

**WILTSHIRE COUNCIL**

**SOUTH WILTSHIRE CORE STRATEGY REVIEW  
DEVELOPMENT PLAN DOCUMENT**

**HEARING STATEMENT  
IN RESPECT OF ISSUE 2**

**EVIDENCE SUPPORTING REVISED HOUSING AND  
EMPLOYMENT FIGURES**

**PREPARED BY PRO VISION PLANNING AND DESIGN ON  
BEHALF OF BEMERTON FARMS**

Ref: HS/Pro Vision Planning and Design/2845/2

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## **SOUTH WILTSHIRE CORE STRATEGY EiP**

### **ISSUE 2: EVIDENCE SUPPORTING REVISED HOUSING AND EMPLOYMENT FIGURES**

#### **POSITION STATEMENT ON BEHALF OF BEMERTON FARMS**

What evidence is there to support the revised housing and employment figures now being proposed by the Council?

How robust is that evidence as compared to the evidence supporting the emerging Regional Strategy?

1. Our May 2011 representations incorrectly stated that the identified housing requirement for Wiltshire was 43,200.
2. The Wiltshire Housing Technical Paper (draft) (January 2011) ('The Technical Paper') confirms that this is the maximum number of dwellings. Paragraph 5.35 of the Technical Paper advised that *"from the assessment it is evident that Wiltshire should plan for net dwelling delivery in the range of 35,900 – 43,200"*.
3. Paragraph 7.1 of the Technical Paper goes on to state that *"for the remainder of this paper (including discussions regarding housing provision for South Wiltshire) a housing requirement of 39,000 will be considered in the light of the analysis above"*. No reasoning or justification is provided for 39,000. It cannot even be said to simply be the 'mid point' between 35,900 and 43,200 (which is 39,550).
4. Nevertheless the key arguments made in our May 2011 representations are still entirely relevant, and more since the housing requirement has been reduced to 39,000 dwellings over the Plan Period. This level of provision would be
  - Below the population led projection<sup>1</sup> and hence would not even provide sufficient<sup>2</sup>,
  - Lower than historic rates of delivery<sup>3</sup>, and
  - Has little if any regard to the employment led projections and the Wiltshire Community Plan that seeks to support the economy and reduce commuting flows<sup>4</sup>.
5. Paragraph 1.11 of the Wiltshire Housing Requirement Technical Paper (draft) (January 2011) ('The Technical Paper') refers to guidance published to local authorities by the Chief Planner at the DCLG prior to the publication of the Decentralisation and Localism Bill. It refers to 'Option 1' figures (i.e. those that were submitted by strategic planning authorities – the Section 4(4) advice – to inform the figures within the original draft RSS)

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<sup>1</sup> Reference paragraph 3.6 of our May 2011 representations

<sup>2</sup> Reference paragraph 3.11 of our May 2011 representations

<sup>3</sup> Reference paragraphs 3.8 and 3.9 of our May 2011 representations

<sup>4</sup> Reference paragraph 3.10 of our May 2011 representations

suggesting that it may be appropriate to base revised targets on these, supplemented by more recent information.

6. However, in practice the starting point for the revised housing provision appears to have been the draft Wiltshire housing requirement figure – 39,000<sup>5</sup> dwellings for the whole of Wiltshire (excluding Swindon) asset out in the Technical Paper. Little or no regard appears to have been paid to the draft RSS figures.
7. Furthermore the Council has advised another Inspector that the Technical Paper is not significant, and he therefore concluded it should be afforded little weight (see paragraph 36 of recent appeal decision ref: APP/3940/A/10/2141906 attached as Appendix 1 to our May 2011 representations).
8. The only “more recent information” available since the Core Strategy Publication document was published is:
  - a) The Cambridge Econometrics Revised Employment Forecast
  - b) The Oxford Econometrics forecast
  - c) The downturn in completions as a result of the recent economic downturn
  - d) The maintenance of the level of delivery arriving from windfalls
9. There has been very little in the way of “more recent information”. It is not therefore clear why the Council have felt it necessary to effectively ‘start again’ in their consideration of housing and employment provision.
10. Section 3 of our May 2011 representations sets out how the figure of 43,200 dwellings (the starting point for the revised South Wiltshire housing figures) across Wiltshire over the Plan Period was derived. This is understood to be largely from historic delivery rates between 2001 and 2008, during the housing boom.
11. Paragraph 5.21 of the Technical Paper states that *“assuming an annual target reflective of delivery within the housing boom, would be truly stretching in the light of these market conditions, and so it is recommended to constrain the dwelling requirement to the order of 42,100”*. The Technical Paper goes on to state that *“as this figure is so close to the number of dwellings required to meet the population led projection it is proposed to amend this maxim to 43,200 in order to meet this requirement”*.
12. Nevertheless it then goes on to base its projections on only 39,000. The Core Strategies reliance on previous levels of housing completions and a depressed housing market is fundamentally flawed and contrary to PPS3 which requires a ‘step change’ in housing delivery, through a new, more responsive approach to land supply at the local level.

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<sup>5</sup> Not 43,200 as stated in our May 2011 representations

13. In addition to the already available new information it is understood that further work is being undertaken regarding the purchase of civilian housing stock by military households and the effect that this has on housing requirements<sup>6</sup>. It is also understood that an updated SHLAA is currently being prepared but is yet to be published<sup>7</sup>. The so called 'new evidence' put before the Inspector is therefore in fact incomplete and thus unreliable at this stage.
14. The revised housing and employment provision figures would fail to support the aims and objectives of the Spatial Vision for South Wiltshire, Wiltshire Community Plan for 2011-2016 or the Wiltshire Corporate Plan for 2010-2014<sup>8</sup>, in particular the need to create an economy that is fit for the future, providing local jobs, reducing commuting flows, creating wealth and investment and helping to enhance people's general health.
15. In order to support the economy and reduce commuting flows it would be necessary to deliver between 35,900<sup>9</sup> and 57,800<sup>10</sup> dwellings across the Plan Period within Wiltshire. Paragraph 4.20 of the Technical Paper states that *"the best opportunity to minimise commuting flows would be to develop towards the lower end of this range, providing that this does not compromise the development of the economy or the delivery of jobs"*. That might support a figure of 39,000.
16. However it is also noted that *"under provision could also lead to an increase in commuting, as the pay differential could favour long distance commuters being able to access the market before local workers"*. A key priority of the Wiltshire Corporate Plan, Wiltshire Community Plan and Spatial Vision for South Wiltshire is to reduce commuting however little if any regard has been had to commuting levels and economic growth (in particular the need to deliver suitable jobs<sup>11</sup>) in the formulation of the overall housing target.
17. As set out in our May 2011 representations the proposed requirement of 43,200 would only provide sufficient housing to meet needs arising from existing population growth and population growth projections. It would not promote economic growth.

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<sup>6</sup> Paragraph 3.14 of the Technical Paper

<sup>7</sup> Paragraph 5.19 of the Technical Paper

<sup>8</sup> As set out at paragraphs 1.16 – 1.26 of the Technical Paper

<sup>9</sup> Job alignment led

<sup>10</sup> Economic led

<sup>11</sup> Paragraph 4.21 of the Technical Paper

18. The Technical Paper states that *“South Wiltshire should seek to deliver a level of housing that would support the delivery of employment”* this would however *“result in an unrealistic requirement of between 16,700<sup>12</sup> and 17,000<sup>13</sup> dwellings<sup>14</sup>”*. Whilst the Technical Paper repeatedly states that this level of employment delivery is unrealistic no reasoning or justification is provided for this position.
19. The unsubstantiated claim that the economic and job alignment led projections are unrealistic is inconsistent with the Council’s own assertion that *“it will be important to seek to deliver an ambitious supply of housing, in order to maximise the potential of South Wiltshire to support employment growth<sup>15</sup>”*.
20. The Technical Paper goes on to state that *“through further examination of the employment projections it is clear that in South Wiltshire, only 2,830 additional jobs would be delivered between 2006 and 2016, whereas some 7,640 jobs would be delivered between 2016 and 2026<sup>16</sup>”*. This totals 10,470, significantly below either the economic or job alignment led projections. There is no explanation or evidence as to how this figure was derived from the Cambridge or Oxford Econometrics studies.
21. If the rate of employment delivery over the first period of the plan (2006 to 2016) is considered in isolation, the number of dwellings required to deliver jobs would be 12,700 from 2006 to 2026<sup>17</sup>. Even based on this relatively constrained level of job creation the number of dwellings proposed in South Wiltshire would be 2,800 below that stated by the Council themselves to be in line with a ‘reasonable’ estimate of employment growth.

### Environmental Capacity

22. Topic Paper 20 seeks to further justify the reduction in housing and employment figures through reference to the environmental capacity of South Wiltshire. There have been no physical material changes affecting the environmental capacity of South Wiltshire, neither have there been any material changes to national planning policy resulting in any new or greater environmental constraints.
23. Paragraph 5.4 of the Topic Paper states that *“it has always been the Council’s case that meeting need as expressed in the Strategic Housing Market Assessment, even for affordable housing, is beyond the environmental capacity of the area. The constraints and availability of brownfield land has not materially altered and hence it is still the case that the SWCS needs to make the most effective progress towards meeting local needs*

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<sup>12</sup> Job alignment led projections, paragraph 9.4 of the Technical Paper

<sup>13</sup> Economic led projections, paragraph 9.4 of Technical Paper

<sup>14</sup> Paragraph 9.5 of the Technical Paper

<sup>15</sup> Paragraph 9.6 of the Technical Paper

<sup>16</sup> Paragraph 9.7 of the Technical Paper

<sup>17</sup> Paragraph 9.7 of the Technical Paper

*in an environmentally responsible manner, rather than simply plan to meet it outright*". Paragraph 8 continues to state that the housing requirement for South Wiltshire *"does seek to maximise the growth within the constraints considered"*.

24. The Council acknowledge that the constraints and availability of brownfield land have not materially altered. Furthermore they state that it is still the case that the Core Strategy makes progress towards meeting local needs in an environmentally responsible manner (i.e. the Council accept that the aims of the Core Strategy and the environmental constraints upon it are unchanged from the Core Strategy Submission Stage).
25. It is not clear what environmental constraints the Council are referring to that were not taken into account at the Proposed Submission Stage. The Proposed Submission Core Strategy considered that 12,400 dwellings was deliverable taking into account the same constraints (i.e. landscape, visual and the historic environment) as the current Core Strategy is being considered. Attempts to justify the reduction in housing numbers due to environmental constraints is further flawed at paragraph 5.8 of the Topic Paper which states that 10,600 dwellings are potentially deliverable (i.e. 700 more than that proposed).

#### Windfall Sites

26. Paragraphs 7.13 and 10.10 of Topic Paper 20 refers to the trend for delivery of windfall sites in South Wiltshire having increased in the period between April 2006 and April 2010 and the need to monitor whether this continues, as it could provide an important source of dwellings in the later stages of the plan.
27. The DCLG document Strategic Housing Land Availability Assessments (SHLAA's) Practice Guidance<sup>18</sup> defines windfall sites as *"those which have not been specifically identified as available in the Local Plan process. They comprise previously developed land sites that have unexpectedly become available"*. Previously developed land / windfall sites are a finite resource. Caution should therefore be exercised over relying on historic windfall rates as once sites are developed there is not necessarily a similar stock waiting to be developed. Furthermore the majority of windfall sites are now likely to be identified in SHLAA's and as such can not be counted towards windfall delivery.

#### Previously Developed Strategic Sites

28. The Core Strategy Review focuses solely on the proposed Greenfield strategic sites. The UKLF, Imerys, Churchfields, Maltings and Central Car Park brownfield sites were discounted from the review<sup>19</sup>.

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<sup>18</sup> Published July 2007

<sup>19</sup> Topic Paper 20, paragraph 10.17

29. Failure to consider these sites as part of the review is unsound. A sound review must take into account whether the PDL sites are likely or not to deliver their part of the overall aims and objectives of the Core Strategy. In particular:
- a) The Maltings and Central Car Park would be retail led. There is little or no retail development taking place at present. Therefore delivery of this development with its associated housing is likely to be delayed. This needs to be taken into account in the housing trajectory.
  - b) The Imerys site is not now going to be available for redevelopment for employment and needs to be taken into account in the employment land trajectory.

#### Salisbury Vision Website

30. The Question and Answer pages on the Salisbury Vision Website included a section on the redevelopment plans for Churchfields Industrial Estate. It is noted that this page has recently been removed from the website. A copy is however attached at Appendix 1.
31. On the fifth page in response to the question “How many hectares of land are required to accommodate new and expanding businesses in the Salisbury District within the next 18 years” it is stated that up to 64 hectares will required – equivalent to nearly two Churchfields. The response continues to state “it will be a tough challenge to find the right places acceptable to everyone, but we can’t shy away from difficult issues. It is in the interests of everyone that Salisbury’s economy moves forward”. Section 4 of our May 2011 representations deal with the proposed redevelopment of Churchfields concluding that based on a requirement of 28 hectares<sup>20</sup> for the proposed Churchfields decant there would be a deficit of -16.75 hectares of employment land<sup>21</sup>. Should the requirement in fact be 64 hectares this would result in an even more significant deficit.
32. Also on page 5 in response to the question “how much additional employment is anticipated” it is stated that “*official figures estimate 13,500 new jobs within the next two decades. If South Wiltshire is to have a thriving economy we need to make sure that there is enough land so that existing businesses expand and we can attract new ones*”. The proposed reduction to future employment land would significantly compromise the ability of South Wiltshire to have a “thriving economy”.

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<sup>20</sup> As set out at paragraph 3.4(c) of the South Wiltshire Core Strategy Proposed Submission Document and paragraph 8.11 of Topic Paper 9 Addendum 2: The Economy, July 2009

<sup>21</sup> There would be a deficit of -20.75 subtracting the Imerys Quarry site

## Other Representations

33. Bemerton Farms support the following representations made by other representors:
- a) The “Household Projections 2008-2033, England” are an important part of the evidence base for assessing future housing demand – they indicate that for the former Salisbury District the number of households are expected to increase by about 12,000 i.e. equivalent to about 12,600 dwellings as per the deposited Core Strategy not the Revised Core Strategy.
  - b) The District Planning Officer’s Society advice note on ‘Planning Post RSS Revocation’ (October 2010) advises LPA’s to be cautious about changing the strategic principles of targets underpinning their Core Strategies.
  - c) The housing requirements specified in the SWRSS (Proposed Changes) represent the last robustly tested housing figures, following extensive consultation and testing.
  - d) Lowering housing delivery is a ‘kneejerk’ response to the current downturn which had already been factored into the original Core Strategy (paragraph 1.17).

## Conclusions

34. The following parts of the revised CSR would be unsound:
- a) FOC/01 because it proposes to reduce housing provision from 12,400 to 9,900.
  - b) FOC/02 because it proposes to reduce employment land provision from that sufficient to provide for about 13,900 new jobs to that sufficient to provide for only 10,400 new jobs.
  - c) FOC/03 because it proposes to reduce the planned growth for Salisbury and Wilton from 7480 homes and 36 hectares of employment land to 606 homes and 29 hectares of employment land.
35. In these respects the revised CS would be unsound because:
- a) These changes are **not justified** by complete and reliable local up-to-date evidence – the evidence relied upon by the Council for making the proposed changes is both incomplete and unreliable and cannot therefore be used to justify the proposed changes;
  - b) **Not effective** in that as a result, these strategic policies for new housing provision and new employment provision would fail to meet the requirements of both the local housing market and the local economy, and would fail to provide for the level of growth which the Council should be aiming for in order to achieve both local objectives and the aims and objectives of national policy.

36. The proposed changes outlined above in paragraph 31 would fail to be justified and fail to be effective for the following reasons:
- a) Section 3 of our May 2011 Representations with regard to housing provision
  - b) Section 4 of our May 2011 Representations with regard to employment provision
  - c) The additional comments made above at paragraphs 1-30 of this Position Statement.
37. In the absence of any complete and reliable local evidence, and in the light of the latest household projections (paragraph 30(a) above), the only way in which the Core Strategy can be made sound is to amend the proposed changes as follows:
- a) FOC/01: Delete 9,900 and reinstate 12,400
  - b) FOC/01: Delete 495 new homes per year and reinstate 620 new homes per year
  - c) FOC/02: Delete 10,400 new jobs and reinstate 13,900 new jobs
  - d) FOC/02: Delete 520 jobs per annum and reinstate 690 jobs per annum
  - e) FOC/03: Delete 9,900 dwellings, 10,400 jobs, 6,060 homes and 29 hectares/ 23 hectares and reinstate 12,400 dwellings, 13,900 jobs, 7,480 homes for Salisbury and Wilton and 29 hectares of employment land for Salisbury and Wilton (30 hectares new allocation).

Plans for the redevelopment of Churchfields Industrial Estate as part of the Salisbury Vision – your questions answered

*Q. What is the Churchfields Industrial Estate?*

A. It is a 33-hectare industrial estate, a short walk from Salisbury city centre, which has grown piecemeal over 40 years into the district's biggest employment site.

*Q. How many people work there?*

A. There are around 4,500 people working for 165 companies with an estimated combined turnover of £600m.

*Q. That's good, isn't it?*

A. There is no doubt that the industrial estate is the area's most important employment centre, but there are a number of problems which need to be addressed. It is poorly situated and would be better served as a redeveloped mixed use site, with a four-star hotel and conference centre, offices and much-needed affordable homes, while retaining existing 'light use' businesses.

*Q. What are the problems?*

A. Firstly, it is widely accepted that there are a number of businesses on site which are inappropriately located. They generate excessive HGV traffic which clog up local residential roads and the city centre, causing congestion and pollution. Something needs to be done about this now as it

is virtually certain that plans for the Brunel Link and Harnham Relief Road, which would have reduced this problem, will now not go ahead.

Secondly, the site is already full. There is no room for expansion because Churchfields is hemmed in on three sides by the River Nadder and water meadows and the railway line on the fourth. To retain existing businesses, and attract new ones, we need to offer them room to grow. In other words, Churchfields cannot offer future growth.

*Q. Why wasn't this all sorted out years ago?*

A. A lack of a masterplan to guide development back in the 1970s meant that Salisbury lost out on new living, working and leisure opportunities. The industrial estate gained a momentum of its own, and nobody has grasped the nettle since then on how the site could better serve the needs of Salisbury. Over 40 years the place has become shabby and neglected. Rejuvenation is required.

*Q. So what is Salisbury Vision's proposal to redevelop Churchfields Industrial Estate?*

A. There could be a four-star hotel and conference centre, along with offices, much-needed affordable homes and existing 'light' businesses.

*Q. Why a four-star hotel and conference centre?*

A. Salisbury doesn't have such a dedicated, upmarket facility. Most cities do, generating visitors and money and creating more local jobs. The famous views across the water meadows to Salisbury Cathedral, coupled with a scenic path into the city centre, would prove a major draw.

*Q. Why offices?*

A. Salisbury has little in the way of purpose-built, modern office accommodation, and it would mean being able to meet the requirements of office employers and other growing economic sectors. Prestigious companies will be more inclined to take root here if Salisbury can offer vibrancy and a good quality of life. Employees would spend money in our city, and the proximity of the railway station means many could commute or live locally without relying on cars. Salisbury is home to four major financial services businesses and we must make sure they, and other potential companies, don't walk away through lack of suitable space. Also, Salisbury currently 'loses' 12,500 workers every day to other areas.

*Q. Why homes?*

A. It is anticipated that the Salisbury and Wilton area could provide 8,700 new homes, around 435 a year, towards the government building target of three million homes in the UK by 2020. Churchfields could potentially provide 500 homes.

*Q. Why affordable homes?*

A. Average house prices in Salisbury in 2007 were more than 11 times average earnings, compared to the average of nine times in England and Wales. House prices in Wiltshire grew by 233% between 1995 and 2006, with Salisbury losing youngsters and graduates to more affordable cities and towns. There is also an acute shortfall in affordable homes. Evidence shows that by 2009 an estimated 669 households every year will need affordable housing. The housing waiting list continues to grow, standing at 2,894 in May 2008. A rising elderly population – an extra 10,000 by 2026 in south Wiltshire – also gives rise to the need for specially designed homes.

Overall, the population of the district is expected to grow by about 14,000 by 2026. Housing development at Churchfields would have an important role in meeting demand. Few other city centre sites offer such scope.

*Q. But house prices have been falling...*

A. Cautious mortgage lenders are reverting back to lending three to four times a person's annual earnings, which would include a cash deposit, so it would still be difficult for many youngsters in Salisbury to get a foot on the housing ladder even if prices halved. More than 16% of all our households in south Wiltshire are home to key workers, such as nurses and teachers, many of whom cannot afford open market housing.

*Q. Where do house builders stand when it comes to supplying affordable homes in their developments?*

A. We are recommending a minimum 40 per cent of affordable homes in all new schemes of five or more homes.

*Q. What do you mean by existing 'light' businesses?*

Some businesses on Churchfields would complement the four-star hotel and conference centre, offices and affordable homes because they don't generate lorry traffic and operate quietly. It would not be necessary to relocate all the businesses.

*Q. What other problems are there at Churchfields?*

A. Walking or cycling into the industrial estate is not pleasant. There is little off-road parking so cars park on the roads, creating hazards. The constant noise of lorries, plus the dangers they present to pedestrians and cyclists,

is also a factor. It is felt by many that Churchfields is somewhat bleak and shabby.

*Q. How many hectares of land are required to accommodate new and expanding businesses in the Salisbury district within the next 18 years?*

A. Up to 64 hectares – equivalent to nearly two Churchfields. It will be a tough challenge to find the right places acceptable to everyone, but we can't shy away from difficult issues. It is in the interests of everyone that Salisbury's economy moves forward.

*Q. How much additional employment is anticipated?*

A. Official figures estimate 13,500 new jobs within the next two decades. If south Wiltshire is to have a thriving economy we need to make sure that there is enough land so that existing businesses expand and we can attract new ones.

*Q. So where would existing businesses at Churchfields be relocated?*

A. Most businesses, understandably, prefer to be located in Salisbury, and this means that the majority of this land would be in or close to the city. One strong contender is land at Harnham, south of the Netherhampton Road, as there is room for development.

*Q. But what about residents who live on Netherhampton Road and Harnham Road?*

A. The western half of the A3094 is ideal for heavier traffic as it is a direct route to the west via the A30 or A36. Businesses reliant on HGVs coming from the east and south would be strongly encouraged to avoid using

residential Harnham Road and New Harnham Road by using the Salisbury ring road and coming back in from the west on the A3094.

*Q. Are there any sites that can completely avoid residential streets?*

A. Unfortunately, there are no appropriate alternative sites near the city centre. Solstice Park at Amesbury does offer a great choice of business space, but we know that many city businesses need and prefer to remain in Salisbury. However, proposed mixed-use developments at Old Sarum and Fugglestone Red, might be able to accommodate some Churchfields businesses.

*Q. Surely we can do without a modern, sustainable local business park and spare the trouble of upheaval?*

A. No, for the reasons already outlined. This is the difficult challenge we face – balancing the economic needs of the city with what is acceptable to local residents. Also, the economic importance of Salisbury having a four-star hotel and conference centre, modern, purpose-built offices and affordable homes cannot be underestimated. There is a clear and compelling case for employment growth and housing growth to ensure Salisbury is a place to invest. Churchfields is the most viable option.

*Q. Isn't the Churchfields issue undermining the long-term confidence of businesses there?*

A. That is not the intention. The idea is to provide a practical solution which will see all the various businesses prosper, whether it be at a new site or at Churchfields. Most business people at the site are acutely aware of its cramped nature and the problems caused by HGVs driving through the historic city centre. They can see the bigger picture.

***Q. What is the Salisbury Vision?***

**A. It is a joint private and public sector initiative to revitalise key areas within the city of Salisbury whilst ensuring that its historic uniqueness is protected. The partnership's aims are to create high-quality facilities, new jobs and an improved and sustainable environment for the people of Salisbury and beyond. Salisbury Vision project members are Salisbury District Council, South West of England Regional Development Agency (South West RDA) and Wiltshire County Council.**

***Q. What level of public consultation has there been regarding the development of a new set of planning policies for the district, which form the backbone of the Salisbury Vision?***

**A. Extensive. Some 6,000 people responded to the first round and around 8,000 comments were received on the second. There is public and business support for the Churchfields redevelopment.**