

GUILDFORD BOROUGH COUNCIL NOTE
INITIAL SUBMISSION WHETHER FURTHER CONSULTATION AND SUSTAINABILITY
APPRAISAL IS NECESSARY

Introduction

1. As identified in GBC's opening remarks two separate changes of circumstances have occurred since the previous hearing sessions that required further consideration in order to ensure a robust plan is adopted. The first was the publication of the 2016-household projections. The second is the material change in circumstances regarding unmet need in the HMA, specifically Woking's position determined when reviewing its local plan that it now has no unmet need.
2. GBC's position in relation to these changes is set out in its Note 33a published in October 2018, which was provided in response to the Inspector's request.¹
 - i. First, it says that as a result of the 2016-based household projections its objectively assessed need is reduced to 562dpa (10,678 overall).
 - ii. Second, it contends that there is no longer any justification for including any contribution to Woking.
3. The implications of these changes for the Local Plan and published main modifications are relatively limited:
 - i. First, the housing requirement figure in 12,600 (630dpa for four years and then 672dpa thereafter) should be reduced to 10,678 (562dpa) [or such different figure as the Inspector may determine] (by reason of the change to OAN and the change of position as to Woking)
 - ii. Second, the additional Green Belt sites, not included within the submission Local Plan but suggested for inclusion as part of the proposed main modifications (in order to assist with early delivery), are no longer required.

[See attached proposed modifications to Policy S2 and Housing Trajectory, noting that the only changes to the main modifications in blue]
4. Importantly,
 - a. GBC do not suggest that the changes to the housing requirement figure justifies a reduction in overall housing supply originally provided for by the Local Plan. This scale of flexibility requisite for this plan ("the buffer") is necessary because of the need to take account of:
 - ensuring sufficient flexibility to adapt to rapid change,
 - to boost significantly the supply of housing,
 - to provide a sufficient degree of flexibility in light *inter alia* of changes to the definition of 'deliverability',
 - uncertainty as to the *future* position in relation to Woking's need
 - the need for infrastructure improvements consequent upon development
 - of some particular importance, the future impact of the application of the standard methodology to Guildford
 - ensuring the longevity of the plan; and
 - generally, the considerable uncertainty in the planning system

¹ ID/10

- b. As Appendix 1 to Note 33a indicates, the Local Plan will continue to provide for the delivery of up to 14,602 houses over the plan period. This is not materially different from that the overall housing provision that the submitted Local Plan would have made provision for² and a similar figure as considered at examination in summer 2018.
 - c. GBC do not now suggest any sites originally included in the submission Local Plan should be removed, or, indeed, that any be added.³
5. Thus, the only substantive differences which arise as a result of the new household projections and Woking's change in position are: (i) the extent to which the overall housing supply provided for by the Local Plan exceeds the overall housing requirement; and, (ii) the non-allocation of 4 additional Green Belt sites which were not included in the submission Local Plan in the first place.
 6. In those circumstances, do the changes warrant a further consultation on the main modification and/or further sustainability appraisal of the Plan?
 7. GBC's view is that in the particular circumstances of this examination that they do not.

Consultation on main modification

8. There is no statutory duty which requires public consultation to be undertaken in relation to "main modifications"⁴. As a matter of practice, of course, public consultation is ordinarily undertaken in respect of proposed main modifications before the Inspector formally recommends them in his report to the authority. This practice stems not from a statutory duty, but from general public law principles of fairness and legitimate expectation. As PINS Procedural Guidance⁵ explains:

*"the Inspector will not contemplate recommending a MM to remedy unsoundness or legal non-compliance unless any party whose interests might be prejudiced has had a fair opportunity to comment on it"*⁶
9. In similar vein to paragraph 5.25 of the Procedural Guidance, the guidance in the PPG at Paragraph: 024 Reference ID: 12-024-20140306 identifies that Inspectors will require consultation on all proposed major modifications.
10. However, as the Procedural Guidance also recognises there may be circumstances (albeit which the guidance indicates would be 'very limited') where *"the Inspector may be satisfied that no party would be prejudiced by a possible new MM (or the amendment of one that has already been publicised) that he/she is contemplating towards the end of an examination....n"*⁷
11. The key question is, "has any party whose interests might be prejudiced by the main modifications as a result of these hearing sessions had a fair opportunity to comment on it"?⁸
12. In this case, the answer must be yes.
13. Any party whose interests may potentially have been impacted by either: (a) the reduction in the housing requirement figure; or (b) the non-allocation of the 4 additional Green Belt

² See Housing Topic Paper

³ MMs include additional density to Garlick's Arch, not as a new or expanded site, and that would remain.

⁴ Section 23(2A)(b) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004) defines "main modifications" as those modifications recommended by the independent examiner under s.20(7C) – in summary modifications which are required to: (a) ensure that the Local Plan satisfies the relevant legal requirements and/ or (b) make it sound. Neither the PCPA 2004 nor the Town and Country Planning (Local Planning) (England) Regulations 2012 ("2012 Regulations") include a requirement for a consultation process on proposed main modifications

⁵ Procedural Practice in the Examination of Local Plans (June 2016), see paragraph 5.26

⁶ *Ibid*, para 5.27, bullet 5

⁷ *Ibid*, bullet 8

⁸ *Jopling v Richmond on Thames LBC* [2019] EWHC 190 (Admin) at [55]

sites has had every opportunity to make representations on these issues as part of these additional hearing sessions. Indeed, it is arguable that the opportunity to comment on these issues has been greater than that normally expected in the main modification procedure, because as well as being able to submit written representations on the issues, there has also been a hearing session dedicated to these issues.

14. To recap on the opportunities people have had to make comments on these issues, the relevant chronology is as follows:

- **26 September 2018** – In a published note (ID/10) the Inspector offered GBC an opportunity to comment on the latest version of the Household Projections and their implication for OAN.
- **17-23 October 2018** – GBC published notes 33 a,b and c setting out their position on the appropriate OAN and housing requirement in light of both the latest household projections, and following Woking’s change of position in relation to unmet need. GBC also explained its view that the 4 additional Green Belt sites are no longer required.
- **29 October 2018** – In a published letter (ID/11) the Inspector, having had regard to GBC’s notes, as well as a letter from the leader of the Council, explains that:

“In the interests of fairness I intend to hold a further hearing to discuss the housing requirement arising from the latest household projections, the implications for the additional sites that were included in the main modifications, and the way forward”

It is also clear from his letter that he was also cognisant of the need to have regard to the implication of the change in respect of Woking’s unmet need.

- **20 December 2018** – The Inspector publishes a further Matters & Issues statement. This invited statements from GBC and attendees *“on the implications of the 2016 household projections for OAN and the plan’s housing requirement. In addition [the Inspector] wants to consider whether there would be consequential changes for the housing trajectory and 5 year HLS, and any other consequences affecting the main modifications, such as the inclusion or exclusion of the additional housing sites”*
- **24 January 2019** – c28 hearing statements were submitted by representors representing the full spectrum of views on the relevant issues, including by representatives of those who were promoting the additional 4 Green Belt sites.
- **12th February 2019** – A full day of debate is had at oral hearing on all of the relevant matters, with 32 participants.

15. In these circumstances, any party whose interests could have been prejudiced by either (a) the proposed reduction in the housing requirement (but not overall housing provision); or (b) the non-allocation of 4 additional Green Belt sites has clearly had ample opportunity to comment on those matters.

16. It is submitted that fairness does not require a further round of consultation, and we invite the Inspector to endorse the above reasoning, including considerations as to the “buffer”.

17. Given the acknowledged housing crisis in Guildford, it is imperative that the Local Plan is adopted as soon as possible in order to unlock the strategic sites and there should be no further delay unless absolutely necessary.

Sustainability Appraisal/Strategic Environmental Assessment

The requirements

18. By virtue of Regulation 12 of the SEA Regulations⁹ (which transposes Article 5 of the SEA Directive¹⁰) an 'environmental report' must "*identify, describe and evaluate the likely significant effects on the environment of – (a) implementing the plan....and (b) reasonable alternatives taking into account the objectives and the geographical scope of the plan*".
19. Therefore, where main modifications to the plan would cause likely significant effects on the environment which have not previously been "identified, described and evaluated" then an update to the environmental report would be required. Where material amendments to the environmental report are required then it would also ordinarily be necessary to undertake consultation in respect of that updated report¹¹.
20. By virtue of section 19(5)(a) of the PCPA 2004, a local planning authority must *also "carry out an appraisal of the sustainability of the proposals in each development plan document"*. The sustainability appraisal (SA) must be submitted when the Local Plan is submitted to the Secretary of State for examination¹² and made available to the public upon its adoption¹³.
21. There is no statutory definition of the SA. However the PPG explains that the SA incorporates the requirements of the SEA Regulations¹⁴, but also "*considers the plan's wider economic and social effects in addition to its potential environmental impacts.*"¹⁵
22. In relation to the SA the PPG also explains that:

*"The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the Local Plan. It should focus on the environmental, economic and social impacts that are likely to be significant. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan."*¹⁶
23. It follows from the above that an update to the environmental report/SA – and thus any consultation on that updated environmental report/SA – is only necessary if the proposed main modifications cause likely significant effects (on environmental, economic and/or social matters) which have not previously been identified, described or evaluated.
24. GBC has not considered further alternatives, it has maintained the approach of providing OAN with a "buffer". Whilst the size of that "buffer" has varied throughout the process [SA 2017 9.4%, 14% at submission and at 26% on main mods in respect of which the Inspector was content and now at 37%] but that does not constitute a different alternative. Our understanding of the Inspector's comments (and in GBC's view) it would not be sound or reasonable to have a buffer that was materially lower.
25. GBC are not advocating any growth option. We are maintaining the approach of meeting OAN with an appropriate buffer.

⁹ Environmental Assessment of Plans and Programmes Regulations 2004

¹⁰ Directive 2001/42 on 'the assessment of the effects of certain plans and programmes on the environment'

¹¹ This is because, whilst the environmental report forms part of the 'environmental assessment', so does the consultation on it and its results.

¹² Reg 22 of the 2012 Regulations

¹³ Reg 26 of the 2012 Regulations

¹⁴ What is a sustainability appraisal, and how does it relate to strategic environmental assessment? Paragraph: 001 Reference ID: 11-001-20140306

¹⁵ Is strategic environmental assessment required in addition to sustainability appraisal? Paragraph: 007 Reference ID: 11-007-20140306

¹⁶ Paragraph: 009 Reference ID: 11-009-20140306

26. This is confirmed in the PPG guidance on the subject which explains:

“Should the sustainability appraisal report be updated if the draft Local Plan is modified following responses to consultations?”

The sustainability appraisal report will not necessarily have to be amended if the Local Plan is modified following responses to consultations. Modifications to the sustainability appraisal should be considered only where appropriate and proportionate to the level of change being made to the Local Plan. A change is likely to be significant if it substantially alters the Plan and/ or is likely to give to significant effects.

Further assessment may be required if the changes have not previously been assessed and are likely to give rise to significant effects. A further round of consultation on the sustainability appraisal may also be required in such circumstances but this should only be undertaken where necessary. Changes to the Local Plan that are not significant will not require further sustainability appraisal work.”

Does there need to be an update to the SA in this case?

27. GBC’s view is no update to the SA is necessary.

28. As noted above, the only changes to the Local Plan itself are that:

- i. First, the housing requirement figure in should be reduced ; as set out in paragraph 3;
- ii. Second, the additional Green Belt sites, not included within the submission Local Plan but suggested for inclusion as part of the proposed main modifications (in order to assist with early delivery), are no longer required.

29. These changes will not give rise to likely significant effects which have not already been identified, described and evaluated.

30. In relation to the first change, although the housing requirement figure is, on GBC’s suggested approach, to be reduced, the level of overall housing supply provided by the plan will remain materially the same as the submission Local Plan, which was subject to SA.

31. Indeed, as can be seen from Table 6.2 of the SA Report Update¹⁷ (ie the version submitted with the Local Plan), eight different housing delivery scenarios were considered to be reasonable alternatives, from total of 13,600 homes over the plan period to 15, 680 homes over the plan period. The likely significant effects of each of these alternatives was identified, described and evaluated.

32. Thus, the change in the housing requirement figure will not give rise to likely significant effects, which have not hitherto been identified, described and evaluated.

33. In relation to the second change, the effect of what is being proposed by GBC is simply to revert to reliance on the same allocated sites included with the local plan as originally submitted. The SA work undertake has already identified, described and evaluated the likely significant effects of the plan without these additional sites.

34. It follows that the non-inclusion of the additional Green Belt sites not give rise to likely significant effects which have not hitherto been identified, described and evaluated.

35. That being the case there is no need to, and it would be inappropriate and disproportionate for GBC to, to undertake further sustainability appraisal in relation to the modifications arising to the plan arising out of these hearing sessions.

Guildford Borough Council

13 February 2019

Appendices

Policy S2: Planning for the borough - our spatial development strategy

Introduction

- 4.1.5 Our development strategy for the plan period is based on national planning policy, with recognition of environmental constraints and the availability and viability of land for development.
- 4.1.6 Development will be directed to the most sustainable locations, making the best use of previously developed land (including in the Green Belt if appropriate). In sequential order these locations are:
- Guildford town centre
 - Guildford, and Ash and Tongham urban areas
 - inset villages
 - identified Green Belt villages.
- 4.1.7 There will also be opportunities for rural exception sites which are small-scale developments providing affordable homes in locations where new homes would not usually be appropriate.
- 4.1.8 Whilst these sustainable locations are our preferred locations for new development, they have been unable to accommodate all of the new development that is required in order to meet identified needs. For this reason, the plan allocates sites outside of the existing built up areas. The following spatial hierarchy has been applied as part of developing the plan's spatial strategy for meeting planned growth:
- countryside beyond the GreenBelt
 - urban extensions
 - new settlement at the former Wisley airfield
 - extensions to villages.
- 4.1.9 Development will be phased across the plan period. We anticipate that smaller allocated sites will provide the majority of supply in the first five years whilst the larger strategic development sites, will deliver the majority of new development in the 6-10 and 11-15 year periods of the plan. The strategic development sites are:
- North Street redevelopment
 - Slyfield Area Regeneration Project
 - Gosden Hill Farm
 - Blackwell Farm
 - Former Wisley airfield.

POLICY S2: Planning for the borough - our spatial development strategy

- (1) ~~The housing requirement for Guildford is 630 562 dwellings per annum over the plan period (2015 – 2034). In addition to this and from 2019, an allowance of 42 dwellings per annum will be provided to contribute towards meeting unmet need arising from Woking Borough Council. This contribution will be reviewed subsequent to Woking Borough Council reviewing their Local Plan in light of an updated objectively assessed housing need and any comprehensive Green Belt and other related studies.~~ During the plan period (2015-34), ~~we will make provision~~ has been made for at least ~~12,426 12,600~~ 10,678 new homes. Table S2a shows the contribution of all sources of housing supply, whilst the distribution of supply across the spatial locations is shown in Table S2b.
- ~~(2) The delivery of homes is expected to increase over the plan period, reflective of timescales associated with the delivery of strategic sites and infrastructure. The housing target each year is as set out below, however, this is not a ceiling, and earlier delivery of allocated sites will be supported where appropriate, subject to infrastructure provision.~~
- (2a) Provision has been made for at least 36,100 – 43,700 sq m of office and research and development (B1a and b) floorspace (net); 3.7– 4.1 hectares of industrial (B1c, B2 and B8) land (gross); and 41,000 sq m of comparison retail floorspace (gross).
- (3) Provision has been made for 4 permanent pitches for Gypsies and Travellers and 4 permanent plots for Travelling Showpeople (as defined by Planning Policy for Traveller Sites) within Guildford borough between 2017 and 2034. Whilst the needs of Gypsies, Travellers and Travelling Showpeople who do not meet the planning definition fall outside this allocation, in order to meet their assessed needs the Council will seek to make provision for 41 permanent pitches for Gypsies and Travellers and 4 permanent plots for Travelling Showpeople who do not meet the definition. The Council will also seek to make provision for 8 permanent pitches to meet potential additional need of households of unknown planning status.

Annual Housing Target

Year	Housing number	Year	Housing number
2019/2020	450	2027/2028	700
2020/2021	450	2028/2029	700
2021/2022	500	2029/2030	800
2022/2023	500	2030/2031	810
2023/2024	500	2031/2032	850
2024/2025	550	2032/2033	850
2025/2026	600	2033/2034	850
2026/2027	700		

Reasoned justification

4.1.9a The figures set out in the Annual Housing Target table sum to a total of 12,426 homes. This is lower than the total supply of homes identified in the Land Availability Assessment as having potential to be delivered over the plan period. This buffer builds flexibility into the plan and demonstrates that our strategy is capable of delivering the target. It also adopts a phased target that gradually increases over time rather than the same annualised target of 654 homes each year. This is due to the likely rate of delivery, particularly on the strategic greenfield sites, which is dependent upon the delivery of necessary infrastructure expected to occur towards the end of the plan period. National policy requires that we meet objectively assessed housing needs, including any unmet needs from neighbouring authorities, where it is practical to do so and consistent with achieving sustainable development. Guildford's objectively assessed housing need has been based on a consideration of the latest 2016¹⁸-based population and household projections. Applied to this demographic housing need is a necessary uplift to take account of market signals and affordable housing need, assumptions of future economic growth, and an increased growth in the student population.

~~4.1.9aa Guildford sits within the same housing market area (HMA) as Waverley and Woking borough councils. Waverley Borough Council has a recently adopted Local Plan that seeks to meet its full needs with an allowance to meet 50% of Woking's unmet housing need. The extent of Woking's unmet need has been based on the 2015 West Surrey Strategic Housing Market Assessment (SHMA). An allowance is also included within this plan to meet 20% of the remaining unmet need (630 homes over the plan period). However, this contribution will be subject to review after Woking Borough Council has reviewed their current Local Plan¹⁸ as the latest population and household projections indicate that the level of unmet need is lower than that assessed in the West Surrey SHMA (2015).~~

4.1.9ab Our total housing supply over the plan period (2015-2034) is indicated in the table below and will comprise homes from a variety of sources in addition to the Local Plan's site allocations.

Table S2a: Sources of supply over the plan period: 2015 – 2034 (net number of homes)

<u>Total target (requirement)</u>	12,600 <u>10,678</u>
<u>Commitments (permissions / completions)</u>	<u>3,675 (980 / 2,695)</u>
<u>Site allocations</u>	Approximately 9,972 <u>9,467*</u>
<u>LAA sites not allocated</u>	<u>620</u>
<u>Windfall</u>	<u>750</u>
<u>Rural exception</u>	<u>90</u>
<u>Total supply over the plan period</u>	15,107 <u>14,602</u>

*This excludes current permissions / completions associated with allocations

4.1.9ac Informed by our spatial development strategy, the anticipated distribution of housing as

¹⁸ Woking Core Strategy 2012.

identified in the plan's site allocations¹⁹ (and non-allocated LAA sites) is reflected in the table below.

Table S2b: Spatial Strategy: Distribution of Housing 2015 – 2034 (net number of homes)

<u>Spatial locations / settlements</u>	<u>Homes (Site allocations + non-allocated LAA sites, excluding permissions and completions)</u>
<u>Guildford town centre</u>	<u>863</u>
<u>Urban areas</u>	<u>1,443</u>
<u>Guildford (incl. SARP)</u>	<u>1,399</u>
<u>Ash and Tongham</u>	<u>44</u>
<u>Within villages</u>	<u>154</u>
<u>Land proposed to be inset in villages</u>	<u>252</u>
<u>Previously Developed Land in Green Belt</u>	<u>195</u>
<u>Countryside beyond the Green Belt:</u>	<u>885</u>
<u>Extension to Ash and Tongham</u>	
<u>Urban extensions to Guildford</u>	<u>3,350</u>
<u>Gosden Hill Farm</u>	<u>1,700</u>
<u>Blackwell Farm</u>	<u>1,500</u>
<u>Land north of Keens Lane</u>	<u>150</u>
<u>Urban extension to Godalming</u>	<u>200</u>
<u>Aaron's Hill</u>	
<u>New settlement</u>	<u>2,000</u>
<u>Former Wisley Airfield</u>	
<u>Development around villages</u>	<u>1,250</u> <u>945</u>
<u>Total</u>	<u>10,592 10,087*</u>

*This total excludes trend based housing supply (Windfall and rural exception) as well as completions and permissions, whether allocated or not.

- 4.1.9b National policy requires that we are able to demonstrate a rolling five year housing land supply from the date of adoption. This phased approach is necessary in order to ensure that the Council is able to demonstrate a rolling five year supply of housing from the date of adoption, as required by national policy. This will also must take account of both the deficit accrued until that point and includes a 20 per cent buffer moved forward from later in the plan period. Without a rolling five-year supply of homes or where the Housing Delivery Test indicates that the delivery of housing was substantially below the housing requirement over the previous three years, the policies which are most important for determining a planning application relevant policies for the supply of housing would not be considered up-to-date.
- 4.1.10 This is still a higher level of development than experienced in Guildford borough during the previous Local Plan period, and represents an increase in new homes in line with the aims of NPPF and NPPG, and the best available information on the likely levels of development to 2034. The phased approach is related to assumptions on the most likely rate of delivery only and do not in any way preclude the earlier delivery of these sites where this is sustainable to do so. National policy states that where possible the deficit accrued since the start of the plan period should be met within the first five years. Given

¹⁹ For more detail on the site allocations, see the summary table in the site allocations policy of the Local Plan.

the step change in housing requirement compared to past delivery rates which have been constrained by Green Belt policy, the accrued backlog at the date of adoption is significant. Whilst the plan includes numerous smaller sites capable of being delivered early in the plan period, there are a number of strategic sites that have longer lead in times. For these reasons, the backlog will be met over the plan period, using the Liverpool approach to calculating a rolling five year housing land supply rather than the Sedgefield approach. For the purposes of calculating the five year land supply, the housing requirement from 2015 to 2018 is 630 dwellings per annum, and from 2019 to 2034 it is 672 dwellings per annum, which includes an allowance of 42 dwellings per annum to contribute towards meeting unmet needs from Woking Borough.

- 4.1.11 Further details of the sites that are considered to be key to delivering the strategy are provided in the site allocations policy of the Local Plan and shown on the Policies Map. The key infrastructure requirements on which the delivery of the plan depends is set out in the infrastructure schedule included as Appendix C or the latest Infrastructure Delivery Plan. Details of all the sites that are expected to be delivered ~~from now until the end of the plan period~~ are set out in the Council's latest Land Availability Assessment. The expected phasing of sites is set out in the Housing Trajectory, included at Appendix 0. This will be updated annually in the Council's Monitoring Report.

Key Evidence

- Employment Land Needs Assessment (ELNA) (Guildford Borough Council, 2017)
- Review of Housing Needs Evidence across West Surrey HMA (Guildford Borough Council, 2017)
- West Surrey Strategic Housing Market Assessment (SHMA) (Guildford Borough Council, 2015) and Guildford Addendum Report 2017
- Land Availability Assessment (Guildford Borough Council, 2017)
- Retail and Leisure Study Update 2014 (Guildford Borough Council, 2015) and Addendum 2017
- Traveller Accommodation Assessment (Guildford Borough Council, 2017)

Monitoring Indicators

Indicator	Target	Data source
The number of new homes permitted and completed each year	630 <u>562</u> homes per annum (2015/16 – 2018/19); 672 homes per annum (2019/20 – 2033/34) 12,426 12,600 <u>10,678</u> homes over the plan period (2015 – 2034)	Planning applications and appeals and building completions data
The number of Traveller pitches and Travelling Showpeople plots	<u>4 permanent pitches for Gypsies and Travellers;</u> <u>4 permanent plots for Travelling Showpeople (as defined by Planning Policy for Traveller Sites);</u> <u>To seek to make provision for 41 permanent Gypsy and Traveller pitches, 4 permanent plots for Travelling Showpeople for households who do not meet the planning definition, and 8 permanent pitches for households of unknown planning status</u> 58 permanent pitches for Gypsies and Travellers and 8 permanent plots for Travelling Show people between 2017 and 2034 or any new target as identified within an updated Traveller Accommodation Assessment.	Planning applications and appeals

Please note employment and retail floor space is monitored as part of Policy E1 and Policy E7 respectively.

Housing Trajectory

	Pre-adoption				First five years					6-10 YEARS					11 - 15 YEARS					Total
	2015/ 2016	2016/ 2017	2017/ 2018	2018/ 2019	2019/ 2020	2020/ 2021	2021/ 2022	2022/ 2023	2023/ 2024	2024/ 2025	2025/ 2026	2026/ 2027	2027/ 2028	2028/ 2029	2029/ 2030	2030/ 2031	2031/ 2032	2032/ 2033	2033/ 2034	
Completions	387	294	299																	980
Outstanding capacity (Commenced)				284						4	4	5	5	5	14	13	13	13	13	373
Outstanding capacity (Approved)					165	165	166	166												662
~ Ash and Tongham (including those subject to Grampian)					185	185	185	186	186											927
~ Howard of Effingham					20	60	60	60	60	35										295
~ Guildford Station							138	151	149											438
Windfall					30	30	30	30	30	60	60	60	60	60	60	60	60	60	60	750
Rural exception					6	6	6	6	6	6	6	6	6	6	6	6	6	6	6	90
Town Centre										117	117	118	118	118	55	55	55	55	55	863
Guildford urban area (excluding SARP)					37	37	37	37	37	23	22	22	22	22	21	21	21	20	20	399
Slyfield Area Regeneration Plan										100	100	100	100	100	100	100	100	100	100	1000
Ash and Tongham (urban area)										5	5	5	5	5	4	4	4	4	3	44
Ash and Tongham extension (currently countryside)										94	94	95	95	95	82	82	82	83	83	885
Within villages					16	16	16	15	15	3	2	2	2	2	13	13	13	13	13	154
Villages (land proposed to be inset from the Green Belt)					46	46	45	45	45	1	1	1	1	1	4	4	4	4	4	252
PDL in the Green Belt					13	13	13	14	14	25	25	26	26	26						195
Proposed new settlement (former Wisley airfield)								50	100	150	150	150	200	200	200	200	200	200	200	2000
Extensions to urban areas and villages																				
Proposed extension to urban area (Gosden Hill, Guildford)								50	100	100	100	100	100	100	210	210	210	210	210	1700
Proposed extension to urban area (Blackwell Farm, Guildford)								50	100	100	100	100	100	100	170	170	170	170	170	1500
Land north of Keens Lane, Guildford						38	38	37	37											150
Aaron's Hill, Godalming						50	50	50	50											200
Land to the north of West Horsley						30	30	30	30											120
Land to the west of West Horsley						34	34	34	33											135
Land near Horsley Railway Station, Ockham Road North						25	25	25	25											100
Land at Garlick's Arch, Send Marsh/Burnt Common and Ripley						65	85	150	150	100										550
Land west of Winds Ridge and Send Hill, Send						20	20													40
East of Glaziers Lane, Flexford						35	35	35												105
Hornhatch Farm, Chilworth						30	30	30	30											80
Aldertons Farm, Send Marsh						30	30	30	30											120
Total housing provision	387	294	299	284	518	770	928	1136	1117	923	786	790	840	840	939	938	938	938	937	14602