

Carter Jonas

HEARING STATEMENT

Guildford Borough Council Local Plan Examination

SUBMITTED ON BEHALF OF MILLER DEVELOPMENTS

May 2018

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1 EXECUTIVE SUMMARY

1.1 This Statement contends that the preparation of the Guildford Local Plan is unsound on the basis that the Council has:

- Failed to correctly allocate land to meet its Objectively Assessed Need (OAN);
- Failed to adequately justify its proposed reduction in the OAN;
- Not justified its assumption that Brexit will have a long term impact on employment growth that will reduce the need for housing;
- Failed to meet the unmet needs of the other authorities in the HMA (notably the needs of Woking BC);
- Placed an undue reliance on strategic housing allocations which are highly constrained and unlikely to deliver the number of houses identified in a timely fashion;
- Failed to justify how it is acceptable to defer its housing delivery to the back end of the plan period in circumstances where it has historically failed to meet its housing requirements and consistently failed to identify a 5 year housing supply;
- Failed to identify smaller housing allocations which are less constrained by costly infrastructure improvements which are capable of delivering much needed housing during the early part of the plan period.

2 INTRODUCTION

2.1 This statement has been prepared on behalf of Miller Developments (“Miller”) who are responsible for the promotion of a residential development at Hook Farm and Hunts Farm, Fairlands (Land Availability Assessment Reference: 2072).

2.2 For the submitted Local Plan, representations have been duly made throughout its production. Where possible, we seek to avoid repetition of these previously made representations and cross-reference where appropriate. Accordingly, this statement should be read in context of these prior submissions.

2.3 We note the scope of examination as detailed within ‘The Matters and Issues for Examination Part 1’ (Doc Ref: ID/3). Whilst there is no opportunity to provide comment on omission sites, we emphasise the land under control by Miller is available, developable, and achievable and could provide circa 250 dwellings during the early part of the plan period. This development would be considered entirely proportionate in terms of scale to the adjacent village of Fairlands. It would also bring forward significant community benefits in the form of affordable units and a new access and drop-off/collection facilities for Worplesdon Primary School; this enhancement would relieve peak time congestion and parking concerns within the village.

2.4 Furthermore, we detail the fundamental problems within the Plan as drafted, and the ability of this site to contribute towards alleviating these shortcomings and forming a sound Plan.

3 MATTER 1 – PLAN PREPARATION

Is the Sustainability Appraisal adequate?

- 3.1 There are fundamental flaws within the Sustainability Appraisal (SA) that are linked to the Council's failure to adequately assess the credentials of omission sites which have the potential of performing a strong role in delivering the preferred spatial strategy. This has contributed to the production of a Plan that is neither 'positively prepared' nor 'effective', as defined by the NPPF.
- 3.2 We have raised concern throughout our representations to preparation of the Plan that the Council has failed to undertake a meaningful approach to the assessment of either alternative strategies, or the sites that would form the basis of these strategies.
- 3.3 The SA states (at para 6.6.2) that in considering the distribution options, a spatial hierarchy was applied alongside other considerations, notably whether the sites being considered were:
- Well located and relatively unconstrained;
 - Deliverable, particularly in the first five years of the Plan; and
 - Bring wider benefits e.g. strategic infrastructure.
- 3.4 Overlooking for now concerns about how the Objectively Assessed Need (OAN) figures have been calculated by the Council (addressed in Matter 2), as well as the deliverability of the proposed strategic allocations, (addressed in Matters 5 and 11), there is a recognised need to release Green Belt sites falling within Tier 10 (potential development areas that lie adjacent to existing villages) of the spatial hierarchy. The SA recognises that such sites can provide a strategic role, particularly where they can be delivered within the first five years of the Plan.
- 3.5 The Council has prioritised three such sites¹ that have been assessed as 'less sensitive' Green Belt sites along with a further four 'reasonable site options'² that are within higher sensitivity Green Belt locations on the basis that these smaller sites that can be delivered in the first five years of the Plan. The latter four sites are listed within the Land Availability Assessment document as contrary to the spatial strategy but each has been thoroughly assessed within the SA.
- 3.6 Using these sites as the only example of Tier 10 sites capable of acting as a reasonable 'variable' from which to assess alternative strategies that provides greater focus on Green Belt releases around villages to the spatial strategy provides an inaccurate picture of how these alternatives could be delivered. In reality, there additional sites that can be provided in conjunction with, or as alternatives to these sites. This would enable the Council to

¹ Land at Winds Ridge, 'the Horsleys', and land at Garlick's Arch

² Aldertons Farm, Land north east of Flexford, Land south of Halfway House, and Hornhatch Farm

deliver a greater quantum of housing earlier in the Plan period. The narrow assessment taken by the Council fails to give adequate consideration of this Option. This is particularly unjustified given the proposed phased approach to the housing trajectory. These shortcomings highlight the failure of the Plan to be positively prepared or for the strategy to be truly justified.

3.7 As an example, land immediately to the south of Fairlands (comprising land at Hook Farm and Hunts Farm) has been completely overlooked within the SA, despite it meeting the tests set out in the SA to a greater degree than other Tier 10 sites. The site lies immediately adjacent to the Fairlands settlement boundary, benefits from good road/public transport access to Guildford town centre and could be delivered in the first five years of the Plan period. In addition, this proposal would alleviate a recognised local constraint by providing an alternative access and parking for the Primary School. Furthermore, the Council's Green Belt and Countryside Study Volume III states that Land Parcel H8 (incorporating land Hook Farm/Hunts Farm, which was identified as parcel H8C) provides opportunities to accommodate development without significantly compromising the purposes of the Green Belt. Parcel H8C was considered to be "*surrounded by defensible boundaries*" and achieved a high sustainability rating (ranked 5th) when compared with the 41 Potential Development Areas surrounding villages; scoring more highly than the four sites assessed within the SA as referenced above.

3.8 Each of the 'reasonable options' identified within the spatial strategy incorporates the inclusion of five strategic sites each of which will deliver in excess of 1,000 dwellings (with a total yield of just under 8,000 dwellings). Given that the deliverability of these sites are highly questionable (detailed under Matters 5 and 11), it would seem reasonable for the SA to have considered alternative options where a range of smaller, sustainable sites accounted for a greater proportion of the assessed need.

3.9 These fundamental flaws in the SA mean there is insufficient evidence to suggest the Council's strategy is the most appropriate way forward. In these circumstances, it is considered that the Plan cannot be considered to be sound when the tests set out at paragraph 182 of the NPPF are applied.

4 MATTER 2 – CALCULATION OF OAN

Are the calculations contained in the SHMA Addendum Report an appropriate basis for establishing the OAN?

4.1 Miller considers it is surprising and disappointing that the *West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017* reduced the overall OAN to 631 dwellings per annum (dpa) from the previously assessed 693 dpa³. This being despite the baseline level of housing need from the latest population projections rising from 517 dpa to 577 dpa. Miller considers that the Council has failed to demonstrate why its current

³ SHMA September 2015

concerns about the economy will continue throughout the plan period given Guilford is consistently ranked as one of the top economic growth locations outside of London⁴.

4.2 Miller supports the agenda set down by Central Government in addressing the chronic housing crisis. There is clearly a significant need for housing in the Borough yet housing delivery has historically been suppressed primarily due to a failure of the Council to produce a sound Local Plan. This is before factoring in the wider needs of the HMA or any London migration sensitivity analysis.

4.3 As the science behind economic forecasting for housing need is recognised as the most volatile of the variables used to inform such assessments given the prevailing need and the Council's historic lack of delivery, Miller would advocate the most appropriate approach to addressing both need and affordability is to apply an uplift of at least 20% to the baseline demographic starting position.

5 MATTER 3 – UNMET NEED IN HMA

Is the plan sound in not making any allowance for unmet need arising elsewhere in the HMA?

5.1 With both Guildford Borough Council and Woking Borough Council located within the same HMA and FEMA, the economic as well as demographic links between the two authorities is undisputed. The NPPF is clear that local planning authorities should work together to meet the objectively assessed need within their HMA.

5.2 In the Council's response to the Inspector's Initial Questions, it was argued that it would be unreasonable for the Guildford to accommodate Woking's unmet need due to both Guildford's own constraints and in advance of Woking reviewing its own Core Strategy.

5.3 In relation to the latter point, it not within the scope of this Examination to pre-empt the outcome of any review of housing need for Woking (appreciating it falls under the same SHMA), nor the results of any Green Belt Review or land availability study within Woking. We would therefore encourage the Inspector to take the same approach as that taken at the recent Waverley Borough Local Plan Examination and require Guildford to accommodate the HMA's residual unmet need of 142 dpa⁵. This figure should therefore be added to Guildford Borough Council's own OAN, whatever figure is ultimately considered appropriate by the Inspector.

5.4 Whilst the Council points to its own constraints which restrict its ability to accommodate Woking's unmet need, the NPPF is clear in requiring that housing need is to be assessed for the whole of the HMA; the same approach should therefore be taken when considering constraints. In this regard, much of Woking's failure to meet its need

⁴ UK Vitality Index 2018 (Lambert Smith Hampton)

⁵ At Woking's inquiry the HMA unmet need was confirmed at 225dpa with Waverley being required to accommodate an additional 83 dwellings leaving a residual figure of 142 dpa.

is due to land availability⁶. By contrast Miller considers that Guildford has greater opportunities to deliver available, achievable and developable sites that are in accordance with national policy and the principles of sustainable development without necessarily undermining the purposes of the Green Belt.

5.5 The Council accepts that exceptional circumstances exist that justify the release of land from the Green Belt. As is detailed above, land at Hook Farm and Hunts Farm is deliverable, sustainable, and has been assessed by the Council as capable of providing defensible boundaries in line with paragraphs 83-85 of the NPPF. Furthermore, the potential of the site to alleviate traffic congestion generated by the primary school adds to the exceptional circumstances justifying the release of this site from the Green Belt.

5.6 The Examination of the Guildford Local Plan remains the 'last piece of the puzzle' in the round of Plan-making across the HMA; accordingly, a failure to accommodate the identified unmet need will result in insufficient housing being delivered to meet the identified needs of the HMA as a whole. This failure would wholly contradict the approach of national Government and undermines the principle of a Plan-led system.

6 MATTER 4 – HOUSING TRAJECTORY

Is the plan's housing trajectory a sound basis for meeting housing need?

6.1 The approach taken by the Council in its housing trajectory reflects the fundamental flaws created by its proposed spatial strategy.

6.2 The NPPF (para 47) requires local planning authorities to ensure their local plans meet the full, objectively assessed needs for market and affordable housing in the HMA, including sufficient sites to provide five years' worth of housing (with appropriate buffers – 20% in this case) on developable sites (as defined in Footnote 11 to para 47 of the NPPF). In addition, Councils are required to identify a supply of specific, deliverable sites (see Footnote 12 of the NPPF) or broad locations for growth identified for years 6-10 and 11-15. The NPPF does not endorse the Council's approach of deferring the delivery of housing to the back-end of the plan period; especially where it is relying on strategic sites that are less certain of being delivered. The Council's approach will merely perpetuate its historical failure to identify a five year supply of housing⁷ and the consequential failure to meet current needs.

6.3 The Plan relies heavily upon the main strategic allocations each of which requires significant infrastructure improvements in order to unlock their delivery. Whilst large sites can provide significant benefits local plans need to ensure a range of sites that can deliver a consistent supply of housing throughout the plan period; particularly in an area that has historically suppressed housing delivery and where the immediate need is so prominent.

⁶ Woking is a far smaller administrative area than either Guildford or Waverley and comprises of a significantly higher ratio of developed land.

⁷ Last assessed as 2.36 years - Authority Monitoring Report 2016/17 (November 2017)

- 6.4 The NLP research paper *“Start to Finish: How Quickly do Large-Scale Housing Sites Deliver?”* assessed the lead-in time of the varying scales of housing development and concluded that from the date of validation of an application the period to the delivery of the first unit on site increases with larger sites; with the total period for sites over 500 units being in the order of 5.3 – 6.9 years. This is particularly true where sites are constrained by complex planning issues such as environmental constraints and/or infrastructure provision. In this context, it is understandable, though not justified, that the Council the majority of its housing coming forward towards the end of the plan period.
- 6.5 In actuality, Miller would suggest that the housing trajectory put forward by the Council is potentially overly ambitious, particularly for the first five years of the Plan. None of the strategic sites currently benefit from an approved application, with only Wisley Airfield having a live application under consideration. It is therefore, extremely unlikely that any of these sites will make any significant contribution to housing delivery in the short term and forecasts for the latter end of the plan period are far from guaranteed (as discussed below).
- 6.6 Furthermore, the phased trajectory anticipates that these strategic sites can all deliver high build-out rates at the same time towards the latter part of the Plan period. The emerging Independent Review of Build Out by Sir Oliver Letwin MP published its interim findings in March 2018 and concluded that a (if not ‘the’) key constraint to improving build-out rates is the absorption rate⁸, particularly in relation to large, homogeneous sites. Many of the proposed strategic sites relied on by the Council will provide a very similar offers i.e. suburban Guildford. Whilst these sites can utilise multiple housebuilders, it is questionable whether these few sites can cumulatively deliver the Council’s target trajectory rate of up to 900 dwellings per annum by themselves. By contrast, Miller considers that spreading more evenly the delivery of housing over the lifetime of the Plan, through the allocation of smaller sites deliverable within the first five years of the Plan, would put less stress on the market and greater certainty to a consistent delivery.
- 6.7 The Council’s historic under-delivery has resulted in the acute need for housing in the short-term, which should not be further deferred until the end of the plan period. It would be irresponsible for the Council to adopt such an approach unless it can demonstrate unequivocally that this is the only strategy available to the Council.

7 MATTER 5 - FIVE YEAR HOUSING LAND SUPPLY

- 7.1 Miller supports the use of a 20% buffer for calculating its five year housing land supply given the Council’s historic under delivery of housing. This is exemplified in the annual completions for 2015/16 and 2016/17, where a deficit of 237 dwellings already exists against the Plan’s target figures.
- 7.2 The use of the Liverpool Method to spread previous under delivery across the life of the plan is considered to be unjustified. As is detailed above, deliverable alternatives to the Council’s strategic sites strategy are available

⁸ The ability of the market to deliver a similar type (tenure, mix, style) of home within a localised area e.g. a single large development site.

which the Council has failed to be adequately consider. The over-reliance on the large strategic sites will result in a failure of the Council to demonstrate a five year supply – as a minimum – over the first half of the Plan period.

7.3 The Council currently anticipates its strategic sites can deliver their first housing completions in 2021/22, with Land to the south of Normandy and north of Flexford providing 200 dwellings during the first five years of the Plan, with the other four strategic sites providing 150 dwellings each (800 dwellings in total). As stated above, the likely lead-in times of these sites is very likely to push the first completions well beyond this first five years. The 'Start to Finish Paper' states: *"Large sites are typically not quick to deliver; in the absence of a live [consented] planning application, they are, on average, unlikely to be contributing to five year housing land supply calculations."*

7.4 Accordingly, we anticipate the Council is likely to be unable to demonstrate a five year supply of housing regardless of which method the Council adopts⁹.

8 MATTER 9 - SPATIAL STRATEGY, GREEN BELT AND COUNTRYSIDE PROTECTION

8.1 We disagree in the strongest terms that the proposed spatial strategy is in accordance with national planning policy, as proposed at paragraph 4.1.5 of the Plan. The NPPF is clear that the needs of the HMA needs to be met in full where this would be consistent with the policies set out in the Framework.

8.2 As has been emphasised in this Statement, there remains available, deliverable sites that would comply with these policies. Specifically, Land at Hook Farm/ Hunts Farm can be released from the Green Belt without compromising the overall purposes of the Green Belt in this area or across the Borough. Furthermore, exceptional circumstances exist which justify the Council examining amendments to the Green Belt at this location in order to accommodate housing delivery. Development at this site would be proportional to Fairlands village, which would be in line with the broader principles of the spatial strategy, which includes development around villages.¹⁰

8.3 The spatial strategy rests on the delivery of several large sites which are reliant on uncommitted highways infrastructure improvements which are potentially undeliverable or likely to be delayed¹¹.

8.4 Whilst it is agreed that the spatial strategy can focus a significant proportion of its housing need as close as possible to the greatest quantum of amenities (i.e. Guildford town centre), this cannot be forced if it puts at risk housing delivery and achieving the principles of sustainable development. Miller has covered the shortcomings of the SA and confirmed its view that further Green Belt releases adjacent to existing settlements can deliver

⁹ Appreciating Miller's view that the housing target should be increased through both Guildford's OAN as well as adding the unmet need from the HMA

¹⁰ Paragraph 4.1.8.

¹¹ See Matter 11 comments.

sustainable developments that will ensure early delivery. There are sites that are well located to Guildford, would not severely affect the strategic road network¹², have a minimal impact upon the purposes of the Green Belt and landscape of the area, and can contribute to much-needed infrastructure and alleviating localised constraints¹³.

8.5 Miller agrees with the Council's statement at paragraph 4.3.16 of the Plan that exceptional circumstances exist to justify the amendment of Green Belt boundaries as part of the local plan process to facilitate development needs and promote sustainable patterns of development. It is therefore disappointing that the Council has not taken this opportunity to produce a positively prepared Plan that seeks to fully accommodate the needs of the HMA, even should this require further Green Belt amendments.

8.6 The Council's own evidence details that further sites exist that, if released from the Green Belt, would not compromise the overall purposes of the Green Belt in those areas. The principles¹⁴ of the vision and spatial strategy for the Plan do not have to be compromised in order for the Council to meet this higher housing need.

9 MATTER 11 - SITE ALLOCATIONS

9.1 To meet its housing requirements the Council has adopted a spatial strategy that seeks to bring forward four strategic sites along the A3 corridor, three of which are immediately adjacent to the Guildford built area with the other being the former Wisley Airfield at Ockham.

9.2 In total, these sites will deliver 6,200 dwellings out of the total allocation supported by GBC of 12,426.

9.3 The strategic sites are:

- Wisley Airfield – 2,000 units
- Gosden Hill Farm, Burpham – 1,700 units
- Land adjacent to Slyfield, Jacobs Well – 1,000 units
- Blackwell Farm, to the west of Surrey Sports Park – 1,500 units

9.4 In addition to these strategic allocations, the Council envisages 1,150 dwellings being provided within the Town Centre principally between Ladymead and the station (principally along the Walnut Tree Close/ Woodbridge Lane corridor).

9.5 All of the above allocations require major strategic infrastructure improvements that require junction improvements or the creation of new slip roads on and off the A3 or other A class roads and the delivery of a

¹² As is the case with many of the proposed strategic allocations

¹³ The proposed primary school access and parking at Hook Farm and Hunts Farm is recognised by SCC as the only viable solution to traffic congestion in Fairlands relating to Worplesdon Primary School.

¹⁴ Focusing growth on most sustainable locations, protecting the character of the borough, safeguarding the most valued natural and historical environment.

Northern Sustainable Movement Corridor. To date GBC has provided little information as to exactly what improvements will be necessary, when they are programmed to take place, or whether they can be funded. In addition, GBC has failed to make public how these improvements are likely to affect the flow of traffic along one of Surrey's principal transport routes¹⁵.

- 9.6 The necessary infrastructure investment required to link the strategic sites to the A3, along with any improvements to the local network and the town centre are all in addition to the proposed strategic highway improvements to Junction 10 (A3/M25) which are currently being consulted upon. Cumulatively, these highway works will have a very significant impact on travel times for potentially many years to come and will almost certainly take place on a phased basis.
- 9.7 Miller is of the opinion that these major highway constraints will significantly affect how the Council's strategic sites will come forward and may even prevent some of the sites coming forward altogether. In some instances, there may be no acceptable highway solution or the cost of the improvements, in addition to the costs of providing other essential services, may make the sites unviable.
- 9.8 The Council has been far from transparent in its consultations on these issues and Miller would argue that that such uncertainty brings into question whether the Council can realistically expect these sites to make any meaningful contribution to the housing needs, even towards the back end of the plan period as suggested.

Wisley Airfield

- 9.9 As things stand, the Wisley Airfield application is currently at appeal and awaiting determination. At the public inquiry both Highways England (HE) and the County Council identified severe reservations about the lack of a suitable highways solution. Notwithstanding the outstanding HE/SCC objections, the draft s106 accompanying the appeal requires a range of highway interventions to be brought forward in order to allow the phased delivery of dwellings. These include, inter alia, additional on and off slips to serve Ripley at Burnt Wood Common, which are considered the only way of relieving existing pressures on the Ockham junction. In light of such objections it is must be questioned whether this site is likely to contribute significantly to the housing targets in the absence of the Burnt Wood Common junction improvements.

Gosden Hill Farm

- 9.10 Highway proposals also inhibit the proposed allocation at Gosden Hill Farm. The existing southbound exit from the A3 is heavily congested at peak times due to the capacity issues at the roundabout junction with Clay Lane; which in turn restricts access to the northbound on slip road. Whilst the provision of a new direct off-slip can provide access to the site there is no immediate solution to either accesses to the A3 southbound or northbound

¹⁵ The A3 which provides the main road link between London and Portsmouth and one of the principal links to the M25 and in turn Heathrow and Gatwick airports

with such movements having to rely on the existing junction of the A25/A3 and the existing Burpham on slip respectively; both of which lack adequate capacity at peak times.

- 9.11 Equally, the network to the south towards the Epsom Road is restricted by a traffic light controlled, single lane road under the railway bridge on Bridge Lane, with no known proposal to address this constraint. With such restrictions, housing delivery on this site is also likely to be restricted in advance of major highway improvements.

Slyfield

- 9.12 The proposals for Slyfield are similarly constrained by only benefitting from northbound access onto the A3 from either the Burpham or Stoke Park junctions. Southbound access is only via the same A25/A3 junction as Gosden Hill Farm, which means passing through the Stoke Park Junction, onto Ladymead before joining the A3 at Wooden Bridge. This is highly congested throughout the day and especially at peak times with traffic backing up to the A3/A31 junction. Again, it is difficult to envisage any significant development on this site in advance of major highway improvements.

Blackwell Farm

- 9.13 Blackwell Farm appears to be the most constrained site due to concerns about highway access. Whilst it might be possible to physically provide a link to Stephenson Road (which currently serves the Science Park, the General Hospital, Surrey Sports Park, the Park Barn residential area and the Tesco superstore at Bannister's Fields) the additional residential traffic would add considerably to already unacceptable levels of traffic accessing the A3 northbound and southbound at the Cathedral slips; which also provides access to the A3 for all development to the west of the town centre. It is considered that these slip roads and adjacent roundabouts lack sufficient capacity to serve a major residential allocation.
- 9.14 The only alternative would appear to be a new access directly from the A3 or from the A31 Hogs Back. Both options are constrained by either the Surrey Hills AONB designation or proximity to the existing A3/A31 junction. In the absence of an acceptable design solution, it is difficult to see how this site can be advanced.

Town Centre

- 9.15 Development in the Town Centre is clearly constrained by the town centre gyratory system, which is congested throughout the day and especially at peak hours and no realistic solution appears to exist to increase capacity to either the north or south of the Walnut Tree Close/Woodbridge Lane corridor, which would again appear to place constraint on housing delivery within the Town Centre.
- 9.16 Given the nature and scale of the infrastructure required for the delivery of all the strategic sites, it is evident that they are likely to require a significant amount of design and collaboration between Surrey County Council, Highways England and Guildford Borough Council which will undoubtedly take several years to agree and then implement. The cumulative impact of the significant amount of construction works on the A3 and M25 can also not be ignored and will need to be a key consideration in the delivery times for these sites. Given that the A3 is a strategic route carrying a significant volume of traffic and that the M25 junction 10 is recognised as being one

of the busiest and most congested junctions in the country this would all but confirm that each site can only be progressed in the medium to longer term as clearly significant works along the A3 would need to take a phased approach to delivery. In Miller's opinion this places a very real concern as to the soundness of the Council's spatial strategy and its ability to meet its housing need through a reliance on the strategic sites.

10 CONCLUSIONS

- 10.1 In light of the concerns expressed in relation to the overall housing targets and the very significant highway constraints it is contended that the Council's strategy and the plan as a whole is unsound and that there is an over reliance on major strategic sites. It is contended that a different approach should be adopted that relies on a greater number of smaller sites that are dispersed across the borough and which can be delivered within the first five years of the Plan.
- 10.2 In the event that the Inspector concludes that further sites are required we would welcome the opportunity of presenting the case to bring forward Miller's proposals for Hook Farm/ Hunts Farm.