

Southborough and High Brooms Neighbourhood Development Plan



2024 to 2038

Basic Conditions Statement

May 2025

**Prepared by the Southborough and High Brooms
Neighbourhood Development Plan Steering Group on behalf of
Southborough Town Council**

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1. Introduction

- 1.1. This Basic Conditions Statement has been written to accompany the Southborough and High Brooms Neighbourhood Development Plan (SHBNDP).
- 1.2. The relevant legal framework for the preparation and making of neighbourhood plans is supported by the Localism Act 2011 and the Neighbourhood Planning Act 2017 and found in the:
 - Town and Country Planning Act 1990: ss. 61F, 61I, 61M-P and Schedule 4B
 - Planning and Compulsory Purchase Act 2004: ss 38A-C
 - Neighbourhood Planning (General) Regulations 2012 (2012 No.637) (as amended)
- 1.3. Paragraph 8(2) of Schedule 4B to the Town & Country Planning Act 1990 requires a neighbourhood plan to meet five basic conditions before it can proceed to a referendum. These are:
 - i. Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
 - ii. The making of the neighbourhood development plan contributes to the achievement of sustainable development;
 - iii. The making of the neighbourhood development plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
 - iv. The making of the neighbourhood development plan does not breach, and is otherwise compatible with, (retained) EU obligations; and
 - v. Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan. The prescribed condition is that the 'making' of the neighbourhood plan is not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2012) or a European offshore marine site (as defined in the Offshore Marine Conservation (Natural Habitats etc.) Regulations 2007) (either alone or in combination with other plans or projects).
- 1.4. There are two further basic conditions which are relevant only to the making of a Neighbourhood Development Order and are therefore not considered in this document.
- 1.5. This document sets out how the SHBNDP meets the Basic Conditions.

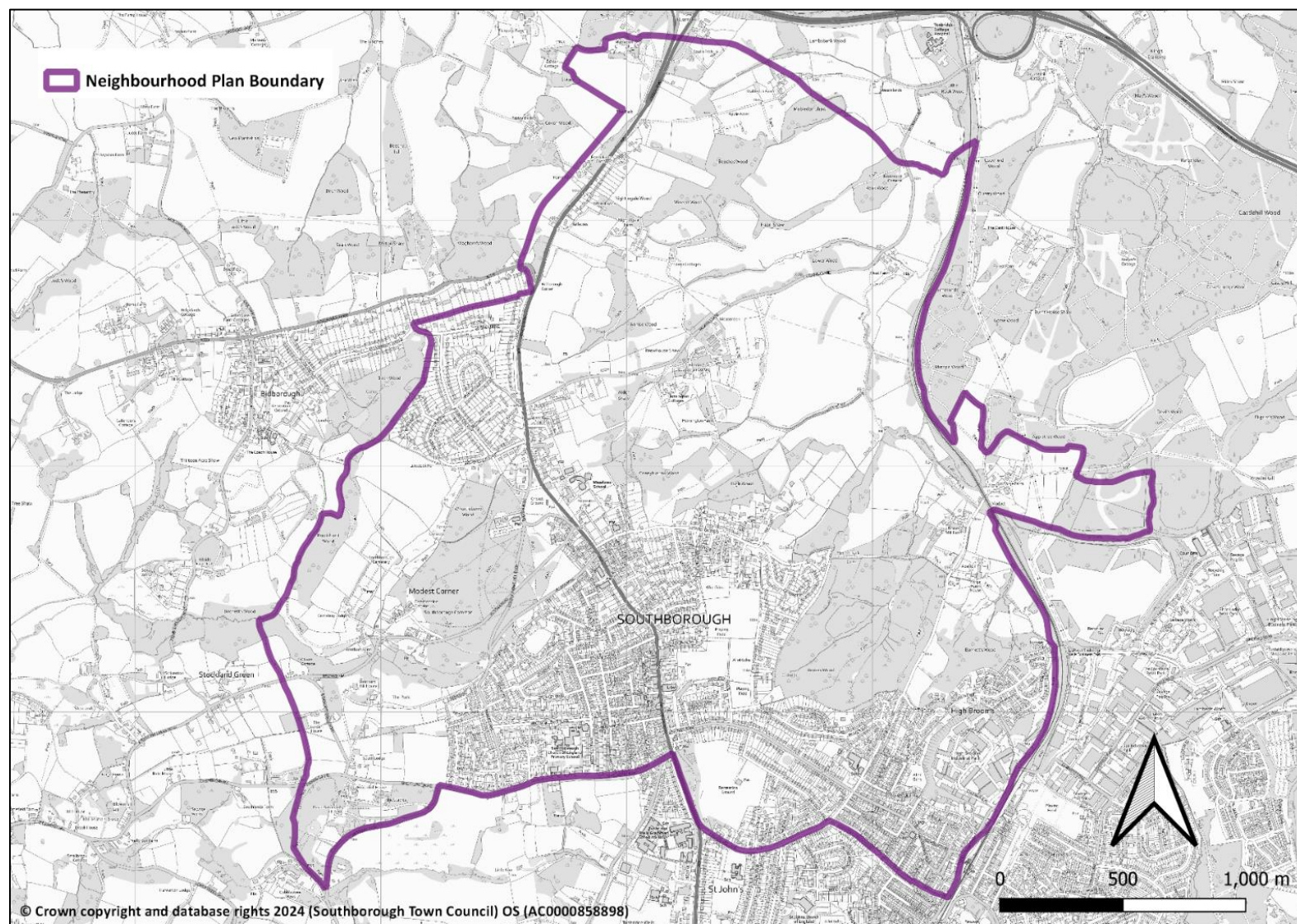
Supporting documents and evidence

- 1.6. The Submission Version SHBNDP, with its policies, is supported by a Consultation Statement, this Basic Conditions Statement and an extensive evidence base. It has also been subject to a Screening, organised by Tunbridge Wells Borough Council (TWBC), to ascertain whether it requires a Strategic Environmental Assessment (SEA) and/or a Habitat Regulations Assessment (HRA). Neither are required. The [SEA Screening Report](#) and [HRA Screening Report](#) have been submitted to TWBC.
- 1.7. Alongside the planning policies, the SHBNDP contains a series of non-policy actions/ projects which fall outside planning policy. These contribute towards the achievement of the Plan's vision and objectives and could form the basis of the principles for the use of any developer funding and other monies arising from other planning obligations. They complement the Neighbourhood Plan document but are not a formal part of the Development Plan.

Key statements

- 1.8. The Neighbourhood Area shares its boundary with that of the parished area of Southborough (including High Brooms) (*Figure 1*).
- 1.9. TWBC designated the Southborough and High Brooms Neighbourhood Area on 11 August 2023.
- 1.10. The SHBNDP sets out planning policies that relate to the development and use of land within the Southborough and High Brooms Neighbourhood Area only.
- 1.11. The SHBNDP refers only to the administrative boundary of the parished area. There are no other adopted Neighbourhood Plans that cover all or part of the Southborough and High Brooms Neighbourhood Area.
- 1.12. The Neighbourhood Plan Steering Group has prepared the SHBNDP to establish a vision for the future of the neighbourhood area. It has engaged with the community to set out how the vision will be realised through planning and controlling land use and development change over the plan period 2024 to 2038.
- 1.13. The Plan does not contain any policies which relate to excluded development as defined by section 61K of the Town and Country Planning Act 1990.

Figure 1: Southborough and High Brooms Neighbourhood Area



2. Basic condition (i) - conformity with national planning policy

- 2.1. To meet this condition, it is necessary to demonstrate that the SHBNDP has regard to national planning policies and the advice contained in guidance issued by the Secretary of State. National policy and guidance are contained within the National Planning Policy Framework ('NPPF') and the Planning Practice Guidance ('PPG').
- 2.2. It should be noted that the Neighbourhood Plan has been prepared in accordance with the NPPF, most recently revised in December 2024 (with additional minor revisions in February 2025).

National Planning Policy Framework

- 2.3. The NPPF has 13 key objectives which are:
- Delivering a sufficient supply of homes
 - Building a strong, competitive economy
 - Ensuring the vitality of town centres
 - Promoting healthy and safe communities
 - Promoting sustainable transport
 - Supporting high quality communications
 - Making effective use of land
 - Achieving well-designed places
 - Protecting Green Belt land
 - Meeting the challenge of climate change, flooding and coastal change
 - Conserving and enhancing the natural environment
 - Conserving and enhancing the historic environment
 - Facilitating the sustainable use of minerals
- 2.4. This Basic Conditions statement explains how the SHBNDP policies contribute to meeting these objectives, where relevant, and also notes the specific national policies that the Plan is intended to support and supplement.
- 2.5. The vision for the SHBNDP is shown in *Table 1*:

Table 1: Vision for the SHBNDP

In 2038 Southborough and High Brooms will be vibrant, thriving places, where people choose to live, work and visit.

The two settlements will remain closely connected while recognising their distinctiveness both from each other and from nearby places, such as Royal Tunbridge Wells.

Our High Street will have been regenerated to offer a range of recreational, retail and community facilities, as an appealing destination for those living here or visiting from the wider area. Within this, the Southborough Civic Centre and town square will provide a safe, inclusive spaces to host events, live music and other activities that bring together local culture and creativity.

The High Brooms Industrial Estate will have evolved its offering to a mix of commercial and other leisure/ recreational uses.

New housing will be carefully planned and managed to meet local needs, and all development will seek to reinforce the character of the local area, with design that is both attractive and sustainable. Our residents will have opportunities to work locally should they wish.

We will celebrate our rich history, protecting and further promoting our heritage. Equally, our rural Green Belt setting, within the High Weald National Landscape, will continue to be highly valued and we will seek opportunities to enhance opportunities for accessing open space and enabling biodiversity. Treasured green spaces and views will be protected for our future generations. The Common will remain a focus for traditional community activities and events.

We will strive to be a walkable, rideable and 'wheelable' (mobility scooters, pushchairs etc.) area, promoting safe, attractive and well-signposted routes to access local facilities, the wider countryside and nearby towns and villages with the infrastructure to support this, including lobbying for improved public transport links.

- 2.6. Five objectives have been identified to support the vision and the planning policies are couched within these.
- 2.7. *Table 2* sets out each objective against the relevant NPPF goal.
- 2.8. *Table 3* provides further detail by setting out the policies of the SHBNDP and which specific paragraphs of the NPPF each has had regard to along with a commentary.

Table 2: Assessment of the SHBNDP objectives against NPPF (2024) goals

SHBNDP objective	Relevant NPPF goal
<p>OBJECTIVE 1: Sustainable development and housing: There are well-designed homes to meet the needs of the local community. They allow growth and adaptation to serve all phases of life, promoting health and wellbeing. The architecture uses passive energy and low carbon building materials, water use is optimised, there is increased biodiversity and reduced carbon emissions for existing and proposed development.</p>	<ul style="list-style-type: none"> • Making effective use of land • Delivering a sufficient supply of homes • Achieving well-designed places • Conserving and enhancing the natural environment • Promoting healthy and safe communities • Meeting the challenge of climate change, flooding and coastal change • Protecting Green Belt land
<p>OBJECTIVE 2: Protecting the natural and built environment: The natural environment of the High Weald National Landscape is protected and celebrated. Green spaces and views that are important to the community are safeguarded and opportunities for biodiversity improvements are sought. There is a network of ecological corridors that connect through the settlements to the wider countryside. Space for a wide range of active and passive recreation, for all ages, is provided. The neighbourhood area's historic buildings are protected and conserved. They are appreciated alongside contemporary architecture as part of our daily activities.</p>	<ul style="list-style-type: none"> • Conserving and enhancing the natural environment • Conserving and enhancing the historic environment • Meeting the challenge of climate change, flooding and coastal change • Protecting Green Belt land
<p>OBJECTIVE 3: Safe and sustainable travel: Opportunities to encourage walking and cycling are optimised to encourage active travel for local journeys. There is the infrastructure to support electric cars as a less polluting option. The Town Council will lobby for improved bus services.</p>	<ul style="list-style-type: none"> • Promoting healthy and safe communities • Promoting sustainable transport
<p>OBJECTIVE 4: Connected and supported communities: The existing facilities are safeguarded and, where necessary improved and expanded, to serve all needs – for health, social and wellbeing, local food production, education, culture, retail, sport and recreation. They are inclusive spaces that connect and bring people together.</p>	<ul style="list-style-type: none"> • Promoting healthy and safe communities

OBJECTIVE 5: Local economy: Established local businesses and new businesses are supported, including working from home, commercial, agricultural and leisure uses. There is a strategy for the High Street and Neighbourhood Centres to ensure their ongoing success. The ongoing provision of employment at the High Brooms Industrial Estate is supported.

- Building a strong, competitive economy
- Ensuring the vitality of town centres
- Promoting healthy and safe communities

Table 3: Assessment of how each policy in the SHBNDP conforms to the NPPF

Policy Title and Reference	NPPF Ref.	Commentary
POLICY SHB1: LOCATION OF DEVELOPMENT	7, 8, 29, 61, 73, 77, 82-84, 96, 98, 111, 124-126, 129, 130, 135, 142- 160, 170, 187, 203	<p>A core principle of national policy is the need for the planning system to contribute to sustainable development. The NPPF states that plans should support strategic development needs as established in the adopted Local Plan and actively manage patterns of growth.</p> <p>Policy SHB1 is an important policy in the context of the Neighbourhood Plan. It sets out key principles which need to be taken into account to ensure that any development proposals are directed to the most appropriate, sustainable locations, where there is easy access to the main services and facilities. The policy will help to protect the wider landscape of the neighbourhood area – including those parts that fall within the High Weald National Landscape) and safeguard against the coalescence of the individual settlements within the neighbourhood area and also those nearby.</p> <p>It supports the development strategy set out in the adopted Local Plan and seeks to align with the emerging Local Plan.</p> <p>The policy supports the reuse of previously developed (brownfield land) where feasible and also bringing redundant / agricultural buildings back into use. The policy attaches great weight to the green belt, notwithstanding national changes to the way this – and grey belt land – is considered.</p> <p>The policy seeks to restrict (further) coalescence between the main settlements in the area and those nearby. This will assist in retaining the character and identity of the area.</p>
POLICY SHB2: MEETING LOCAL	61-68, 71, 82-	National policy supports the delivery of homes that meet the needs of groups with specific housing requirements. The size, type and tenure of housing needed for

HOUSING NEEDS	84, 156, 157	different groups in the community should be assessed and reflected in planning policies. Policy SHB2 sets this out for the neighbourhood area, evidenced by a Southborough and High Brooms Housing Needs Assessment that has drawn on the findings of the Strategic Local Housing Needs Assessment, population forecasts and other local and national data sets.
POLICY SHB3: CHARACTER AND DESIGN OF DEVELOPMENT	96, 109, 125, 129, 130, 131- 140, 187,203	The NPPF states that neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development. Policy SHB3 is underpinned by the Southborough and High Brooms Design Guidelines and Codes, which forms an integral part of the neighbourhood plan. This defines the character areas that have been identified locally and how proposals should respond to the specific characteristics of each. The policy sets out key principles that should apply across the piece but does not seek to replicate the guidance in the Design Guidelines, which should be read in parallel with the policy.
POLICY SHB4: ENERGY EFFICIENCY AND DESIGN	131-140, 161- 167	National policy states that plans should take a proactive approach to mitigating and adapting to climate change. Notwithstanding the fact that many of these factors are dictated via building regulations, Policy SHB4 takes a proactive approach to setting out the methods that applicants should seek to include within development proposals to support this national aim. The policy also sets out some general parameters for supporting individual and community renewable energy schemes, a renewed government priority.
POLICY SHB5: CONSERVING HERITAGE ASSETS	135, 202, 203, 206, 205-221,	National policy states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment. Policy SHB5 sets out how this can be achieved in the Southborough and High Brooms neighbourhood area. In particular, it identifies 15 non-designated heritage assets.

POLICY SHB6: SOUTHBOROUGH HIGH STREET AND OTHER NEIGHBOURHOOD CENTRES	85, 88, 89, 90, 96, 98, 101, 111a, 125, 131-136, 141	National policy states that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Policy SHB6 complements this approach, setting out policy requirements to support the ongoing viability and vitality of Southborough high street. This includes guidance relating to the use of buildings, including supporting upper floor residential, and improvements to the public realm. The policy would also apply to smaller neighbourhood centres, which play a vital role particularly for those living very close by.
POLICY SHB7: SUPPORTING THE CULTURAL AND CREATIVE ECONOMY	85-87, 96, 98	The policy supports the national aims for enabling a strong economy, notably focussing on supporting the cultural and creative industry locally. This is a sector that is being promoted across Kent and within Tunbridge Wells borough and Southborough has much to contribute to this.
POLICY SHB8: SUPPORTING FLEXIBLE WORKSPACES AND OPPORTUNITIES FOR HOMEWORKING	85, 86	Policy SHB8 aligns with the strategic need for planning policies to allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances. A high percentage of residents in the neighbourhood area work from home when compared to the national average. The policy supports this new work approach. It also strongly links to Policy SHB7 in supporting business units, which could in turn support the creative industry sector.
POLICY SHB9: LANDSCAPE AND BIODIVERSITY	103, 136, 187, 188, 103, 136, 187, 188, 192, 193	This policy seeks to ensure that development proposals have carefully considered how they will mitigate their impacts on the natural environment and landscape and go further in contributing and enhancing it. It sets out the key features of the natural landscape that are particularly important and reflective of the area including trees and hedgerows. It supports the use of wildlife-friendly features within developments. The policy focusses on improving biodiversity locally, in line with national planning policy.

		In accordance with the Environment Act, the policy requires development proposals to deliver a biodiversity net gain of at least 10%, although at least 20% is encouraged in line with advice from the Wildlife Trusts. Where this cannot be achieved on-site, there is a desire for it to be delivered within the neighbourhood area in the first instance.
POLICY SHB10: LOCAL GREEN SPACE	106-108, 153-160	The policy seeks to designate 37 local green spaces (include clusters), which are demonstrably special to the local community, and which have been assessed against the national policy criteria. Some of these are already within green belt locations, however planning practice guidance states that local green space can be within a green belt location. In the SHBNDP, such spaces have been highlighted by the community as important, hence their inclusion.
POLICY SHB11: LOCALLY SIGNIFICANT VIEWS	131-135, 187	The policy identifies 12 views that have been identified by the community as being particularly important to the area, for instance where they take in valued landscapes and/or heritage assets. This aligns with national policy, which supports neighbourhood planning groups in identifying the special qualities of each area and explaining how this should be reflected in development.
POLICY SHB12: DARK SKIES	198	National policy states that planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. Despite being located close to Royal Tunbridge Wells and Tonbridge, parts of the neighbourhood area retain their dark skies, and the policy seeks to ensure that development proposals support this important feature.
POLICY SHB13: IMPROVING	96, 98, 105, 109, 110, 111,	National policy supports the need to identify and pursue opportunities to promote walking, cycling and public transport use. Policy SHB13 conforms to this idea by

WALKING, CYCLING AND EQUESTRIAN OPPORTUNITIES	115-117, 135	encouraging strong connectivity between development and ‘active travel’ networks. It sets out how proposals can achieve this in the neighbourhood area.
POLICY SHB14: PUBLICLY ACCESSIBLE OFF- ROAD PARKING	109, 113	National policy supports the need to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists. Policy SHB14 aligns with this approach, recognising that whilst a shift to more active modes of travel is optimal, some users will continue to be reliant on their private vehicle to access services and facilities. The policy supports the installation of EV charging points and cycle parking at these locations.
POLICY SHB15: IMPROVING OPPORTUNITIES FOR COMMUNITY AND CULTURAL FACILITIES, SPORT AND RECREATION	96, 98, 101, 103, 104	National policy sets out that planning policies and decisions should aim to achieve healthy, inclusive and safe places and plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environment. Policy SHB15 supports this by setting out the specific needs of the community, supported by the justification text, and guarding against loss of important facilities.

3. Basic condition (ii) - contribution to sustainable development

- 3.1. The NPPF states in paragraph 7 that *‘the purpose of the planning system is to contribute to the achievement of sustainable development.’*
- 3.2. For the SHBNPD, sustainable development has provided the fundamental basis of each of its policies. The National Planning Practice Guidance advises that *‘sufficient and proportionate evidence should be presented on how the draft neighbourhood plan ... guides development to sustainable solutions’* (Planning Practice Guidance, Paragraph: 072 Reference ID: 41-072-20140306).
- 3.3. Table 5 summarises how the overarching ambitions and policies in the SHBNPD contribute towards economic, social and environmentally sustainable development, as defined in the NPPF. Many of the ambitions of the SHBNPD overlap the three strands of sustainability, so for the purposes of this document, the most relevant strand has been taken to illustrate conformity.

Table 4: Assessment of the SHBNPD ambitions and policies against sustainable development

Deliver economic sustainability
NPPF definition – ‘to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.’
SHBNPD Objective: Objective 5: Local economy
NP Policies: Policy SHB6: Southborough high street and other neighbourhood centres Policy SHB7: Supporting the cultural and creative economy Policy SHB8: Supporting flexible workspaces and opportunities for homeworking
Commentary: The Plan includes three policies aimed at supporting the local economy. One relates to the role that the high street and smaller neighbourhood centres play, both economically and socially. The second policy relates to the cultural and creative industries, which play a significant role locally and could be further enhanced. The final policy recognises new ways of working and the importance this has in the neighbourhood area. In these ways, the Plan seeks to contribute to building a sustainable economy.

Deliver social sustainability
NPPF definition – ‘to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being.’
<p>SHBNDP Objectives:</p> <p>Objective 1: Sustainable development and housing</p> <p>Objective 3: Safe and sustainable travel</p> <p>Objective 4: Connected and supported communities</p>
<p>Np policies:</p> <p>Policy SHB1: Location of development</p> <p>Policy SHB2: Meeting local housing needs</p> <p>Policy SHB13: Improving walking, cycling and equestrian opportunities</p> <p>Policy SHB14: Publicly accessible off-road parking</p> <p>Policy SHB15: Improving opportunities for community and cultural facilities, sport and recreation</p>
<p>Commentary:</p> <p>The NPPF underlines the importance of supporting strong, vibrant, inclusive and healthy communities by providing the supply of housing required to meet the needs of present and future generations and by creating a high-quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being.</p> <p>Policy SHB1 sets overarching principles to ensure that development is directed to the most sustainable locations.</p> <p>Whilst the Plan does not seek to allocate homes at this time (a position agreed with TWBC officers) it does focus on the type, mix, size, tenure and affordability of housing that should be supported in the neighbourhood area, drawing on the findings of the local housing needs assessment</p> <p>The Plan includes a policy to provide the social, recreational and cultural facilities and services to address the community’s needs. This is underpinned by local feedback gathered during the engagement phase of the project.</p> <p>A key principle of the SHBNDP is to support active travel principles, whereby residents and visitors should have the opportunity to walk, cycle and ride safely if they choose. This will support healthier lifestyles and could also help to reduce local traffic on the roads.</p> <p>In these ways, the Plan aims to support social sustainability.</p>

Deliver environmental sustainability
NPPF definition – ‘to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy,’
SHBNDP Objective: Objective 2: Protecting the natural and built environment
NP Policies: Policy SHB3: Character and design of development Policy SHB4: Energy efficiency and design Policy SHB5: Conserving heritage assets Policy SHB9: Landscape and biodiversity Policy SHB10: Local green space Policy SHB11: Locally significant views Policy SHB12: Dark skies
Commentary: <p>Policies to celebrate, protect and enhance the natural, built and historic environment of the neighbourhood area form an important element of the SHBNDP and this conforms to the national aims set out in the NPPF.</p> <p>A locally distinctive Southborough and High Brooms Neighbourhood Area Design Guidance and Codes has been developed and forms an integral part of the Plan, underpinning many of the policies. It sets out expectations including in relation to local character, design, biodiversity and environmental considerations. The policies embed the need for high-quality, sustainable design that incorporate the principles to help mitigate climate change.</p> <p>The Plan includes policies identifying non-designated heritage assets and locally important views and viewpoints. This will contribute to preserving the character and sense of place of the area.</p> <p>The Plan maps out the green spaces and corridors locally that form a network of habitats, with a view to encouraging their protection, improvement and connection. Natural features distinctive to the parish are identified, to encourage their protection and for inclusion in the design of new development. In addition, a series of Local Green Spaces, considered to be demonstrably special to the community, are designated.</p> <p>The Plan emphasises the need to promote more sustainable modes of transport in order to reduce traffic congestion and carbon emissions, while supporting healthy lifestyles.</p> <p>In these ways, the Plan seeks to contribute to protecting and enhancing the natural, built and historic environment of the neighbourhood area.</p>

- 3.4. As demonstrated in *Table 3*, the strategic objectives of the Plan are considered to comprise a balance of social, economic, and environmental goals. The policies in the Plan demonstrably contribute to sustainable development.

4 Basic condition (iii) - general conformity with the strategic policies of the development plan

- 4.1. The policies of the SHBNPD must be in general conformity with the strategic policies of the adopted Local Plan:
- The saved policies of the Local Plan 2006 - remaining 2006 Local Plan saved policies are listed in Appendix 1 of the [Site Allocations Local Plan document](#)
 - The [Core Strategy Development Document](#) (adopted 2010)
 - The [Site Allocations Local Plan](#) (adopted 2016)
- 4.2. A new Local Plan for Tunbridge Wells borough is in the process of being developed by TWBC. Following the Regulation 19 consultation, it was submitted to the Secretary of State for independent Examination on 1 November 2021. Upon receipt of the Inspector's Initial Findings Letter in November 2022, TWBC decided to progress the examination with revisions to the Development Strategy to the Tunbridge Wells Submission Local Plan (SLP).
- 4.3. The latest [Local Development Scheme](#) (March 2025) sets out the proposed timetable for the emerging Local Plan and states that the intention is to adopt the new Local Plan in March to May 2025. Once adopted, the new Local Plan will replace the saved policies of the 2006 Local Plan, the Core Strategy (2010) and the Site Allocations Local Plan (adopted 2016).
- 4.4. As the [Submission Local Plan \(SLP\)](#) is well-advanced, its policies carry increasing weight as the Plan goes through the process and have been an important consideration in the development of the SHBNPD policies.
- 4.5. It is confirmed that there are no policies in the strategic documents relating to minerals and waste that are of relevance to the SHBNPD.
- 4.6. *Table 5* sets out which adopted Development Plan policies each SHBNPD policy conforms to, where strategic policies of the adopted Core Strategy (2010) are prefixed with 'Core Policy'. The table also sets out where the policy synchronises with the policies contained in the SLP. Strategic policies in the SLP are prefixed 'STR'.

Table 5: Relevant strategic policies in the Adopted and submission Local Plans

Policy Title and Reference	Adopted Local Plan	Submission Local Plan	Commentary
POLICY SHB1: LOCATION OF DEVELOPMENT	Saved TWBC Local Plan policies: MGB1, LBD1, ED5; TWBC Core Strategy: Core Policies 1, 2, 10 and 14	STR/SO 1, STR1, STR3, STR4, STR5, STR9, EN19, EN25, H12	Strategic policy – both adopted and proposed - sets out the overarching strategy for Southborough. Policy SHB1 conforms to this, extending this to High Brooms and providing additional local detail to guide land use and applications locally, to ensure that they are sustainably located. This includes, for instances, safeguarding against the coalescence of individual settlements and those nearby. It will also help to ensure that the High Weald National Landscape can conserve its key characteristics.
POLICY SHB2: MEETING LOCAL HOUSING NEEDS	TWBC Core Strategy: Core Policies 6 and 10	STR 1, STR/SO 1, H1, H3, H6, H8	Adopted policy states that the provision of market and affordable dwellings should reflect both current and projected local housing needs to ensure that proposed development contributes towards attaining a sustainable, balanced housing market. The SLP states that the mix should reflect any requirements set out in relevant policies in the Local Plan or a ‘made’ neighbourhood plan for the area. Policy SHB2 sets out the mix of housing required to meet the needs of the neighbourhood area and is underpinned by a local housing needs assessment.
POLICY SHB3: CHARACTER AND DESIGN OF DEVELOPMENT	Saved TWBC Local Plan policies: EN1, EN5, TP5; TWBC Core Strategy: Core Policies 4, 5, 6 and 10	STR2, STR6, EN1, EN2, H2, H6, H11, H12, EN16, EN17, TP3	Adopted policy requires developments to be of a high-quality design which conserve and enhance the locally distinctive sense of place and character. This is further embedded in the SLP. Policy SHB3 is underpinned by locally specific Design Guidelines and Codes for the neighbourhood area and

Policy Title and Reference	Adopted Local Plan	Submission Local Plan	Commentary
			provides addition local detail to support the strategic policies.
POLICY SHB4: ENERGY EFFICIENCY AND DESIGN	Saved TWBC Local Plan policies: EN1, EN24; TWBC Core Strategy: Core Policies 4, 5 and 10	STR2, STR7, EN1-EN3	<p>Adopted policy encourages sustainable design and construction principles and best practice in order to combat avoidable causes of climate change and adapt to and/or mitigate already-unavoidable impacts of climate change. The SLP sets out that all development within the borough will recognise the Climate Emergency and be supportive of the Council's ultimate target to achieve net zero emissions across the borough by 2030.</p> <p>Policy SHB4 aligns with these strategic ambitions, setting out specific measures that should be considered locally within development proposals. It also sets out broad parameters against which community energy schemes should be considered.</p>
POLICY SHB5: CONSERVING HERITAGE ASSETS	Saved TWBC Local Plan policies: EN5, EN10; TWBC Core Strategy: Core Policies 4 and 10	STR2, STR8, EN4, EN5	<p>Adopted policy seeks to conserve and enhance the locally distinctive sense of place and character. It states that the Borough's heritage assets, including Listed Buildings, Conservation Areas, Scheduled Ancient Monuments, archaeological sites and Historic Parks and Gardens will be conserved and enhanced, and special regard will be had to their setting. This is also supported in the SLP.</p> <p>Policy SHB5 adds additional local detail by identifying non-designated heritage assets that contribute to place and character at the neighbourhood level.</p>

Policy Title and Reference	Adopted Local Plan	Submission Local Plan	Commentary
POLICY SHB6: SOUTHBOROUGH HIGH STREET AND OTHER NEIGHBOURHOOD CENTRES	Saved TWBC Local Plan policies: CR3, CR7, ED2, ED3, ED5; TWBC Core Strategy: Core Policies 7, 8 and 10	STR/SO1, STR2, STR5, EN6, EN7, ED1, ED2, ED8, ED9, ED11	Southborough high street and its smaller neighbourhood centre are recognised in strategic policies. Policy SHB6 supports these, setting out measures to enable a vital and viable place, with improved public realm to encourage greater footfall and usage, a key priority for the SLP.
POLICY SHB7: SUPPORTING THE CULTURAL AND CREATIVE ECONOMY	Saved TWBC Local Plan policies: CR2, CR3, CR7; TWBC Core Strategy: Core Policies 7, 8 and 10	STR5, ED1	Adopted policy supports the provision of cultural and community facilities. Supporting the public realm, art and culture is also a key priority in the SLP. Policy SHB7 supports a flourishing creative and arts sector in Southborough and High Brooms.
POLICY SHB8: SUPPORTING FLEXIBLE WORKSPACES AND OPPORTUNITIES FOR HOMEWORKING	TWBC Core Strategy: Core Policies 7 and 10	STR1, ED2, ED4, ED12	Adopted policy supports maintaining the overall net amount of employment floorspace across the Borough for a range of employment generating uses. SLP policy provides the framework for a thriving economy across the borough. Policy SHB8 recognises new ways of working, which are particularly important locally, and supports opportunities to enable this. It would also support provision of spaces for start-up businesses, with read across to Policy SHB7.
POLICY SHB9: LANDSCAPE AND BIODIVERSITY	TWBC Core Strategy: Core Policy 4	EN9, EN10, EN12-14, OSSR1	Strategic policy places great weight on the importance of the natural environment, including designated habitats and other natural features. Policy SHB9 conforms to this, setting out expectations at the neighbourhood level, including specific features of note locally that should be retained and, where possible, new similar features incorporated into new development.

Policy Title and Reference	Adopted Local Plan	Submission Local Plan	Commentary
POLICY SHB10: LOCAL GREEN SPACE	Saved TWBC Local Plan policies: EN22; TWBC Core Strategy: Core Policy 4	STR2, STR5, EN15, OSSR1	The adopted plan recognises the importance of green space in terms of the different roles it plays. The SLP includes a specific policy encouraging local planning groups to identify local green spaces in their areas. Policy SHB10 identifies 37 such spaces.
POLICY SHB11: LOCALLY SIGNIFICANT VIEWS	Saved TWBC Local Plan policies: EN1; TWBC Core Strategy: Core Policy 4, Core Policy 5; TWBC	STR7, STR8, EN4, EN5, EN15	Views within the neighbourhood area contribute greatly to the sense of place and character, which is prioritised in adopted and proposed strategic policy. The SHBNDP identifies 12 views which are considered particularly special locally and sets out how impacts on them should be mitigated.
POLICY SHB12: DARK SKIES	Saved TWBC Local Plan policies: EN4; TWBC Core Strategy: Core Policy 4	STR8, EN8	Strategic policy recognises the importance of minimising light pollution. Policy SHB12 conforms to this, providing additional local detail to guide planning applications in the neighbourhood area.
POLICY SHB13: IMPROVING WALKING, CYCLING AND EQUESTRIAN OPPORTUNITIES	Saved TWBC Local Plan policies: TP1, TP3; TWBC Core Strategy: Core Policy 3	STR5, STR6, EN21, TP1, TP2	Strategic policy recognises the importance of providing a range of travel options and enabling opportunities to walk and cycle. The neighbourhood area is of a size that is walkable for many residents and visitors and the policy seeks to support and enhance this active travel network. It is complemented by a series of interventions that would further enhance the movement network.
POLICY SHB14: PUBLICLY ACCESSIBLE OFF-ROAD PARKING	Saved TWBC Local Plan policies: TP9; TWBC Core Strategy: Core Policy 3	STR6, TP4	Notwithstanding the underlying aim of supporting active travel, strategic policy recognises the need to enable a choice of transport modes. In line with the ambition to support the viability of the high street and the creative and arts sector, the provision of

Policy Title and Reference	Adopted Local Plan	Submission Local Plan	Commentary
			public car parking would be supported to enable greater access to the high street. In addition, access on foot to High Brooms Station is more challenging due to the topography of the area. Provision of parking here could encourage greater public transport use. Policy SHB14 supports the need for the provision of cycle and EV charging in public locations to help enable a shift to less promoting forms of transport.
POLICY SHB15: IMPROVING OPPORTUNITIES FOR COMMUNITY AND CULTURAL FACILITIES, SPORT AND RECREATION	Saved TWBC Local Plan policies: OSSR2, CS6, R1; TWBC Core Strategy: Core Policy 8	STR5, STR7, ED12, OSSR2	The retention/improvement of existing community facilities, and the introduction of new ones is underpinned in strategic policy. Policy SHB15 complements this by identifying specific types of provision that would be supported. This is likely to come forward by way of major development but could inform the redevelopment of existing sites.

5 Basic Condition (iv) - conformity with retained EU obligations

- 5.1 The SHBNDP, and the process under which it was made, conforms to the Strategic Environmental Assessment (SEA) Directive (EU 2001/42/EC) and the Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations).
- 5.2 In accordance with Regulation 9 of the SEA Regulations 2004, TWBC, as the responsible authority, determined in November 2024 that a Strategic Environmental Assessment (SEA) is not required as the SHBNDP's policies – individually or collectively - are unlikely to have significant environmental effects.
- 5.3 The [SEA Screening Statement](#) is contained within the evidence base submitted alongside the Submission Version SHBNDP.

6 Basic condition (v) - conformity with the prescribed conditions

- 6.1 Under Directive 92/43/EEC, also known as the Habitats Directive (Directive 92/43/EEC 'on the conservation of natural habitats and of wild fauna and flora'), it must be ascertained whether the SHBNDP is likely to breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017. Assessments under the regulations are known as Habitats Regulations Assessments ("HRA"). An appropriate assessment ("AA") is required only if the Plan is likely to have significant effects on a European protected species or site. To ascertain whether it is necessary to undertake an assessment, a screening process is followed.
- 6.2 TWBC, as the responsible authority, determined in November 2024 that the SHBNDP is unlikely to have significant impact on European sites and therefore does not require a full HRA to be undertaken.
- 6.3 The [HRA Screening Statement](#) is contained within the evidence base submitted alongside the Submission Version SHBNDP.
- 6.4 In addition to conforming to its EU obligations, the SHBNDP does not breach and is not otherwise incompatible with the European Convention on Human Rights.

7 Conclusion

- 7.1. The relevant basic conditions as set out in Schedule 4B to the TCPA 1990 are considered to be met by the Southborough and High Brooms Neighbourhood Development Plan and all the policies therein. It is therefore respectfully suggested to the Examiner that the SHBNDP complies with Paragraph 8(1) (a) of Schedule 4B of the Act.