



ET Planning

Neighbourhood Plan Appraisal

Client:

Compton Parish Council

*Exploration of opportunities,
constraints, possible policies and
next steps for preparing Compton's
Neighbourhood Plan.*

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1. Executive Summary

1.1 Compton Parish Council (CPC) has commissioned ET Planning to consider the potential benefits and implications of preparing a Neighbourhood Plan.

1.2 This report identifies:

- Opportunities: A Neighbourhood Plan could strengthen community influence on planning, particularly in relation to design, heritage and landscape protection.
- Constraints: Large parts of the parish are subject to Green Belt, National Landscape, and heritage designations, which already limit speculative development.
- Potential Local Policy Topic Areas: Local policies could enhance protection of key views, heritage assets, and areas outside the National Landscape, while potentially shaping small-scale housing delivery.
- Next Steps: The process will require governance arrangements, funding, community engagement, and coordination with Guildford Borough Council.

1.3 Overall, a Neighbourhood Plan would not radically alter housing numbers but would give CPC greater control over proposed developments within their Parish.

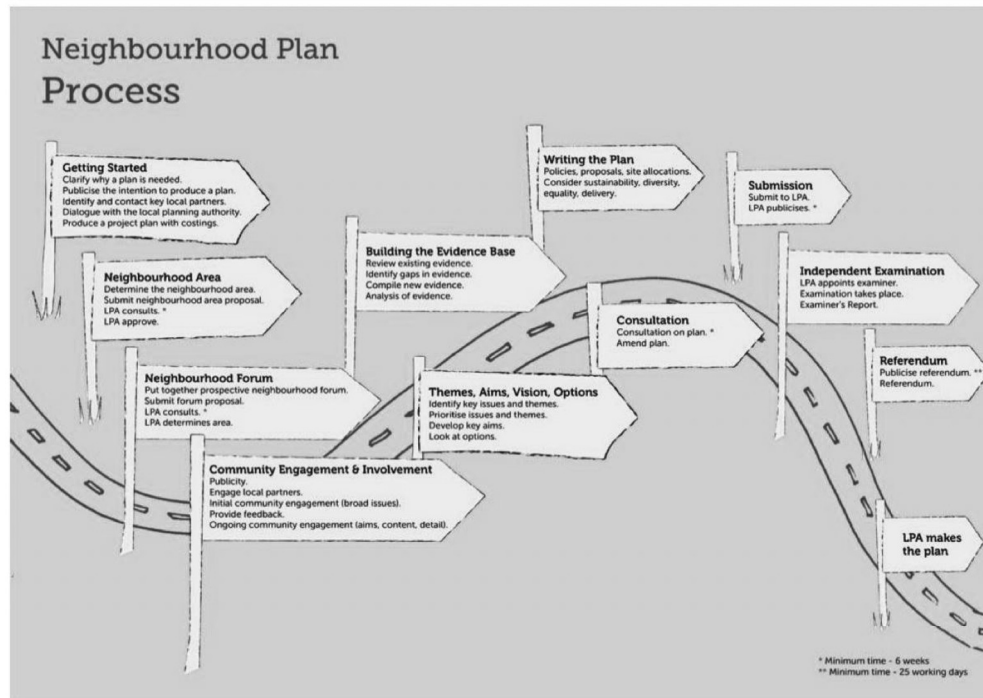
2. Introduction

- 2.1 Neighbourhood Plans were introduced by the Localism Act 2011 and now form an established part of the planning system, with more than 1,800 adopted nationally. They give communities a formal role in shaping local development. National planning policy (PPG, Paragraph: 001 Reference ID: 41-001-20190509) confirms that Neighbourhood Plans allow communities to decide where development should take place, influence design, and set out what infrastructure is needed.
- 2.2 Paragraph 3 of the Neighbourhood Planning PPG highlights the main benefits of preparing a Neighbourhood Plan:
- **Influence over development:** Once adopted, a Neighbourhood Plan forms part of the statutory development plan, giving communities a stronger role in deciding where and how development happens.
 - **A shared local vision and investment:** Neighbourhood Plans allow communities to plan positively for the future and, where applicable, secure 25% of Community Infrastructure Levy revenues to support local priorities.
- 2.3 The importance of Neighbourhood Plans was reaffirmed in June 2025 by the Minister for Housing and Planning, who confirmed that they remain a valuable tool¹ despite reductions to Government funding for technical support after March 2026.

¹ [Written questions and answers - Written questions, answers and statements - UK Parliament](#)

Stages involved in creating a Neighbourhood Plan

- 2.4 There 12 key stages involved in creating a Neighbourhood Plan ('NP') which are shown in the diagram below.



Source: Community Planning


- 2.5 Compton Parish Council are at the "Getting Started" stage. Representatives of the Parish Council therefore need to agree why a plan is needed in order to help set its aims and vision.
- 2.6 In addition to this work, this report gives potential consideration to the Neighbourhood Plan Area, to help inform future works.

3. Methodology


3.1 The report draws on three main sources of information:

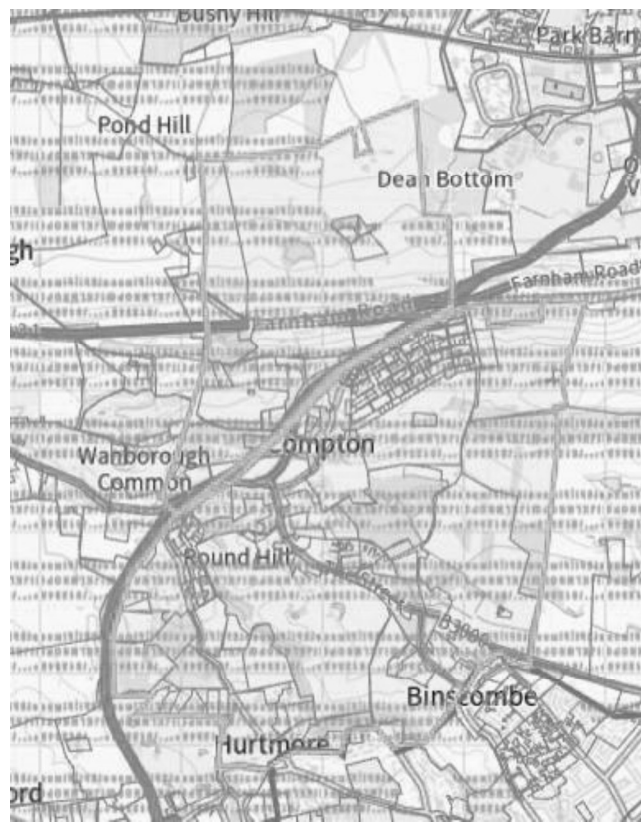
- **Desktop research:** including an analysis of planning and landscape constraints within and around Compton Parish (see Chapters 5 and 6).
- **Housing context:** a review of Guildford Borough Council's housing position in the context of the emerging Local Plan.
- **Stakeholder engagement:** discussions with Compton Parish Council to ensure the assessment reflects local priorities and concerns.

4. Constraints and Opportunities

Local Planning Authority	<p>The Parish Council is located within the area controlled by Guildford Borough Council. The Parish Council area directly borders Godalming, which is controlled by Waverley Borough Council.</p>
Settlement	<p>Compton is the only settlement of note in the Parish although there are clusters of houses dispersed throughout the area.</p>  <p>Source: LandInsight</p>
Parish Council Area (Ha)	<p>Approximately 840 hectares.</p>

Title deeds	774 title deeds have been identified on the site. This includes the University of Surrey (Titled Deeds Refer to Blackwell Park Ltd).
Prevailing character	<ul style="list-style-type: none"> • Prevailing rural character and many of the amenities reflect this setting. • Guildford and Goldalming By-Pass and Farnham Road run through the Parish Council area. • No obvious natural or manmade defined boundaries which have shaped the Parish Council area.
Key amenities	<p>These include Old Barn Antiques, The Withies Inn and St Nicholas's Church.</p> <p>Two key places of note are Watts Gallery and Watt's Chapel – The roots of these buildings can be traced back to 1904 and 1895 respectively.</p>
Flood Risk	The Parish Council area is reasonably free of constraints in terms of flood risk. The map below shows the area of land which is subject to surface water flood risk.

	 <p>Source: LandInsight</p>
	<p>With the exception of a small area to the north east of the Parish, which is within the ownership of the University of Surrey (Titled Deeds Refers to Blackwell Park Ltd), the Parish Council area is encompassed by land designated as green belt. This is shown in the map below.</p>



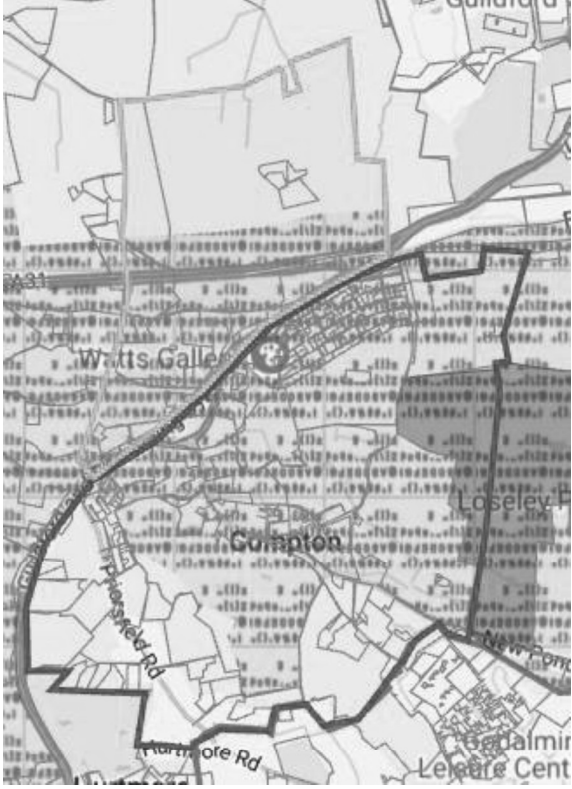
Source: LandInsight

Article Four Directions

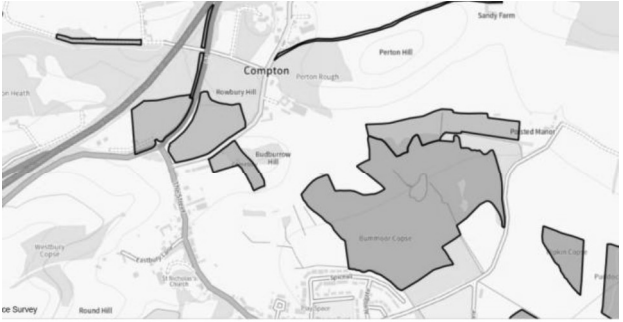

The Article 4 directions that are in place are shown in orange.

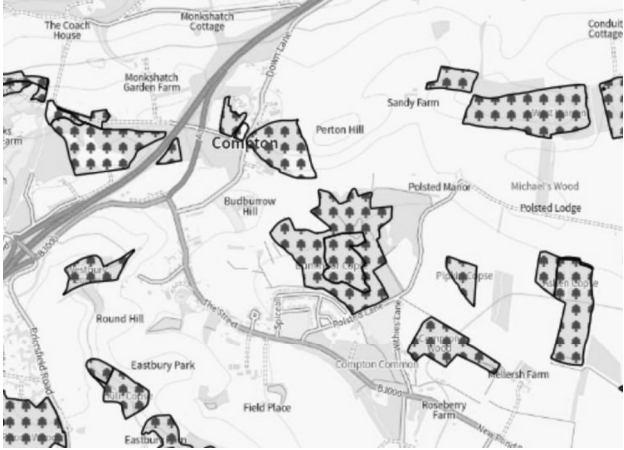



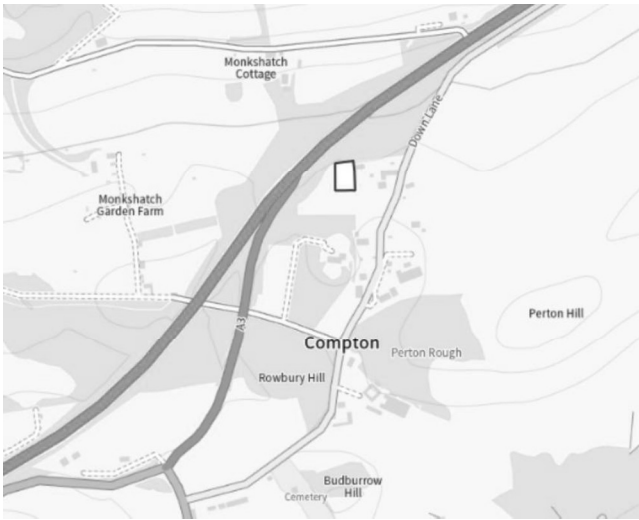

Source: LandInsight

<p>National Landscapes (AONB)</p>	 <p>Source: LandInsight</p> <p>A significant proportion of the parish council is designated as national landscape. This area is located in the centre of the parish council area and is shown above, hatched in brown.</p>
<p>Five year housing land supply position.</p>	<p>Guildford Borough Council accepts it cannot demonstrate a five year housing land supply (Housing Land Supply Statement, April 2025).²</p>


² <https://www.guildford.gov.uk/article/22879/Monitoring-the-Local-Plan>



<p>Site of Nature of Conservation Importance</p>	 <p>Source: Maps.Guildford.Gov.UK</p>
<p>Trees</p> <p>Tree Preservation Orders (TPOs) are shown in purple.</p>	 <p>Source: LandInsight</p> <p>The Interactive Policies Map shows pockets of ancient woodland throughout the Parish Council area.</p>

	 <p>Source: Maps.Guildford.Gov.UK</p>
<p>Heritage Assets and Conservation Area</p> <p>(Designated heritage assets are shown in orange. The Conservation Area shown in blue).</p>	 <p>Source: LandInsight</p>
<p>Archaeology</p>	<p>There is a single parcel of land has been identified as an area of archaeological importance.</p>

	
<p>Land Availability Assessment</p>	<p>The Parish Council area includes one major housing allocation: Blackwell Farm (Site Reference: 311). The existing Local Plan allocates the site for 1,500 new homes in the plan period.³</p>  <p>Source: LandInsight</p> <p>The separate access area is shown below.</p>

³ Policy A36 of Guildford Borough Local Plan: Strategy and Sites 2015-2034 (Adopted April 2019).

	 <p>Source: LandInsight</p> <p>Full details of the council's requirements are set out within pages 197 – 200 of the Guildford Borough Local Plan: Strategy and Sites 2015-2034 (Adopted April 2019).</p> <p>A number of other sites have also been considered but subsequently discounted by the Council. These include: 2307, 899, 5, 56, 1027, 1028, 1276, 1029 and 1030.</p> <p>In addition, a small number of discounted sites lie outside the Parish Council area, to the north of Hurtmore and to the east and west of the parish boundary.</p>
<p>Footpaths</p> <p>A network of Public rights of way is shown in red.</p>	

	 <p>Source: LandInsight</p>
Cycle Routes	 <p>Source: LandInsight</p>
Neighbourhood Areas	<p>There are two Neighbourhood Plan areas in close proximity to the site. These are Puttenham Neighbourhood Plan Area (Made 2018) to the west of the Parish Council area & Godalming and Farncombe Neighbourhood Plan Area (Made 2024). They are identified in brown on the map overleaf.</p>

5. Potential Approaches to a Neighbourhood Plan

Stage 1: Clarify why a plan is needed

- 5.1 The impetus for preparing a Neighbourhood Plan arises from Guildford's current housing shortfall and recent changes to housing policy—particularly those affecting the Green Belt.
- Increases to Housing Numbers - Changes to the Standard Method for Housing Need mean that Guildford has to deliver 1,170 homes each year. This previous target was 743 homes per year. Given this the council accepts it no longer can demonstrate a five year housing land supply⁴ and the tilted balance applies in favour of developing housing.
 - Changes to the National Planning Policy - Recent changes to Green Belt policy (Chapter 13 of the NPPF and the Green Belt PPG) mean that land previously designated as Green Belt, but not strongly contributing to its purposes and located in sustainable areas, could now be reclassified as 'grey belt' (Paragraphs 110, 115, 143 and 155 of the NPPF).

Existing Protections within Compton Parish Council

- 5.2 Within the context of a housing shortfall, the scale and type of planning constraints are key factors in determining whether development will be approved.
- 5.3 Existing constraints restrict development regardless of whether a Neighbourhood Plan is in place. The impact of these constraints depends on both the proposal and the nature of the constraint.
- 5.4 Paragraph 189 of the NPPF affords the highest level of protection to land designated as National Landscape. This should give the Parish Council confidence that strong safeguards are already in place to restrict development in areas designated as National Landscape.

⁴ [Five Year Housing Land Supply - 1 April 2025 Position Statement \(8\).pdf](#)

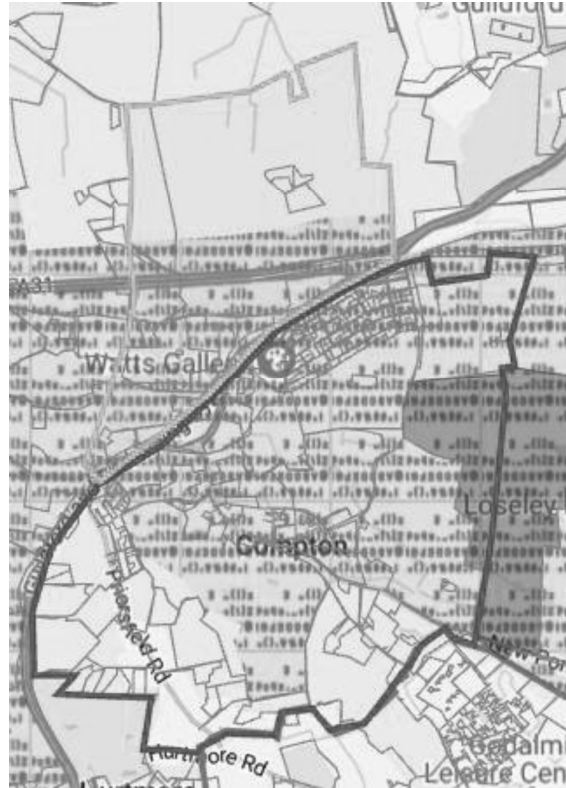


Figure 3: The Parish Council area designated as a National Landscape.

Source: LandInsight

- 5.5 Furthermore, Footnote 7 of the NPPF confirms that the tilted balance does not apply where there is a 'strong reason' for refusing development i.e. development that would affect habitat sites (and those listed in Paragraph 194), Sites of Special Scientific Interest, Green Belt, Local Green Space, National Landscapes, National Parks (including the Broads), Heritage Coast, irreplaceable habitats, or designated heritage assets. That being said, the new national policy on "grey belt" has weakened the Green Belt protection.

The Potential value of a Neighbourhood Plan

- 5.6 It is assumed that the Parish don't wish to use the Neighbourhood Plan to make a housing allocation (s), although it would benefit from the five year housing land supply protections if it did so (under Paragraph 14 of the NPPF).

- 5.7 Given that the NPPF assigns great weight to conserving and enhancing the landscape and scenic beauty of National Landscapes—described as having the highest status of protection—a key area for consideration is the land not designated as National Landscape. This includes the pockets of Green Belt land to the north and south of the Parish, as well as areas without any landscape constraints. These are likely to be a particular focus of Neighbourhood Plan policy and represent locations where the Plan could add significant value.
- 5.8 The key advantage of preparing a Neighbourhood Plan is that, once made, it forms part of the statutory development plan and must be taken into account in decision-making (Neighbourhood Planning PPG 004 Reference ID: 41-004-20190509).

Choosing the Right Neighbourhood Plan Topic Areas

- 5.9 Neighbourhood Plans should not duplicate policies contained within the Local Plan. Planning Practice Guidance also contains advice in relation to the wording of specific policies.
- 5.10 In addition to this there are restrictions on the types of policies that can be included. For example, Neighbourhood Plans cannot be used to introduce specific technical standards, such as energy efficiency or water standards. It is therefore recommended that such matters are left to the Local Plan update.
- 5.11 Our initial assessment suggests that it would be beneficial to consider policies covering design, local heritage assets, landscape (particularly key views), local gap (s) and local green spaces.
- 5.12 Given that a large proportion of the Parish Council area is designated as a national landscape, Policy P1 offers significant protection from development over and above green belt (Policy P2) and countryside policy (Policy P3).

POLICY P1: Surrey Hills Area of Outstanding Natural Beauty and Area of Great Landscape Value

- (1) The Surrey Hills Area of Outstanding Natural Beauty (AONB), as shown on the Policies Map, will be conserved and enhanced to maximise its special landscape qualities and scenic beauty.
- (2) In accordance with the NPPF, there will be a presumption against major development in the AONB except in exceptional circumstances and where it can be demonstrated to be in the public interest.
- (3) Great weight will be given to the conservation and enhancement of the natural beauty of the AONB and development proposals must have regard to protecting its setting.
- (4) Development proposals will also be assessed against the provisions of the current Surrey Hills AONB Management Plan.
- (5) The AGLV, as designated on the Policies Map, will be retained until such time as there has been a review of the AONB boundary. Development proposals within the AGLV will be required to demonstrate that they would not harm the setting of the AONB or the distinctive character of the AGLV itself.

5.13 This is reinforced by national policy - Paragraph 189 and Footnote 7 of the NPPF which offers the highest protection to national landscapes, and also prevents the tilted balance from being applied.

5.14 We also recommend that the Neighbourhood Plan Group (NPG) considers whether there are areas, outside the spaces designated as national landscapes that the Parish council would like to protect.

Design (including the use of a Design Code)

5.15 Recent planning reforms, including the White Paper and the Levelling Up and Regeneration Act, place greater emphasis on creating 'beautiful places' and ensuring that good design is a core objective of the planning system. Local Planning Authorities (LPAs) will be required to produce design codes for their areas, which will carry full weight in decision-making. This approach could also be applied at parish level.

5.16 A Design Code is a set of clear, illustrated requirements—preferably visual and numerical—that establish parameters for the physical development of a site or area. Once a code is produced (for example, by Locality), a corresponding policy should be included in the Neighbourhood Plan to ensure that it carries full weight within the development plan. This policy

could highlight important local design features with which applications must comply, and may also link to other policies, such as heritage.

- 5.17 Alternatively, a design policy could be developed. Due to changes in funding, may need to be paid by the Parish Council, and could cost £10,000 (Locality funding has been ceased for new applicants following the Spending Review; For existing applicants Locality have until March 2026 to deliver projects).

Local Green Spaces (LGS)

- 5.18 The Planning Practice Guidance identifies Local Green Space designation as a mechanism for providing special protection to green areas of particular importance to local communities.
- 5.19 A number of Neighbourhood Plans have successfully designated LGS, and once adopted, these areas receive the same level of protection as Green Belt land under the NPPF (paragraph 149). Development is constrained in these locations under Footnote 7.
- 5.20 There would be benefits for allocating green spaces outside of land designated as National Landscape. These green spaces would have to be targeted and their use would have to be limited to small areas and based on a methodology.

Protection of Key Views

- 5.21 It is recommended that a landscape specialist be commissioned to prepare a report identifying locally important views, particularly from publicly accessible locations. The evidence from this report could then be used to inform a robust policy within the Neighbourhood Plan. Due to the large number of footpaths and cycle ways this is recommended as a key focus of the policy. It is worth considering whether the areas that are outside the AONB, but within the green belt are particularly considered.

Protection of Key Views

- 5.22 A landscape specialist could also be commissioned to consider the merits of a Local Gap(s). A Local Gap function is primarily to prevent the coalescence of two settlements. This policy may be especially valuable in areas outside the designated National Landscape. A specialist's input would help determine the most appropriate locations and boundaries for such gaps, ensuring their effectiveness.

Heritage

- 5.23 We recommend further exploration of potential non-designated heritage assets. A heritage consultant may be required to assess and advise on features of local heritage significance. The heritage consultant would identify potential heritage assets, those which are not designated, and these could be offered protections in planning policy.

Site Allocations

- 5.24 One key area that the Parish council needs to fully consider is whether the group should allocate sites for housing. It is assumed that the Parish do not wish to pursue this.

- 5.25 Paragraph 14 of the National Planning Policy Framework states:

In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided the following apply:

- a) the neighbourhood plan became part of the development plan five years or less before the date on which the decision is made; and
- b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement (see paragraphs 69-70).

- 5.26 This means that if the Neighbourhood Plan allocates sites to meet its housing need then the tilted balance couldn't be engaged for five years. Four key points to note:

- Irrespective of whether sites are allocated, the tilted balance will not apply to protected landscapes, identified in Footnote 7 of the NPPF, under current planning policy.

- Planning Practice Guidance (Paragraph: 097 Reference ID: 41-097-20190509) is clear that the NP must include a site allocation to meet identified need and this would be needed to be done to meet paragraph 14b) and windfall alone would not suffice. Therefore, in order to qualify for para 14 it appears that the identified need must be higher than 0.
- If the Parish Council did want to allocate a small housing site in the locality, Guildford Borough Council would firstly need to agree that the Parish Council has a housing need and would therefore need to provide a number for housing for the Parish.
- If a site were to be allocated through the Neighbourhood Plan process the Parish Council would need to undertake a Call for Sites exercise and a report outlining the site selection process would also need to be undertaken. Furthermore, a Strategic Environmental Assessment (SEA) may need to be completed by AECOM.

5.27 It is noted that this may not be a popular option locally and local consultation will likely be crucial if this were to be pursued.

5.28 Any increase in the requirement (to support an allocation) would also need the agreement of the Borough Council and supported by their evidence base. We would question the likelihood of this being achieved, and so, subject to the thoughts of the Parish it may be better to proceed without allocating sites.

6. Implementation Considerations

Stage 2: Consideration of Neighbourhood Plan Area

- 6.1 One key question we have considered is the area that the Neighbourhood Plan would cover. Our assessment is that the Neighbourhood Plan area should be the existing Parish Council area – This will need to be agreed formally at stage 2 (See Page 3).
- 6.2 If the Council decided to proceed with a Neighbourhood Plan, the simplest approach would be to align the Neighbourhood Plan area with the existing Parish Council boundary.
- 6.3 Alternatives, including both smaller and larger Neighbourhood Plan areas, have been considered and are discussed below.
- 6.4 We ruled out creating a Neighbourhood Plan Area which was smaller than the Parish Council area as it would exclude some homes that are located within the Parish from the Neighbourhood Plan area, even though those residents would still contribute to the costs of preparing the plan. Furthermore, there are no clear advantages to Compton in designating a smaller area.
- 6.5 Exploring a larger area may offer benefits if the Parish Council wishes to allocate housing beyond the current Parish Council boundary. However, expanding the Neighbourhood Plan Area to the south and west are limited due to the existing made Neighbourhood Plan. This leaves the potential expansion of the area towards Guildford.
- 6.6 While expanding the Neighbourhood Plan area towards Guildford could potentially trigger protections under Paragraph 14 of the National Planning Policy Framework (NPPF), reaching agreement on on site allocations may prove difficult and will involve creating an additional Governance structure to facilitate this. See site allocations sections for more details.
- 6.7 If a decision is made to proceed with a Neighbourhood Plan, an application must be submitted to the local planning authority by a parish or town

council, a neighbourhood forum, a prospective neighbourhood forum, or a community organisation (in the case of a Community Right to Build Order). This application is required for the designation of a neighbourhood area, in accordance with Regulation 5 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

- 6.8 The application must include a statement explaining why the proposed neighbourhood area is considered appropriate. The local planning authority is required to determine the application within prescribed timescales (see Paragraph: 024 Reference ID: 41-024-20190509 of the Planning Practice Guidance).

Stage 2: Timetable for introducing a Neighbourhood Plan

- 6.9 Given the potential costs of developing a Neighbourhood Plan, a key consideration for the Parish Council is the timetable for introducing the Neighbourhood Plan. One option is for the Council to introduce a neighbourhood plan alongside the LPAs new emerging local plan. This would allow the Parish Council to consider the evidence base the council is considering and make sure that the policies are consistent with the emerging local plan. However, in this instance, the Local Development Scheme for the Local Plan states that the council will adopt its new local plan in mid-2029.

New Guildford borough Local Plan	
Note – the following dates are estimates only	
Scope	Will set out the spatial vision, objectives and strategy together with site allocations for the development of the borough in the plan period up to 2045. It may also include local DM policies where justified and consistent with the suite of National Development Management Policies.
Which saved policies will it replace?	It will replace the Local Plan: Strategy and Sites, Local Plan: Development Management Policies and the residual policies in the Local Plan 2003
Geographical coverage	Borough wide
Status	Development Plan Document
Conformity	Consistent with the National Planning Policy Framework
Timetable	
Evidence base gathering, early engagement with relevant internal and external stakeholders, draft the plan, sustainability appraisal and governance processes	Current – August 2026
Consultation on draft Local Plan (minimum six weeks) (Regulation 18)	September – October 2026
Analysis of representations, preparation of submission plan, sustainability appraisal, governance processes	November 2026 – March 2028
Pre-submission publication and consultation (minimum six weeks) (Regulation 19)	Spring 2028
Submission to the planning inspectorate for Examination (Regulation 22)	Autumn 2028
Examination in public – hearings (Regulation 24)	Winter 2028/29
Anticipated adoption (Regulation 26)	Mid 2029

- 6.10 If the council wants to produce its local plan alongside the emerging local plan, then the Parish Council is potentially looking at a potential implementation after 2030. This is a considerable delay given the Parish council wants to influence development, while there is a shortfall of housing in the borough.
- 6.11 If the council wants to introduce a Neighbourhood Plan before this point then it needs to progress with the local plan under the existing local plan. This presents some challenges given the housing numbers. Careful liaison will need to take place.

7. Conclusions and Recommendations

7.1 This report demonstrates that there are clear opportunities for Compton Parish Council to prepare a Neighbourhood Plan that reflects local priorities and adds value to the existing Local Plan framework. While the ability to influence housing numbers may be limited, the Neighbourhood Plan could play an important role in protecting the parish's rural character, enhancing design quality, and safeguarding valued landscapes and heritage assets.

7.2 The next steps for the Parish Council will be to:

- Confirm whether to proceed with a Neighbourhood Plan.
- Define the neighbourhood area (likely to align with the parish boundary).
- Undertake early community engagement to identify key priorities.
- Consider commissioning technical support (for example, on landscape or heritage) to underpin robust policies.

7.3 Subject to these considerations, a Neighbourhood Plan offers Compton the opportunity to secure greater local influence over future development and ensure that growth and change within the parish are guided by community-led priorities.

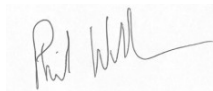


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DISCLAIMER: The review/appraisal does not include a statutory Land Charges search and does not include a Land Registry Search of property covenants. The Desktop appraisal may not identify Tree Preservation Orders, Enforcement Notices, Article 4 Directions or other constraint or historic information not readily published by the Local Planning Authority. These constraints if applicable to the land may limit the value of the advice given in the appraisal. Separate legal checks should be undertaken, through a Land Charges Search which is normally undertaken by a solicitor or conveyancer.

The advice given in this appraisal is provided on the basis of the information that can be found with reasonable enquiry on publicly and freely available online government and local government websites. ET Planning cannot be held responsible for circumstances where information has been misfiled by other organisations or where information can only be obtained through paid services or requires excessive interrogation of available data or where ET Planning is not engaged for the implementation of any strategy recommended in this report.



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