9) Strategic context

a) Introduction

Housing markets function within the context of the policy framework in which they find themselves. Policy and strategy have a specific importance for the social housing stock in that political decisions impact upon ownership and standards of provision. Strategy also has a key impact on the development of new affordable homes in terms of levels of output, location and type of development. The policy context however also has important consequences for the existing and new private housing markets; in particular through public sector driven regeneration and through investment in public transport and the road network.

The Housing Market Assessment Good Practice Guidance states that Housing Market Assessments should highlight the significance of policy at a number of levels for housing markets and housing provision. This should cover a number of strategies including regional spatial guidance, regional Housing and Planning guidance, transportation strategies and local Housing and Planning policies.

b) The Nottingham Core HMA within the East Midlands region: policy implications

Over-arching framework

The over-arching policy context for the region is contained in the Integrated Regional Strategy (IRS) (EMRA, Jan 2005). This sets out five 'agreed priorities for the Region'. These are to:

- Reduce inequalities in the region;
- Conserve and enhance the natural environment;
- Create sustainable and healthy communities;
- Improve economic performance and competitiveness, and to:
- Use natural resources more efficiently and reduce the impacts on climate change.

These policies are a response to the wider environmental objective to conserve land, make best use of existing property resources, develop sustainable communities and to design new housing maximizing opportunities for renewable energy and recycling. Nottinghamshire features strongly in the good practice case studies selected; example include the Sherwood Energy Village and the Hockerton Housing Project.

The IRS has implications for Housing and Planning strategies in that the emphasis on sustainability to a large extent underpins the principle of the sequential test, set out by central government and supported within the Regional Spatial Strategy and which then in turn has implications for the distribution of housing across the Nottingham Core HMA.

c) Planning for housing at the Regional level

The most significant regional policy statement for this housing market assessment is the Regional Spatial Strategy (RSS 8) otherwise known as the 'Regional Plan'. The Plan provides a long term development strategy for the region over a 15-20 year period up to 2026. It covers the scale and distribution of new housing, priorities for the environment, transport, infrastructure, economic development, agriculture, minerals extraction, waste treatment and disposal. The Plan is currently in draft form and was released for consultation on 28th September 2006. The consultation period was closed on 20th December 2006.

The Draft RSS has a number of over-arching objectives which are set out in Policy 1. These are:

- To reduce social exclusion;
- To protect and enhance the quality of urban and rural settlements;
- To improve the health of the region's residents;
- To improve economic prosperity, employment opportunities and regional competitiveness;
- To improve accessibility to jobs, homes and services;
- To protect and enhance the environment;
- To achieve a 'step change' in the level of the region's bio-diversity;
- To reduce the causes of climate change;
- To minimise environmental impacts of new development and promote optimum social and economic benefits.

These objectives reflect, in large measure the objectives set out in the IRS and which relate in particular to ensuring that new housing development is built sustainably and with minimal impacts to the countryside and urban areas.

The Draft RSS (Policy 2) sets out 'a Regional Approach to Selecting Land for Development'. This suggests that suitable sites within urban areas should be selected as a first priority, then adjoining urban areas, then suitable sites in rural areas adjoining existing development and then 'suitable sites elsewhere'. In practice, this implies a continuation of the Sequential Test which has been used over the past few years in all English regions.

In Nottinghamshire, the percentage of new dwellings built on previously developed land has increased in most Local Authority areas in recent years as the table below shows:

Table 162. New dwellings built on previously developed land

Local authority	1997 to 2000	2001 to 2004
Ashfield	34%	48%
Bassetlaw	45%	42%
Broxtowe	56%	67%
Gedling	83%	90%
Mansfield	16%	52%
Newark & Sherwood	43%	74%
Rushcliffe	47%	75%
Nottingham	84%	94%

Source: CLG (May 2006) Land Use Change Statistics

Policy 17 of the Draft RSS sets out a “regional target of 60% additional dwellings on previously developed land or though conversions”.

In large measure, housing development is to be steered towards previously developed land by the focus on the Draft RSS (Policy 4) of building the largest share of housing in the Principal Urban Areas (PUAs) of Nottingham, Leicester and Derby (in addition to Northampton and Lincoln).

An important part of the Regional Planning process for housing provision was the Regional Assembly’s ‘Options for Change’ paper. This was issued for consultation on 24th October 2005. The Paper set out 9 options across two policy dimensions: first, the trend (above, below or with current household change) and locational distribution (trend in distribution; urban concentration plus regeneration or strong urban concentration). In more detail, the options were:

Option 1A: Below trend growth with trend based distribution;
Option 1B: Below trend growth with urban concentration plus regeneration;
Option 1C: Below trend growth with strong urban concentration;

Option 2A: Trend based growth with trend based distribution;
Option 2B: Trend based growth with urban concentration plus regeneration;
Option 2C: Trend based growth with strong urban concentration;

Option 3A: Above trend growth with trend based distribution;
Option 3B: Above trend growth with urban concentration plus regeneration;
Option 3C: Above trend growth with strong urban concentration.

Where: ‘below trend growth’ meant ODPM trend minus 20% household growth 2006 to 2026 and ‘above trend growth meant ODPM trend plus 20% household growth 2006 to 2026.

At the Regional Housing Spring Seminar (Wed 3rd May 2006) Andrew Pritchard, Director of Planning and Transport presented a paper in which it was stated that “at the regional level, a distribution policy based on ‘Urban Concentration and Regeneration’ is preferred on the basis of comments received to the ‘Options for Change’ consultation and the results of the Sustainability Appraisal. In the same paper it was stated that:

“The strategy for the Nottingham Core HMA should consist of:

- *Strengthening the role of Nottingham as a Principal Urban Area through urban intensification and planned and sustainable urban extensions;*
- *Meeting affordable housing needs in a way that promotes a more sustainable pattern of development”.*

In order to deliver this strategy an HMA benchmark of around 2,370[49] dwellings per annum should be used in applying this figure at the local level through the Three Cities SRS, the following factors should be given particular attention:

- Estimated urban capacity and the impact on employment land within the built up area of Nottingham;
- The impact on Green Belt and other environmental designations established around Nottingham;
- Fluvial flood risk;
- The impact on existing and planned transport infrastructure;
- Water resources and water treatment capacity.

Policy 14 of the Draft RSS now reflects the figure of 2,370 homes per annum. This housing market assessment looks in more detail at how this figure is justified.

A key development in parallel to the RSS is the New Growth Point (NGP) initiative for which Nottingham, Leicester and Derby have bid successfully to central government for. CLG have now confirmed that these authorities are designated as a New Growth Point. The implications of this are that, provided the cities can deliver the targeted housing levels under the Draft RSS, central government will provide a level of support for infrastructure provision. The Plan (Policy 13) states that a balance of economic, commercial and cultural roles (for the region) can be achieved by developing a mix of housing types, by providing sufficient employment land and by the enhancement of transportation links.

d) Regional housing investment: the East Midlands Regional Housing Strategy

The Regional Housing Strategy (RHS) was prepared by the East Midlands Regional Housing Board in 2004. It has published a strategy covering the period 2004-2010. The Strategy recognises that the Region is diverse and includes areas where housing growth is likely to be very significant (in particular the Milton Keynes South Midlands sub regional area) as well as areas where the market is still looking to improve (in particular the Northern HMA). These differences present significant challenges to the programme of housing investment and regeneration.

The Strategy provides an evidence base and suggests that a key feature of the East Midlands Region is that it has a high level of employment but that it also has a high proportion of relatively low paid jobs. This housing market assessment looks in more detail at this issue and the implications for the housing market.

The Strategy further highlights features of the Three Cities sub-region stating that it is a policy objective that these main urban areas become a focus for *"financial services, scientific research, cultural industries and leisure".* A threat to the realisation of this objective is the trend of better educated households leaving the cities to move to the rural areas or to the fringe of cities. Improved housing choice within new developments of Nottingham, Leicester and Derby may help to stem the trend to city flight.

The Regional Housing Board, in its 'Investment in Housing in the East Midlands 2006-8' sets out the budget for funding the regional affordable housing programme. This covers in part (15% of total budget) the requirement for Decent Homes, and in part (16%) meeting the needs of vulnerable people in the private sector to have Decent Homes. The major part of the budget (62%) will be allocated to supporting the delivery of 4,336 new affordable homes.

[49] This figure excludes Hucknall

In total, this sum amounts to £165 million which means, according to the report, that the RHB can fund the delivery of over half of the RPG benchmark figure.

Whether this level of investment will suffice to meet housing needs under the RSS depends however also on the performance of the housing market. If housing becomes less affordable over the next few years (relative to the current position), then the target for affordable housing (and the level of investment needed) is also likely to grow. This housing market assessment looks at future needs in some detail.

The Investment strategy for the Three Cities sub region will be directed towards those areas where meeting affordability is the greatest challenge. Priority is likely to be given to areas (within the Nottingham Core HMA) such as Rushcliffe, Gedling and Broxtowe. There might also be investment in affordable housing to support the activities of the regeneration agencies in the Region.

e) Affordable housing policies: regional steer

The Draft RSS emphases the need for housing strategies to meet needs. Policy 15 states that:

"Local Development Frameworks should have regard to the priorities identified in the Regional Housing Strategy, and includes policies seeking the provision of a mix of dwellings in terms of size, type, affordability and location, having regard to the existing local stock, in order to help create sustainable communities which provide wider housing opportunity and choice"

Interim affordable housing targets are set out. For the Nottingham Core HMA, these are 23% Social Rent and 7% Intermediate housing. These figures are based on research carried by the Cambridge Centre for Housing and Planning Research which was completed in August 2006. The Draft RSS states that these targets are to be reviewed following the completion of this Housing Market Assessment.

f) <u>Housing and the economy: regional policy</u>

Balancing housing and the economy

The Regional Plan (Policy 4) aims to focus housing development in the principal urban areas. This approach, of itself should help to link housing development with employment opportunities in the city of Nottingham in particular. Policy 13 states that:

"Development plans, Local Development Frameworks, Local Transport Plans and economic development strategies should support the continued regeneration of Derby, Leicester and Nottingham, and maintain and strengthen the economic, commercial and cultural roles of all three cities".

It goes on to say that the linkages can be strengthened by making provision for a mix of housing types, and by ensuring that provision is made for employment land to meet the needs of indigenous manufacturing and distribution and to encourage in new investment.

The Regional Economic Strategy (RES) states that:

"Lack of balance between housing and job markets can lead to increased commuting and congestion, which also impacts on economic growth and performance. The relationship and alignment between regional economic objectives, the RSS, and Local Plans and Development Frameworks is key in this regard, as are the masterplans of the URCs and other partners. The opportunity for people to live near to their place of work, social or cultural opportunities and services, and to be well connected to the region's transport networks is vital if we are to create sustainable communities where people want to live and work, now and in the future." (Section 7c)

Land for employment and housing

It needs to be recognised that there are pressures on land for different uses. The Draft RSS highlights in particular the issue of office provision in the Three Cities sub area. It states that "office supply is constrained ……….partly due to pressure from other uses such as housing. There is a particular shortage of sites suitable for science and technology users. The availability of good quality industrial land is also constrained, particularly within the city boundaries". (Para 3.2.8)

EMDA are committed (EMDA, March 2005) to supporting the Region's Regeneration companies in bringing forward high quality employment sites. In particular, the Corporate Plan states that EMDA will focus attention on a number of critical employment sites identified in the Regional Employment Land Priority Study (RELPS). The Regional Economic Strategy (RES) states that a strategic priority is "to ensure that the quality and supply of development land, and balance between competing land uses, contributes towards sustainable growth of the regional economy". It aims to ensure an annual increase in employment floorspace of 1.5% per annum up until 2009. In doing so, it is recognised that:

“As the regional economy continues to restructure, the requirement for development land is changing. There will be a significant decline in demand for industrial floor space and a significant increase in demand for office floor space over the next 10 to 15 years. This restructuring towards office based and service sector focused employment has implications for the allocation and use of employment land and the nature of new supply. Due to the higher density of employment in the service sector compared to industrial or manufacturing. Less land will be required than that needed historically”. (Section 7b)

Less overall demand for land as a result of a shift in employment trends away from industry to commercial uses means therefore less land take. In many cases, this will provide an opportunity to replace factory sites with housing, and to do so without encroaching into the green belt. The RES identifies colliery sites as being a prime target for bringing land back into beneficial use, where a key end use can be housing.

However, the East Midlands Employment Land Priorities Study 2006 [50] comments:-

“…… One of these projects, entitled Land Supply: Employment Land, comprises an investigation of the loss of employment land to housing. This is an issue of great concern in the urban areas.

and

“Employment land is being replaced by housing, which commands higher market values and requires little or no public investment. Consequently, ‘many of the City Growth Strategies pilot areas are in danger of ‘losing their winners’ – the growing businesses that provide jobs income and wealth to the community”.

EMDA are additionally committed to bringing forward a Brownfield Action Plan consistent with the National Brownfield Land Strategy. Opportunities to use EMPIF (the East Midlands Property Investment Fund) will be utilised to help, where necessary, the private sector bring forward key sites.

Investing in the local economy

The need for investment in the employment market is emphasised in the Development Strategy for Greater Nottingham, published by the Greater Nottingham Partnership (GNP) in May 2004. The Partnership covers Nottingham City, Gedling, Rushcliffe, Broxtowe, and Hucknall. The GNP Strategy highlighted the fact that Nottingham has been recognised as one of England's "Core Cities" in 2001. The Core Cities group comprises what Central Government recognises as the country's 8 largest and most significant cities outside of London: Birmingham, Bristol, Leeds, Liverpool, Manchester, Newcastle, Nottingham and Sheffield. Previous studies benchmarked England’s Core Cities against their European equivalents. This confirmed that in broad terms, English Core Cities were losing ground to London and did not “punch their weight” in terms of regional development in the same way as their European counterparts. However, Core Cities had the potential in scale and depth to achieve high economic performance for the city itself and for the surrounding region.

[50] http://www.emda.org.uk/documents/doclist.asp?action=display&filevar=215

The challenges facing the local economy in the Greater Nottingham area are well summarised in the following (from the GNP Strategy):

"Nottingham's rate of jobs growth ……………… needs to be re-invigorated with a necessary emphasis on generating more opportunities in services, the knowledge economy and, building upon recent successes in public service investment, particularly in education and health. We see a great opportunity for the city and for government in civil service relocation to Nottingham and for attracting knowledge based service operations. We also need to foster a more entrepreneurial culture and to give a boost to our rate of business start-ups and to social enterprise. The present skills base does not provide a sound platform for a modern economy. We must also manage the impact of currently lower rent and land values resulting in ideal sites for edge of city centre and district centre business and commercial investment, including lower-cost flexible workspace for growth businesses, being lost to high value residential and leisure developments".

g) <u>Housing and transport</u>

Transport – overview for the HMA

The significance of the transport system to the housing market is well understood and well documented. The transport system is the link between place of residence and place of work. Home workers and the economically inactive may rely less on transport for work related journeys, but use either public or private transport for non-work reasons. Evidence shows that while journeys to work are considerable in the peak hours, leisure and other non-business related journeys account for a much larger proportion of the total number of journeys taken in the region (see RES Evidence Base – page 220/221, Chart 3 and text).

The Nottingham Core HMA is generally well served in terms of major road links north-south – to London and to the North East. The M1 cuts both the Erewash (Junction 25 – Long Eaton) and Broxtowe districts (Junction 26 – Nuthall/north-west Nottingham); although these stretches of road tend to be congested at peak hours. However, its east-west links are poor, despite improvements in recent years to the A50, A52 and A14 (Disney, 2000).

Nottingham City is popular as an employment and student centre. Congestion in the city is significant and especially access from the south over the River Trent. There are Four Park and Rides – Queen's Drive, The Racecourse, The Forest and Phoenix Park – but "all these require users to drive through at least one major bottleneck to reach them" (Disney, 2000).

The RSS (Para 3.1.5) states that "the strategic road network will not be capable of accommodating satisfactorily traffic generated by the proposed level of housing growth across the Region as a whole, should current growth in traffic trends continue".

The Nottingham Express Transit (NET, known as the 'tram') is improving access to the North West corridor of the city and locations such as New and Old Basford, Highbury Vale and Bulwell, and connects Nottingham City and some smaller suburban centres to Hucknall. The tram extends between the city centre and Radford. The Department for Transport has recently approved funding for Phase 2 of the tram which will see two additional routes to the west and south of the City – to Chilwell via the Queens Medical Centre Hospital, and to Clifton via Wilford.

Nottingham City has a relatively poor suburban rail network, although this is not the case throughout the wider HMA. Erewash (Long Eaton) and Broxtowe (Beeston), for example, are relatively well served – with good access to Leicester and London. Nottingham City is linked to the east with lines to Grantham, Newark and Lincoln. Ashfield and Mansfield (as well as Hucknall) are linked by the Robin Hood Line which runs to the North of the City.

Nottingham City Transport operates buses mainly within the city boundary. Trent/Barton buses operate longer distances – to Long Eaton, Ilkeston, Eastwood, Heanor, Ripley, Hucknall and Bingham.

A growing issue of importance has been the amount of HGV traffic coming to and from the East Midlands Airport (EMA).

The Regional Transport Strategy (RTS)

The Regional Transport Strategy policies takes direction from the national transport objectives and policies set out in the White Paper – the Future of Transport (2004). At the time of writing, the RTS was being reviewed as part of the RSS. However, many of the policies and objectives in the existing (March 2005) RTS remain in the revised version published in September 2006. The RTS Core Strategy is based on:

- Reducing the need to travel, especially by car;
- Promoting a step change in the level of public transport;
- Making better use of existing networks;
- Only developing additional highway capacity when all other measures have been exhausted.

The need to reduce car use and produce a step change in the quality and quantity of public transport are key objectives in relation to the Three Cities area. Policy 46 states that local authorities should "examine the feasibility and appropriateness of introducing fiscal measures to reduce car usage". However, the Strategy also encourages (Policy 45) a "behavioural change" in attitudes towards car usage and towards walking and cycling as alternative means of getting to work[51].

The RTS recognises that the "overall quality and quantity of local bus service provision in the East Midlands is unacceptably low". It suggests that local authorities and local public transport providers should work together to increase the level of bus and light rail patronage at the regional level towards the national target of 12% by 2010".

Perhaps one of the most significant areas of transport policy highlighted in the RSS relates to the development of a Regional Freight Strategy. The Plan states that there are around 140,000 HGV movements through the region every day. EMA (East Midlands Airport) handled 246,000 tonnes of freight in 2003. Following A Regional Freight Strategy has been developed as a 'daughter document' of the RTS. This Strategy focuses not least on encouraging increasing volumes of freight moved by rail rather than road.

A wider surface access strategy for EMA focuses on improving public transport links to the airport from the three cities in particular, and details of this strategy are given in both the RTS and the EMA Masterplan (December 2006).

[51] Due to the review of the RTS, some policy numbers may change in the revised RTS – however, the core policies referred to here remain a key part of the emerging RTS.

The following initiatives are part of the RTS:

Nottingham Workplace Parking Scheme (2006-2011);
Nottingham Light Rail Extensions (2006-2011);
Extension of Robin Hood Line to Bingham (2011-2016);
Rail station Masterplans (Nottingham*, Leicester & Derby) (2006-21);
Gedling Integrated Transport Scheme (2006-2011);
Nottingham Ring Road Major Scheme (2006-2016);
New River Trent Crossing (under investigation – likely to be towards 2016).

* The GNP Strategy states that "A new transportation hub and interchange at the new station linking with the tram network will open up opportunity to expand the Southside business quarter. Major improvements to the Midland station are planned to create a 'state of the art' interchange. This will double the number of passengers the station can handle, radically improve passenger facilities and provide convenient interchange with NET, buses, cycles, taxis and cars. Demand will drive more rail services to and from the station.

h) Housing regeneration

Nottingham City has benefited significantly over the past few years from the re-development of areas such as the Lace Market for residential property. This, along with other schemes in the Castle and Derby Road areas, have brought 'city living' to Nottingham. A full analysis of the performance of this market can be gained from the recent draft Knight Frank report (November 2006), which is relatively optimistic about the City Centre market.

There are currently a number of other key regeneration initiatives for the city. These are well summarised in the Greater Nottingham Partnership Strategy. As follows:

Waterside Regeneration

The drive to regenerate the Waterside area derives from the need to improve Nottingham's competitiveness through the provision of high quality residential accommodation within an exceptional public realm environment. The regeneration of Waterside has the potential to deliver a new sustainable community, with access to one of Nottingham's greatest asset – its River front. The partners have a commitment to sustainable development and high quality design and to ensuring that the area's regeneration accommodates the relocation needs of displaced businesses.

Eastside Regeneration

Eastside contains several major redevelopment sites close to existing commercial development but is disconnected from the City Centre core. Intervention to secure sites to provide a long term provision of commercial space, residential units and mixed use as well as works to reconnect the area to the heart of the City are required.

Southside Regeneration

Major enhancement of the Station is at the heart of the Southside proposals - creating a state of the art public transport interchange. Within the area a number of significant commercial opportunities exist which will effectively extend the City Centre Southwards and assist in reconnecting the Meadows area to the central core. The Southside will optimise the opportunities brought by NET phase II to create a new standard of design for both buildings and public realm at this key gateway to the City. The benefits of development within the Southside can extend through the Meadows and on to the River Trent frontage to help secure proposals being developed as part of the Trent River Park.

Actions (from the Greater Nottingham Partnership Strategy 2005)

The following were set out as priorities for action in delivering the regeneration of these areas:

Ensure the strategic planning framework is conducive to achieving long term sustainable growth, through the active implementation of the Joint Structure Plan, and through active engagement in the preparation of the Sub Regional Strategy, as it emerges after 2005.

Capture the benefits of the new Planning system to ensure it facilitates priority actions.

A tabular summary of the key strategies and their status for each of the five local authorities within the Nottingham Core HMA can be found in the Appendix of Tables and Additional Information: Table 16 to 20.

CHAPTER 9 SUMMARY: STRATEGIC CONTEXT

1. The Integrated Regional Strategy provides the policy context for the East Midlands with a strong focus on sustainability. The Draft Regional Plan (RSS8) is the most significant policy statement in terms of housing and largely reflects the objectives outlined in the Integrated Regional Strategy.

2. RSS8 encourages an approach which prioritises development in urban areas, and policy targets specify a focus on previously developed land or conversions. This has been reflected in the Nottingham Core Housing Market Area.

3. The Regional Assembly's 'Options for Change' paper sets out options regarding growth trends and spatial distribution in terms of housing provision. As a result of consultation on this paper, the strategy for the Nottingham Core Housing Market Area focuses on strengthening the city's role as a Principal Urban Area and meeting affordable housing needs in a way that promotes sustainable development. In delivering the benchmark figure of 2,370 dwellings per annum consideration should be given to urban capacity, environmental impacts, flood risk, impact on transport infrastructure and water resources.

4. The New Growth Point initiative, which is included in the housing provision figures of the Draft RSS, will signify increased provision for infrastructure in Nottingham, Leicester and Derby.

5. The Regional Housing Strategy sets the policy objective that the Three Cities urban areas become a focus for 'financial services, scientific research, cultural industries and leisure'. This objective may be assisted through improved housing choice to reduce the risk of city flight.

6. The Regional Housing Board Investment Strategy allocates funding for the delivery of affordable homes which would be equivalent to half the Regional Planning Guidance benchmark figure. The ability of the planned investment to meet housing need will depend on the performance of the housing market and relative affordability. The investment strategy for Nottingham is likely to focus on the areas presenting the greatest challenge, which are currently Nottingham, Rushcliffe and Broxtowe.

7. An interim affordable housing target for the HMA as a whole is set out in the Draft RSS. This is to be reviewed following this Housing Market Assessment.

8. The Regional Economic Strategy encourages links between housing development and employment by providing appropriate housing for people to live near their place of work, or close to transport networks in order to create sustainable communities.

9. RSS8 highlights the shortage of and high demand for industrial land for office provision. The East Midlands Development Agency are focusing on addressing the shortage of employment floorspace which it predicts will be required predominantly for office space, which is typically higher density. This should permit the re-allocation of industrial land between housing and office space without encroaching on the green belt. There is however some concern that too much land is being allocated to housing to the detriment of employment land.

10. The Development Strategy for Greater Nottingham (Greater Nottingham Partnership) emphasises the need to stimulate the economy by promoting modern sectors in knowledge and services, and through supporting land use for growth businesses rather than for high value residential and leisure developments.

11. The Nottingham Core Housing Market Area has generally good north/south road links but east /west links are less well served. The city suffers from high levels of congestion which impacts on the utility of the available Park & Ride services. RSS8 says that the road network cannot sustain the projected increase in traffic resulting from the proposed level of housing growth. The Nottingham Express Transit (Tram) service is assisting in improving transport links across the city. Rail links are relatively poor within the city but better throughout the wider HMA.

12. The Regional Transport Strategy focuses on reducing car use and improving public transport, as well as on reducing the number of HGVs by encouraging freight movements via rail rather than road.

13. Several housing regeneration initiatives are underway across the HMA to provide modern sustainable city based business and residential accommodation, with attention to maintaining long term sustainable growth.