

The Draft Local Industrial Strategy for Gloucestershire Consultation Feedback from Gloucestershire County Council

Technical Comments and Suggested Amendments

The following are suggested amendments where officers felt that alternative wording or corrections were more technically correct. These have been listed under the appropriate headings, however, should further clarity be required please contact either Claire Edwards or Sandie Donaldson.

MAGNET COUNTY

Page 16, the statistic that is referred to from the UK Commission for Employment and Skills paper isn't clear – is it saying that people are leaving through retirement at a higher rate of new jobs becoming available?

Page 17, the Health & Wellbeing Strategy is referenced but the statement actually refers to the Director of Public Health Annual Report 2018/19

There are a few references to working with “health community partners” and these are very welcome. However, this could be amended to either “health, care and public sector partners” or to “partners working in the health and care system”.

GREEN

Page 33 | Affordable, sustainable ‘green’ housing; 3rd Paragraph;

The current paragraph wording would benefit from changes to clearly show to readers of the LIS how it is coherent and joined-up with well-establishing, active policy initiatives and applicable standards that are already being enforced with new development. A suggested revision could read:- ‘...These will be sustainable settlements that: - meet the nationally recognised Building with Nature benchmark (developed in Gloucestershire) for green infrastructure; will embed the principles of the circular economy; deliver affordable, inclusive and sustainably-designed eco-friendly homes that promote healthy lifestyles; improve connectivity and increase active travel; and protect and bring about improvements to our natural assets’

Page 33 | Final Paragraph;

As explained above for the 3rd paragraph of Affordable, sustainable ‘green’ housing, opportunities to champion well-established, active policy initiatives such as support for the transition to the circular economy, should be taken. A suggested revision could read as follows: - ‘...We will act as champions for research and development to encourage the necessary change of mind-set to achieve a cleaner and greener Gloucestershire which has successfully transitioned to the circular economy. This will be achieved through delivering new housing, commercial development and supporting infrastructure, and the upgrading of the built environment – particularly the retrofitting of existing housing stock. Established sustainable construction policy commitments contained in Gloucestershire’s county and district local plans will be supported and practice guidance as exemplified by Stroud District

Council's "Sustainable Construction & Design Checklist and the County Council's "Waste Minimisation in development Projects' Supplementary Planning Document will be promoted.'

Page 39 | we want to...;

The bullet point covering the 'circular economy' would benefit from a bit of re-working as it isn't currently capturing the challenge for the LIS and other key partners over the coming years. It should ideally headline the key measures and mechanisms that will need to be employed. This is important to ensure readers are in little doubt about what is understood by the term 'circular economy' and where we are with its implementation. Delivering a circular economy is described as a 'key challenge' and 'requiring a fundamental step change' in the functioning of the economy. A suggested revision to the bullet point could read as follows: - '...support the transition to the circular economy throughout Gloucestershire that will deliver a step change in resource efficiency, more rapid innovation to keep products and materials at their highest use for as long as possible and an uplift in preventing and minimisation the amount of waste generated.'

On p. 35 of draft LIS – with transport contribution to in excess of 40% of all CO2 emissions in Gloucestershire being transport related, reducing road based CO2 emissions need to be listed as one of the actions to reduce Gloucestershire's reliance on fossil fuels.

p. 38: the engagement about clean public transport methods should not only be with regional partners, but also with local partners, such as GCC

The total of Growth Deal related investment in transport infrastructure since 2015 was in excess of £37m, unlocking a total investment in transport infrastructure of more than £50m in growth deal funded schemes with a further £24m Growth Deal investment in transport infrastructure planned until 2021. The monetary and other benefits created for Gloucestershire through this investment significant and it is hoped that future close cooperation will continue to deliver for Gloucestershire

It is good that infra-structure is a core function – however like Transport/ Thinktravel – infrastructure underpins all the other core functions of ideas, places and business environment - with people at the centre.

There is no real mention of walking/only a slight mention of cycling. Suggested additional text 'better walking and cycling links and connectivity to enabling more people to actively travel for more of their daily journeys'

It would be prudent to include: " e-bikes can play a pivotal role in emerging technology and can change travel behaviour to increase connectivity and extend frequency and average trip distances under pedal power for business commuter and leisure by 2-4x plus" This distance opening up increased connections between rural and urban communities and access to employment and growth from new and existing communities – but also widening multi-modal options for connecting to high frequency trains/buses etc.

Linked to above and multi-modal connections – If a target could be in here to include better cycle links and accessibility to bikes i.e. cycle hire scheme across the county at key transport/community/employment hubs

Potential to Include and highlight more the key function of integrated travel hubs – which could use innovative access to information to enable smarter greener travel

Door-door- needs to extend to multiple trips and multi-modal options – young people or families in modern society rarely travel door to door - home – to work – their travel behaviour tends to amount to multiple trips to multiple destinations – and accessibility to sustainable and active travel needs to match this.

Opportunity to match Infrastructure to making the county the greenest – ‘greenest county greenest commute’ – and use the principles of GI to embed across all aspects of economic & residential growth.

All new infrastructures should be green infrastructure

Would like to see if the LEP, as part of the LIS Gloucestershire, conduct similar surveys to the ‘Sustrans Bike Life reports’ which could extend to all forms of sustainable transport potentially. <https://www.sustrans.org.uk/bike-life/>

IDEAS

Page 49 we want to...;

Whilst the focus here is on Agri-tech matters, the paragraph that references the ‘healthy circular economy’ may benefit from a revision to ensure readers of the LIS are not confused as to what is being supported. It is not clear what a ‘healthy circular economy in food and farming’ is and whether it is different to the government’s wider ambitions to deliver a ‘circular economy’? Also, is there an opportunity being missed here to show how the LIS is hooking up to the Government’s strategic ambitions expected in the forthcoming Agriculture Bill...? A suggested revision could read as follows: - ‘By transitioning to the circular economy through food and farming, our aim is to make Gloucestershire a leader in building natural capital, improving food security and driving-up efficiency, reducing food-relates illness and contributing to the fight against climate change.’

PEOPLE

There is a lack of clarity about what the LEP mean by “young people” – whilst the LEP may wish to avoid defining this too strictly, this will be subject to very different interpretation by the audience, so some clarity may be helpful. The ordering of “attract and retain” used throughout the document also implies that the primary intention is to bring young people in to Gloucestershire, rather than to ensure young people here are given opportunities to learn and develop skills that are needed by local business sectors and secure good quality jobs here. A suggested alternative might be “develop, attract and retain”.

Page 55 There could also be a clearer definition of or narrative for “flexible working”, e.g. on p55. This can mean a range of things to different people (everything from the ability to work from home through to 3-4 day weeks, portfolio careers, etc.) – what is and isn’t in scope? Or is part of our strategy to work on this?

INFRASTRUCTURE

Page 67 – The current landscape - Some of the train times seem slightly high/low.

Gloucester to Cardiff can be achieved in 1:05 mins

Moreton to Worcester – 39 mins

Moreton to Oxford – 38 mins

Cam and Dursley – 35 mins

Perhaps Kemble to London (1hr 15 mins) and Lydney to Bristol Temple Meads (1hr 36 mins) should be added to the map as these are important commuter routes. The station data needs referencing and dating.

Page 69 – Recent Investment - An additional bullet point should be added: Supporting the North Cotswold Line Task Force in improving services between Moreton in Marsh and Oxford/London.

Rail Study – The paragraph needs updating as the 2015 Amey Rail Study has, to some extent, been superseded. Suggest: Gloucestershire County Council with support from GFirst LEP and the district councils have commissioned a Rail Investment Strategy for Gloucestershire. This will establish the economic value of county rail routes and provide the evidence base to prioritise future investment on the rail network. It will also inform sustainable transport options for existing and proposed new large scale development identified in local plans.

P.69 recent investment: Not clear, why this section refers to the Connecting Places strategies, only, not to the whole LTP. Also: the list of recent transport investments includes a number of schemes that have not happened yet (A46 alignment, Motorway junction upgrades, WCTIS, etc.). There is also some recent investment to future investments missing from this list. Please get back to GCC transport officers to ensure that the list either includes all of the recent transport investment, or all of the transport investment that is likely to come forward in the future.

Page 70 | Housing, 2nd Column, 2nd paragraph bullet points;

There is a good opportunity here to demonstrate coherence within the LIS around its key supporting messages – particularly clean growth and the circular economy. As such the bullet-points that make reference to waste management matters and pioneering initiatives would benefit from a bit of reworking. A suggested revision to the 2nd bullet point could read as follows: - ‘- meaningfully contribute to delivering the circular economy, improving energy efficiency and the uptake of green energy solutions, and;’ A suggested revision to the 3rd bullet point could read as follows: - ‘ – act as a national pioneer, piloting innovative and technologically advanced clean and green design approaches within new construction.’

Page 70 | Housing, 2nd Column, 4th Paragraph;

There is another opportunity to demonstrate coherence within the LIS around its key supporting messages – particularly clean growth and the circular economy. A suggested revision could read as follows: - ‘This will require collaboration by all of the county’s local authorities to ensure future homes are resource and energy efficient, digitally connected and future-proofed. Work to support this is already underway.

Page 71 Smart charging the EV Super Highway’ scheme needs to be explained

Page 73 | what we need..., 2nd Column, last-bullet point (single prioritised infrastructure plan);

The reference to the proposed SoCG should add the following bullet point: - ‘support the transition to the circular economy.’

Page 73 Mass transit transport solution

This section might need amending to remove reference to Guided Busways as I don’t think the EoI states a preference for a particular technology at the moment. The EoI is keeping options open in terms of what type of system would be employed

Page 73a single prioritised Infrastructure plan

This should refer to seven planning authorities not districts.

Reference to the seven local plans needs clarifying as the Development Plan for Gloucestershire consists of the:

- Joint Core Strategy (Cheltenham, Gloucester and Tewkesbury)
- Current adopted local plans for Cheltenham, Tewkesbury & Gloucester
- Local plans for Cotswold, Forest and Stroud,
- Minerals Local Plan,
- Waste Core Strategy, part of the former Waste Local Plan,

It would be simpler to just refer to the Statutory Development Plan for Gloucestershire which covers the six districts and GCC.

Page 74 talks about the development of a cycle strategy. This should build on the work GCC is doing with its Local Cycle and Walking Investment Plans. We have cycle strategies – both national and local. We have important major local industries lobbying for better cycle routes. We need the commitment to their delivery.

Page 74 | what we need...

For reasons of consistency with other changes suggested concerning the circular economy, the bullet point on page 74 may benefit from a little reworking. However, it is not clear whether it is meant to be transport-focused in line with the other bullet-points around it? The assumption has been made this isn't the case. A suggested revision could read as follows: - 'A positive and supportive investment environment in which to secure the infrastructure and networks needed to deliver the circular economy. This should build upon existing good practice in place across our industries, and align with wider, cross-cutting ambitions to drive forward the waste hierarchy – particularly focused on achieving greater resource efficiency, encouraging more re-use, and maximised opportunities for recycling and recovery.'

'A resilient transport network that enables sustainable economic growth by providing door to door travel choices' (LTP Vision)

Gloucestershire's LTP has been updated to support delivery of the Strategic Economic Plan, the emerging Local Plans and, where possible, maximise the opportunity for further levels of investment as they become available for transport within the county. It also enhances the ability of County Council officers to successfully negotiate with developers to secure infrastructure associated with emerging developments

Page 74 –Rail Strategy

A fourth bullet should be added: Improve connectivity between the Forest of Dean via Lydney station and the Greater Bristol Area

- Improve connectivity between the Forest of Dean via Lydney station and the greater Bristol area.

Page 78 – please check locations of centres on map (Birmingham is not correct and the link should following the M5) + add Cardiff

Page 79 - The Forest of Dean District is a Defra R80 classified area, in which 95% of its population still live in a rural environment. – remove the word still as this implies they haven't been able to move instead of choosing to live somewhere

Page 79 - Tourism - Whilst the Cotswolds is the largest AONB in Gloucestershire there are two others – Wye Valley and Malvern Hills. Whilst the latter is only a very small area the Wye Valley covers a larger area to the west of the county and being the birthplace of modern tourism and the 'picturesque movement' should be mentioned. The map should include Malvern Hills and Wye Valley AONBs. Approx. 65,000 people use the station during the National Hunt Festival. This would equate to 130,000 actual rail journeys.

Page 80 – Local Plans

As discussed above this needs clarifying. The Joint Core Strategy is an overarching planning document covering Cheltenham, Gloucester and Tewkesbury. I don't think Gloucester City have an actual adopted local plan. For Tewkesbury and Cheltenham some of their adopted local plan policies have been 'saved' but are somewhat dated. All three JCS authorities are progressing their respective local plans but are not adopted at the moment as they have had to wait for the JCS to be adopted. The Forest of Dean doesn't have an adopted local plan but have an adopted Core Strategy, Allocations Plan and Area Action Plan. They are at the early stages of LP production.

GCC has an adopted and emerging Minerals LP and Waste Core Strategy.

To avoid all this rather complicated, tedious and technical planning discussion something that refers to the Statutory Development Plan for Gloucestershire providing the framework for future growth discussed in the LIS might be simpler.

Looking beyond the county – references to the M4 access being via South Glos – the A417 links the Central Gloucestershire City Region to the M4 and Thames Valley – the omission of this corridor at a time when we are making a case for the A417 Missing Link seems short sighted.

There is inconsistencies with references to the Sub-National Transport Bodies – please note that GGC as a member of the Western Gateway and the G:First LEP through the Western Gateway's Transport and Business Forum – through this they would be able to influence Sub-national policies/ priorities. The links to Midlands Connect are not so strong other than being a partner on the A46 Partnership group

PLACE

The Place section doesn't read as a very coherent section at the moment – although all of the elements are important, it reads like a collection of topics, rather than as a clear aspiration for the place. From a health perspective, should the section on inclusive growth and social mobility could be moved into the People section and the Place section focus on the role of anchor institutions as one of Gloucestershire's assets to build on, alongside tourism, culture, the city region, etc.

Page 82 it needs to be made clear, that growth needs to be allocated in sustainable locations, to enable access with sustainable modes

Gloucestershire's LTP has been updated to support delivery of the Strategic Economic Plan, the emerging Local Plans and, where possible, maximise the opportunity for further levels of investment as they become available for transport within the county. It also enhances the ability of County Council officers to successfully negotiate with developers to secure infrastructure associated with emerging developments.

We want

To preserve the county's deeply rural environment, we want to keep Gloucestershire at least 95% building-free. In total, less than 3% of the total land in the county has been built on, highlighting how rural the county is, whilst revealing an opportunity for further use of the county's land to unlock sites for future housing and employment. This statement should be reworded as it contradicts the Growth agenda and the proposed city region

GENERAL COMMENTS ON DOCUMENT OVERALL

Practically, the 'diversity' of the Gloucestershire population is not really addressed in the pictures included. There were very few pictures of 'older people' although they are mentioned throughout the document as being important. Only one picture containing people from minority ethnic groups is included, a picture of an RAU event page 51– in which case

they may have been students. Almost all pictures contain young white people and certainly none with an obvious disability.

Also whilst the document does look very professional, a lot of the text is rather small even on the general text pages. This is perhaps difficult to read for some people and the pages where there is small white text out of a very dark background (dark blue or green) are particularly tiring to read.

DRAFT