

Response to IPSOS Consultation ReportCross cutting Themes

	Consultation response theme	Constituent Councils response	Change to Proposal
1.1	Views expressed about an elected Mayor. Views that a Mayor is not needed, it would put too much power in one person, and is only proposed to enable certain politicians to further their own career.	<p>A Mayor is a requirement of the Government to access a level 3 devolution deal. A level 3 deal is the highest level of devolution deal available and provides access to the highest levels of funding from Government, and to the widest range of powers and functions. When the balance of consultation responses are considered, broad support is given for the other benefits of the deal, and accordingly, whilst there is concern about an elected Mayor, the consultation responses indicate a desire for the benefits which are linked to the requirement for an elected Mayor. In addition, the Constituent Councils consider that the opportunities which a level 3 deal will offer are what are needed in the proposed EMCCA Area to achieve our objectives as set out in the Proposal document.</p> <p>See further detail in Governance section 2.1</p>	No change
1.2	Issue raised that Leicestershire County Council are not part of the proposed CCA. Also issue raised that Leicester City and Rutland are not included.	The Constituent Councils understand that the Government's current position is that there are specific reasons why it is not possible to include Leicestershire County Council within the proposed EMCCA at the present time. However, the Levelling Up and Regeneration Bill provisions provide the scope to enable Leicester City Council, Rutland County Council and	No change

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		<p>Leicestershire County Council to become part of the EMCCA in future.</p> <p>The Constituent Councils are content that the geography of the proposed EMCCA is appropriate - see principle two of the eight principles established by the Constituent Councils for the governance framework to be applied to the delivery of the Devolution Deal (“the Principles”). These principles included the four principles for levelling up set out in the Levelling Up and Regeneration White Paper and four local principles:</p> <p><i>Principle two: Sensible geography - the East Midlands area covered by this devolution deal has one of the most functional, self-contained economic geographies in the country - 92% of workers live in the area and 87% of residents work in the area.</i></p>	
1.3	<p>Suggestion that the proposed CCA should not be called the East Midlands Combined County Authority if Leicestershire County Council are not involved.</p>	<p>When considering the proposed name of the CCA, the Constituent Councils took into account the following factors:</p> <ul style="list-style-type: none"> <li>• It is straightforward and thus relatively easy for the wider public to understand;</li> <li>• It follows the terminology used by Government and the offer documentation;</li> <li>• Similar naming conventions relating to devolution exist in other parts of the country. For example, the West of England Combined Authority includes Bath and North-East Somerset, Bristol and South Gloucestershire, but not Devon, Dorset, or Cornwall;</li> <li>• EMCCA would not need to be changed in the event that other councils seek to join the CCA at a later date.</li> </ul> <p>DLUHC has confirmed that the official name has to include ‘combined county authority’.</p>	<p>Agreed to retain ‘East Midlands Combined County Authority’.</p>

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1.4	<p>Suggestion that the city areas will benefit disproportionately from devolution and that the needs of more rural areas will be over-looked.</p>	<p>The draft Proposal envisages that all four Constituent Councils would be represented on the EMCCA with two members each.</p> <p>Likewise, the draft Proposal sets out that four of the available memberships of the EMCCA would be for representation from the Districts and Boroughs of the two County areas. This means that the Council representation on the EMCCA would be made up as follows:</p> <p>Two members from Derbyshire County Council,</p> <p>Two members from Nottinghamshire County Council,</p> <p>Two members from Derby City Council,</p> <p>Two members from Nottingham City Council,</p> <p>Two members representing district and borough councils across Derbyshire, and</p> <p>Two members representing district and borough councils across Nottinghamshire.</p> <p>Accordingly, the draft Proposal seeks to ensure representation on the EMCCA from all areas within the proposed EMCCA area.</p> <p>The role of all of the members of the EMCCA would be to make decisions in the best interests of the whole of the proposed EMCCA area. The Constituent Councils envisage the proposed EMCCA preparing an investment strategy and decisions about investment funding would need to be made in line with a</p>	No Change

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		published strategy, and in the interests of maximising opportunities for growth across the proposed EMCCA area.	
1.5	Views expressed that the CCA will create an additional layer of bureaucracy and/or add further complexity to an already complex structure.	<p>The proposed EMCCA is not about adding a layer of unnecessary bureaucracy.</p> <p>Principle six of the Principles states the importance of subsidiarity - <i>The CCA will perform a role that adds value to existing governance arrangements - primarily focused on strategic place shaping functions such as plan making and strategic commissioning. The CCA will not create an additional layer of governance, but instead will bring the governance that currently sits at national government level down into the CCA Area, much closer to businesses and communities. Place making functions will be delivered through the existing local planning authority arrangements that are better placed to deliver functions for which they are statutorily responsible and as close to communities as is practicable.</i></p> <p>As principle six sets out, it is the view of the Constituent Councils that a Mayor (and indeed the proposed EMCCA as a whole) would not add a layer of governance, but rather fulfil a role which adds value to the existing regional governance structures.</p>	No Change
1.6	Issues raised about the potential cost of the proposed EMCCA, based on a view that Constituent Councils already struggle to balance their budgets.	It is not anticipated that having an elected Mayor would add to the cost of the proposed EMCCA. The Constituent Councils expect the EMCCA to be funded from the committed central Government funding associated with the EMCCA (if approved), which amounts to £38m a year. A Mayor would nevertheless have the power to raise a precept in respect of Mayoral functions if necessary.	No Change

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		<p>Whilst a Mayor would have a degree of power, that power can be controlled in a number of important respects - for example, the EMCCA could amend the Mayor's budget if a 2/3 majority agreed. Likewise, the exercise of planning powers would require the consent of the Local Planning Authority for the area affected. The majority of powers which the proposed EMCCA would exercise are not mayoral powers and would require a vote of the EMCCA.</p> <p>The Government will provide capacity funding of £0.5m in 2023-24 once the establishing legislation is made and a further £1m in 2024-25 and DLUHC have confirmed that expenditure can be incurred pending receipt of the capacity grant funding</p>	
1.7	Views expressed that there will be mismanagement based on issues raised about competence of existing local authorities.	<p>Normal local authority rules about finance, conduct and management designed to minimise the risk of mismanagement would apply to the proposed EMCCA.</p> <p>Principle Four of the Principles seeks to ensure appropriate accountability. <i>"The Constituent Councils have committed to developing a Constitution and Assurance Framework that will confirm, clarify and formalise the intention of institutions and local leaders to continue to be transparent and accountable, work closely with local businesses, seek the best value for taxpayer' money and maintain strong ethical standards"</i>.</p> <p>Equally the Constituent Councils intend the governance structure of the proposed EMCCA to be set up so as to ensure accountability, which would include representation from outside of the Constituent Councils, and also include outside interests such as from business. Appropriate safeguards would need to be put in place through the proposed structures</p>	No Change

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		<p>outlined in the draft Proposal document which include at least one Overview and Scrutiny Committee, and an Audit Committee, which would be required to have an independent chairperson who is not otherwise associated with the Mayor or involved in the EMCCA. It is also possible to design the governance arrangements to include more roles for critical friend type oversight, though this would be a decision for the EMCCA once formed.</p>	
1.8	<p>Views expressed that local politicians are making a power grab through the proposed EMCCA, and that political affiliation will negatively affect decision making.</p>	<p>Elected Politicians would have a key role in decision making of the proposed EMCCA. The draft Proposal sets out that each of the four Constituent Councils would nominate two representatives alongside District and Borough representatives.</p> <p>A Mayor would be elected by voters in the proposed CCA area, and so would be directly accountable to the local electorate. As such, voters could vote for the Mayoral candidates on the basis of competence, politics etc. Likewise, if the Mayor was perceived to not deliver in the way the electorate expect to see, they could hold the Mayor to account at the ballot box.</p> <p>Although some power would be concentrated in the Mayoral role, the draft Proposal sets parameters for the use of powers which requires a level of consensus for most decisions to be made. This means that all members would work on behalf of the whole of the proposed EMCCA area.</p> <p>This is stated in both the Deal and the draft Proposal, specifically in Principle Four of the Principles: <i>Appropriate accountability - the Constituent Councils have committed to developing a Constitution and Assurance Framework that will confirm, clarify and formalise the intention of institutions and</i></p>	No Change

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		<p><i>local leaders to continue to be transparent and accountable, work closely with local businesses, seek the best value for taxpayers' money and maintain strong ethical standards.</i></p> <p>Whilst the EMCCA would constitute a new organisation, its functions would be limited to very specific areas, which include a specific number of powers that are currently administered by Central Government, and not held at a local level.</p>	
1.9	Desire to have a referendum or other vote on the question of formation of a CCA.	The Levelling Up and Regeneration Bill requires a consultation to be undertaken across the area before a Proposal for a CCA can be submitted to the Secretary of State. A referendum could not replace a consultation in this context and so a consultation was legally required to be carried out.	No Change
1.10	Suggestion that the Constituent Councils, and the District and Borough Councils will not be capable of working together.	<p>The Constituent Councils have a strong track record of working collaboratively together, and with District and Borough councils over many years. Over the last eighteen months this has accelerated significantly following the announcement that Derbyshire and Derby and Nottinghamshire and Nottingham had been identified as county deal pathfinder areas in the Levelling Up White Paper. This announcement was testament to the collaborative efforts of the four Constituent Councils and District and Borough Councils.</p> <p>Since the announcement, the Constituent Councils have worked together very effectively and collaboratively to get to this point in the planning process and are all committed to continuing to work together to create the CCA if the decision is taken to proceed. Proposed future governance arrangements have been designed and developed to ensure the continued involvement of District and Borough Councils. This commitment is supported by Principle Five of the Principles which seeks to</p>	No Change

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		<p>ensure inclusivity as follows <i>“The Constituent Councils have committed to creating as inclusive a model of governance as possible, in pursuit of agreed outcomes. Devolution of power and responsibilities will be to the Constituent Councils, however, the importance of the continued role of the eight Derbyshire and seven Nottinghamshire district and borough councils will be respected”</i>.</p>	
1.11	<p>A desire to retain current geographic boundaries. Views expressed that District and Borough Councils, and Parish Councils, will lose their influence and control, and will become obsolete.</p>	<p>The draft Proposal for an EMCCA sets out that all existing District Borough and Parish Councils will be retained, and no powers and functions are being removed from them. The Proposal sets out that the proposed EMCCA could concurrently exercise some powers with other Councils, but in the case of the majority of District and Borough Council powers that would be affected (mainly relating to planning and housing) were the proposed EMCCA created, consent would be required from the District and Borough Councils before the CCA could exercise those powers.</p> <p>The commitment to a meaningful role for District and Borough Councils within the proposed EMCCA is reflected in all of principles five, six and eight of the Principles:</p> <p><i>Principle five: Inclusivity - The East Midlands Constituent Councils have committed to creating as inclusive a model of governance as possible, in pursuit of agreed outcomes. Devolution of power and responsibilities will be to the Constituent Councils, however, the importance of the continued role of the eight Derbyshire and seven Nottinghamshire district and borough councils will be respected.</i></p> <p><i>Principle six: Subsidiarity - The East Midlands CCA will perform a role that adds value to existing governance arrangements -</i></p>	No Change



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		<p><i>primarily focused on strategic place shaping functions such as plan making and strategic commissioning. The East Midlands CCA will not create an additional layer of governance, but instead will bring the governance that currently sits at national government level down into the East Midlands, much closer to businesses and communities. Place making functions will be delivered through the existing local planning authority arrangements that are better placed to deliver functions for which they are statutorily responsible and as close to communities as is practicable.</i></p> <p><i>Principle eight: Choice - The preferred governance model for the East Midlands CCA will identify a mechanism for including district and borough councils in the geography. This model will respect the existing sovereignty of these lower tier local authorities. Individual councils will also be able to continue to exercise choice about participation at sub-CCA tiers of partnership working.</i></p> <p>Likewise, the draft Proposal contains a number of mechanisms by which District and Borough Councils will contribute to the governance of the EMCCA.</p> <p>The draft Proposal document sets out the proposal for four Non-Constituent Members of the EMCCA to be nominated by the District and Borough Councils, and sets out the mechanism to be used, which was specifically agreed with the District and Borough Councils.</p> <p>As well as the Non-Constituent Memberships, the draft Proposal also outlines the roles envisaged for District and Borough Council</p>	

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		<p>representatives on the Overview and Scrutiny Committee/s, and the Audit Committee.</p> <p>Furthermore, as set out in the table of powers appended to the draft Proposal, the consent of District and Borough Councils would be required prior to the exercise of certain functions by the EMCCA.</p> <p>The draft Proposal does not impact on the role of Parish Councils which would continue to perform their valuable functions in local communities.</p>	
1.12	Views raised that the ambitions and activities outlined in the Proposal are likely to be underfunded	<p>The draft Proposal sets out the Constituent Councils' intention to create a fully developed long term transformational funding programme covering all budgets for devolved functions. This would include a new £1.14 billion fund (£38 million a year fixed for 30 years), provided by the Government, accountable to the EMCCA. In addition, the proposed EMCCA would have the flexibility to secure private and public sector leverage. The £1.14 billion could be used to draw in additional investment, meaning the true benefit of the devolution deal could potentially be significantly higher.</p> <p>Were the decision taken to proceed with creation of a CCA, as it moves forward over time, the Constituent Councils envisage the EMCCA also looking to secure additional powers and funding to support the delivery of the stated ambitions. The Constituent Councils believe that establishing the EMCCA would create a stronger basis for bidding for Government funding.</p>	No Change
1.13	Suggestion that an Innovation Board could be established to develop and	The draft Proposal identifies that the proposed EMCCA area benefits from strong innovation expertise locally. Establishing	Proposal wording changed to be clearer on how existing local strengths in

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	implement an Innovation Accelerator	the EMCCA offers opportunities to build on local strengths, working closely with key partners.	<p>innovation and development will be built on and progressed further.</p> <p>Wording added: “We will seek to enhance joint working with UK Research and Innovation, so we can collaborate on strategies that will drive forward research and innovation in our Area, building on our local strengths.”</p>
1.14	Proposal needs to consider how inequalities, socio economic factors and social mobility will be addressed.	<p>The draft Proposal recognises the socio-economic challenges to be addressed by the EMCCA. In particular Section 2 of the Proposal (background and context) evidences high levels of poverty and deprivation in some parts of the CCA, and the significant gap between the overall performance of the CCA Area and that of England in terms of socio-economic and health outcomes. For example, 13 out of 17 local authority district and unitary areas within the Area are identified as ‘social mobility cold spots’.</p> <p>One of the stated outcomes of the EMCCA is to reduce inequality and promote social mobility to allow people to achieve their potential.</p> <p>The EMCCA will help to overcome the historical imbalance of spending at the local level and ensure that the Area gets the necessary boost in funding to address longstanding inequalities and support levelling up of our communities.</p> <p>We intend to achieve this through our priorities, for example, Skills, which will include harnessing the adult education budget and developing the LSIP, targeting resources to help improve</p>	No Change

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		<p>basic skills across the CCA and reduce levels of unemployment and physical inactivity.</p> <p>There are also wider opportunities identified in the Proposal to work across priority themes to improve the socio-economic, health and environmental well-being of people who live and work in the EMCCA (for example, reducing homelessness through improved planning or in the transport priority by improving opportunities through increased connectivity/ reducing transport isolation).</p> <p>Looking beyond the deal, the Proposal sets out our intention to work with government and partners to improve key outcomes for our people, for example, to develop an ambitious, long term mayoral social mobility strategy, supporting young people through their journey to adulthood.</p>	
1.15	Proposal needs to ensure the voice of businesses are reflected and heard	<p>The importance of working with businesses and ensuring the business voice is heard is of critical importance to the future CCA. This is reflected in the commitment to have meaningful role for businesses within the proposed EMCCA as reflected in principles six and eight of the Principles outlined in the Proposal document in respect of appropriate accountability and subsidiarity as follows:</p> <p>Principle Four of the Principles seeks to ensure appropriate accountability. <i>“The Constituent Councils have committed to developing a Constitution and Assurance Framework that will confirm, clarify and formalise the intention of institutions and local leaders to continue to be transparent and accountable, work closely with local businesses, seek the best value for taxpayer’ money and maintain strong ethical standards”.</i></p>	Strengthened wording to reflect critical importance in ensuring business voice is heard.

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		<p><i>Principle six: Subsidiarity - The East Midlands MCCA will perform a role that adds value to existing governance arrangements - primarily focused on strategic place shaping functions such as plan making and strategic commissioning. The East Midlands MCCA will not create an additional layer of governance, but instead will bring the governance that currently sits at national government level down into the East Midlands, much closer to businesses and communities. Place making functions will be delivered through the existing local planning authority arrangements that are better placed to deliver functions for which they are statutorily responsible and as close to communities as is practicable.</i></p> <p>In addition, Section 5 of the Proposal sets out initial details on the potential involvement of businesses in future governance arrangements. These arrangements will be further developed with businesses should the Proposal for the creation of the EMCCA be supported.</p>	

## Consideration of consultation responses for each Theme Group area

### Governance

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2.1	<p>The majority of stakeholders and non-stakeholders disagreed with the election of a Mayor because</p> <ul style="list-style-type: none"> <li>(a) it was felt to be unnecessary,</li> <li>(b) there were views expressed that too much power would sit with a single person,</li> <li>(c) views also expressed that the Mayor would lead to additional cost and be an additional layer of bureaucracy,</li> <li>(d) a perceived lack of democracy in electing a mayor when the preference would be to have a public vote</li> <li>(e) a lack of local representation given the potential for the mayor to not be local and therefore detached from local issues</li> <li>(f) may promote own area of EMCCA to detriment of others</li> </ul>	<p>In relation to whether a Mayor is necessary - a Mayor is a requirement of the Government to access a level 3 devolution deal. A level 3 deal is the highest level of devolution deal available and provides access to the highest levels of funding from Government, and to the widest range of powers and functions.</p> <p>When the balance of consultation responses are considered, broad support is given for the other benefits of the deal, and accordingly, whilst there are issues about an elected Mayor, the consultation responses indicate a desire for the benefits which are linked to the requirement for an elected Mayor. In addition, the Constituent Councils consider that the opportunities which a level 3 deal will offer are what are needed in the proposed EMCCA Area to achieve our objectives as set out in the Proposal document.</p> <p>An elected Mayor is also in line with the Principles:</p> <p><i>Principle one: Effective leadership with a directly elected mayor across the area.</i></p> <p><i>Principle six: Subsidiarity - The East Midlands MCCA will perform a role that adds value to existing governance arrangements - primarily focused on strategic place shaping functions such as plan making and strategic commissioning. The East Midlands MCCA will not create an additional layer of governance, but</i></p>	<p>No changes have been made due to the implications of removing the Mayor from the Proposal.</p>

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	<p>(g) a need to build in a way to guarantee the competence and experience of the mayor</p> <p>(h) issues raised about the mayor being affiliated to a political party</p>	<p><i>instead will bring the governance that currently sits at national government level down into the East Midlands, much closer to businesses and communities. Place making functions will be delivered through the existing local planning authority arrangements that are better placed to deliver functions for which they are statutorily responsible and as close to communities as is practicable.</i></p> <p>As principle six above sets out, it is the view of the Constituent Councils that the Mayor (and indeed the proposed EMCCA as a whole) will not add a layer of governance, but will fulfil a role which adds value to the existing regional governance structures.</p> <p>It is not anticipated that having an elected Mayor will add to the cost of the proposed EMCCA. It is expected that the EMCCA would be funded from the committed central Government funding associated with the EMCCA (if approved), which amounts to £38m a year. A Mayor would nevertheless have the power to raise a precept in respect of Mayoral functions if necessary</p> <p>Whilst a Mayor would therefore have a degree of power, that power is controlled in a number of important respects - for example, the EMCCA members could amend the Mayor's budget if a 2/3 majority agreed. Likewise, the exercise of planning powers would require the consent of the Local Planning Authority for the area affected. The majority of powers which are proposed to be exercised by the</p>	

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		<p>EMCCA are not mayoral powers and would therefore require a vote of the EMCCA.</p> <p>A Mayor would be elected by voters in the proposed EMCCA Area, and so is directly accountable to the local electorate. It would be for voters to vote for the Mayoral candidates on the basis of competence, politics etc. Likewise, if the Mayor does not deliver in the way the electorate expect to see, they can hold the Mayor to account at the ballot box.</p>	
2.2	<p>Both stakeholders and non stakeholders raised issues that EMCCA members would not be representative of the local area and might not care about local issues.</p> <p>There was also a view that EMCCA members should be elected.</p> <p>There were also views expressed about the competence of prospective members.</p>	<p>Members of the proposed EMCCA are likely to be representative of the local area as core membership will be appointed from the Constituent Councils, and from the District and Borough Councils.</p> <p>Whilst it is not a requirement that members of the proposed EMCCA will be elected members of the appointing Council(s), it is likely that elected members would be appointed to most of the roles available to representatives from Councils. However, even if an officer(s) were appointed to membership of the proposed EMCCA, the officers will have an astute and thorough understanding of the local area as their role as officers within any of the appointing Councils will be focused on the local area. This understanding would be both of the local area within the proposed EMCCA Area of the Council they are elected to/employed by, but also as to the proposed EMCCA Area as a whole. The Constituent Councils work together, or have worked together, regularly on matters spanning the proposed EMCCA Area.</p>	No Change



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		<p>The memberships of the proposed EMCCA which would not be held by the Constituent Councils and/or District and Borough Council representatives (for example, the business voice if appointed to the EMCCA) would also likely be linked to the local interests which they represent.</p> <p>Voting in of members (except a Mayor) is not envisaged by the provisions of the Levelling Up and Regeneration Bill as that presently drafted, and so not currently possible.</p>	
2.3	<p>Views were expressed by stakeholders and non-stakeholders that the draft governance Proposals were unclear as to how they would ensure an equitable approach towards the deployment of investment funding, particularly to ensure that the focus is not entirely on the two city areas.</p>	<p>All four Constituent Councils would be represented on the proposed EMCCA with two members each. Likewise, the draft Proposal sets out that four of the available memberships of the proposed EMCCA would be for representation from the Districts and Boroughs of the two County areas. This means that the Council representation on the proposed EMCCA would be as follows:</p> <p>Two members from Derbyshire County Council</p> <p>Two members from Nottinghamshire County Council</p> <p>Two members from Derby City Council</p> <p>Two members from Nottingham City Council</p> <p>Two members representing district and borough councils across Derbyshire</p>	No Change

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		<p>Two members representing district and borough councils across Nottinghamshire</p> <p>Accordingly, there would be representation on the proposed EMCCA from the non city areas of the proposed EMCAA Area.</p> <p>The role of all of the members of the proposed EMCCA would be to make decisions in the best interests of the whole of the proposed EMCCA area. The Constituent Councils envisage the proposed EMCCA preparing an investment strategy and decisions about investment funding would need to be made in line with a published strategy, and in the interests of maximising opportunities for growth across the proposed EMCCA area.</p>	
2.4	<p>Leicestershire County Council and East Midlands Councils question how the devolution could be described as for the East Midlands when it only incorporates the D2N2 area. Suggestion devolution would be better focussed on the six C's (Derby, Nottingham, Leicester, Derbyshire, Nottinghamshire and Leicestershire), and could also include Rutland. The University of Derby was also supportive of continuing to explore opportunities to incorporate Leicester and Leicestershire.</p>	<p>The Constituent Councils understand that the Government's current position is that there are specific reasons why it is not possible to include Leicestershire County Council within the proposed EMCCA at the present time. However, the provisions of the Levelling Up and Regeneration Bill would enable Leicester City Council, Rutland County Council and Leicestershire County Council to become part of the EMCCA in future.</p> <p>The Constituent Councils are content that the geography of the proposed EMCCA is appropriate - see principle two of the Principles:</p> <p><i>Principle two: Sensible geography - the East Midlands area covered by this devolution deal has one of the</i></p>	No Change

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		<p><i>most functional, self-contained economic geographies in the country - 92% of workers live in the area and 87% of residents work in the area.</i></p> <p>See also section 1.4</p>	
2.5	<p>A number of organisations suggested that they should have a place on the EMCCA, or should have a role in the governance structures otherwise. These include the Peak District National Park, Burton and South Derbyshire College, the NHS, the universities of Nottingham Trent, Derby and Nottingham, Nottingham College, Derventio Housing Trust (asking for VCSE representation), Nottingham Growth Board (asking that businesses are represented) and the TUC.</p>	<p>If the decision is taken to submit the draft Proposal to the Government, the Constituent Councils intend to start considering the possible governance models in more detail and will have regard to all of the suggestions made.</p> <p>However, Government has placed limits on numbers and so all of the requests will not be able to be accommodated - but the Constituent Councils would hope to be able to accommodate a range of representations from those who have expressed an interest in the wider governance structure of the proposed EMCCA.</p>	No Change.
2.6	<p>A number of responses suggested that the advisory boards should have certain members, as follows:</p> <ul style="list-style-type: none"> <li>The Co-operative Party suggested that the Business and Economic Advisory Board should contain representatives from different business models such as co-operatives, employee owned businesses and social enterprises</li> </ul>	<p>If the decision is taken to submit the draft Proposal to the Government, the Constituent Councils intend to start considering the possible governance models in more detail and will have regard to all of the suggestions made, as to how it is best to accommodate a range of interests which reflect the stated priorities of the proposed EMCCA. The draft Proposal makes it clear that the proposed EMCCA could establish a number of advisory boards, which is one option for accommodating relevant interests.</p> <p>Should a decision be taken to submit the draft Proposal to Government, further work will be</p>	No Change

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	<ul style="list-style-type: none"> <li>• Visit Peak District and Derbyshire felt that a business advisory board was needed to provide the sector with the opportunity to be visible and ensure it is highlighted in growth plans</li> <li>• Arts Council England felt a place should be reserved for culture in any governance arrangements</li> <li>• Nottingham Growth Board questioned the level of influence that the proposed Business and Economy and Advisory Board would have</li> <li>• East Midlands Chamber emphasised the need for voices of both the private and third sectors to be meaningful in the structures. Also highlighted the need for business representation.</li> <li>• The Derby and Derbyshire Local Access Forum suggested that consideration be given within the EMCCA to appointment of</li> </ul>	<p>undertaken to develop the operating model of the proposed EMCCA, including how data/insight is sourced to inform strategy and evaluation.</p>	

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	<p>advisory bodies with non-exec functions</p> <ul style="list-style-type: none"> <li>• TUC suggested additional advisory boards on housing, transport, net zero and skills as well as boards for public service provision and social mobility. TUC also wants involvement in Education and Skills Advisory Board and the Business and Economy Advisory Board.</li> <li>• The universities suggested creation of a unit that provides data and insight, informs strategy, guides investment decisions, oversees programme monitoring and supports evaluation of activity</li> </ul>		
2.7	<p>A number of stakeholders expressed views suggesting there was a democratic deficit created by the exclusion of District and Borough Councils from being Constituent Councils of the proposed EMCCA. In addition views on the limits on representation on the proposed EMCCA were outlined.</p>	<p>The inability for District and Borough Councils to be Constituent Members of the proposed EMCCA is based on the provisions of the Levelling Up and Regeneration Bill as it is currently drafted. Likewise, the Government has been prescriptive about limiting the number of District and Borough Council Non-Constituent Members. However, the Constituent Councils are committed to ensuring that the District and Borough Councils can play a meaningful role in the proposed EMCCA, and always have been.</p>	No Change

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		<p>The commitment to a meaningful role for District and Borough Councils is reflected in all of principles five, six and eight of the Principles:</p> <p><i>Principle five: Inclusivity - The East Midlands Constituent Councils have committed to creating as inclusive a model of governance as possible, in pursuit of agreed outcomes. Devolution of power and responsibilities will be to the Constituent Councils, however, the importance of the continued role of the eight Derbyshire and seven Nottinghamshire district and borough councils will be respected.</i></p> <p><i>Principle six: Subsidiarity - The East Midlands MCCA will perform a role that adds value to existing governance arrangements - primarily focused on strategic place shaping functions such as plan making and strategic commissioning. The East Midlands MCCA will not create an additional layer of governance, but instead will bring the governance that currently sits at national government level down into the East Midlands, much closer to businesses and communities. Place making functions will be delivered through the existing local planning authority arrangements that are better placed to deliver functions for which they are statutorily responsible and as close to communities as is practicable.</i></p> <p><i>Principle eight: Choice - The preferred governance model for the East Midlands MCCA will identify a mechanism for including district and borough councils in the geography. This model will respect the existing sovereignty of these lower tier local authorities.</i></p>	

Section	Consultation response received	Constituent Councils response	Change to Proposal
		<p><i>Individual councils will also be able to continue to exercise choice about participation at sub-CCA tiers of partnership working.</i></p> <p>The draft Proposal document sets out the proposals for four Non-Constituent Members of the proposed EMCCA to be nominated by the District and Borough Councils, and sets out the mechanism to be used, which was specifically agreed with the District and Borough Councils.</p> <p>As well as the Non-Constituent Memberships, the draft Proposal also outlines the roles envisaged for District and Borough Council representatives on the Overview and Scrutiny Committee(s), and the Audit Committee.</p> <p>Furthermore, as set out in the table of powers appended to the draft Proposal, the consent of District and Borough Councils would be required to the exercise of certain functions by the proposed EMCCA.</p>	
2.8	Nottinghamshire Disabled People's Movement questioned whether the cabinet would include any input from people from the voluntary sector and with protected characteristics	As with other requests for a role on the proposed EMCCA, the Constituent Councils will consider these points if the decision is made to submit the draft Proposal to Government.	No Change
2.9	Some non-stakeholders raised the issue that proposed EMCCA members will receive excessive salaries.	DLUHC have indicated that there will be provisions included in the Statutory Instrument setting out the position on allowances which can be claimed by EMCCA members as follows:	Proposal changed to insert additional section in the Governance section between the sub-section on Advisory Boards, and the sub-section on Overview and Scrutiny Committees as follows:

Section	Consultation response received	Constituent Councils response	Change to Proposal
		<ul style="list-style-type: none"> <li>• The Mayor and members of committees/sub-committees who are not elected members of a Constituent Council may be paid an allowance, the amount to be recommended by an independent remuneration panel;</li> <li>• Members of Overview and Scrutiny Committees and/or Audit Committee (whether or not also elected members of a Constituent Council) may also be paid an allowance, the amount to be recommended by an independent remuneration panel; and,</li> <li>• Otherwise members may only be paid allowances for travel and subsistence, paid in accordance with the EMCCA’s published policy.</li> </ul>	<p>“Members Allowances The statutory instrument which creates the EMCCA will set out the position on members allowances. DLUHC have indicated that the SI will provide that allowances will be payable as follows: The Mayor and members of committees/sub-committees who are not elected members of a Constituent Council may be paid an allowance, the amount to be recommended by an independent remuneration panel; Members of Overview and Scrutiny Committees and/or Audit Committee (whether or not also elected members of a Constituent Council) may also be paid an allowance, the amount to be recommended by an independent remuneration panel; and, Otherwise members may only be paid allowances for travel and subsistence, paid in accordance with the EMCCA’s published policy”.</p>
2.10	Some respondents questioned whether the Police and Crime Commissioner is needed if there is to be a Mayor.	The draft Proposal states that whilst the Levelling Up and Regeneration Bill includes the possibility of a Mayor exercising the functions of the Police and Crime Commissioners for the proposed EMCCA Area, that is not the current intention of the Constituent Councils.	<p>Proposal changed to add words below to Governance section, under “Mayoral Functions” heading, to the end of the last paragraph:</p> <p>“It is intended however that there will be close working between the East Midlands</p>



Section	Consultation response received	Constituent Councils response	Change to Proposal
		<p>The Devolution Deal document sets out “a commitment to developing, in partnership with the Government, an arrangement which ensures close cooperation with the Police and Crime Commissioners” (summary) and; an intention for the CCA to “work with the Derbyshire and Nottinghamshire Police and Crime Commissioners to agree an appropriate arrangement to ensure close collaboration and productive and joint working on public safety” (paragraph 110).</p> <p>The Constituent Councils are committed to close working with the Police and Crime Commissioners to ensure that there is no overlap, or additional bureaucracy added from the creation of the proposed EMCAA. We have proposed an amendment to the draft Proposal to emphasise this.</p>	<p>CCA and the Area’s Police and Crime Commissioners generally; and particularly, productive and joint working on public safety; and the East Midlands CCA will work with the Area’s Police and Crime Commissioners to agree a protocol for working together.”</p>
2.11	<p>CBI suggested that the proposed EMCCA explores the potential for the functions of the D2N2 Local Economic Partnership to be integrated.</p>	<p>LEP integration is planned as part of the draft Proposal - see section of the draft Proposal headed business interests in the Governance section.</p>	<p>No Change</p>
2.12	<p>Derbyshire Transport Action suggested that one of the associate members of the proposed EMCCA should be a planner to ensure that major housing developments can be easily served by transport/active travel.</p>	<p>If the decision is taken to submit the draft Proposal to the Government, the Constituent Councils intend to start considering the possible governance models in more detail and will have regard to all of the suggestions made.</p>	<p>No Change</p>

## Homes

Section	Consultation response received	Constituent Councils response	Change to Proposal
3.1	Stakeholders made specific points regarding the Proposals relating to homes, including in relation to support for the protection of greenbelt land, the provision of better housing, the allowance for effective planning when it comes to new housing, and agreement with the extra funding to construct new homes.	<p>The Constituent Councils' aims for the proposed EMCCA would promote genuine place making and 'great places to live' through high quality design and aligned with the Futures Homes Standards. The Constituent Councils agree with the need for new housing effectively served by infrastructure (digital and transport) and key public services, such as healthcare and education.</p> <p>In terms of planning for future housing, an opportunity for the proposed EMCCA, and one which other Combined Authorities have pursued, is to commission, in conjunction with the relevant councils, a region-wide local housing needs assessment to better understand the nature of current and future housing needs across the area, providing robust evidence to support future plan making. The Constituent Councils agree that housing affordability will also need to be a key consideration, and mixed tenures promoted to better meet local needs.</p>	No Change
3.2	Stakeholders questioned consenting arrangements for exercise of planning functions, and questioned the meaning of the term "Mayoral Development Areas" and the creation of Mayoral Development Corporations	<p>In terms of the proposed planning related powers for the proposed EMCCA and Mayor, it should be noted that:</p> <p>It is not currently proposed that the EMCCA has strategic planning powers.</p> <p>All the planning related powers of the proposed EMCCA/Mayor could only be exercised with the</p>	No Change

		<p>consent/approval of the relevant local planning authority (LPA).</p> <p>A Mayoral Development Corporation (MDC) is a statutory body created to bring forward the regeneration of a defined area (Mayoral Development Area). MDCs have powers to acquire, develop, hold, and dispose of land and property. They also have powers to facilitate the provision of infrastructure. It should be noted that the powers related to the creation of an MDC would be vested in a Mayor and subject to approval of the lead member of all the Constituent Councils. Any exercise of planning functions would have to be approved by the LPA(s) affected.</p> <p>Even should the EMCCA be created, except where a LPA has consented to the MDC exercising powers to determine planning applications, the LPAs would continue to have responsibility for determining planning applications, and ensuring that, through relevant planning conditions, investment is made in required infrastructure and impact mitigation including highways, transport, education and environmental measures.</p> <p>In relation to protection of the greenbelt, should the EMCCA be created, the primary planning policy would remain the national planning policy framework, which prioritises use of brownfield land for development and optimised densities of development in urban locations. Any proposed Green Belt revisions would remain a matter for the relevant LPA through the statutory planning process (except except where a LPA has</p>	
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		consented to the MDC exercising powers to determine planning applications).	
3.3	Non-stakeholders made comments in support of the draft Proposals relating to homes but these were more conditional and relied on other factors being resolved as well - principally the need for additional and supportive infrastructure and the ongoing protection of the greenbelt land (which they felt was not explicit in the draft Proposals).	See response 3.2 above ref planning policy etc	No Change
3.4	Both types of respondents raised the need to protect greenbelt land in favour of development on brownfield sites. One point was a potential negative impact the draft Proposals may have on greenbelt and open spaces.	See response 3.2 above ref planning policy etc	No Change
3.5	<p>A number of non-stakeholder comments on the potential for some areas to become overcrowded and overdeveloped.</p> <p>Belief expressed that the draft Proposal would not benefit local people and, ultimately, not deliver against its targets for more homes.</p>	<p>Operating at a regional level, if created, the EMCCA would be able to support prioritisation of new housing linked more coherently to future anticipated areas of economic growth and seek to ensure coordination with infrastructure investments. This would contribute to enhancement of the self-containment of the proposed EMCCA area's regional economy, reducing the need for net commuting into the region and reducing average journey to work distances.</p> <p>The proposed EMCCA would also be able to enable and encourage greater public-public and public-private sector partnership working, championing new approaches to the use of public land to achieve housing</p>	No Change

		<p>targets. The Constituent Councils envisage the EMCCA developing a more strategic relationship with Homes England to contribute to these endeavours.</p> <p>Working with local authorities across the region, the EMCCA could oversee a regional pipeline of future housing schemes, identifying where public sector investment will be required to overcome market failure and ensure delivery of both housing development and enabling infrastructure.</p> <p>Linked to the above agenda, the Constituent Councils envisage the EMCCA's investment strategy could consider, as in the case of other Combined Authorities, prioritising developments which contribute to specific strategic objectives such as sustainability, delivery of affordable housing and high quality design.</p>	
3.6	A number of responses expressed general disagreement without further elaboration as to why.	A number of responses were made which did not set out the nature of the issues raised and so the Constituent Councils are unable to meaningfully take account of these issues as part of the consideration and analysis of the consultation.	No Change.
3.7	Some responses expressed views about funding for housing/planning raising the issue that the draft Proposal would be underfunded, and issues about financial mismanagement. Some specific issues were raised about funding for fuel energy efficiency and home insulation.	<p>The Devolution Deal includes a number of housing-related funding streams, which include:</p> <p>An initial £9 million housing capital funding pot to be spent by Constituent Councils to support the delivery of housing priorities.</p> <p>£16.8 million of devolved capital funding provided to the EMCCA in 2024/25 to support the building of new homes on brownfield land.</p>	No Change.

		<p>£918,000 of capacity funding to the Constituent Councils/EMCCA across 2023/24 and 2024/25 respectively, to support development of a pipeline of housing sites.</p> <p>The Devolution Deal includes a funding stream of £38 million annum for the next 30 years. The future investment strategy of the proposed EMCCA could leverage further funding for new housing development and retrofit schemes to enhance the energy efficiency of existing housing stock. Retrofit schemes of this nature have been delivered by the local authorities in the region and the Constituent Councils believe the EMCCA could consider funding an expanded programme of such activity, to be delivered in partnership with the local authorities.</p> <p>This investment strategy could also make use of precepting powers - that is where the Mayor has the power to add a charge, or precept, onto council tax bills to help fund the Mayoral functions.</p> <p>In terms of management of finances and funding, the EMCCA would, like other Combined Authorities, need to operate to an assurance framework - this is a set of systems, processes and protocols designed to provide a consistent approach for appraisal, assurance, risk management and performance throughout the lifecycle of EMCCA projects and programmes.</p> <p>The assurance framework would need to set out key processes for ensuring accountability, probity, transparency and legal compliance and for ensuring value for money is achieved across investments.</p>	
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		This is in addition to the robust governance arrangements set out in the draft Proposal document.	
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## Skills

	Consultation response received	Constituent Councils response	Change to Proposal
4.1	Stakeholders made specific points regarding the draft Proposals relating to skills, some of which included suggestions to enhance them. Non-stakeholders also predicted that adult education would be underfunded and also a lack of adult education courses which are not anticipated to deliver useful and practical skills for local jobs	<p>If a decision is taken to progress the proposed EMCCA, the Constituent Councils propose the development and agreement of a single, shared evidence base. This would need to draw on quantitative and qualitative information over a range of socio-economic factors (including issues raised via the consultation process around matters such as rurality, deprivation, business need, green agenda and groups furthest from the skills/ job market).</p> <p>This evidence base would then be used to inform a comprehensive Employment and Skills Strategy for the EMCCA to provide a focus for skills interventions and prioritisation for the proposed EMCCA area.</p> <p>Within the Devolution Deal, in relation to skills, only the Adult Education Budget (AEB) is proposed to be devolved by Government to the EMCCA - this does not include apprenticeships or traineeships. The level of funding to be devolved is not yet clear and would need to be subject to detailed discussions with Government within a timescale that has yet to be agreed.</p>	<p>Wording in skills section changed to make it clear that focus is on adult education, including change to the title of the section to 'Skills &amp; Adult Education'</p> <p>Changes also made to widen the reference to stakeholders in this section of the Proposal.</p>

	Consultation response received	Constituent Councils response	Change to Proposal
		The level and type of adult education courses would need to be confirmed once the level of funding has been agreed and assessment of need has been completed.	
4.2	See the Mansfield DC response at second bullet point.  <i>“Will AEB drive lower average skill levels up towards the UK average... intervention programmes”</i>	Under the draft Proposals, the EMCCA would only receive devolved AEB - this budget is specifically targeted at those aged 19 and above and on qualifications up to and including Level 3 skills, plus adult and community learning.  The Constituent Councils propose that decisions on where, what and how the AEB is spent will be based on the evidence base (needs assessment) and skills strategy outlined in 4.1 above.	No Change
4.3	The Green Party did not think the case for sub-regional decision making about education and training had been adequately made.	The draft Proposal sets out the challenges which exist in the proposed EMCCA Area and the Constituent Councils consider that the local challenges can best be addressed by working at the level of the proposed EMCCA Area.  The Constituent Councils envisage the proposed EMCCA (working closely with national, regional, and local partners such as Dept for Works and Pensions, the Chamber and voluntary/community sectors), having the ability to develop an increasingly integrated skills system over time.  Where the proposed EMCCA receives devolved powers and funding it would have the ability to make	No Change



	Consultation response received	Constituent Councils response	Change to Proposal
		<p>investment decisions and commission activity based on local need.</p> <p>The draft Proposal sets out why the Constituent Councils' view is that the devolution of the AEB would provide the EMCCA with an opportunity to maximise the impact of this funding by shaping its own AEB provision and in a way that best fits the needs of our residents, businesses, and wider economy.</p>	
4.4	The Green Party did not feel that the draft Proposal took into account the national context for skills provision.	<p>The Constituent Councils believe that the proposed devolution of AEB and the need to draw down greater control of budget and powers is in direct response to the national context.</p> <p>Devolution of AEB in the first instance, would bring in a higher level of local determination on lower level skills/ training provision which would be enhanced over time through additional areas of devolution or stronger joint working with national partners such as DWP.</p>	No Change
4.6	Non-stakeholder comments were made in relation to the specific proposal relating to the East Midlands Freeport.	The Freeport is a standalone entity independent of the proposed EMCCA. Accordingly, the Freeport was not the subject of the consultation, but as set out in the draft Proposal the proposed EMCCA will ensure its Employment and Skills Strategy helps shape the work on other key infrastructure and growth projects, such as Freeports, to drive its levelling up ambitions and ensure all employment opportunities are maximised.	No Change

	Consultation response received	Constituent Councils response	Change to Proposal
4.7	Non-stakeholders questioned whether the draft Proposals relating to skills are realistic and therefore achievable, and felt the D2N2 area is too diverse in terms of industries and educational attainment to be covered by a single authority.	<p>The Constituent Councils' view is that the draft Proposals to devolve AEB, setting of allocations and outcomes for skills providers and supporting/ shaping the Local Skills Improvement Plan are considered to be entirely realistic and are common to all existing Combined Authorities.</p> <p>The proposed D2N2 geography is based on what is demonstrated to be a strong 'functional economic area' (including travel to work and travel to learn factors) and so, whilst economically diverse, is considered to be the best and most appropriate level at which to attract devolved funding, organise delivery and make best use of all available resources.</p>	No Change

### Transport

	Consultation response received	Constituent Councils response	Change to Proposal
5.1	Stakeholders made a number of points which amounted to suggested areas of policy focus for the EMCCA.	The Constituent Councils envisage the EMCCA formulating future policy as it would evolve. An important aspect of this would be the drafting of the single Local Transport Plan, which would be confirmed by the Mayor. The Government's publication of Local Transport Plan guidance which would inform the production of the plan is still awaited.	Proposal changed to remove reference to March 2024 as the date for preparation of the new single Local Transport Plan as Government still to publish guidance causing uncertainties around timescales.

	Consultation response received	Constituent Councils response	Change to Proposal
5.2	Overseal Parish Council, the East Midlands Chamber, Visit Peak District and Derbyshire, Railfuture, Manchester and East Midlands Rail Action Partnership, the Green Party, and a number of non-stakeholders expressed views that the improved transport connections would be focussed on the city areas	Both urban and rural areas would be represented on the EMCCA. It would be for the EMCCA to determine transport priorities and programmes consistent with the new single Local Transport Plan for the whole proposed EMCCA area and to balance priorities between different areas once that plan is in place.	No Change
5.3	A number of responses focus on franchising - for example see the comments of the Association of Local Bus Undertaking Managers and the Campaign to Protect Rural England	Bus franchising powers would be important for the Mayor to hold as they allow for the regulation of bus services for a given area. Although bus franchising powers are being sought as part of the draft Proposals they would only be deployed in circumstances where necessary. In line with the legislation, franchising can only be implemented in areas where there is market failure in some form, such as where there is a significant risk of commercial operators withdrawing a significant number of services, poor reliability, need for greater integration, unaffordable fares or other similar circumstances. The overriding intention of these proposals would be to better meet the needs of bus users not to disregard them.	Proposal changed to include further references to bus franchising recognising that bus franchising is an important power for the Mayor to hold, even if not used, for the effective coordination and integration of public transport services.
5.4	Derbyshire Transport Action raised whether or not a commitment to improving the existing route network was contrary to the target of achieving net zero.	Consistent with other existing Combined Authority areas the Mayor would have powers over a Key Route Network. This would enable main traffic routes to be managed consistently across the proposed EMCCA area, including new investment. This would include measures that contribute towards net zero such as cycling facilities, bus priority and coordination of EV charging.	Proposal wording changed to make it clearer that the Mayor will have the power to coordinate and manage a Key Route Network.

	Consultation response received	Constituent Councils response	Change to Proposal
5.5	The Green Party felt that the draft Proposal was too focussed on mobility rather than accessibility	The draft Proposal document sets out the scope of responsibilities and powers the proposed EMCCA rather than setting the policies to be followed. The Transport policy direction of the proposed EMCCA will be set through the drafting of a new single Local Transport Plan. This would need to include seeking the right balance between mobility and accessibility.	No Change
5.6	A number of non-stakeholders expressed views on HS2 - some in support, and a number in opposition.	Although the HS2 proposition has changed, HS2 remains a live national transport project that the Constituent Councils believe the proposed EMCCA would need to respond to and influence. HS2 itself is not under consultation as part of this exercise however.	Proposal changed to update/remove the specific reference to HS2 Phase 2b and the plan showing the former HS2 Eastern Leg line of route and previous station locations and to amend wording to make it clearer an emerging new HS2 Growth Strategy is being prepared.
5.7	A number of non-stakeholders expressed views that the draft Proposals would not be sufficiently funded, or would be too expensive and therefore unaffordable	The Devolution Deal includes guaranteed funding, some of which will be allocated to transport. A Mayor would also have the power to raise funds through a precept and would receive specific funding to develop a single Local Transport Plan. In addition, the proposed EMCCA would receive a devolved and consolidated integrated transport budget. It would also have access to other competitive funding opportunities. Ultimately the Government will determine the scale of any funding awards but existing Combined Authority areas have typically received higher funding awards per head than non Combined Authority areas.	Proposal changed to reflect that the £500,000 of additional revenue funding in 23/24 and 24/25 is specifically to support the preparation of a single Local Transport Plan for the proposed EMCCA Area.
5.8	A number of non stakeholder expressed views that the integrated system would not be well managed and would not operate well. Views were also expressed	Effective governance and oversight would be necessary ensure that the EMCCA is well managed. The Combined Authority model is something that operates transport infrastructure successfully elsewhere in the country.	No Change

	Consultation response received	Constituent Councils response	Change to Proposal
	that the Proposals would not result in a truly integrated transport network.	The Constituent Councils view is that managing transport provision over a larger geography provides greater opportunities for coordination and integration. There would also be opportunities for efficiencies through economies of scale and larger scale procurements.	
5.9	Whilst there was support for smart ticketing from a number of stakeholders and non-stakeholders, there is also reference to a national scheme emerging from the DfT and so smart ticketing being a 'red herring'	Local authorities within the proposed EMCCA area can demonstrate existing best practice in integrated ticketing that can be expanded or applied elsewhere within the area. Midlands Connect/DfT are working up complimentary Proposals that will allow different schemes across the whole of the Midlands to be joined up that will give added value to local schemes.	No Change
5.10	A number of non-stakeholders commented that trams are too expensive and unsustainable as they are not self funding	The Nottingham Express Transit tram system is an important part of the local public transport system. Although tram systems are typically more expensive, they have the capacity to move large numbers of people and typically generate large benefits. The current Nottingham NET system is funded through the Private Finance Initiative. It would be for the proposed EMCCA with the Government to determine any future expansion.	No Change

### Net Zero

	Consultation response received	Constituent Councils response	Change to Proposal
6.1	Stakeholders made specific points regarding the reducing carbon/Net Zero	The Constituent Councils note and welcome the overwhelmingly positive nature of these comments.	No Change

	Consultation response received	Constituent Councils response	Change to Proposal
	Proposals - see bullet points on p51-52 of IPSOS Report in this respect	The 2050 target currently aligns with the national target for Net Zero and there are more ambitious local targets being set that would be supported.	
6.2	<p>Non-stakeholders raised points that;</p> <p>(a) the net-zero/reducing carbon Proposals are unrealistic and unachievable.</p> <p>(b) the Net Zero Proposals would be poorly managed.</p> <p>(c) the reducing carbon/Net Zero Proposals would not deliver benefits for local people.</p> <p>(d) they disagreed with nuclear power.</p>	<p>Whilst the achievement of Net Zero targets is a challenge, significant strides have already been taken e.g. in 2020 wind and solar produced a higher proportion of UK electricity, at 43%, than fossil fuels, at 40%, for the first time demonstrating that decarbonisation of the energy system is possible.</p> <p>Furthermore, the Government has set a legally binding target for 2050 and stakeholders have raised the challenge that there needs to be greater ambition. Councils within the proposed EMCCA area have more ambitious targets. There is also the cost of non-action which would result in loss of investment, jobs and growth for the region and put the region at greater vulnerability from volatile hydro-carbon energy costs. There is already a robust governance framework in place across the proposed EMCCA area for delivering Net Zero Proposals locally and regionally. There is a track record of collaborative working and this has been supported by the Net Zero Hub (Nottingham City Council act as accountable body) which has been successful in securing and delivering multiple high value projects and programmes across the region in partnership with Local Authorities and other public and third sector organisations.</p> <p>To achieve Net Zero, funding will be required. However targeted place based funding can ensure the local people do benefit. A socio-economic report on Local</p>	No Change

	Consultation response received	Constituent Councils response	Change to Proposal
		<p>Area Energy Planning that looked at Improvements to the thermal efficiency of housing, electrification of road transport and an increased deployment of solar PV across D2N2 would have a total net benefit of £11b from an investment of £7.6b. This could save 51.5m tCO2e to 2050 and create 4,500 local green jobs. The resulting improvements in air quality and environmental benefit will have positive health benefits for citizens reducing which will also reduce health care costs.</p> <p>It is expected further education is needed on the potential benefits of Nuclear Fusion, which is very different from Nuclear Fission. Local consultations were conducted in advance of the site at Bassetlaw being selected in the face of heavy competition from other parts of the country. One of the reasons Bassetlaw was successful was through strong local support for the opportunity that could result in a global hub for a diverse mix of technological and scientific expertise, which is expected to realise significant economic opportunities.</p> <p>Net Zero projects that can be delivered now will need to be progressed (e.g. large scale Solar PV and battery storage) but the future achievement of Net Zero will rely on a diverse range of low carbon technologies and this means innovative future sources need to be considered and invested in with a long term outlook.</p>	
6.3	In the bullet list of Suggestions, responses suggested changes to the reducing carbon/Net Zero Proposals.	The Constituent Councils note the suggestions in respect of the policy approach of the proposed EMCCA.	No Change

	Consultation response received	Constituent Councils response	Change to Proposal
		These will be taken into account in the formulation of the EMCCA policy, should it be established.	
6.4	Non stakeholders raised issues surrounding financial aspects of the Proposals.	<p>Normal local authority rules about finance, conduct and management designed to minimise the risk of mismanagement would apply to the proposed EMCCA.</p> <p>Principle Four - one of the eight Principles which underpin the Devolution Deal and Proposal document seeks to ensure appropriate accountability. <i>“The Constituent Councils have committed to developing a Constitution and Assurance Framework that will confirm, clarify and formalise the intention of institutions and local leaders to continue to be transparent and accountable, work closely with local businesses, seek the best value for taxpayer’ money and maintain strong ethical standards”.</i></p> <p>Equally the governance structure of the proposed EMCCA would be set up so as to ensure accountability, which will include representation from outside of the Constituent Councils, and will also include outside interests such as from business. Appropriate safeguards will be in place through the proposed structures outlined in the draft Proposal which include at least one Overview and Scrutiny Committee, and an Audit Committee, which will be required to have an independent chairperson who is not otherwise associated with the Mayor or involved in the EMCCA. It would also be possible to design the governance arrangements to include more roles for</p>	No Change



	Consultation response received	Constituent Councils response	Change to Proposal
		critical friend type oversight, though this will be a decision for the EMCCA were it to be formed.	

### Public Health

	Consultation response received	Constituent Councils response	Change to Proposal
7.1	Mansfield District Council queried whether or not there would be a commitment to engage with local, non-Constituent Councils for any Proposals that specifically affect their area (in terms of homelessness, health and social care programmes)	The proposed health improvement duty for the EMCCA complements and supports the action taken by its Constituent Councils. Engagement with non-Constituent Councils will be as important in proposals related to this duty as they are in matters relating to environment, planning, regeneration and transport	No Change
7.2	East Midlands Green Party questioned how the draft Proposals to improve health and wellbeing would integrate with the proposed EMCCA's four main priorities. Nottingham Trent University felt that the interface between EMCCA's public health responsibility and the health and social care system needed to be fully explored.	<p>The proposed health improvement duty for the proposed EMCCA involves making the protection and improvement of people's health and wellbeing a central consideration in everything it does, including in environmental, planning, regeneration and transport.</p> <p>The health and social care systems in Derbyshire and Nottinghamshire come together in their respective statutory Integrated Care Boards and in their Health and Wellbeing Boards. In both of these partnership arrangements the Constituent Councils are statutory members. Each ICB and HWB provides the governance structure through which any initiative of the proposed EMCCA with a bearing on the health and social care system can be fully explored.</p>	<p>New section added to the Proposal outlining details of the proposed health improvement duty alongside changes to wording throughout to reinforce that the protection and improvement of people's health will be a central consideration in everything the EMCCA does.</p> <p>Specific references in respect of the key themes added as follows:</p> <p>Transport - reference to active travel now included in respect of the</p>

	Consultation response received	Constituent Councils response	Change to Proposal
			<p>preparation of the refreshed Local Cycling and Walking Infrastructure Plan</p> <p>Net Zero - reference to giving consideration to delivering retrofit where it will have the greatest impact on health and wellbeing.</p> <p>Homes - reference to considering how planning and delivery could benefit people who are homeless and at risk of homelessness</p> <p>Reference to healthy life expectancy and reduced inequalities included in Outcomes section of Proposal</p>
7.3	NHS Derby and Derbyshire Integrated Care Board are keen to understand ambitions regarding public health and NHS powers.	Evidence shows the powerful influence on health and wellbeing played by the wider social and economic environments in which our population live, work and grow old. The ambition arising from this is to ensure that health and wellbeing remains central to the proposed EMCCA's policy and implementation relating to environment, planning, regeneration, and transport. There is no plan for the proposed EMCCA to assume duties or powers specific to an NHS organisation.	Changes made as highlighted above.
7.4	Nottingham Growth Board and non-stakeholders were wary of creating an additional layer of complexity with the work already done and were unhappy with the thought of an additional layer of	The health improvement duty of the proposed EMCCA ensures that the prominence given to health and wellbeing in decision-making is consistent with that of the Constituent Councils. At this stage, the discharging of this this duty would be through the EMCCA's work on environment, planning, regeneration and transport in	No Change

	Consultation response received	Constituent Councils response	Change to Proposal
	bureaucracy or tier of government being created relating to public health.	which it will have regard to the specialist public health advice received from its Constituent Councils. This need not entail any additional tier of public health planning and there is no expectation that the EMCCA itself will require a dedicated public health delivery function of its own.	
7.5	Non-stakeholders commented that it would be a bad idea that would not work as it hasn't worked elsewhere in the country, whilst others stated that there would be a lack of joined up, integrated or efficient working given this currently does not happen already.	The health improvement duty of the proposed EMCCA integrates a public health approach in its decision-making. At this stage, the discharging of this duty would be through the EMCCA's work on environment, planning, regeneration and transport in which it would need to have regard to the specialist public health advice received from its Constituent Councils. This need not entail any additional tier of public health planning and there is no expectation that the proposed EMCCA itself will require a dedicated public health delivery function of its own.	No Change
7.6	Non stakeholders commented that they believed the size and diversity of the area within the proposed EMCCA remit would make it unmanageable and expressed views that larger cities may be prioritised over smaller, more rural areas.	The Constituent Councils will each ensure that the health and wellbeing needs of their respective population, and the variations in need between communities in each of their populations (e.g. rurality), are addressed as the EMCCA discharges its health improvement duty in its various themes of work.  See also 1.4 and 2.3 in this regard.	No Change
7.7	Non-stakeholder issues were raised that public health would be negatively impacted, or would be underfunded	The proposed health improvement duty for the EMCCA involves making the protection and improvement of people's health and wellbeing a central consideration	No Change

	Consultation response received	Constituent Councils response	Change to Proposal
	generally, as well as relating to the funding of social care more specifically.	<p>in everything it does, including in environmental, planning, regeneration and transport.</p> <p>The Constituent Councils would retain their respective statutory health improvement duty and the revenue received by them annually in the form a Public Health grant is not impacted by the health improvement duty which the proposed EMCCA would have.</p>	