

Appendix 1

Proposed Response to the Government Consultation on proposals to establish a Mayoral Combined County Authority for Norfolk and Suffolk

Details of the Government consultation can be accessed via the following link:-

- <https://consult.communities.gov.uk/lggc/norfolk-and-suffolk-devolution-consultation>

Seven questions are asked in the online consultation as detailed below and respondents are asked to indicate their position in support for or objection to the proposals through the following structured answers and with scope to provide written comments.

For each question, you can provide the following answers:

- strongly agree
- agree
- neither agree nor disagree
- disagree
- strongly disagree
- don't know
- prefer not to say

The District Council's proposed response to the consultation questions is as follows:-

Question 1: To what extent do you agree or disagree that establishing a Mayoral Combined County Authority over the proposed geography will deliver benefits to the area?

Agree

North Norfolk District Council supports the broad principles of the Government's devolution proposals and specifically the proposal for Norfolk and Suffolk to have control over funds and powers devolved from the Government to meet the specific needs and priorities of our two counties through the establishment of a Mayoral Combined County Authority.

The District Council is concerned that at the present time the opportunities and challenges of the two counties are not well-understood within Government and that, compared to other areas of England where Devolution Deals have been agreed and Combined Authorities and Elected Mayors established, Norfolk and Suffolk and their businesses and communities run the risk of being "left behind", with the full potential of the region not being realised.

The proposals for a Mayoral Combined County Authority with an elected mayor will therefore allow this deficit in devolved funding and powers and having a strong voice into Government to be addressed.

Question 2: To what extent do you agree or disagree with the proposed governance arrangements for the Mayoral Combined County Authority?

Strongly disagree

The Devolution Deal initially proposed for Norfolk and Suffolk suggests that only Norfolk County Council and Suffolk County Council would be constituent members of the new Norfolk and Suffolk Combined County Authority; and North Norfolk District Council has significant concerns about the exclusion of the district, borough and city councils in this model given that many of the housing, planning and economic growth functions which are fundamental in supporting the delivery of the Government Plan for Change and economic growth agendas sit with district authorities.

The District Council understands that under the proposed governance model the two county councils will each have two seats on the proposed Combined County Authority as constituent members and that there will then be four non-constituent members whose voting rights is at the discretion of the MCCA. This means that decisions relating to Norfolk, with a population of approaching 1 million residents, will be taken by no more than four people with a direct connection to the county.

Whilst the District Council understands that this is an interim model, pending election of the Norfolk and Suffolk mayor and local government reorganisation, we believe that a more inclusive governance structure is needed which involves all borough, city, and district councils in the decision-making process. Such an approach would better utilise the expertise of all local leaders in the interim period, promoting understanding of the powers and functions of the MCCA, pending local government reorganisation, where a new and more direct relationship will be established between the mayor and the MCCA and local communities through any new unitary councils.

District Councils are the authorities with primary responsibility for housing, planning and economic growth and act as vital connectors between the tiers of local government, government agencies, and the communities they serve. The potential for district councils to therefore play a significant role in supporting the success of any new devolved structures across large geographies and communities of interest should not be under-estimated. The District Council recognises that in due course local government reorganisation might address these elements, but the District Council believes they need to be integrated at the design and setup phase of the new MCCA.

At present, the proposed number of non-constituent members of 2 per county, which is stated in the consultation proposals could be “representatives of an organisation; for example, a district council, local NHS trust, the Police and Crime Commissioner, or a local registered provider” and could therefore lead to a scenario where there is only 1 district representative per County (or even none). In Norfolk, the strength of our County is its diversity – from communities to demographics to the economy. North Norfolk District Council is therefore

concerned that the proposed model would simply ignore the importance of ensuring equal representation from our rural, urban and coastal areas.

North Norfolk District Council would therefore request that Government considers:

1. increasing the number of non-constituent members (per County) to ensure equal representation for our rural, urban and coastal areas; with a minimum of half the non-constituent members being from the borough, city, and district councils.
2. that non-constituent members be automatically given voting rights on issues which directly affect their area or require the use of their resources or capacity to deliver.

Question 3: To what extent do you agree or disagree that working across the proposed geography through the Mayoral Combined County Authority will support the economy of the area?

Agree

The wider geography of Norfolk and Suffolk can bring together the economic strengths of both counties in a coordinated approach. This could help align key priorities like strategic infrastructure development, skills training, and business support across the two counties, fostering a more cohesive and efficient economic strategy.

Norfolk and Suffolk have coastal, urban and rural areas with varying levels of economic activity and prosperity. Devolution and a combined authority approach with the right partners around the table could help direct and target investment and resources into the more peripheral, rural or economically disadvantaged areas, creating a more inclusive and balanced approach to economic development across the entire region. This would reduce inequalities and support more sustainable growth in all areas.

Such an approach could enable the prioritisation and targeting of policy interventions in areas that will deliver local, regional and national strategic objectives including growth and regeneration benefits and, in places like North Norfolk, ensure that our local businesses and communities were better placed to realise benefits from major national infrastructure investment such as cable corridors associated with the export of offshore wind generation, from which there are almost no local benefits, as the district's local electricity infrastructure is severely constrained. This might include focussed interventions where markets are insufficiently coordinated, require infrastructure investments or have complex value chains.

This approach would need to take account of and consolidate local strengths, specialisms, clusters, places, and types of economic activity – especially in the cases of capital-intensive and inward investment-driven investments, where national and international visibility, as well as local capability/capacity, are critical success factors.

There are some risks, however, which would need to be managed by working across such a wide geography in terms of economy growth. While some parts of Norfolk and Suffolk, particularly urban areas like Norwich and Ipswich, may see significant economic benefits from an MCCA, smaller towns, rural areas and the coastal fringe such as North Norfolk might, as in the past, not receive the same level of focus or investment, and this could exacerbate regional inequalities, with some areas experiencing more rapid growth than others. Any MCCA would therefore need to be effective at balancing needs across the region, recognising the

strengths of the area, but also the investment required to support certain parts of the region to grow and ensure that all communities within the region benefit equitably from economic policies.

Question 4: To what extent do you agree or disagree that working across the proposed geography through the Mayoral Combined County Authority will improve social outcomes in the area?

Neither agree nor disagree

Whilst North Norfolk District Council can see the potential for devolution to help improve social outcomes across the region, there are also wider factors which need to be considered by Government across the wider public sector which could improve social outcomes for communities.

Working across Norfolk and Suffolk, we can see that further partnership working, building on already strong local partnership relationships, could lead to even greater coordination of services such as housing, growth and strategic planning and economic development, which have a direct effect on social outcomes.

However, there also needs to be a realistic assessment of what an MCCA might achieve, recognising the role of the principal local authorities in the area (currently the districts, city, borough and county councils, and probably unitary councils in the future), who work closest to local communities, families and individuals and deliver those services which have a direct and lasting impact on social outcomes (housing, education, early help and prevention, social care etc).

North Norfolk District Council therefore believes that there is a need to reach agreement over what local government structure is most appropriate as being the first pillar to drive better social outcomes locally. At the present time, North Norfolk District Council is concerned that local government reform in Norfolk proposes new councils of a size, geography and scale which would not be truly local: something which should be a driving factor in the process of local government reorganisation in support of a successful programme of devolution and in maximising the opportunities which might present themselves for the region through an MCCA.

Alongside this, we support the statements made by Government in the English Devolution White Paper with respect to wider public service reform, as public services such as public protection, DWP, local health and social care and education and training services are all interconnected and require a broader, more holistic and joined-up approach to effectively meet the social needs of communities and individuals. However, without a wider debate around the provision and reform of these services in a geography as large as Norfolk and Suffolk, and agreement over what is an appropriate scale of local government which is close enough to local communities to understand and respond to their needs, North Norfolk District Council would be concerned that the aspirations and opportunities presented by establishing an MCCA will not be realised for North Norfolk's small and dispersed communities and would not yield the scale and kind of change the Government is seeking.

Question 5: To what extent do you agree or disagree that working across the proposed geography through a Mayoral Combined County Authority will improve local government services in the area?

Neither agree nor disagree

North Norfolk District Council agrees that in order to see large scale economic benefit from a Devolution Deal, a broader geography is required. However, it is open to question over whether, and to what extent, an MCCA will improve local government services in Norfolk and Suffolk as this will depend on its design, leadership, and the specific local context. For Devolution to be successful, North Norfolk District Council believes that any new local authorities need to be of the right size and scale, across both counties, to be close enough to the communities they serve and ensure effective representation of their communities' views and needs, whilst working in collaboration with the MCCA to support the delivery of the devolution objectives around housing and economic growth, infrastructure, transport and education and training.

At this moment in time, with the separate discussions going on in Norfolk and Suffolk about the reorganisation of the current local government system, the District Council does not feel able to answer this question with any degree of certainty or confidence – hence our response that we neither agree nor disagree with the question.

The Council is pragmatic about participating in a debate on the need for local government reorganisation and is not closed to proposals for reform; however, the vast geography of Norfolk, and its diverse economic, demographic and community structures does not, in North Norfolk's view, support a single or even two unitary structure in the county moving forward. This is because the District Council does not believe the needs and interests of its rural and coastal communities will be well-served by such large and remote organisations. The extent to which local government services will be improved across the proposed geography of the MCCA will be dependent on how well-executed and designed any new councils might be. If they are at the right size and scale, North Norfolk District Council could see that improvements might be realised, but if poorly implemented, there could be an imbalance in strategy and service delivery.

We would therefore ask that Government recognises that local government should serve "local" communities and geographies and does not disadvantage our communities and residents by proposing a devolution model which some people might say just recreates a two-tier form of local government which is of a larger scale and further removed from our communities.

North Norfolk District Council supports the devolution of powers, functions and budgets from Whitehall to the region, but would be concerned that local government reorganisation is in fact the opposite of devolution at a local level. This is because much larger units of local government administration would see decisions which directly impact on peoples daily lives being taken further away by people who have little understanding of the places where the impact is most greatly felt; and would be seen in the interests of economy and efficiency rather than resident or customer need, with services centralised or removed to more distant locations again directly impacting on residents or place – the example of the loss of banks and financial services from market towns, undermining their historic role as service and retail centres through reduced footfall being a clear example of unintended consequences from what is a

commercial, economic decision. This would apply equally to some frontline public service provision to our most vulnerable and disadvantaged residents – such as those seeking housing support if services are centralised involving them in costly travel to a distant council office for support by infrequent public transport. Some residents of North Norfolk are also seeing this additional cost and time burden being passed to them in terms of accessing local GP services following the closure of a rural surgery and in visiting relatives in remote acute hospitals whilst community facilities, such as Benjamin Court in Cromer, remain unused. The District Council is therefore concerned that local government reorganisation will result in similar financial pressures impacting on service delivery models, meaning that the costs (and inconvenience) of accessing remote and distant services falls on residents.

Question 6: To what extent do you agree or disagree that working across the proposed geography through a Mayoral Combined County Authority will improve the local natural environment and overall national environment?

Agree

North Norfolk District Council does see the potential for the geography of the proposed MCCA to realise and deliver improvements to both the local and national natural environment through the more effective co-ordination of environmental initiatives, pooling of resources, and long-term and strategic environmental planning.

The North Norfolk District has significant areas of designated landscape and habitats – including large areas of the northern Broads, the Norfolk Coast Area of High Landscape Value, chalk rivers (Wensum, Glaven, Stiffkey) Special Areas of Conservation and internationally recognised coastal and marine environments – but, as a relatively sparsely populated area with significant tourism and day visitor pressures, is often challenged in being able to present the case for funding significant projects of environmental improvement, notwithstanding the extent and quality of the district's natural assets. The District Council believes that there would therefore be benefits to taking a more strategic approach which integrated approaches to the environment, with housing, economic development and transportation.

North Norfolk District Council also recognises that across the broader Norfolk and Suffolk geography, collectively and through strong public / private partnership working, the region has a leading UK role in terms of making a significant contribution to UK energy transition and national Net-Zero ambitions with major strengths offshore wind, North Sea hydrocarbon transition, Carbon Capture and storage, hydrogen, solar and nuclear new builds. These all present opportunities to drive local growth, economic and social regeneration, aligning with national policy objectives to 'identify and support clean energy industrial sectors with the greatest growth potential' and 'consider where sectors and relevant capabilities are located to identify clusters that can drive growth'.

However, the District Council considers that the extent to which the region might be successful in this space will be dependent on ensuring that local environmental needs are appropriately considered and that policies are implemented equitably across the entire region. It is accepted that there may be disparities in the focus needed at a local level and that across Norfolk and Suffolk the environmental challenges are vastly different, therefore requiring both a strategic and more localised focus. Achieving the right size and scale of local government which is

close to the communities they serve is essential in delivering the strategic ambitions of the MCCA.

Question 7: To what extent do you agree or disagree that working across the proposed geography through the Mayoral Combined County Authority will support the interests and needs of local communities and reflect local identities?

Disagree

Please see comments we have made above in response to Questions 4 and 5 above.

While the MCCA could have the potential to support the needs of local communities and reflect local identities through coordinated efforts and stronger regional advocacy, it depends on how well the balance is struck between the high-level MCCA regional priorities and planning and local identity as North Norfolk District Council believes that the MCCA will not have the resources or capacity to do everything. The relationship between the MCCA and any new unitary councils established and their relationships with their communities will therefore be critical in terms of the extent to which the MCCA will be able to support the interests of local communities and reflect local identities.

As outlined in our response to Question 1, North Norfolk District Council recognises that an MCCA working across the geography of Norfolk and Suffolk could amplify the region's voice, allowing for more resources and political influence to be directed towards shared regional needs. This could create a unified approach to regional issues like transportation, housing, and economic development, which could be beneficial for local communities. The wider geography may also support common issues that affect multiple communities more effectively and with a more holistic view.

However, North Norfolk District Council believes that it needs to be recognised that a good balance needs to be achieved between the strategic MCCA and any new unitary councils in order to avoid any sense of loss of local control and dilution of local representation in respect of key decisions taken and services provided to local communities.

Smaller communities within the Norfolk and Suffolk, such as those across North Norfolk might feel that their unique needs and identities are overlooked in favour of broader regional priorities. This may become even more so, if the MCCA's focus becomes too dominated by larger, more populous, and urban areas. There is also a risk that local communities may feel disconnected from decision-making processes, particularly if they do not share the same concerns as the regional Mayor and decision-making board. This could further undermine the sense of local identity and understanding of individual community needs. It is therefore essential that these issues are given very careful thought and consideration in proposing and agreeing the population and geographic "size" of any new unitary councils so that they are seen to have support of their residents, businesses and communities by being close to and responsive to the needs, concerns, aspirations and ambitions of the communities they serve.

Without clarity over the number, scale, size and geographies of any new unitary councils, North Norfolk District Council feels it is unable to answer this question with a positive response at this time.