

## **DRAFT GLOUCESTERSHIRE LOCAL INDUSTRIAL STRATEGY 2019**

### **A RESPONSE TO THE CONSULTATION FROM CPRE GLOUCESTERSHIRE**

#### **CPRE Gloucestershire: our role and primary interests**

CPRE Gloucestershire is a campaigning charity. Our primary interests and concerns are with the future of the county's rural areas and communities and the rural economy; and with the county's outstanding assets of distinctive landscapes, rich biodiversity and vibrant market towns and villages.

We warmly welcome the overall intention in the draft LIS which puts clean growth at the heart of the strategies for business growth and in the approach to infrastructure investment; commits to protecting, restoring and promoting the county's green assets and natural environment; and to strive to reduce carbon emissions to net zero by 2050 and at a faster pace if possible.

In our campaigning and advocacy we will be promoting similar messages and will continue to support the work and endeavours of the Local Nature Partnership through our membership and place on the LNP Board. Specifically, we want to see the standards of new development raised in terms of design, energy efficiency and provision of green infrastructure; we support and promote the Building with Nature benchmark; and we want to help with developing the thinking on how biodiversity net gain should be delivered.

New development must be proportionate to need and in the right place, better linking housing and jobs and reducing the need for travel. CPRE devotes much effort into inputting into the spatial planning process such as the JCS Review and Local Plan Reviews and will continue to do so. We are taking a particular interest in the proposed Ashchurch/Tewkesbury Garden Community which we hope will become an exemplar of best practice. And we will wish to engage constructively with emerging thinking over delivering the ambitions of Gloucestershire 2050.

#### **Observations on the draft Local Industrial Strategy**

Retention and attraction of skilled young people will be critical to the success of the LIS. Four key factors are identified viz: exciting and challenging jobs, a positive and innovative approach to addressing climate change, the attraction of the county's natural assets, and the availability of affordable housing. Accessible public transport is also mentioned.

The strategy has a clear vision for the first of these though we would recommend that Agri-tech is given greater prominence by having a chapter to itself rather than be buried in Innovation. Agri-tech is particularly relevant to Gloucestershire and it provides one of the routes to innovative approaches to addressing climate change.

There is a danger that a positive approach to climate change is taken to mean a concentration on installing renewable energy capacity. The challenge is for Gloucestershire to be a leading innovator of the technologies which third world nations need and can afford if they are to be weaned off their current dependence on fossil fuels. That is not to say that Gloucestershire should not play its full part in reducing greenhouse gas emissions locally but that must not be at the expense of other factors which make this such a special county and one attractive to young people.

Similarly, there is an emphasis on green infrastructure in developments: we support this but it is not sufficient. The interviews with young people showed what they valued was the unique and varied countryside from the broad attraction of its distinctive landscapes to the smaller scale of its diverse biodiversity. Landscape is not given prominence in the document. A strong statement of how landscape is to be protected while managing development is needed in the opening section of the Green Chapter. We welcome the commitment to 95% of Gloucestershire remaining 'green' but it is not clear how this will be achieved. The '95% pledge' should also be in the opening section of the Green Chapter and qualified by the words "achieved by working with local planning authorities so that development is in the right places and works with and is not is damaging to the local landscape".

Insufficient affordable housing is a major problem particularly in rural areas which are key locations for many of our flourishing small businesses. The definition of affordable housing is very broad from a discount off market prices, through starter homes to social housing for rent. The LIS needs to be much clearer on what young people can realistically afford and how many units of what sort of type will be needed. This is a subset of the overall affordable housing need in the county: the LIS should make clear what priority should be given to it by local planning authorities in their discussions with developers and how it is to be funded. The current model of largely depending on the house building industry to provide affordable housing subsidised by market housing cannot be relied upon to meet this specific need and there is a severe shortage of central government funding. The LIS needs to make positive and innovative suggestions as to how this gap is to be filled – otherwise the aspiration to provide housing which young people can afford will have little practical chance of being implemented.

The importance of the rural dimension to Gloucestershire is such that we consider that it merits a separate chapter in the LIS, entitled 'The Rural Economy'. This umbrella term would pick up a number of the issues raised including rural affordable housing, rural jobs and rural public transport. It would also be the place to explain what is meant by the term 'rural' as the needs and challenges of a rural county exist on a spectrum and there cannot be a generic or one size fits all approach.

## **Other points**

### ***Natural capital***

Maintaining and enhancing natural capital assets is a very welcome key principal of the LIS. We suggest that the term natural capital needs to be explained and it would be helpful if examples were given of how maintaining and enhancing natural capital is going to be achieved in practice.

### ***Rural Public transport***

Rural public transport services are only mentioned once despite the statement that 'Our survey of young people revealed that transport was their number one 'worst thing about living in Gloucestershire'. There is much emphasis on electric cars, walking and cycling. The rest of the strategy fails to mention rural public bus services (and the re-establishment of these). Electric vehicles might be a great idea for a large town, as well as walking and cycling, but not for someone who lives in the far reaches of the county. How do young people access our county's great educational establishments? Must they drive? And whilst it is apparent and welcomed that we concentrate on young people remaining in the county, there is an existing population who are retired and whose needs must be considered.

### ***Farm diversification***

The LIS should say more about realising diversification opportunities on farms. This would provide new income streams to enable investment in the landscape and biodiversity. The EU LEADER programme has stimulated many initiatives. There is a need for a replacement funding programme. The focus for farm diversification and the provision of non-agricultural employment space should be on the re-use of under-used and redundant buildings, not on new buildings built on farmland.

### ***Food security***

There is no mention of the importance of UK food security and increasing our self-sufficiency in the production of food that can be readily provided through UK agriculture. We need to retain as much productive farmland as possible, particularly in light of BREXIT and the climate crisis.

### ***Landscape and tourism***

In terms of Gloucestershire's outstanding landscape, CPRE has welcomed the Report of the Glover Review of National Parks and AONBs. We supported the ambitions of the Cotswolds Conservation Board for National Park status for the Cotswolds and have long campaigned for AONB status for the Forest of Dean. In both cases we consider that designation would not only assist the conservation and management of the special qualities of the areas but it would be beneficial for tourism and the wider rural economy, and we have noted that the Report recommends that the duty required of National Parks to seek to foster the social and economic wellbeing of the local communities in their area should be made a statutory purpose. In finalising the LIS, we hope that the LEP will add its support for implementing the Glover Review recommendations.

### ***Green Belt***

The adopted Joint Core Strategy has resulted in the removal of significant areas from the Gloucestershire and Cheltenham Green Belt to deliver urban extensions to Gloucester and Cheltenham to meet development needs in the most sustainable way which could not be met within the existing urban areas. CPRE supported this approach. Going forward and with the need to retain the separate identities of Gloucester and Cheltenham, further green belt releases should be kept to a minimum with the priority for development redevelopment within the existing urban fabric. The aim to enhance the green belt to provide community benefits is welcome. CPRE wishes to contribute to this work.

### ***A local green skills and business hub***

We note the reference to Ecotricity's stadium and employment hub. While the concepts may be fine, the particular site proposed at M5 junction 13 is controversial. Reference to the location should be removed.

### ***Children's Countryside Code***

We were pleased to note reference to this CPRE initiative which we hope to take forward over the coming year.

### ***Where we can help***

The following areas are ones where CPRE Gloucestershire can help with delivery:

- Promoting community-led housing and particularly affordable rural housing where we are aiming to partner with GRCC to promote the concept
- Enhancing the Gloucester and Cheltenham Green Belt where we have said that we wish to contribute to this work
- Inputting to the LNP work exploring how biodiversity net gain might best be delivered

- A possible initiative with the Campaign for Better Transport around rural bus services, based on research shortly to be published on 'Transport Deserts'
- Producing a guide for communities and individuals on actions that they might undertake to help deliver net zero carbon emissions. For this project we will be looking for some help with production costs and promotion.

In addition to the above we can provide relevant CPRE research papers and reports as they are published.

In the light of the consultation feedback, we would welcome the opportunity for a meeting to hear about next steps with finalising the LIS and to discuss where we can help.

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