



The countryside charity
Sussex

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13 April 2025

Dear Sir Madam,

Re: Sussex and Brighton devolution consultation

Please find the CPRE Sussex response to Sussex and Brighton devolution consultation consultation below.

Information requested

Submitted by: Prof Dan Osborn

Position: Chair

Organisation: CPRE Sussex

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Response

Thank you for the opportunity to respond to the consultation on the proposed Sussex and Brighton Mayoral Combined County Authority.

CPRE Sussex sees some welcome opportunities in the return of strategic planning – especially on transport, energy and land use – at the sub-regional scale. Combined with an effective Land Use Framework, a thoughtful Regional Energy Spatial Plan, a focus on active travel and public transport, and a prioritisation of eco-housing for social rent in accordance with local need and in sustainable locations, a Mayoral Combined County Authority could benefit Sussex and beyond.

But as things stand we are greatly concerned that the current proposals will take local government away from local people, centralising rather than devolving, and risk ignoring the complex physical, social and political geography of an overwhelmingly rural area with an urban-focused and distant administration.

The consultation suggests there is a woeful lack of focus on the environment climate mitigation and adaptation, the countryside and especially nature, wildlife and ecosystems. Sustainable decisions should be based on consideration of economic, social and environmental considerations with equal weight being given to each. Nature is far from a blocker of development. All human wealth and health is derived from the planet's natural systems of which nature is a part. In recent months the Department has omitted this important consideration from its work, for example in omitting natural capital from the list of capitals important to human and economic development. Bad decisions and governance structures will be the result of ignoring the importance of natural capital and ecosystems. This is not difficult to put right. But, unless the current imbalance in what is proposed is corrected as we suggest in response to relevant questions the people and natural systems of Sussex will pay for such bad decisions in coming years.

Importantly, the proposals create a democratic deficit and lack of resources for implementation. Above all, they appear to place an empty 'growth at all costs' mantra at the heart of the new authority, ahead of a balanced approach to sustainable development which would recognise that healthy ecosystems are the foundation upon which all human activity rests. In some senses, the proposals are akin to the long defunct Regional Development Agencies that failed due to a lack of democratic transparency and accountability and a failure to respond to local needs - as they were deaf to some of local voices they should have been responding to.

We hope that these fundamental flaws are addressed in the final shape of any emerging Authority.

We expand on these points in our answers to the consultation questions below.

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?

It entirely depends on the precise powers that the Authority eventually has, and how they are used.

But, the challenges posed by the climate, nature, water and housing affordability crises, and the competing pressures on finite land use (including for food production and flood protection, as well as nature, carbon storage, housing and low-carbon energy infrastructure) suggest that strategic planning on a 'larger-than-local' scale could be beneficial.

Sussex, and the wider region, have been poorly-served by the abolition of strategic regional planning, so its return would likely be welcome, in principle.

We are concerned, however, that the combination of creating a Sussex-wide Mayoral Authority and, in parallel, sucking powers ‘upwards’ from boroughs and districts through ‘local government reorganisation’ will take local government further away from people and places, and result in the loss of important local knowledge – including a rural perspective, in what could well be an urban-based authority.

Given the scale and nature of the challenges Sussex faces, if the Mayoral Authority (and the subsequently reformed local unitary authorities) are to deliver significant benefits, it is unclear how they will do so in the absence of either additional finance from central government or additional fiscal powers to enable them to raise funds themselves, beyond the council tax precept. With public infrastructure, social housing and our natural environment in such dire states, we do not believe that changes in local government structures and ‘efficiency savings’ alone can deliver the necessary investment. It is unclear to us that any such savings will, in any case, be delivered through this reorganisation. Indeed, to deliver the full extent of the Mayoral Authorities function would likely require a very large transfer of funds from central government and a substantial increase in Council Tax. The political ramifications of this would probably be notable.

Furthermore, the impetus behind the programme appears to be a belief that such changes will help to deliver ‘growth’, and that such growth is a benefit in its own right. We disagree, believing that achieving growth is not an end in itself, and that the types of growth produced, and who benefits from them, matter very greatly. For example, enriching a small number of large housebuilding companies at the expense of local green spaces and wildlife, and with little or no social housing provision, will not be a benefit to Sussex.

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

We disagree, most strongly.

We are concerned that putting decision-making in the hands of just 7 representatives, none of whom represent bodies working at the most local scale, is a recipe for decisions that are distant from the needs of the people of Sussex. Unitarisation will only compound the issue. Sussex’s complex politics – as shown by the significant number of political parties and independents currently represented within its councils – would be poorly reflected in such a small and concentrated authority. As such the proposals are anti-democratic and as such will not address the concerns of local people.

Sussex’s broad geography should be better represented too. Under the proposed arrangements, it would be possible for all 7 representatives to be drawn from a narrow ‘central Sussex’ area, clustered around the Brighton Main Line; this would likely poorly reflect the diverse concerns of the area.

The authority should be larger and should reflect the political balance and diversity seen across the current county, city, district and borough councils, as well as Sussex's geography.

One way of achieving a better reflection of this political geography would be for the Authority Members to be directly-elected, rather than simply appointed by the dominant parties on the upper tier (or unitary) authorities. Directly elected Authority members is an important factor in the success of London. CPRE Sussex believe that only a directly elected approach will create a successful Mayoral Authority. How else can a Mayor be held to account?

Further, the direct election of Authority Members, including the Mayor, might be undertaken using electoral systems that have a greater degree of proportionality. We note that the London Assembly elections use an Additional Member System, and that, until recently, the London Mayor was elected using a Supplementary Vote system.

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?

It will depend on the actions taken by the Authority. It could do, if the Authority helps to, e.g., deliver more investment and better coordination across public transport, active travel and rural broadband, or through the construction and purchase of social housing with high environmental standards, especially on brownfield land – i.e. meaningful regeneration.

But it should be clear where its economic focus lies – prioritising wellbeing and the needs of those with least is meaningful; growth at all costs is not. 'Supporting the economy' must not mean trashing the environment or our beautiful landscapes, and it should recognise the highly-rural nature of Sussex and the unique nature of such an economy and what this could mean for the future in terms of sustainability. An urban-focused Mayoral Authority that focuses investment only in larger towns and cities (i.e. a metropolitan authority such as that of London or Manchester), or neglects the skills and needs of the land-based sectors, will fail to support the economy of the area. Sussex is a complex social economy and one that is not reflected in the simplistic GVA figures provided in the consultation (some of which seem at odds with ONS figures and which ONS themselves urge are not used at the scale of areas such as Sussex).

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?

We neither agree nor disagree.

As previously stated, this is highly contingent on what the Authority does. A Sussex-wide tier of government will not inherently improve social outcomes, but a strategic view and a greater degree of coordination could lead to better outcomes in some cases.

To take housing as one example, if a Mayoral Authority were (able) to focus on driving public investment into social housing (both new-build and purchase of existing stock), guided by well-evidenced local plans that focus on local need, it could deliver some significantly improved outcomes. In a context where council house waiting lists are effectively ‘years long’. CPRE Sussex would welcome this as a key means to preserving a thriving and diverse countryside. It would also help build more cohesive urban communities.

On Transport, as another example, a more sophisticated and nuanced view is needed. It is not sufficient to say that transport links are poor east west implying they are better north south. It depends where in Sussex you live as to what your experiences are. If you live in central Sussex your view may well be that transport links in all directions are fine. If you live in more rural areas in East or West Sussex you may well have a very different view. One notorious example is the A27 where there seems to be a desire to create an outer London dual carriageway along its whole length and to do this with very expensive options (almost at the scale of vanity projects). A Mayoral Authority with directly elected representation might be able to hear local views more clearly and find solutions that did not cost as much but achieved greater connectivity and solved local issues by more focused improvements.

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?

We disagree.

As previously stated, this is highly contingent on what the Authority does, and the powers and duties it ultimately has.

While we welcome the scope for a more strategic, Sussex-wide approach, and greater collaboration between local authorities within Sussex, there is a very significant risk that a centralised, urban Authority, which does not reflect the complex political geography of Sussex as a whole, will be remote from the needs of local people.

This could be significantly compounded by the completion of local government reorganisation, with both elected representatives and officers more distant from the nuances of particular communities, and service delivery homogenised over greater areas and less responsive to specific feedback. At present it is completely unclear what local authorities will exist after reorganization or what their powers will be. This will have a direct bearing on the effectiveness of the Mayoral Authority and the uncertainty is not good for investment or sustainable development.

CPRE Sussex believe that if ‘devolution’ and ‘local government reorganisation’ happen largely as proposed, there must be strengthened duties and powers for Town Councils and Parishes. Town and Parish Councils have the potential to really understand the detail of what is happening at the neighbourhood scale – and neighbourhood plans have shown their ability to let people shape the places that they live, including making provision for growth in the housing that is most needed locally. If ‘local’ government is, in practice, becoming more centralised through these changes, strengthening Town and Parish Councils, including giving them a greater formal voice within the Mayoral Combined County Authority structure, would help redress the balance.

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?

We strongly disagree. We fear the proposals will achieve the exact opposite of what is required by our international agreements, UK law and in terms of sustainable development but a one-sided emphasis on growth at all costs.

The current consultation gives us no confidence that it will deliver any improvements, especially given a wider context of government policy and rhetoric, pitching nature as a ‘blocker to growth’. Some of these pitches about nature are unevidenced and some are, at the very best, seriously mistaken (including the Chancellor’s claim about a £100M bat tunnel as part of HS2 – the costs there were caused by humans not bats).

It is very disappointing that the consultation wording devotes just two paragraphs to ‘environment and climate change’, making it almost an afterthought, with the word ‘nature’ getting just three mentions in the entire document.

Powers and duties in relation to both energy and transport could make the Mayoral Authority an important driver of low-carbon action, but this must come within an overall framework of duties in relation to climate, nature and landscapes.

This is critical to ensure that the Mayoral Authority does not, for example, simply back the road-building-dominated plans recently proposed as part of the emerging Transport for the South East strategy, but instead supports public transport and active travel.

On energy, it is critical that the Mayoral Authority supports the low-carbon transition in a manner that protects wildlife, landscapes and local community views.

Furthermore, strategic action on climate cannot be reduced only to action on energy and transport, but it must be integrated with plans for housing, health and economic development – and it must include action on climate adaptation, not only carbon-cutting, since our existing built environment is already struggling with the impacts of climate change to date. Climate change is here in Sussex already. The people, buildings, infrastructure of Sussex and its natural systems will need help to successfully adapt. This is an economic opportunity as well as a social need. People will suffer in health and even die if adaptation fails, due to overheating in homes and flooding, for example. It is a duty of all levels of government – including any Mayoral Authority – to address these issues with urgency. They are not to be regarded as an afterthought or the concerns of other Departments. They are central issues, or should be for all of government.

We support the view of the South East Climate Alliance, expressed in relation to the Devolution White Paper as a whole, and equally applicable in relation to the Sussex and Brighton Mayoral Combined County Authority that:

Strategic oversight of planning, transport, housing and health requires strategic oversight of action on climate. The climate and nature crises have the potential to overwhelm plans for growth and infrastructure. The future implications for both Strategic Authorities and unitary councils will be huge.

The Mayoral Authority must similarly also have a much greater focus on wildlife, ecosystems and natural landscapes. In a context where the current Planning and Infrastructure Bill threatens to cause very significant harm to nature in the name of building more houses, the Authority must have the powers and duties to stand up for nature, rather than supporting developers to bulldoze the Sussex countryside.

Nature Recovery Strategies are an unproven approach thus far and even if they work (which CPRE Sussex hopes they will) they are a necessary but not sufficient policy tool. Nature is everywhere and only local surveys show what wildlife is actually present in an area and it is this local diversity that provides local people with the value that contributes to their health and wellbeing. The Mayoral Authority needs to be able to recognise this reality in its work not think it can rely on incomplete online databases for its information as good as these can be in some cases and for some uses. Online tools have, after all, only become available after years of local survey work.

Thus, Mayoral (and any future Unitary) Authorities need statutory duties for climate and nature in order to get the time, money and attention needed to meet the level of the challenge we face and achieve carbon reduction and nature recovery targets.

CPRE Sussex calls for the following:

- That Strategic Authorities should have a duty to produce a Climate and Nature Strategy and Plan alongside the duties already proposed to produce a Local Growth Plan and a Spatial Development Strategy.
- That, alongside this duty, stringent and ambitious Climate and Nature outcomes are included in the Integrated Settlement Outcomes Framework
- That Climate and Nature Data are included in the data produced by the proposed Mayoral Data Council
- That in the same way that Strategic Authorities will be expected to drive a “health in all policies” approach that they should also be expected to drive a “climate and nature in all policies” approach. This would have regard to the need to reduce emissions, look for climate mitigation and adaptation opportunities and replenish nature in the exercise of all their functions.
- That the duty to produce a Climate and Nature Strategy should be accompanied by a requirement on a Strategic Authority to work with its unitary councils to create a co-ordinated action plan. The plan should achieve the required trajectory to meet emission reduction targets, increase renewable generation and replenish nature. Performance should be monitored and reported at all levels against the plan both to Government and local people.

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?

We strongly disagree.

As discussed above, we are highly concerned about a centralisation and homogeonisation of local government, that will gloss over important and nuanced differences, and marginalise rural voices. Distant decision-making may impose inappropriate development on communities and the green spaces they value.

The examples of non-constituent and associate members given in the consultation document make no reference to community groups (eg local environmental action groups), charities or town/parish councils, who might provide the kind of detailed local knowledge that the Authority will need if it is truly to reflect local identities. This is a very significant omission and one we would like to see rectified.

Professor Dan Osborn,
Chair CPRE Sussex