

***EAST MIDLANDS GREEN PARTY – responding to the proposed East Midlands Combined County Authority (East Midlands Devolution Deal)
January 2023***

The East Midlands Green Party does not support this proposal.

We note that the consultation is not concerned with the principle of the proposal, which has already been agreed by the constituent councils and the government and is offered to the residents of the Area as a “done deal”. We wish, nevertheless, to point out that while Green Party policy supports the principle of subsidiarity: namely that nothing should be done centrally if it can be done equally well, or better, locally, our policy is also clear that subsidiarity for one location should not threaten the sustainability of a wider area. In terms of the EMCCA, no clear rationale has been provided for the proposal to be taken forward by Nottinghamshire and Derbyshire and not other counties in the region or indeed the region as a whole.

Furthermore, we do not support the imposition of a mayoral system by a majority vote of local councillors and instead would require local referendums to demonstrate popular support for the proposal.

With regard to the funding on offer from national government if the proposal goes ahead, we welcome additional investment in the region, but recognise that the sum on offer is insignificant on its own. We understand that the funds may be used as leverage to bring in further investment but the mechanisms for this are not clear and the outcome is uncertain. We note that the sum on offer is not index-linked and is spread evenly across the next 30 years; its impact will inevitably diminish over time and in any case it will always be at the behest of future governments.

We are also concerned that funding and inward investment will not be spread fairly across the Area and small district and borough councils will lose out. We believe that the lack of voice for district and borough councils on the EMCCA (see below) makes inequality across the Area more likely.

With regard to the specific proposals under consultation, we recognise that some may bring benefits to the two counties but overall we are not convinced that the proposal represents a good way forward for the region. Our reasons are set out below.

Governance: Strongly Disagree

1. The election of a Mayor does not represent real devolution. It is simply replacing a remote Westminster politician with a remote individual who is supposed to represent 2.2 million people which they cannot. The benefits of a mayoral model are unproven and have been rejected in, for example, Bristol in May 2022 when voters chose to return to a committee system. Mark Weston, the leader of the Conservative group, is quoted in the Guardian (06/05/22): “The mayoral model has proven a disaster for Bristol – too much power at the whim of one individual.”
2. The proposal perpetuates the discredited First Past the Post (FPTP) electoral system. Unlike other recent mayoral elections, the election of the EMCCA

mayor will see a return to the FPTP system. We believe this is an affront to democratic government in the region and oppose it in the strongest possible terms. We believe that the Supplementary Vote systems should be used for EMCCA mayoral elections.

3. The methodology for appointing members to the EMCCA is not transparent. We understand that the Leader of each Constituent Council will automatically take one of the eight places on the EMCCA. We question how the other the four members “appointed by each Constituent Council” will be selected. It is not clear what, if any, democratic mandate they will have.
We understand that the district and borough councils of each county will be able to 2 Non-Constituent members of the EMCAA. It is not clear how these members will be selected or what, if any, democratic mandate they will have. We further question what is meant by “suitable” representation from business, and wonder how suitability will be determined. We would like to see a strong commitment for the additional four Non-Constituent or Associate members to represent a range of sectors such as education, voluntary, arts, trade unions.
4. The Mayor will not be held properly to account. Green Party policy requires that where a mayoral authority has been approved by a local voters through a referendum, a regional assembly is also established, with members elected by proportional representation, to provide oversight of the activities of the mayor and genuine accountability to the electorate. This model is proving effective in London. We do not consider the proposed Overview and Scrutiny Committee, which sits within the structure of the CCA and whose members will be appointed by the CCA, will have sufficient independence to ensure the Mayor is properly and directly accountable to voters.
5. The interests of borough and district councils will not be properly represented. It is proposed that four “non-constituent” members will be nominated to represent the interests of 15 borough and district councils. Given the diversity of the two counties, it seems unlikely that four members will be an adequate voice. Furthermore the lack of guaranteed voting rights for these members significantly undermines their position on the authority. It seems the inclusion of “non-constituent” members is, in the main, merely a token gesture towards the interests of local communities.

Overall, in our view the proposed governance structure demonstrates a significant democratic deficit. If the aim of this deal is genuinely “greater local accountability and decision-making power”, then the new authority should be constituted with a mayor and a regional assembly, both elected through proportional representation. This would ensure that representation accurately reflects the vote share and operates within a proven model of power, scrutiny and accountability.

Homes: Disagree

1. The proposal lacks detail about the relationship between the EMCCA and district/borough councils. In principle, Planning decisions should be taken at local level, by councillors who have local knowledge. The proposal does not provide clarity about which body will have ultimate authority and the outcome may, deliberately or not, result in a transfer of power to the mayor and away from local people.

2. The proposal lacks detail about the mechanisms which will underpin its new powers. We are concerned about the “new, broad powers to acquire and dispose of land ...” and question whether this includes, for example, the power of compulsory purchase.
Similarly, what is meant by “power to designate Mayoral Development Areas and to create Mayoral Development Corporations”? We believe that, given the clear democratic deficit of the model, this represents a significant threat to local interests.

Skills: Disagree

1. The case for sub-regional decision making about education and training is not made. While it may be the case that the EMCCA will be better able to match adult skills provision to the needs of the Area, no evidence is provided to explain why the current system is failing or why the proposals are the solution. It may be that the Area is too small and the training providers within it too few to make an impact on deficits in adult skills. It may be that improvements require a regional, not Area, level response, or indeed a different response entirely.
2. The proposal is too focused on work, careers and the economy. We would like to see a broader view of adult learning, recognising that adult education plays a significant role in people’s well-being in ways not limited to work and careers, and affects the economy beyond the direct needs of employers. It can, for example, improve social inclusion and social cohesion, generating self-confidence and having a wider impact in families and communities than simply fitting people for jobs. This is particularly the case for excluded groups such as people with disabilities.
3. The proposal does not take into account the national context for skills provision. Many skills providers operate nationally, regionally or inter-regionally. It is not clear how the EMCCA’s “ability to set allocations and outcomes” will be enacted in this context.

Transport: Neither agree nor disagree

1. We support improvements to public transport which will encourage and enable more people to give up their private vehicles. The benefits of available and affordable public transport are well known and we would welcome improved services, particularly east-west.
2. The proposal may simply enhance the cities of Nottingham and Derby and their immediate environs at the expense of the rest of the sub-region. Proposals around mass transit opportunities, expanding the NET tram system and linking with HS2 may do little for people in market towns and rural communities.
3. The proposal appears to be concerned with mobility rather than accessibility. The proposal aims to improve people’s mobility within the Area and between the Area and other parts of the country. Green Party policy calls for a focus on accessibility, in other words, on enabling people to access jobs and services locally rather than travelling greater distances. With this in mind, we would like to see a more transparent commitment to transport as an enabler at local level. Plans for transport should explicitly support local communities, being linked to housing provision, education and health services as well as employment.

Reducing Carbon/Net Zero: Neither agree nor disagree

1. We support the EMCCA's general ambitions with regard to reducing carbon and addressing climate change. We are, however, yet to be convinced that the establishment of the EMCCA will add significant value to the work which could be undertaken by existing local authorities and we see the commitment to achieve net zero by 2050 as lacking urgency. The Green Party calls for the UK to reduce its emissions to zero by 2030.
2. The expectation that nuclear fusion and hydrogen will prove the solution to our need for clean energy may be unfounded.

We are concerned about the references to nuclear fusion and hydrogen as sources of clean energy. Both these technologies are in the early stages of development and there remain significant hurdles to overcome. We suggest the ambition should be to move from fossil to **renewable** energy from a number of sources, rather than focusing on these two 'magic bullets'.

3. It is not clear how the EMCCA will deliver economic growth and greater prosperity while achieving its ambitions for reducing carbon/net zero. It has become clear that unlimited growth has led to steep costs to the planet, such as deforestation, environmental damage, pollution and carbon emissions driving the climate catastrophe. We believe that economic growth must be sustainable which means growth that is repeatable, ethical and responsible to current and future communities.

We are sceptical that the EMCCA will deliver its promises on this priority. We recognise that all local authorities must balance a host of competing priorities but experience to date has demonstrated that the overall response in the UK, at every level of government, has been too little, too late. It remains to be seen whether the EMCCA follows that pattern, although it seems likely given the democratic deficit within the proposals and the lack of representation for minority parties.

Public Health: Neither agree nor disagree

1. The case for sub-regional decision making about public health is not made. It is not clear how the proposals to improve health and well-being integrate with the EMCCA's four main priorities.

The reasons why current services are inadequate are not provided and neither is it clear how the proposals will improve matters.

2. The proposals may simply add complexity to an already fractured environment.

We are all aware that the lack of integration between health and social services is causing catastrophic problems for the NHS. It is not clear that adding the activities of the EMCCA to the mix will add value to the work already undertaken by the constituent councils.

Appendix: extract from the on-line consultation

*Following the description in each section is the question **To what extent do you agree or disagree with the proposals** and then the choices:*

- *Strongly agree*
- *Agree*
- *Neither agree nor disagree*
- *Disagree*

- *Strongly disagree*
- *Don't know*

Followed by the statement ***If you have any comments you would like to make about ..., you will have an opportunity at the end of the questionnaire.***

At the end of the questionnaire is one text box for comments which I understand has a limit of 4000 words.

*There is also a tick box for **I do not wish to make any comments***

Finally, we are asked to **select the sector that best describes your group or organisation:**

PLEASE TICK ONE BOX ONLY

- Local government
- Voluntary and community sector
- Elected representative
- Civil service or government
- Charity
- Academic
- Action Group
- Transport
- Business
- Something else – please write in
- Prefer not to say

And to tell us about the group, organisation, or business you represent:

Name of organisation:

Your position in the organisation:

EMCCA Draft Proposal (East Midlands Devolution Deal)

Consultation

Section 1 – Governance

In order that powers and funding are available, suitable governance arrangements must be put in place which provide Government with assurance that funding will be spent appropriately, and statutory functions will be delivered effectively and efficiently.

The proposed Governance will include:

- A new directly elected Mayor who will bring new powers and funding from central Government to the local level. This includes powers to set a budget and issue a precept.
- In addition, the EMCCA will feature eight members, consisting of a Lead Member and one further member appointed by each Constituent Council (Derbyshire County Council, Nottinghamshire County Council, Derby City Council and Nottingham City Council).

- The EMCCA will appoint four non-constituent members from the Area's district and borough councils.
- The EMCCA will also appoint up to a further four non-constituent or associate members.
- The EMCCA will ensure that there is suitable representation from business.

Section 2 – Homes

Our homes – we will work with local authorities, landowners, developers and the full range of housing providers to promote regeneration, create affordable, good quality housing options and to retrofit existing homes to be more environmentally sustainable.

Devolution will help us deliver this through:

- £16.8 million of funding controlled locally to spend in 2024/25 to support the building of new homes on brownfield land.
- £9 million housing capital funding to support the delivery of housing priorities.
- New, broad powers to acquire and dispose of land to build houses, commercial space and infrastructure, for growth and regeneration.
- The Mayor's power to designate Mayoral Development Areas and to create Mayoral Development Corporations (which is a statutory body created to bring forward the regeneration of a defined area). This will support delivery on strategic sites across the Area through drawing on existing work, subject to the agreement of local partners.

Section 3 – Skills

Our skills - we will work collaboratively with employers, skills providers and local authorities to ensure our citizens have the opportunity to develop key skills and access opportunities to work well and build fulfilling careers. This will also help the creation of a strong and sustainable local economy.

Devolution will help us deliver this through:

- Holding the Adult Education Budget (AEB) from academic year 2025/26.
- Owning the ability to set allocations and outcomes to skills providers.
- Supporting and shaping the Local Skills Improvement Plan (LSIP) for the Area.

Section 4 – Transport

Our transport - we will work with transport providers inside and outside the EMCCA Area to develop our collective infrastructure and create the best possible public transport system for our citizens, reflecting the strengths already within the four Councils to set our aspirations and support regeneration.

Devolution will help us deliver this through:

- A combined transport budget, with the Mayor and the EMCCA responsible for setting a transport strategy for the Area, including for public transport.
- An additional £500,000 of funding in both 2023/24 and 2024/25.
- The ability to accelerate the delivery of smart, integrated ticketing across all local modes of transport in the Area.
- The opportunity to coordinate a Key Route Network (a collection of the most important local authority roads within the Area) across the Area.
- Mass transit opportunities, including integrating and potentially expanding the NET tram system, in support of the East Midlands HS2 Growth Strategy.

Section 5 – Reducing Carbon/ Net Zero

Our carbon reduction/net zero ambition – we will work across the Area to lead the way in moving from fossil to fusion and play our part in meeting the national ambition to achieve net zero by 2050. Our ambition is that the EMCCA Area will be a leader in pioneering new forms of clean energy generation and will act as an exemplar for climate change adaption.

Devolution will help us deliver this through:

- An investment in the EMCCA Area of £9 million via a Net Zero funding pot.
- The opportunity to increase the Area’s electricity network capacity.
- The opportunity to explore the establishment of heat network zoning in England (this is developing heat networks in specific areas where they can provide the lowest cost, low-carbon heat to consumers) to decarbonise heating and hot water within specific zones.
- The potential for increased investment from the UK Infrastructure Bank.

Section 6 – Public Health

Public Health – using powers under the NHS Act 2006, the EMCCA will complement and support the action already being taken by Constituent Councils to improve people’s health and well-being across the Area. This will allow us to consider health and well-being throughout the EMCCA’s activities as well as enable work on local issues where health plays a key role, for example, tackling homelessness and rough sleeping.

Devolution will help us deliver this by:

- Ensuring that improving and protecting the public’s health is a central consideration to everything the EMCCA does, including in environmental considerations, planning, regeneration and transport.
- Providing the EMCCA, under the NHS Act 2006, with the opportunity to deliver public health initiatives throughout the Area.
- Enabling the EMCCA to support the Constituent Councils with tackling local issues such as homelessness and rough sleeping through integrating the consideration of public health into use of other powers by the EMCCA such as housing powers.

Section 7 – Your Comments

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If you have any comments you would like to make about the proposals for the East Midlands Combined County Authority, please tell us using the space below.