

# Cornwall's Devolution Deal: Towards a More Sustainable Governance?

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## Abstract

This article considers the devolution deal signed by Cornwall and the Isles of Scilly in the summer of 2015. It asks if the deal constitutes a more sustainable approach to governance, concluding that while there are some factors that help to enhance sustainability, other areas urgently require more attention. These claims are made through an analysis of a model of sustainability which emphasises the importance of networks and feedback loops envisaging civil society as an adaptive organism. This helps to show that although power is significantly dispersed in some aspects of the 'Cornwall Deal', this latter does little to alter the highly centralised nature of governance across England, or provide spaces where local actors can feed back into central policy.

**Keywords:** Cornwall, English devolution, decentralisation, sustainable governance, local government, resilience

## Introduction

ALTHOUGH Scotland, Wales and Northern Ireland have had devolved governance since 1997, England remains one of the most highly centralised nations in Europe. This has been an ongoing trend for several decades. During the 1990s many of the functions of local authorities were transferred to new regional tiers of governance, such as Government Offices for the English Regions, Regional Development Agencies and unelected Regional Chambers. These bodies were abolished by the Conservative–Liberal Democrat Coalition government elected in 2010, and many of their functions were transferred to central government through the Department of Communities and Local Government, the Department for Work and Pensions and the Department for Trade and Industry. This has removed communities from governance decisions and rendered them less able to make the changes to their localities that they would like to see. In addition, local strategic planning has had to fall in line with central targets and policy, further limiting what local authorities and communities may do in an increasingly hierarchical, top-down system.

Devolution was brought sharply back onto the political agenda over the time of the Scottish Independence Referendum in 2014, and resulted in the launch of a devolution Bill (now the Cities and Local Government Devolution Act 2016). The aim of the Act is to 'confer additional functions to combined authorities', making provisions for the establishment of directly elected mayors for these authorities, and the creation of sub-national transport bodies.<sup>1</sup> To date, a number of devolution deals have been agreed, with Greater Manchester, Sheffield city-region and Cornwall at the forefront. Other local authorities have also submitted bids, and are currently exploring how they might develop and their own deals.<sup>2</sup>

This article will focus on Cornwall's devolution deal, with the aim of assessing whether this represents a shift towards a more sustainable system of governance. It will be argued that Cornwall's deal does little to address the overly hierarchical, top-down and centralised nature of English governance, and that this compromises its sustainability. I begin by looking at the history of decentralisation campaigns in Cornwall, before considering decentralisation and devolution in more depth and presenting the

concept of sustainability that I will use. Then, I set out what can be achieved by Cornwall's deal. Drawing on these analyses, I will conclude with a critical reflection on the extent to which Cornwall's devolution deal is likely to lead to a more sustainable system of governance.

## Cornish political decentralisation and identity

Political decentralisation has been an emotive topic in Cornwall for decades, with a major petition of 50,000 signatures in 2001<sup>3</sup> and a Private Members Bill in 2009 by then MP Dan Rogerson both calling for a Cornish Assembly. Polls<sup>4</sup> have reaffirmed support for decentralised governance. Much of the rationale for the 2008 transition to a unitary authority was grounded in claims that this would move Cornwall closer to having its own directly elected devolved body. Cornish persistence in campaigning for a Cornish Assembly comes from two key factors. First, it is based on a very strong sense of Cornish identity, with a distinct language, flag and other symbolisms of nationhood. Cornish cultural distinctiveness underpins a set of shared experiences that are perceived as 'different' from England as a cultural and political entity.<sup>5</sup> Second, it is rooted in a feeling of economic and political inequality with the rest of the UK. Cornwall has been one of the poorest parts of the country for many decades, and many believe that Cornwall's poverty has been exacerbated by central government's neglect.<sup>6</sup> It is only relatively recently that governance in Cornwall has embraced Cornish identity. In the past, Cornwall County Council was frequently charged with trying to deny Cornish identity through institutional combination with neighbouring Devon, and by developing policies that fostered a homogenous British identity at the expense of Cornishness.

This began to shift from the early 1990s, when the ability to draw on a strong cultural identity helped to make some key changes. The catalyst for this was the campaign for Objective 1 funds. For complex reasons, Cornwall was unable to qualify for EU structural funding, designed to provide investment in social and physical infrastructure in order to improve the fortunes of

disadvantaged regions. The campaign to make Cornwall a NUTS 2 region for statistical purposes (and so access structural funding) began in the early 1990s. Identity provided a crucial part of this campaign's success, and represented a significant break with previous institutional discourse.<sup>7</sup>

Since then, Cornish identity has played an important role in local political life, operating as a movement (or set of movements) based on an emancipatory politics that seeks to challenge perceived central neglect and a civic definition of Cornish identity that incorporates newcomers to the region.<sup>8</sup> At the same time, the emphasis of attempts to ameliorate regional economic inequalities has shifted from tackling particular economic sectors to dealing with the competitiveness of regions. Identity forms a large part of this competitiveness, whereby the way in which regions are perceived, imagined and governed can be conceived as playing an important role in their ongoing reputation.<sup>9</sup> This moves beyond simplistic branding to reputation development and management. The images, symbolisms, ideas and beliefs that underpin authentic, lived, regional identity have a function in differentiating one region and its products from others. Cornwall has built on the strength and mobilisation of its identity. The food and drink sector in particular has been quick to trade on reinterpretations of traditional symbols, which have proliferated as a consequence, with positive feedback loops for the development and growth of local identity. Moreover, Cornwall Council's most recent economic strategy is a cultural *and* economic strategy, focusing on (and fusing) the interplay between the two.<sup>10</sup>

Cornish identity is still far from uncontested amongst the various institutions involved in governance in Cornwall, although it has become much more accepted over recent years. Some individuals and groups retain an older scepticism towards identity-based narratives, while others use it to pursue a range of agendas. Appeals to Cornish identity can be interpreted by some as indicative of a navel-gazing parochialism that does the region more harm than good. For others, a strong attachment to place is a condition which the various organisations involved in Cornish governance networks need to use and exploit more frequently.

Many in this latter camp are situated within what we might call the Cornish Cultural Movement, and are also involved in maintaining language and traditional practices, seeing these as key components of Cornishness. Because of this history, there can seem to be a tendency for discussions about political decentralisation of any type to be characterised in terms of an inaccurate mis-depiction of cultural campaigners. Sometimes onlookers interpret political decentralisation, devolution and a Cornish Assembly as a move towards Cornish independence, which no group in Cornwall is actually actively calling for. What has been clear throughout this process is the extent to which identity has been important for initiating, mobilising, sustaining and developing the devolution campaign in Cornwall. It has also been evident that Cornish devolution can have a polarising effect, with some critics suspicious that while Cornish cultural identity might be a good marketing tool, Cornish *political* identity may be indicative of parochialism.

## English regional devolution or decentralisation?

The debates about devolution in Cornwall, and a Cornish Assembly, are so familiar and widespread that locally it is easily forgotten that this current round of devolution deals is linked up to an England-wide agenda.<sup>11</sup> Indeed, in some of their consultations on the Case for Cornwall<sup>12</sup> (that is, Cornwall's formal requests for more powers from central government put forward in summer 2015), the Cornwall Council formally framed its asks as being 'on the trajectory towards a Cornish Assembly'. Both critics and proponents focused on the Cornish Assembly debate, with little or no reference to other deals being sought in different regions. Despite this, the Case for Cornwall was presented to the public as a means of creating greater sustainability for the governance of the region, enabling policy tools which would best support Cornwall's needs.

The view for a sustainable Cornwall presented in the document is one that 'is prosperous, resilient and resourceful; where communities are strong, and the most vulnerable protected'. The Local Government

Association (LGA) was more forthright in the language that it uses. In a document entitled *English Devolution: Local Solutions for a Successful Nation*, the LGA makes the case for a range of measures that regions need in order to develop a successful system of governance in the twenty-first century. Echoing contemporary regional development, these include improving the competitiveness of regions through better integration of service provision, tailoring structures to the local environment and devolution of budgets and taxation to local areas.

The crucial factor in the LGA's support of devolution to regions in England seems to be the projected efficiency savings to be gained from localised governance systems. Moreover, although they use the language of devolution, this is a very different model from that of the UK's first devolved nations. Scotland and Wales, for instance, have their own Parliament and Assembly respectively, with political and legislative powers attached to these. The devolution proposals outlined by the LGA refer to the cascade of power from the centre to the region, with regards to 'freedoms and flexibilities' only around delivery, with no legislative or extra powers of taxation. There is no mechanism for devolved English regions to create their own policy agendas, to develop legislation to address local issues or to feed policy requirements back to central government. Neither do the proposals free English devolved regions from central policy and strategy and the requirement to create Local Plans which are in accordance with national, rather than local, priorities. Moreover, unlike Scotland and Wales, there is to be no new democratically elected decision-making arena (such as an Assembly or a Parliament), which raises questions about how accountable devolved regions will be under these changes. Indeed, a forthcoming boundary review in Cornwall is widely expected to dramatically reduce the number of Council members of the Unitary Authority.

It is noteworthy that bodies calling for a Cornish Assembly are split in their assessment of Cornwall's deal. While some claim that it improves Cornwall's case for an Assembly in the future, others argue that the earlier Case for Cornwall was lacking in ambition, and that the eventual deal does

not amount to significant decentralisation, let alone devolution. Moreover, the widespread use of the word 'devolution' by central government is misleading, implying as it does a significant shift in power from the centre to the regions which, in practice, is not on the table. The assumption of both the Cornwall deal and the LGA seems to be that the dispersal of political power from the centre to the regions will enable more sustainable service delivery. In the following analysis I will consider the extent to which Cornwall's devolution deal constitutes any real kind of devolution, and evaluate claims to sustainability, starting with an assessment of what this latter means.

## The sustainable region

A sustainable system of governance should be flexible and responsive enough to reflect and adapt to changing conditions. The current system of territorial governance across England, with its sites of power increasingly centralised in Westminster, is vulnerable to disconnect with the public, communities, localities and regions. While decisions might be the rational best choice for the UK as a whole, they may fail to respond to the lived realities of ordinary people in their localities, which might be far removed from the views and perceptions of the central government. Moreover, highly centralised policies undermine the local identities which are essential mobilising factors to community development. Conflict can also happen when communities feel unable to make the changes that they wish to see, because their plans conflict with a central agenda that they feel unable to influence.

We can imagine the current English devolution agenda as an attempt to address these hierarchies, dispersing power across regions and localities, enabling them to have a greater say in decisions that affect their communities. If this is to be effective, we need to see strong feedback loops developing between all parts of the body politic, from individuals to political elites. This would help to foster democratic renewal and greater civil society engagement. We will also need to see support in terms of resources, such as adequate funding to

develop and deliver essential services, and a strong vision for how local economies, businesses and communities can be better connected in order to provide sufficient employment and enable businesses to flourish. This can provide the fuel for regions not just to sustain themselves, but also to grow, develop and adapt confidently to local and global challenges. Finally, sustainable governance needs the ability to enable regions to creatively try new approaches, breaking free from unhelpful patterns that damage local communities and economies. Fostering new relationships is one way to do this, and the Cornwall devolution deal needs to better connect together politics, society, and the economy.

## The Cornwall devolution deal

In this section I will set out the main achievements of Cornwall's devolution deal. Later, I will explore these developments in terms of sustainability, considering the role of power and connectivity, and the extent of political devolution achieved at this time.

The Cornwall devolution deal<sup>13</sup> was signed in July 2015 by Cornwall Council, HM Government, Cornwall and Isles of Scilly Local Enterprise Partnership (LEP) and Kernow Clinical Commissioning Group. Unlike other areas, Cornwall's deal is not based on a city-region scale but is a county deal; furthermore, it does not include a requirement for a directly elected mayor. This is because existing governance arrangements in the area follow the territorial boundaries of Cornwall, whereas other regions often have a complex patchwork of layers of interlocking and overlapping structures and authorities. For example, Cornwall is served by a single NHS Trust (Royal Cornwall Hospitals), a single Clinical Commissioning Group (NHS Kernow), a single LEP (Cornwall and the Isles of Scilly Local Enterprise Partnership) and a single Unitary Authority with a Leader/Cabinet model (Cornwall Council). Within this group, Royal Cornwall Hospitals is the only body that does not have a leading role in any part of the deal, and will not act as an accountable body.

The LEP (which is essentially a partnership between local authorities and businesses, and is not directly elected) has a leading role over large areas in the deal, especially the aspects that touch on the economy. This means that there is no clear line of accountability for the deal as a whole, and large parts of it are outside the remit of democratically elected bodies. It is notable here that unlike, for example, Welsh devolution, no singular organisation acts as a central accountable body. Instead the devolution deal is a partnership of three organisations, only one of which is democratically elected. Elected representatives will play a role in the scrutiny function of Cornwall's governance, alongside business representatives, although the number of elected representatives of Cornwall Council as a whole is expected to be significantly reduced.

The deal sets out ten policy areas. Key measures include 'Efficiency Making in the Public Estate', an initiative to ameliorate government and local public sector joint working, improving efficiency where public assets such as land buildings are owned by a broad mix of local and national bodies. The aim of this element of the deal is improvement and savings through co-location, collaboration and asset rationalisation. Efficiency will also be met through the invitation for Cornwall Council, the Council of the Isles of Scilly, NHS Kernow and local health organisations to integrate health and social care services, creating a business plan to develop an integrated approach for health and social care. At present, resources are fragmented across a number of organisations, but this plan will move towards a single budget and commissioning arrangement. However, it is not clear here if Cornwall gains any more powers per se, other than the ability to consider how to deliver health and social care more efficiently.

The economy is an important aspect of the Cornwall deal, which grants Intermediary Body Status for European Regional Development Funding (ERDF) and the European Social Fund (ESF). In the current round of funding, responsibility to select projects and ensure compliance lay with the Department of Communities and Local Government (for the ERDF) and the Department of Work and Pensions (for the ESF). While the deal does

not shift responsibility for European Structural Funding to Cornwall, it allows Cornish decision-makers to select projects to be funded. What the deal does *not* enable is for Cornwall to interact directly with the European Commission with regard to the negotiations over structural funding and the shape of the Single Programming Document which sets out the agenda for Structural Fund priorities. This places UK Structural Fund recipients in a uniquely centralised position in relation to the EU, demonstrating the highly centralised nature of British politics. However, Cornwall is given back some of the powers of delivery which it had previously, but lost in the post-2010 austerity centralisation.

Other policy areas enable tighter networking, interlinking and feedback loops between labour market needs and training provision, as well as a Growth Hub to provide better support for businesses to innovate and grow, under the umbrella of Integrated Local and National Business Support Services. The Growth Hub involves significant local additional financial investment, but does not have the capacity to feed back to a central government level about what business needs are and how they might contribute to developing national policy if required. Cornwall has also been granted the power under the heading of Integrated Public Transport to franchise bus services, which together with Smart Ticketing will enable improvements in service quality through better integration, ticketing and bus infrastructure.

Additionally, with the help of the LEP, the Education, Training and Learning Apprenticeship Opportunities strand of the deal enables stronger integration of further education and training provision in accordance with economic needs. This plan will use the Adult Skills Budget, other existing local budgets, EU structural funding and any private investment that may be available. Remaining areas include a Cornish Heritage Environment Forum to help protect Cornish culture and environment (although, controversially, Cornish language funding was removed at the last minute), and a pledge to support the natural environment through Energy and Resilience Projects including a Low Carbon Enterprise Zone and Energy Efficiency Improvements in Homes. The environmental

aspects receive less attention than the other areas in the deal.

## **The Cornwall devolution deal: towards a more sustainable region?**

Can the devolution deal improve the sustainability of Cornwall's governance? To answer this, we can divide the deal into two parts. First, the document appears to provide greater *connectivity* and dispersal of power across a number of areas of public sector provision. Other parts emphasise how they will make Cornwall function more *efficiently*. But to understand better whether the deal actually offers a sustainable system of governance, we also need to look at feedback loops, and this is the aspect that is the most telling. The region needs to have conduits and flows of information between it and organisations higher up the scale in the wider governance ecology, such as national government. Such enhanced communication helps people and individuals to better adapt to the social, political and economic environment, and therefore to survive and flourish.

The integrated public transport offer supports ease of movement, enabling people and businesses to interact, communicate, develop and grow to a greater extent than is currently possible. This is to be welcomed. Many other parts of the deal also have the potential to transform connectivity within the system, enabling more accurate feedback to be presented, explored, used and developed. For example, we can see a tight network developing between the LEP, central government and other organisations to identify and develop apprenticeship needs and educational provision. Better interaction between education provision and business needs has the potential to make significant impacts in the economy, ensuring conduits of information which provide a more accurate analysis of the economic needs of the system and the environment within which it operates. This has clear potential to enhance Cornwall's adaptivity by improving the speed at which these needs can be met. Allowing Cornwall to have an intermediary body for the delivery of structural funding and the development of the Growth Hub are

other areas which facilitate intra-connectivity within the area. These measures also have potential to allow better understanding of how the region can respond to its market needs, and evolve with regard to its ever-developing niche.

Other aspects of the deal are designed to make more *efficient* use of resources. For example, the integration of health and social care is happening in a broader environment of increasing public sector cuts and the requirement to deliver more with less. This means that Cornwall will have greater capacity to shape delivery of health and social care services within the region, simplifying the current systems of delivery. Likewise, the idea of 'Public Sector Hubs', whereby different organisations share use of public assets, also offers efficiency savings in the context of a vastly shrinking state, and frees up public land for sale for development. Here, Cornwall is being reshaped to facilitate adaptation to national policy.

From this point, we need to consider what is included in the deal, and to where the sites of power are connected. This is interesting, because the 'vision of Cornwall' that is incorporated into the deal appears to be predominantly based within a layer of strategic decision-making. The capacity to 'plug in' to a layer of Cornish civil society is lacking in the format of devolution that has been developed, despite the very clear need for accurate information about what is happening 'on the ground'. For example, the feedback loops with regard to understanding the needs of the economy begin and end with the LEP, and are entirely reliant on the skills and capacity that the LEP has to communicate with civil society. However, many citizens within Cornwall (and indeed many businesses) are unaware that the LEP exists, and do not have either an understanding of its role and function or the capacity to feed into its decision-making processes. Engagement with and impact on the LEP appears to rely on the awareness of businesses and their willingness, ability and time to be members of a larger intra-Cornwall industry network. Smaller enterprises may be less competent at making themselves heard. This complicates how civil society can feed into the decentralised provisions within the deal, and raises serious questions about the quality

of the democratic engagement that it may be offering.

The situation is similar for individual members of civil society. In the entire devolution deal document, there is no mention of democracy, civil society or participation. It offers no support for political engagement, and no provision for citizens' involvement beyond the traditional channels of elected representatives. Identity (in the form of culture and heritage) is included for its utility only, rather than as a good in and of itself. Political participation remains enshrined under the Localism Act 2011, offering decentralisation of service delivery to eligible towns and parishes, but does nothing to address the centralism by which neighbourhood planning (and indeed local authority planning) can only take place within the tight control of central strategy and the National Planning Policy Framework. This indicates that even though Cornwall has been offered 'devolution', it will not be able to set its *own* policy agendas based on local needs. Indeed, the deal makes no new provision for policy making at all, even within the context of national strategic direction. Rather, the deal represents decentralisation of central government *implementation*. Indeed, this is what is meant by the emphasis on 'freedoms and flexibilities', that is, an ability to implement central policy on a local level, which is tailored to the local context.

Further, from the differences in emphasis between the deal and the earlier Case for Cornwall, it appears that the priorities of central government are different from those of Cornwall Council and their partners. The overarching emphasis behind the Case for Cornwall and its vision of sustainability was to strengthen the Cornish economy, improve productivity and address some of its unique challenges to housing and service provision. However, the aim of the central government, as reflected in the deal, was to make cost savings and to improve labour market engagement. Housing was completely omitted from the deal, despite being the most sensitive aspect according to the consultation process, reflecting the depth of Cornwall's housing crisis. Moreover, the identity that has been so effective in mobilising people in Cornwall for better local governance is reduced to a few lines that emphasise the

economic utility of culture and heritage, rather than the impact that it can have as a way of bringing communities together and mediating change. This indicates that, while using the rhetoric of devolution, the emphasis was still on central priorities, to the detriment of any real willingness to address local issues.

Meanwhile, no organisational body has overarching responsibility for managing Cornwall's deal. Instead it is managed by a patchwork partnership of member organisations—Cornwall Council, the LEP and the Kernow Clinical Commissioning Group. Of these, Cornwall Council is the only organisation that has clear routes of democratic accountability, or (as importantly) clear routes through which the public can participate in decision-making. However, this sole accountable body is merely a partner in a strategic governance network, rather than the primary authority. This compromises the capacity of the general public to feed information to the strategic decision-making tier of governance on which the Cornwall deal rests, and consequently raises a structural challenge in terms of the capacity of decision-makers to make choices, based on the most effective and accurate information, that connect with and reflecting the views of the local citizens. An alternative to this could have been to strengthen the role of Cornwall Council, which could have added credence to the claims that the deal is part of the trajectory towards an Assembly.

Instead, Cornwall's new governance network has little capacity to feed back further up the line towards central government. This latter retains ultimate control over adaptation to a changing socio-economy, and Cornwall is not invited to contribute to the processes which help to shape that environment. Instead of being able to use local knowledge to help *shape* the central agenda, the deal invites Cornish local authorities to have more choice over how to *deliver* that agenda. This is apparent with regard to health and social care and Intermediary Body Status. In the latter instance, in particular, the ability to decide which projects should be funded is limited by central policy and the Single Programming Document, prepared centrally and setting out the agenda for Cornwall's Structural Funds programme.

Equally, and betraying an intensely central rather than local focus, greater adaptivity over further education provision is not about improving Cornwall's economic capacity (as in the Case for Cornwall), but about meeting central targets regarding unemployment.

What does this mean for the sustainability of Cornwall's devolution deal? Cornwall's adaptability is compromised on a number of levels. First, governance in Cornwall sits in isolation from individuals and citizens, who can provide information and energy to help to drive the adaptive process. Second, Cornish governance and civil society has only minimal opportunity to feed back into helping to shape national policy. It is impossible to conclude that this amounts to a real devolution, or even decentralisation of power, and the risk here is that civil society could become disillusioned, especially if citizens' experiences of 'devolution' are related to an inability to make the changes that they feel are necessary. Consequently, the deal can only currently offer some *limited* prospect of sustainability, but it remains to be seen how policy-makers can shape Cornwall's deal in coming years, as changes become embedded and improved.

## Notes

- 1 Cities and Local Government Devolution Act, available at <http://www.legislation.gov.uk/ukpga/2016/1/contents/enacted/data.htm> (accessed 29 July 2016).
- 2 <https://www.gov.uk/government/policies/city-deals-and-growth-deals?page=2> (accessed 29 July 2016).
- 3 J. Willett and A. Giovannini, 'The uneven path of UK devolution: top down vs bottom up regionalism in England, Cornwall and the

North East compared', *Political Studies*, vol. 62, no. 2, 2014, pp. 343–60.

- 4 For example, a Survation poll in November 2014 found that 60 per cent of the respondents in Camborne and Redruth were in support of greater devolution, with 49 per cent in support of an assembly (<http://survation.com/a-tight-con-ukip-race-in-camborne-redruth-survation-for-the-university-of-exeter/>); and a Pirate FM Poll in September 2014 found 64 per cent support for devolution (<http://www.piratefm.co.uk/vp/-/news/-/latest-news/1398586/vote-should-cornwall-be-next-for-devolution/>) (urls accessed 29 July 2016).
- 5 Willett and Giovannini, 'The uneven path', 2014.
- 6 P. Payton, ed., *The Making of Modern Cornwall*, Redruth, Institute of Cornish Studies, 1993.
- 7 J. Willett, 'National identity and regional development: Cornwall and the campaign for Objective 1 funding', *National Identities*, vol. 15, no. 3, 2013, pp. 297–311.
- 8 Willett and Giovannini, 'The uneven path', 2014.
- 9 T. Herrschel, 'Growth and innovation of competitive regions: the role of internal and external connections', *European Planning Studies*, vol. 18, no. 7, 2010, pp. 1169–72.
- 10 Cornwall Council, *Culture and Economic Strategy*, Truro, New County Hall, 2014.
- 11 To describe Cornwall as a part of England is highly contentious. Here we refer to the administrative area of which Cornwall is a part, rather than making any kind of national claim.
- 12 'The Case for Cornwall', available at <http://www.cornwall.gov.uk/media/13331534/c4c-full-document.pdf> (accessed 29 July 2016).
- 13 Cornwall devolution deal, available at [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/447419/20150715\\_Cornwall\\_Devolution\\_Deal\\_-\\_FINAL\\_-\\_reformatted.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/447419/20150715_Cornwall_Devolution_Deal_-_FINAL_-_reformatted.pdf) (accessed 29 July 2016).