recommendations on geography no later than **28 September 2018**.

Those LEPs proposing geography changes should provide detail of the proposed changes. In your response you should outline why these changes would be suitable for your local area. These proposals should include timescales for the transition to different geographies. LEPs should work with the LEP Network and neighbouring LEPs to ensure a shared understanding of the geography changes being proposed exists.

For LEPs who are proposing no changes you should respond briefly outlining why no change is required. For LEPs in MCA areas, these proposals should consider the current relationship between the MCA and LEP geographies. All LEPs should aim to have revised geographies (if required), by **spring 2020.**

LEP response

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Context

The Leeds City Region economy is the largest outside of London and, worth £67 billion, is the largest component of the Northern Powerhouse. With over 3 million residents, a workforce of 1.4 million, 126,000 businesses, 14 further education colleges and 9 higher education institutions it has the scale, variety and concentration of assets to be a powerful driver of a successful UK economy.

Leaders of the eleven local authorities¹ have a strong track record coming together to work across the functional economic area because they recognise the value of linking together complementary local economies.

- The Leeds City Region Leaders' Board (a joint committee) was formed in April 2007, the first legally constituted city region body with a remit to work together on economic development and regeneration.
- Building upon this, the Leeds City Region Enterprise Partnership was one of the first wave of LEPs agreed in 2010 based on a compelling case that several local economies genuinely look multiple ways, and are therefore best served by being members of two LEPs.
- The Leeds City Deal was agreed in 2012, securing Government's support for transformative plans to create 60,000 new jobs, accelerate the output growth rate and reduce carbon emissions.
- The LEP was the first to agree its Strategic Economic Plan, unlocking three rounds of local Growth Deal funding amounting to over £1 billion.
- Partners have operated a successful City Region Business Rates Pool since April 2013, which was in December 2017 extended by Government to be a 100% retention pilot for 2018/19. A joint West and North Yorkshire bid for a 2019/20 pool has been submitted, underlining the strong sense of joint working across authorities.
- Six local authorities (those in West Yorkshire and the City of York) worked together to create the West Yorkshire Combined Authority in April 2014.

Therefore, for over a decade, private and public partners have worked together flexibility and pragmatically to pursue a shared vision of a globally-recognised economy where good growth delivers jobs, prosperity and a high quality of life for everyone.

There is absolute commitment that the scale and pace of delivery associated with the agreements and programmes above should not be compromised.

¹ Barnsley, Bradford, Calderdale, Craven, Harrogate, Kirklees, Leeds, North Yorkshire, Selby, Wakefield, York.

LEP approach

The LEP and its partners feel that it has operated very successfully under the current arrangement. Business and local government leaders have combined to take decisions about policies and according to how local economies actually operate – which can include looking multiple ways. This pragmatic approach has delivered:

- the biggest growth deal in the country securing capital investment in local infrastructure, with the LEP and accountable body overseeing that spending as transparently as any in the country
- Stimulating commercial development of nearly 300 acres in Enterprise Zones across the City Region
- Reducing by 2/3^{rds} the number of unemployed young people on our journey to becoming Neet-free
- Securing £4 million to rejuvenate the Bradford Odeon and spark culture-led regeneration in a pivotal Northern Powerhouse city
- Providing business support to 4,600 firms since 2013, with capex grants levering £170m of private sector investment, directly creating over 3,000 new jobs
- Winning investment from international brands such as Burberry, Julius Baer, and Reed Smith, and helping local firms export through an agreement with Chinese e-commerce platform kaola.com, with 5 million daily users.

Such pragmatism means the LEP sees no reason why some form of overlapping geography would be incompatible with Government's aspirations for LEP performance, accountability, capacity and leadership. It is recognised, however, that Government has determined that, on balance, there should be no overlapping areas.

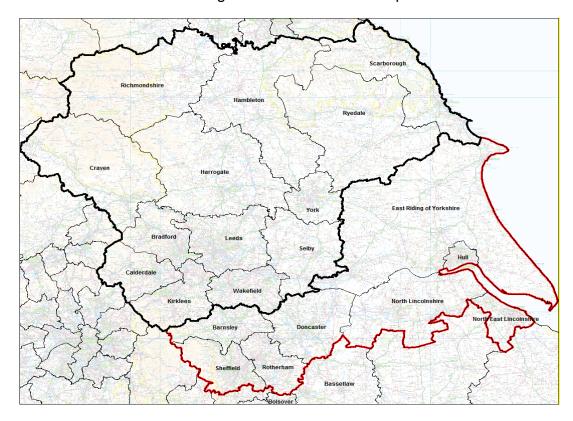
Accordingly, the LEP Board comes forward with a proposal that delivers both the letter and spirit of that approach. In doing so, it positions the residents and businesses of the City Region, via a new LEP, at the heart of discussions on future local industrial strategy and how the UK's Shared Prosperity Fund and 2019 Spending Review should support extraordinary economic growth and sustained social transformation.

This proposal is based upon the presumption that Government will remove all LEP overlaps. Should Government make any exception to its policy position to remove overlaps, the LEP would take that opportunity to review this response.

Proposed geography to remove overlaps

Whilst it is recognised that there are options for retaining the current geography or having a West Yorkshire only geography, it is proposed that a new LEP is created by combining the York, North Yorkshire and East Riding LEP, except for the East Riding, and the Leeds City Region Enterprise Partnership, except for Barnsley.

The proposed new LEP area is pictured below (in black outline), in relation to the wider Yorkshire and Humber region. There are no overlaps.



The proposed new LEP would have a population of 3.1 million people and an annual economic output of £70.3 billion with 1.4 million jobs and 137,000 businesses. At almost 4,000 sq miles it covers 8% of England, including the major cities of Leeds, York, Bradford and Wakefield complemented by diverse and distinctive towns and extensive rural and coastal areas (including three national parks). The rich diversity of places within the new geography means that coastal, rural and urban areas can combine to be stronger together, more effectively delivering inclusive growth, and be more influential with national and international partners. It is likely to be the largest LEP economy in the country outside of London.

For compliance purposes, it is assumed that Barnsley is within the boundary of the Sheffield City Region LEP area. We would still wish for strong collaborative working with Barnsley (as per the section of working collaboratively below), and would wish to review the inclusion of Barnsley if their formal LEP circumstances change.

Economic rationale and impact

In their respective Strategic Economic Plans, both LEPs have **similar visions** to deliver prosperity and inclusive growth by addressing priorities on business support/growth in priority sectors, increasing productivity and skills, and transforming infrastructure.

The new proposed LEP area removes existing overlaps, and represents a **functioning economic area** with 93.8% of residents within new LEP boundary

also working within the area. This draws together a dozen travel to work areas identified by the Office for National Statistics (2011):



This proposal is based on a strong economic rationale that the coming together of diverse but complementary local economies creates the significant, international scale to drive economic and social transformation – rebalancing the UK economy so that it genuinely works for all across North and West Yorkshire. It will also strike a balance across urban and rural economy issues, and allow a distinct focus on coastal in collaboration with the Humber and East Riding LEP (if created). Our detailed quantitative analysis, which is available on request, illustrates the fine balance of different arrangements and could justify other viable options.

Over a decade of experience of working on strategic economic issues across local administrative boundaries has illustrated the importance of taking account of complementary places, and how strengthening the links between them stimulates growth. For example:

- Leeds is a core city, with major international profile and strengths in digital and creative industries, financial and professional services and health technologies. Its growing international connections and inward investment successes provide a world-class engine of inclusive growth which depends on and complements its neighbours.
- Key cities and towns like Bradford, Wakefield, York, Huddersfield and Harrogate have industrial strengths in advanced manufacturing, logistics, business administration and world-class research institutions. Each has a high quality 'place offer' with global assets like York's heritage city, Harrogate International Convention Centre, Halifax's Piece Hall and the Hepworth Gallery.

- Most of the Leeds City Region is rural, exemplified by the Bradford district, which is 2/3^{rds} rural and includes the market towns of Shipley, Keighley and Ilkley. In coming together with the wider North Yorkshire and York economy, there is a valuable opportunity to learn and strengthen how future industrial strategy and projects can be best designed to create a rural powerhouse and capitalise on the Yorkshire coast, tackling shared challenges like rural isolation, stalled wages and housing affordability.
- Our experience of driving inclusive growth has illustrated that increasing opportunity and tackling barriers to social mobility require strong local partnerships. In bringing together a larger footprint, we remain committed that our inclusive growth policies and projects have the needs and goals of individuals at the centre. We think scale brings benefits though, in terms of having greater efficiencies for projects and better opportunities to share learning from different areas.

There is also a strong case that a broader **range of sectors** across North and West Yorkshire provides a strong base for developing a robust and impactful local industrial strategy.

- The biggest sectors in terms of employment are similar across both West and North Yorkshire; health, business administration, education and manufacturing.
- The Northern Powerhouse Independent Economic Review 2016 points to complementary sector specialisms across North and West Yorkshire. For example, North Yorkshire and York's agritech and food manufacturing clusters relate closely with Leeds City Region's food and drink sector. The Leeds City Region's advanced manufacturing strength depends on and influences leading bio-renewables and low carbon activity in York and North Yorkshire. The visitor and leisure economy in Yorkshire is already subject to significant collaborative work through destination management organisation Welcome to Yorkshire and joint work on major international festivals and events. The region's visitor economy is being helped to be even more successful through the West Yorkshire and York Transport Fund improving access from the cities of Leeds, York, Bradford and Wakefield to the Yorkshire coast.
- This synergy between the largest sectors of employment across the two LEPs presents an opportunity for future targeted programmes and policies that will benefit from economies of scale, particularly in business support. This greater diversity of sectors creates more opportunities to tackle cross cutting policy challenges such as automation and post-Brexit trade (including identifying more sustainable supply chains), creating a more resilient economy. Rural post-Brexit changes, such as those to the Common Agricultural Policy, are also likely to provide opportunities around new

supply chains, natural capital and bio-economy and be shared across all rural communities.

Ultimately, expanding the geographic scope of the LEP increases the weight and resilience of the partnership between business and public leaders. By working closely with business and local communities, this means a refreshed LEP is best placed to take the opportunities of the local industrial strategy and UK Shared Prosperity Fund to do even more to improve the lives of residents, improve productivity and strengthen the regional and national economy.

Bringing **prioritisation and decision making** structures together will enable better targeting of shared priorities, effective use of resources, and the opportunity for bolder more transformative policies and projects. It will allow for better use of assets across the region to capitalise on the region's recognised brands and promote exports combined with more intensive and tailored promotion and business support.

Local views and support

The LEP acted promptly to proactively seek the views of private and public partners, and on balance there is strong support for the proposed new LEP.

This includes:

- The LEP Chair, Roger Marsh, personally leading discussions via the LEP's Business Communications Group (6 September) and the Regional Council of the CBI (12 September). Together, they constitute senior business leaders and major business representative groups in the City Region that have expressed:
 - Support for the role of the LEP and its strengthening of governance and leadership as a means of bringing together business and civic leaders to secure investment and prioritise according to local needs.
 - Support for a merged geography covering West and North Yorkshire, reflecting complementary local economies and building upon the respective strengths of the Leeds City Region and York, North Yorkshire and East Riding LEPs – for example, driving inward investment and business growth across priority sectors and diverse local economies including cities, market towns and rural areas.
- The LEP's Employment and Skills Panel (11 September) and Business, Innovation and Growth Panel (13 September) discussed issues of the LEP Review including support, on balance, for a geography covering West and North Yorkshire.
- The West Yorkshire Combined Authority's (as accountable body) scrutiny committee endorsed the primary preference of a West and North Yorkshire geography, with a West Yorkshire LEP as a strong alternative option.
- Seek views directly from businesses and residents on the issue of geography. The 'Your Voice' microsite (https://www.yourvoice.westyorks-ca.gov.uk/lepreview) sought views on the broad direction and principles, with the seven responses favouring, on balance, a LEP covering a larger footprint.

Discussions with neighbouring LEPs

The LEP Chair has personally initiated and led discussions with all neighbouring LEPs, including the York, North Yorkshire and East Riding LEP (with whom the proposal constitutes an effective merger). It is recognised that the position of the YNYER LEP Board is to retain the status quo, with overlaps.

That said, the YNYER LEP in its consideration of geography options considered how it might explore the potential for a North and West Yorkshire LEP as a way to implement Government's policy position. In doing so, the Leeds City Region LEP supports the notion of a cross-LEP working group, working to both LEP Boards, to undertake a fundamental review of decision making within organisations and bring forward a proposal for a new LEP (cognisant of the new national assurance framework). These are addressed in more detail below on key risks.

It is felt that this could be undertaken, without prejudice and subject to Government clarifying its policy position on overlaps without exception, to shape the operations of a new LEP that values the different strengths of the two LEPs that can be brought together and built upon. This can provide a means of ensuring a new LEP, covering the breath and diversity of North and West Yorkshire does not lose sight of the aims and opportunities for individual places or sectors.

Partners are clear that any new, merged LEP must make an immediate and tangible impact, with a local inclusive industrial strategy agreed with Government in 2020, developed initially under the guidance of a joint shadow Board. This will put the region in a strong position for the new UK Shared Prosperity Fund by capitalising on the expertise developed by both LEPs in serving businesses and communities across West and North Yorkshire on priorities like supporting enterprise in rural areas, securing transformational inward investment and driving productivity and higher level skills that improves the living standards of everyone.

Working collaboratively

Irrespective of the LEP's footprint, business and civic leaders have long recognised the need to work with neighbours to champion local interests and collaborate on a more successful and inclusive Yorkshire, Northern Powerhouse and UK economy. We are clear about using the new LEP geography to build on a track record of collaboration:

Across the North - Business and civic leaders in the Leeds City Region have always understood that our position at the heart of the North is an enormous opportunity to unlock opportunities and fulfilling the region's exceptional potential. Recently, the LEP has been instrumental in bringing together the NP11 group of LEPs to pursue mutual interests. Equally, civic leaders have been active in establishing the Convention of the North to champion its needs on the national and international stages. Looking to the future, the

weight of the new LEP and its location at the heart of the North means the Partnership can play an even stronger role to make the North the solution.

- Across Yorkshire the LEPs have regularly come together to liaise on shared issues, while local government leaders have been proactive in establishing the Yorkshire Leaders Board. There are excellent examples of cooperation through joint work on Brexit and energy, and in future partners in the Leeds City Region would be keen to continue with these links, including relationships with Humber LEP on shared coastal matters, and recognising the links between Beverley, Pocklington and Hull to York. Similarly, the LEP understands that the Sheffield City Region LEP intends to maintain its geography which means a new West and North Yorkshire LEP will be proactive in capitalising on the shared opportunities with, for example, Barnsley and neighbours in the Sheffield City Region, because of their similar economic structure to Wakefield and Kirklees.
- With other areas with shared sectoral interests such as places with strengths in health and life sciences, agritech and digital and creative industries, where Leeds hosted the first creative cities convention. Similarly, local government partners are also part of diverse national networks, like the core and key cities groups which focus on shared challenges like those cities with a high proportion of jobs at risk of automation.

Key milestones

Please indicate any key milestones the LEP is required to meet to address the above recommendation:

- October 2018 Cross LEP (YNYER and Leeds City Region) working group established to jointly identify and solve issues.
- November 2018 Government expected to confirm decisions about geography (including whether to maintain its policy position on no overlaps, without exception).
- March 2019 New LEP Shadow Board established to focus on developing the Local Industrial Strategy and agreeing new governance and assurance processes.
- March 2020 Full implementation of new LEP.

Key risks and/or issues

Please indicate any risks or issues that may prevent the LEP meeting the recommendation above. The LEP should also outline how it is mitigating these risks.

<u>Issue 1</u> – Having a larger and more diverse LEP (including rural, coastal and urban areas) could lead to difficulties in prioritising decisions and investment.

Mitigation: In the light of Government's revised national assurance framework, partners work together to agree a local process that is trusted to prioritise projects effectively, recognising the economic and social needs of all places. This will be structured around a local inclusive industrial strategy that can be developed by a joint Shadow Board during 2019/20 that addresses the issues in rural, coastal and urban areas).

In terms of later-stage decisions, currently both Leeds City Region (via the Investment Committee) and YNYER (via the Infrastructure Board) have prioritisation roles that each include all councils in the area, which is conducive to strong partnership work.

<u>Issue 2</u> – With Government mandating the balance of LEP Boards, a new LEP will need to strike a balance to ensure appropriate representation of areas and accountability.

Mitigation: Leeds City Region and YNYER and partners work together to explore solutions, including factors like:

- Membership and decision-making at all stages;
- The role of the Combined Authority as accountable body and LEP Board.

<u>Issue 3</u> – There is a risk that smaller authorities struggle to resource early-stage project development, which can compromise the pipeline of projects meaning they struggle to fully realise the tangible benefits from the Partnership.

Mitigation: That partners agree practical means to use increased capacity funding to focus on early-stage development. Government must assist this by ensuring a single, larger LEP does not result in less capacity funding than two smaller LEPs.

Issue 4 – Agreement of accountable body

Mitigation: The West Yorkshire Combined Authority is the single accountable body for all LEP funding and partners will work together to ensure this arrangement is developed in due course to ensure compliance with Government proposals and local accountability requirements over a wider geography. This will make clear the difference between the role of the LEP and the role of the Combined Authority.

Issue 5 – Strategy does not take account of interests and opportunities in all places

Mitigation: Building on the existing cooperation between LEPs, officers are tasked to work together with a view to developing a single local industrial strategy by April 2020 to drive productivity and inclusive growth. This will begin initially by learning from current policies and evidence bases and reporting to each LEP and, from April 2019, report to a Shadow LEP Board.

Issue 6 – Identity and brand

Mitigation: Partners are clear that the priority remains delivery of each LEPs' current project pipeline, but as part of the implementation plan, partners need to reach agreement on an identity and brand for the new LEP that reflects the diversity and strength of all places.

Should a decision be made to create a new LEP then a cross LEP working group, supported by both LEP Boards, will be developed to undertake a review of decision making in both organisations in order to ensure that decision making involves all parts of the region in an effective and practical way. A new LEP must have a new, shared culture that reflects the economic geography of the region and strengthens links across the business base, including being seen and accessible in all parts of the area.

Recommendation:

We will encourage Local Enterprise Partnerships and mayoral combined authorities to move towards coterminous boundaries where appropriate in line with the wider discussions on Local Enterprise Partnership geographies. These proposals should be submitted by 28 September 2018. Government will respond to these proposals in the autumn and future capacity funding will be contingent on successfully achieving this.

Information required in geography proposal:

For LEPs in MCA areas, these proposals should consider the current relationship between MCA and LEP geographies.

LEP response

Please outline the LEP's response to the recommendation. The response should consider the information required, outlined above:

The proposal does not relate to a mayoral Combined Authority so partners at this stage have not considered the issue of coterminous boundaries.

In considering the LEP's response to Government's request, partners are clear that this is a separate process to devolution. Consequently, this proposal is not intended to prejudice discussions around any devolution agreement, such as One Yorkshire. Government's confirmation is sought that this is the case.

Key milestones

Please indicate any key milestones the LEP is required to meet to address the above recommendation:

n/a

Key risks and/or issues

Please indicate any risks or issues that may prevent the LEP meeting the recommendation above. The LEP should also outline how it is mitigating these risks.

n/a

Annex B: Geography proposal response template

LEP Name: Humber

Please outline the LEP's plans to address the geography recommendations below, noting the guidance provided by the Unit. In your response, you should outline any key milestones, risks and issues.

Proposals should be submitted to <u>LEPpolicy@communities.gsi.gov.uk</u> **no later than 28 September 2018**, copying in your Area Lead.

Geography

Recommendation:

As Local Enterprise Partnerships are central to future economic growth, Government will ask Local Enterprise Partnership Chairs and local stakeholders to come forward with considered proposals by the end of September on geographies which best reflect real functional economic areas, remove overlaps and, where appropriate, propose wider changes such as mergers. ... These proposals should be submitted by 28 September 2018. Government will respond to these proposals in the autumn and future capacity funding will be contingent on successfully achieving this.

Information required in geography proposal:

All LEPs should outline their response to the Government's recommendations on geography no later than **28 September 2018.**

Those LEPs proposing geography changes should provide detail of the proposed changes. In your response you should outline why these changes would be suitable for your local area. These proposals should include timescales for the transition to different geographies. LEPs should work with the LEP Network and neighbouring LEPs to ensure a shared understanding of the geography changes being proposed exists.

For LEPs who are proposing no changes you should respond briefly outlining why no change is required. For LEPs in MCA areas, these proposals should consider the current relationship between the MCA and LEP geographies. All LEPs should aim to have revised geographies (if required), by **spring 2020.**

LEP response

Please outline the LEP's response to the recommendation. The response should consider the information required, outlined above:

The Humber LEP welcomes the LEP Review and the Government's commitment to

strengthening LEPs. We accept the Government's decision to end overlaps and want to move forward with implementing this. In preparation for this response, we have undertaken detailed analysis (including external analysis) of our economic geography over recent months, and engaged with the local business community. Our response is therefore based on evidence and consultation.

The Humber LEP's proposal is to retain its current geography (Hull, East Riding, North Lincolnshire and North East Lincolnshire), which will necessitate the removal of overlaps with the York, North Yorkshire & East Riding and Greater Lincolnshire LEPs. We propose to strengthen collaboration with these LEPs in place of the overlaps, and also strengthen collaboration with other LEPs particularly through the NP11.

The case for the Humber geography is detailed in the attached document which was discussed by our Board. In summary, this is:

- i) There is strong business support for the Humber LEP geography. Letters from local membership organisations are included¹. Business campaigned for the creation of the Humber LEP and remains firmly supportive of it.
- ii) The Humber meets the test of a functional economic area: it has sufficient scale; several nationally-significant industrial clusters which span both banks of the Humber Estuary and all four of our local authority areas; is the 9th most self-contained labour market of any LEP and has the 6th most distinctive industrial structure; and a recent independent review of our economic geography found that it is becoming more integrated. This has been facilitated by the reduction of the Humber Bridge tolls and the creation of the Humber Enterprise Zone, both enabled by Government.
- iii) The Humber has strategic opportunities for growth, including on energy, energy-intensive industries and around our ports, which are shared across all four local authority areas. These will form the basis of a distinctive and ambitious Local Industrial Strategy.
- iv) The Humber partnership has strengthened over recent years, particularly since the Hull & Humber City Deal, and is achieving results. It is a sound platform for moving forward.

We have also reviewed whether any of our neighbouring local authority and LEP areas are sufficiently aligned with ours to justify an expansion of our geography or a merger of the Humber with another LEP. The evidence is that the economic case for this would be very weak, and we would be concerned this would compromise our ability to focus on the

restructured its geography, which also now matches the LEP's.

¹ Bondholders, CATCH, CBI, Chamber of Commerce, City Leadership Board, Humber Business Leadership Team, Institute of Directors and Team Humber Marine Alliance. The geography of 6 of these 8 matches the LEP's (the CBI covers Yorkshire & Humber, and the City Leadership Board is Hull only). We are unaware of any local business membership organisations in Lincolnshire which also cover any part of the Humber. Additionally the FSB has stated its support for the Humber but cannot provide a letter due to national policy. It has recently

Humber's distinctive economic opportunities. There are also a number of practical difficulties involved, which are set out in the annex to our submission. **Our Board has therefore concluded that no mergers or changes of membership are appropriate or deliverable.**

Our Board's decision was supported by all of the business and education representatives present, and three of the four local authorities (Hull, East Riding and North East Lincolnshire). East Riding of Yorkshire Council and North East Lincolnshire Council have also informed the York, North Yorkshire & East Riding LEP and Greater Lincolnshire LEP respectively of their preference to remain in the Humber LEP.

Unfortunately North Lincolnshire did not feel able to support the Board position. North Lincolnshire argued that a larger geography (i.e. a Humber/Lincolnshire merger) would give our area more influence, but the rest of the Board disagreed and were instead more concerned that this would dilute the focus that is required on the distinctive industrial clusters around the Humber – which do not extend into Lincolnshire County. As set out in the attachments, a Humber/Lincolnshire merger is not justified by the economic evidence and we have not found any support for it from business. It is also opposed by Hull City Council, East Riding of Yorkshire Council and North East Lincolnshire Council. Our majority view, therefore, is that it is not appropriate or deliverable.

We have attempted to come to a consensus with our two overlapping LEPs but unfortunately we understand that their submissions will be in conflict with ours.

Key milestones

Please indicate any key milestones the LEP is required to meet to address the above recommendation:

Given that the YNYER LEP and GLLEP positions will be in conflict with ours, it is difficult to set out milestones with any certainty.

Our preference would be for Government to decide quickly during October that the Humber geography will be maintained, so that we can move forward with discussions with neighbouring LEPs and affected local authorities on the areas where we will need to strengthen collaboration. We set out some examples of how this could work in the accompanying document discussed by our Board.

Allowing for Board approvals by the three LEPs, we would anticipate agreements on the specifics being in place by the end of March 2019 and collaborative arrangements being put in place from April onwards, including transitioning out of existing funding programmes such as LGF and ESIF by 2021 (recognising that output delivery will continue afterwards and will need to be monitored by the original contracting LEP/accountable body).

As noted in our Chair's letter to Jake Berry and the business organisation letters, and as

discussed with Claire Perry and others, there is an urgent need to move forward with the development of an industrial strategy for the Humber. We have been developing our evidence base over recent months and launched a consultation document setting out our proposed sector focus in the summer. We anticipate beginning drafting the strategy shortly, and would like to have this ready to launch in draft before the NP11 energy conference we are hosting in June 2019.

Key risks and/or issues

Please indicate any risks or issues that may prevent the LEP meeting the recommendation above. The LEP should also outline how it is mitigating these risks.

Local political agreement

As noted above, one of our four local authorities did not support our Board position. However it is important to state that North Lincolnshire Council remains committed to Humber partnership working. The position presented at the Board was for a larger geography, not for leaving the Humber geography. Once a final decision is made we would expect all parties in the Humber to move forward positively together.

Agreement with overlapping LEPs

Again as noted above, it appears that conflicting proposals will be submitted. Our preference would be for Government to make a quick decision for the Humber to retain its current boundaries on the basis of the economic evidence, business support and majority political support. We would welcome any discussions to facilitate this, and remain in regular contact with our neighbours.

Industrial strategy

As noted above, there is pressure from industry for us to quickly move forward with a Humber LIS. Our SEP has also reached the end of its life, so is in need of replacement. We recognise that LEP geography needs to be clear before Government can fully engage with an area on this, but given that some of the opportunities and issues in our area are timesensitive (linked to the offshore wind sector deal, the need for our key industrial clusters to decarbonise and become more energy efficient, and the impact and opportunities for the Humber ports arising from Brexit), we hope it will be possible to give some priority to the Humber in this process. This would send a positive message to the many large, foreignowned businesses in our area which are keen to engage on this.

ESIF delivery

We have several projects jointly funded with either the YNYER LEP or GLLEP allocations (and some with other LEPs areas as well, e.g. NPIF), but we would expect these to be unaffected. Currently the last joint ERDF project (with YNYER) ends Q4 2019, although further projects

may come forward in the October call. Joint ESF delivery, via the DWP opt-in which also covers the GLLEP area, may run until March 2021 depending on forthcoming performance decisions.

Some projects funded solely from the GLLEP or YNYER allocations also operate in the overlap areas. We would expect these to continue as planned and come to a natural end, with future support being simplified and consistent across the Humber geography, in line with Growth Hub aims. Whilst we have achieved this through our ESIF allocation, there are differences in the overlap areas.

Growth Hubs

We assume that BEIS will decide with LEPs when the appropriate time is to end overlapping Growth Hubs. However the BEIS core funding is matched into ERDF in our case and others, so this will need to be taken into account while the ERDF projects are still live.

Growth Deal delivery

Our preference would be for projects to remain with their current LEPs. It would be unnecessarily complicated for us to take on responsibility for the delivery of part-completed GLLEP and YNYER LEP projects in the final years of the programme. Ongoing monitoring and accountability for outputs should also remain with the originating LEP and accountable body.

Recommendation:

We will encourage Local Enterprise Partnerships and mayoral combined authorities to move towards coterminous boundaries where appropriate in line with the wider discussions on Local Enterprise Partnership geographies. These proposals should be submitted by 28 September 2018. Government will respond to these proposals in the autumn and future capacity funding will be contingent on successfully achieving this.

Information required in geography proposal:

For LEPs in MCA areas, these proposals should consider the current relationship between MCA and LEP geographies.

LEP response

Please outline the LEP's response to the recommendation. The response should consider the information required, outlined above:

Not applicable to our area.

Key milestones

Please indicate any key milestones the LEP is required to meet to address the above recommendation:

Key risks and/or issues

Please indicate any risks or issues that may prevent the LEP meeting the recommendation above. The LEP should also outline how it is mitigating these risks.