Public Document Pack



Supplement for

OVERVIEW	AND SCRUTINY	COMMITTEE -	MONDAY,	13 OCTOBER 2	2025

Agenda No.

- 10. **Bromford Housing Update** 3 10
- 13. **Updates from Gloucestershire County Council Scrutiny Committees** 11 30



O&S Meeting on 13th October 2025 – Bromford Flagship Housing – Q+A Session

Member Submitted Prior Questions have been arranged into the following 3 themes:

- Theme 1 Allocation of Homes/ Tenant support
- Theme 2 Delivering Affordable Homes
- Theme 3 Improvement and Retrofitting of Existing Bromford Stock

Theme 1 – Allocation of Homes/ Tenant support

• Exploring the allocation of homes into rural villages who come from cities and don't have their own transport. Communication and accessibility - it can be very difficult reaching anyone through the telephone service with long waits

Social properties are allocated in the most part by Local Authority policy as well as housing legislation. Cotswold District Council operates within the Gloucestershire Homeseeker Partnership, meaning that lets are subject to Homeseeker Plus Policy. This aims to give priority to those with a local connection and those in the highest need of housing. Whilst there may be extenuating circumstances where the Local Authority may deem a case a priority and seek to direct match or likewise a housing provider complete a management move for one of their own customers due to a severe risk to the customer, on the whole customers are let based on local connection and need. Where a shortlist may be unsuccessful due to low demand or other reasons, a property could be offered to somebody without the local connection but still with a need for housing. In the most part, these individuals will still have a connection to Gloucestershire

• We have seen several cases of applicants coming to Avening as their first rural home - what is the policy on filling empty properties? And Is any coaching given to applicants about the suitability and lack of facilities and transport in rural locations?

Where we may have concerns around someone's suitability for an area eg perhaps they don't drive and live in a very rural area, we will discuss our concerns with the individual. However, we do not have the ability to reject somebody because we don't believe it will work. We treat our applicants and customers with respect, will talk through any concerns and allow the customers to make their decision with all of the information. With regards to coaching, when a customer moves in we will seek to ensure they settle into their property and start their tenancy well. This will include seeking them to understand and link into their local community

Management of tenants especially those struggling to pay their rent

Bromford seeks to support our customers to enable them to thrive in their home. This support comes through our investment in our Neighbourhood Coaching teams and our Income Management Teams. Neighbourhood Coaches can help with low level budgeting and signposting, however when more intricate or detailed advice around income maximisation our Income Management team will step in and support customers. Like any landlord, we will seek to support customers to enable them to pay their rent and other priority bills.

• The continuation of families being housed in homes with no carpets or flooring (I understand that currently Housing Associations are only required to provide this in kitchens and bathrooms). I am a trustee of a small local charity and requests to provide flooring is one which continues to be received, particularly from young families who are unable to place babies and children on the floor to learn to crawl/walk and there is the additional impact of the cost of heating properties with no flooring, which during a cost of living crisis is an additional financial burden to our residents. Can I also receive reassurance that properties with decent carpets are no longer being stripped out at the end of a tenancy and skipped and sent to landfill, as has been reported to me previously, but that they are now being cleaned - some flooring is better that nothing.

Carpet is something that we have discussed at length with Councillors. Whilst there is currently no legislation around carpets being provided, our Empty Homes team do everything they can to retain carpet for the next customer. There are cases where homes are let without flooring as the carpet was unable to be saved however these are few and far between now. We would welcome examples where it is perceived that carpet has been needlessly ripped out so that we can investigate the narrative around this.

Bromford has been trialling providing carpets in homes for several years on a small scale via our Home Standard work. This has seen refurbished carpet tiles installed into hundreds of Bromford properties, where customers would not have been able to afford it any other way. These installs allow us to measure the impact it makes to a customers life to enable us to put forward the case for our future approach towards carpet. The Government recently announced that it intended to bring an updated

Decent Homes Standard forward which will require the provision of flooring in all rental properties, by 2035.

 Policies on assisting tenants who have particular needs which are not easily met in rural areas such as access to domestic violence, mental health or substance abuse support

We look at all cases on a case by case basis, as we recognise that there is no one size fits all. This also allows us to understand circumstances and adapt our approach when necessary. We recognise that there is less outreach or access to services in rural areas and as we move forward with Place Based working, we aim to have even stronger links with our community partners to better support our customers in times of need.

 What is the profile of the housing waiting list - including length of time for urgent and non-urgent cases

There are 1806 households registered for Housing on HomeseekerPlus. The Banding of which is

Emergency 40 Gold 54 Silver 321

Bronze 1391

As HomeseekerPlus is a choice-based system, the length of time an applicant might wait to receive an offer of a property is dependant on the applicant themselves:

- Applicants bid on the properties that they wish to be considered for.
- If an applicant is only choosing to bid on properties within a small geographical area, they may wait for many years before receiving an offer of accommodation.
- Some applicants do not bid at all.
- There are on average only 30 vacant properties each month advertised via HomeseekerPlus.
- Lack of available social housing also influences the time that applicants may wait for an offer of accommodation

Management of external areas including grass cutting, hedge trimming etc

Our Service Standard explains best how we manage and maintain our customer spaces. This can be found here: <u>Bromford Standards</u>.

 Congratulations on the website; it's a huge improvement and lots of useful content is readily accessible. Neighbourhood coaches remain incredibly important to many of the residents I come into contact with though: are there sufficient Neighbourhood Coach hours available to fully support residents and help them thrive in their home?

We need to better understand the demand and where we can have the most impact with customers. We have seen and felt over the years that support services are able to offer less and less due to competing challenges and dwindling funding. We've also seen an increase in customer need, an increase in the severity of customer circumstances and an expectation of increased delivery from the Regulator and Ombudsman. This ultimately sees the Neighbourhood Coaches having to step into more spaces, take longer to support customers with certain challenges which ultimately decreases the availability of our Neighbourhood Coaches to be reactive to our customer's needs. All of our front line colleagues are incredibly important to delivering our housing management services to enable of customers to thrive and as we move forward with our vision of Place Based working, it will be exciting to see how our approach develops to better serve our customers and communities.

 Update on changes to their administration strategy resulting from their merger with Flagship Housing - including plans to increase their property portfolio in the Cotswold District in the forthcoming new developments, changes to their offices and management, or the way their neighbourhood coaches work, etc

Fundamentally, there will be no changes in how we operate. We will continue to move towards Place Based Working which will develop how we work locally with customers.

Theme 2 - Delivering Affordable Homes

- Do Bromford have a strategy or delivery plan to increase the quantity of social housing in the District?
- What prevents Bromford from responding to calls for social housing providers as part of developments in our District and rural areas in generally? How can we overcome these barriers?

- How can CDC, town and parish councils best work with Bromford to deliver more social housing of the type and quality the District needs?
- Future plans to provide more social and affordable housing in the Cotswolds

Bromford has an ambitious development pipeline of 2000 homes per year, with 50% of these being social rent, making us one of the biggest developing housing associations in the country and the top deliverer of social rent. Our recent merger activity supports this aspiration by unlocking some £1.9bn in additional funding capacity.

Bromford works in partnership with Homes England and has secured funding through its strategic partnership approach across 2021-26. Central government support to fund affordable housing remains key and the recent announcements of £39bn from 2026 are welcomed.

Cotswold DC administrative area remains an important location for Bromford. We are in the process of regionalising our new homes activity, with the creation of a West region, headed up by a Regional Director with responsibility and remit to undertake all new homes activity across the Gloucestershire and West of England LA areas, which includes the Cotswolds. This will be a team of 40 colleagues who will undertake all activities from site and opportunity identification through to shared ownership sale and customer care, ensuring regional accountability.

We have also set up a Partnership Board with senior management colleagues from both Bromford and CDC, an objective of this board is to consider ways to increase the delivery of affordable housing in the District. This will be looking at opportunities to combine land holdings to create new developments.

In the last 5 years Bromford have delivered in excess of 350 affordable homes, with more than 50% of these being social rent. There are a further 200 in the growing pipeline between 2025-2029.

Bromford has undertaken land, S106 and regeneration activity across the District with scheme sizes ranging from 13 to 85.

<u>Theme 3 – Improvement and Retrofitting of Existing Bromford Stock</u>

• Programme of retrofitting measures to improve energy efficiency

- Policies on improving the energy efficiency of their building stock to bring them up to an EPC rating of C and also managing the maintenance of the properties
- What data is used to assess whether properties are in need of retrofit measures (EPC alone or other info such as heat loss mapping)?
- How many Bromford properties in the District are in need of retrofit? What proportion of Bromford stock is this?
- Does Bromford have a strategy or delivery plan to deliver retrofit for the housing stock in our district?
- What levels of funding and resources have been allocated to retrofit?
- Given some of the challenges of retrofitting existing stock (noting examples of
 planning refusals in Guiting Power and Lower Swell for example) is there
 scope to take a more place-based approach and work with partners to offer
 retrofit at a neighbourhood level? I.e. retrofit solutions offered to (paying)
 privately owned homes as well as Bromford homes.
- Ageing properties, can we receive an update on the number of ageing properties held by Housing Associations in the district and how many are being treated for damp problems and any plans to retrofit these properties.
- Maintenance and refurbishment of properties

Bromford has a proactive planned maintenance programme which looks to improve their properties and the assets within the properties. This strategic plan will also look to understand what a property will need over the next 30 years to ensure we are investing in the right way. There will also be regular reactive repairs, when a customer makes us aware of some form of disrepair. We will seek to repair homes until it is no longer economically effective to do so. At this time, a complete component change may be considered. By addressing issues proactively, it can reduce the likelihood of breakdowns and emergency repairs. Regular upkeep ensures properties remain in good condition, extending their lifespan and maintaining their value. It also supports a tenant to thrive in their home and encourages them to take pride and look after it.

Bromford has a programme of retrofitting homes across the group and our current focus is on our worst performing homes; those at EPC D or below. This approach is aligned with the gateway for grant funding eligibility under the Social Housing Decarb fund and the more recent Warm Homes: Social Housing Fund. It also applies to ECO4. Whilst EPC is a coarse metric, it is one that we are obliged to use but we also target a reduction in heat demand when designing a package of retrofit works under the strict PAS 2035 process. In all cases, we consider the cost of heating our homes for our customers.

We are aiming to move a minimum of 98.5% of homes to EPC C or better by 2028 and are working towards moving all homes to EPC C or better by 2030. This is a huge task and is further complicated by a number of non-traditional, system build homes that we have across the group, a proportion of which are in CDC. Part of the PAS 2035 process is that any building defects have to be remediated before any retrofit works can be completed. Costs for certain non-trad homes can be as high as £150k per home.

In additional to a retrofitting approach, we undertake component-based upgrades like external wall and cavity wall insulation, loft insulation and low carbon heating using a data driven approach and to respond to customer need. In some cases, we are having to replace defecting external wall insulation completed prior to stock transfer and low carbon heating will be offered to customers when solid fuel heating systems are found to be beyond economical repair.

We take a data led approach which is used for calculating the energy performance of a home based on our asset information. This includes insulation levels, heating type, windows and doors performance, etc, and this data is then used to target improvements. We are trialling the use of sensors to gain real-world data which enables bespoke retrofit solutions to specific house types based on how they perform which will reduce costs and ensure the measures are a success for the occupier.

There are currently around 580 homes in the CDC LA area (around 10%) that are below EPC C and these are our priority for upgrade works. Around 80 of these are on our SHDF programme and others are being upgraded via ECO 4. Some of these homes are currently refusals (for example, replacement of solid fuel heating due to fuel poverty concerns). We are currently reviewing eligible homes for inclusion in the WM:SHF programme.

We have a dedicated Decarb Team within the Home Investment team that focusses on these works and Bromford has committed £633m to achieving Net Zero by 2050. As part of the LA partnership meetings, we are working towards review of existing

retrofit projects and agreeing suitable measures based on architype and location as part of agreeing a design guide to fast track suitable solutions.

With respect to a Place Based Delivery model, we are open to collaborating with CDC to enable different tenures within the same neighbourhood to benefit from the improvement works. We would need to work through how this is set up in terms of the funding model and grant availability/eligibility for private owners.

GESSC September 19, 2025

23 invitees. 15 attendees. 9 members. 1 Member Apologies 4.

Reports pack thin!

The Gloucestershire Economic Strategy Scrutiny Committee will:

- 1. To review the decisions, plans, and policies of the Gloucestershire City Region Board:
- 2. To scrutinise the impact and delivery outcomes of successful Strategic Economic Development Fund (SEDF) bids;
- 3. To identify future areas of economic growth for inclusion in the Gloucestershire Economic Strategy*;
- 4. To provide a scrutiny function for any potential devolution deal in so far as it relates to the Gloucestershire City Region Board or the Gloucestershire Economic Strategy*.

The Gloucestershire Economic Strategy Scrutiny Committee may not exercise any function other than those outlined above.

*Note: The Gloucestershire's Economic Strategy (2024-2034) outlines the county's existing strengths, opportunities and challenges and provides a clear statement of intent for Gloucestershire – to achieve greener and inclusive economic growth that delivers a stronger, more sustainable, economy; and sets us on the journey to achieving a new Gloucestershire 2050 Vision.

- Cllr Julian Tooke, Gloucestershire County Council's (GCC), Cabinet Member and Chair of the City Region Board, gave an update supported by David Owen, GCC Director of Economy and Environment, and Ben Watts, GCC Planning, Economy and Growth Manager.
 - a. Said to be a "new committee". There was a different participation.

 Unclear why. I am now one of the most experienced and joined others in pointing out that this was intended to be a succession with a different format but the same remit.
 - b. Owen met with Leaders from each of the districts. (Cllr Evemy is the CDC representative, but Cllr Wilkinson had attended for us at their last general meeting.)
 - c. They fed into the Local Growth Plan (LGP), which is expected to be finalised in November.
 - d. The Spatial Development Strategy (SDS) intends a countywide spatial development plan with central government passing legislation.
 - e. Strategic Economic Development Fund (SEDF) it had been agreed at September's City Region Board that a separate working group would be set up to hear presentations from each of the 9 SEDF bidders.

- Feedback from this meeting would be incorporated into the Senior Officer Group meeting and the SEDF bid report which would go to November's City Region Board. The decision on which of the bids would be funded would be made in November's meeting.
- f. The LGP will have an action plan by November for monitoring. It has five missions, Talent and Future Skills; Employment and Health for People and Places; Thriving Communities and Culture; Environment, Housing and Infrastructure; Innovation, Investment and Enterprise. Summary details in Appendix 1.
- g. David Owen said there was a good process with good senior participation. It was an economic growth board. Julian Tooke emphasised a partnership approach, which was Cllr Spivey's way.
- h. Officers confirmed that they believe there was good collaboration across the districts.
- 2. We discussed sensibly what we should be doing as committee to meet with the county needs and be taken seriously. There was some frustration from some members about GESSC being out of sync with information from CRB. Officers blamed this on central government legislation and it's quick timescales. They are planning an action to resolve this difficulty.
 - a. It was confirmed that the committee wanted to add value through scrutiny and intended to bring items on areas where this could be done, such as FoD, see below.
 - b. There was a debate about whether the focus should be only on business economics or whether the economic health of the county took into account broad notions of economic well-being and contribution.
- 3. Members from Forest of Dean expressed concern about their economic growth and hope that the LGB would reflect the whole county and not be focused on prime economic areas only.
 - a. Tooke confirmed that this matter to him and this was why the county had supported the Forest of Dean UNESCO Biosphere Application.
 - b. Members pointed out that in wealthy areas there was still pockets of deprivation. The was a desire for more focus on skills and well-being.
- 4. We had a data presentation once again, with the same limitations that had been previously noted (late arrival and low granularity because of government designs). Nevertheless, there was some interesting information. I pointed out that the link between the data and what was being done with it, strategic significance, was not being described again and it was agreed that this would be desirable. Edited version at Appendix 2.
 - a. There is a 17.4% growth in population over 25 years, with a 43% increase in those over 65 while the number of children have declined.
 - b. Insufficient affordable housing. CDC is the poorest in providing this.

- c. The average monthly rent in Gloucestershire is over the national average.
- d. CDC Is weakest in digital connections.
- e. CDC Is the only district with job density greater than one that is it lacks people to do jobs.
- f. The county loses young people but gains and all other age groups.
- g. In general we are presented to when we could've read the report and ask questions. The data represents outcomes and the drivers are not provided. This implies that we are tackling issues without necessarily understanding the systemic context, if the data is considered to be significant in the strategic process. There are no figures on industrial needs and trends generally, as an example of the question, are we getting the figures we need or just the ones that are available? They are macroeconomic figures.

5. Mobile data

- a. Findings reveal a considerable disparity between Ofcom's official coverage data model and reality. Ofcom has acknowledged flaws in their model data and have release new coverage checker that attempts to reflect the actual real-world experience of users, but this data is still improving.
- b. There are barriers to 5g rollout. They will belong to the natural issues: more infrastructure required, higher costs, not always commercially viable, not everybody in the community wants it as there are health and aesthetic concerns.

Chart 3: Survey Results by Constituency

	RSP Data	OFCOM View	RSP Data	OFCOM View
Constituency	% Postcodes without Good Voice	% Area without Good Voice	% Postcodes without Good Data	% Area without Good Data
Kenilworth & Southam	29	0	3.8	0
The Wrekin	27.6	0	4.7	0
Telford	27.6	0	4.3	0
Stratford-on-Avon	26.8	0	3	0
Tewkesbury	22.6	0	4.2	0
Warwick & Leamington	20.9	0	2	0
Forest of Dean	19.3	0.2	3.2	0
North Shropshire	17.8	0	2	0
Hereford & South Herefordshire	17.4	0.2	2.7	0
Montgomeryshire & Glyndwr	17.2	3.6	5.2	0.9
North Cotswolds	17	0	3.1	0

Monmouthshire	16.6	2.5	3.7	1
South Cotswolds	16.2	0	1.8	0
South Shropshire	15.2	0.2	2	0
Brecon, Radnor &	14.4	5	2.9	1.4
Cwm Tawe				
Bromsgrove	14.1	0	1.2	0
Cheltenham	12.9	0	2.7	0
Wyre Forest	12.3	0.1	1	0
West Worcestershire	10.6	0	0.7	0
North Herefordshire	10.2	0	0.9	0
Gloucester	9.7	0	1.4	0
Stroud	9	0	0.9	0
Droitwich & Evesham	8.9	0	0.6	0
Shrewsbury	7.7	0.1	0.5	0
Nuneaton	7.7	0	0.2	0
Redditch	7.3	0	0.3	0
North Warwickshire &	7.3	0	0.6	0
Bedworth				
Rugby	6.7	0	0.5	0
Worcester	4.6	0	0.4	0

6. After discussion, it was agreed that Democratic services would prepare a work plan for agreement with the cabinet member. Does this make the scrutiny body independent like CDC? Not sure.

Appendix 1

Draft Local Growth Plan (September 25) - Emerging missions and delivery activities

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Draft Local Growth Plan (September 25) - Emerging missions and delivery activities

Missions	Areas of activity
Mission 1: Talent and Future Skills – "Unlocking talent, unlocking tomorrow" To secure the county's long-term economic resilience and productivity, we must invest in our talent pipeline and future skills.	SkillsGreen SkillsBusiness engagement
Mission 2: Employment and Health for People and Places – "Wellbeing without barriers" For sustainable economic growth to be truly successful it must be inclusive. This means removing barriers faced by economically inactive individuals, those with health challenges, and communities experiencing disadvantage.	 Removing barriers to employment Digital Inclusion
Mission 3: Thriving Communities and Culture – "A sense of place and belonging" The county's vibrant cultural and creative industries are integral to this identity and are a key focus for growth and support, particularly as a nationally recognised sector. Embracing these opportunities will be key to ensuring Gloucestershire remains vibrant, inclusive, and economically resilient.	 Town/city centre strategies – including regeneration plans Social value – support for local procurement Local Visitor Economy Partnership
Mission 4: Environment, Housing, and Infrastructure – "Building balance with nature" Long-term spatial planning and infrastructure delivery are critical to supporting growth in Gloucestershire. Well-planned, high-quality places not only facilitate economic growth but enhance health, wellbeing, and quality of life.	 Spatial Plans – Strategic and Local Transport connectivity improvements Access to Nature Digital connectivity
Mission 5: Innovation, Investment & Enterprise – "From vision to value" Gloucestershire's spirit of enterprise runs deep – rooted in a proud industrial and agricultural heritage and reimagined through a new generation of innovators, entrepreneurs, and change makers.	 Business Support Inward Investment Alternative funding models

Together, we can shape a county that is **fairer**, **smarter**, **greener**, and even more extraordinary than it is today.

The five economic missions outlined in this plan will help us get there.

Gloucestershire



81.7% of people in employment

Talent focused with 337,000 Students (within 60 miles)

46,822 Small and Medium Sized Businsses



228,860

REGISTERED BUSINESSES Distinctive cultural and visitor economy offer with a £1.3 BILLION tourism economy





38.3%

PEOPLE HOLDING UNDERGRADUATE DEGREES OR EQUIVALENT

A diverse geography with a city, many vibrant towns, and extensive rural areas.

4770 High Growth Potential SMEs

Surrounded by

3
designated National
Landscapes with a
proposed UNESCO
Biosphere

Excellent
connectivity to rest
of UK - an hour from
Birmingham, Bristol,
Oxford and Cardiff =
two hours from
London, offerings
significant
connectivity
advantages.

5 dedcated local Growth Hubs

Gloucestershire
has a higher
percentage of
medium sized
businesses with
over 50
employees than
the UK average

Appendix 2

Data presentation

Annual Economic Update



Kate Martin, Data, Analysis and Insight team

















Mid-2047 766,595

17.46% + 113,929 people

Between mid-2022 and mid-2047

(Mid-2022 652,666)

Components of change









-7.11%

+22.88%

+3.47% -1.73%

Births – deaths (natural change)

Internal migration International migration

Cross border migration

District lens District • Cheltenham • Cotswold • Forest of Dean • Gloucester • Stroud • Tewkesbury 800.000 150.522 139.055 600,000 133.530 147.052 135,033 123.225 400.000 97.032 200,000 0 2022 2032 2047

2022 based sub-national population projections (migrant category), ONS)

Gloucestershire Population Profile 90+ 85-89 80-84 75-79 70-74 65-69 60-64 55-59 50-54 0 0 45-49 35-39 30-34 25-29 20-24 15-19 10-14 5-9 Female Male 0-4 30,000 20,000 10,000 10.000 20,000 30,000 **Number of People** Males 2022 Females 2022 --- Males 2032 -Females 2032 --- Males 2047 --- Females 2047 2022 based sub-national population projections (migrant category), ONS)

Broad age groups 2022



0-15

17.52%





16-64 60.56%

65+ 21.92%











16-64 0-15 14.21% 59.02%

65+ 26.76% 4.73% decline in the number of 0-15 year olds, 2022-2047

14.47% increase in the number of 16-64 year olds, 2022-2047

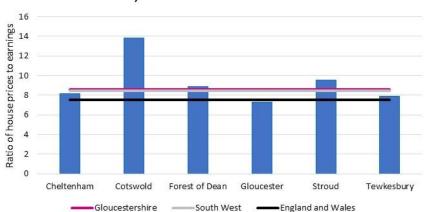
43.44% increase in the number of 65+ year olds, 2022-2047

Housing affordability



8.6 times earnings to buy purchase a median priced property

Median house prices to median workplace earnings, 2024, Gloucestershire and districts





0.9 point fall in the ratio of house prices to earnings 2023-2024











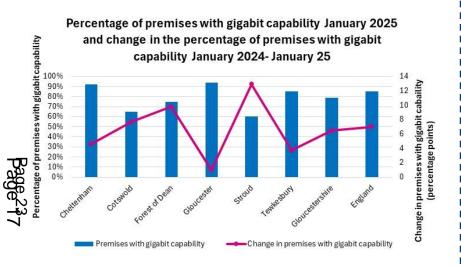






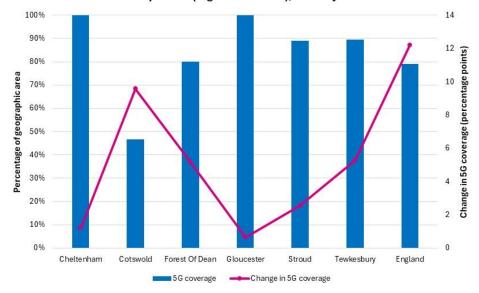


Digital and Mobile connectivity



79% of premises have gigabit capability, **below** the government target of 85%

Percentage of geographic area (outdoor) with 5G coverage from at least one operator (high confidence), January 2025, and change in Percentage of geographic area (outdoor) with 5G coverage from at least one operator (high confidence), January 2024 - Ja















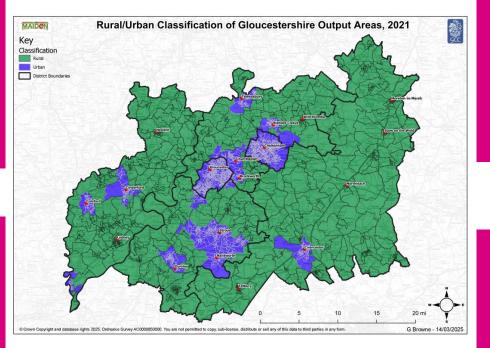




Rural/urban (New data)

87.5% of the geographic area is classed as rural

29.2% of the population live in rural areas



Amongst the 20% most rural local authorities in the country

Rural areas have an older population

















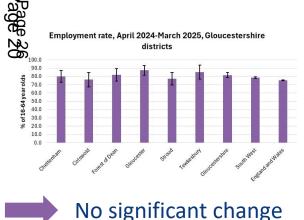


Employment, unemployment and economic inactivity



81.7% of 16-64 year olds in employment

higher than the national average



initiation

2.0% of economically active 16-64 year olds are unemployed

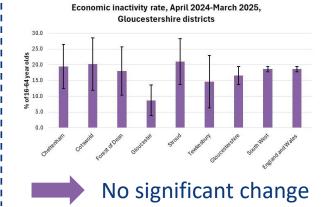


No significant change on previous year



16.6% of 16-64 year olds economically inactive

higher than the national average











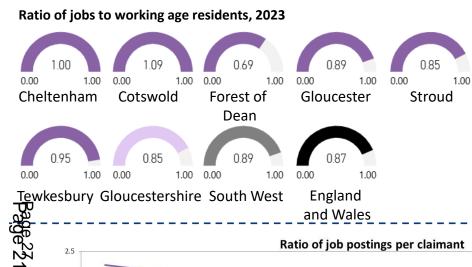


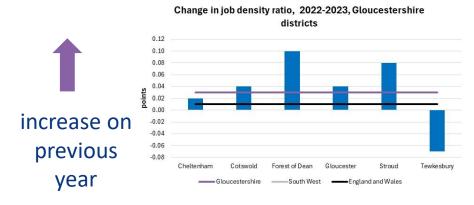


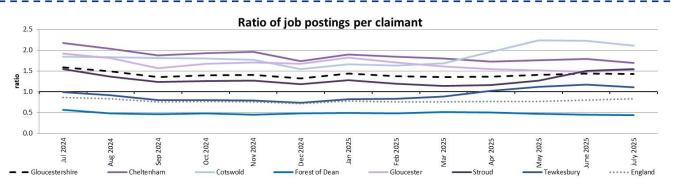




Jobs

























Businesses



93.8% of businesses survive one year higher than the national average



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57.6% of businesses survive three years higher than the national average

But survival rates are falling

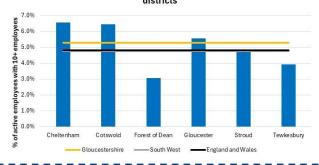




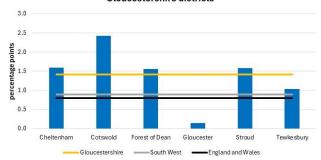
In 2023 business births outnumbered business deaths in Gloucestershire

0.3% increase
in business floorspace
between
2022-2023
(higher than the national average)

High growth businesses as a percentage of active enterprises with 10+ employees, 2023, Gloucestershire districts



Change in high growth businesses as a percentage of active enterprises with 10+ employees, 2022-2023, Gloucestershire districts







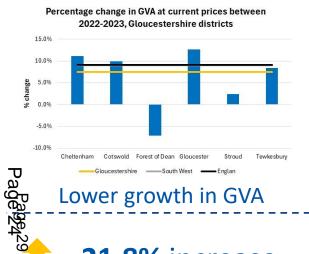








GVA, productivity and exports



Lower growth in GVA

21.8% increase in the value of exports between 2021 and 2022 (higher than the increase seen nationally)



