

Examination of the Tunbridge Wells  
Borough Local Plan

**Tunbridge Wells Borough Council  
Hearing Statement**

**Matter 12: Transport  
Infrastructure (Policies STR6,  
TP1, TP2, TP3, TP4, TP5 and  
TP6)  
Issue 3: Parking Standards and  
Public Car Parks**

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# Matter 12 – Transport Infrastructure (Policies STR6, TP1, TP2, TP3, TP4, TP5 and TP6)

## Issue 3 – Parking Standards and Public Car Parks

**Inspector’s Question 4: [re. regard to NPPF in setting residential parking standards]**

*Paragraph 107 of the Framework states that if setting local parking standards, policies should take into account;*

- *The accessibility of the development;*
- *The type, mix and use of development;*
- *The availability of and opportunities for public transport;*
- *Local car ownership levels; and*
- *The need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.*

***How have these factors been taken into account in setting the residential parking standards in Policy TP3?***

### **TWBC response to Question 4 (presumed to be Q1)**

#### **Introduction**

1. The basis for the proposed locally-set residential parking standards required (while referring to Kent County Council’s (KCC’s) latest standards for all C2 use class and non-residential developments) is set out in the Council’s Residential Parking Standards Topic Paper [\[CD 3.116\]](#). The Council’s response below outlines how the five factors in paragraph 107 of the NPPF have been taken into account in setting these standards.

## Consideration

### The accessibility of the development

2. The accessibility of settlements and new developments varies considerably across the borough given that the majority of the borough is rural, with a number of settlements of varying sizes. The parking standards proposed include three 'Zones'. Zone A relates to Royal Tunbridge Wells Town Centre, Zone B relates to the Limits to Built Development of Royal Tunbridge Wells (excluding Zone A), Southborough, Rusthall, Pembury, Paddock Wood, Cranbrook, and Hawkhurst, and Zone C relates to everywhere in the borough excluding Zone A and B. These proposed Zones reflect the Council's revised settlement grouping in the Settlement Role and Function Study (February 2021) [[CD 3.133](#)], being all of the settlements in Groupings A – C.
3. As such, at the same time reflecting the average car/van ownership levels within areas and settlements across the borough, the Council has sought to propose lower (as well as mandatory) standards within the Royal Tunbridge Wells Town Centre (as this is considered to be the most accessible location within the borough with excellent public transport links), followed by slightly higher (as well as minimum) standards within the settlements identified above (in Zone B) as these settlements are considered to generally have good accessibility (albeit at a comparatively lower level than Royal Tunbridge Wells Town Centre), followed by slightly higher (as well as minimum) standards everywhere else within the borough (as these areas relate to predominantly rural areas with generally poor levels of accessibility and public transport links).
4. The Council's Residential Parking Standards Topic Paper [[CD 3.116](#)] also included an assessment the accessibility to places of work by non-car modes of transport, drawing upon data of the working population's method of travel to work in the borough (based on 2011 Census Data, ONS). Drawing upon this data, it has ultimately been concluded that private vehicle use outside of Royal Tunbridge Wells is high and relied upon in the borough, regardless of average car/van ownership levels. Indeed, the central wards in Royal Tunbridge Wells had particularly low levels of private car use and the highest levels of active modes of transport and public transport use and hence is considered to be the borough's most accessible location due to its inclusivity of many bus route start

and end points as well as the central train station (although it is acknowledged that a reliance/need for some private car use still remains within these central locations).

5. Given the above, there is therefore a need to ensure that there is ample parking provision to accommodate the higher need for private car use within the rural areas of the borough in comparison to areas which have a relatively larger use of public transport (i.e. areas with greater levels of accessibility). As such, it has been considered that the lowest standards proposed should be expected within the most accessible locations of the borough as residents are less likely to be dependent on the private car to travel, with the highest standards proposed expected in the more rural and isolated parts of the borough where the reliance on the private car is far greater.

#### The type, mix and use of development

6. As is discussed further below, the Residential Parking Standards Topic Paper included a detailed assessment of the average car/van ownership levels across Lower Super Output Areas (LSOAs) across the borough. This included an assessment of average car/van ownership levels by the number of bedrooms in a household as well as by the number of bedrooms by accommodation type (i.e., house or bungalow, or flat, maisonette, or apartment). These average car/van ownership levels per accommodation type and number of bedrooms (within each area) have subsequently been incorporated into Policy TP3 where, for each Zone, a different standard is proposed for houses/flats and by number of bedrooms within each dwelling.
7. Regarding use, it should be emphasised that these residential parking standards proposed within Policy TP3 are for C3 use class only; C2 and non-residential development is as per KCC's latest standards, as noted within the Policy.
8. It should also be noted that Policy TP3 proposes a number of exceptional circumstances whereby the Local Planning Authority may allow proposals to depart from the proposed residential (and other) parking standards. This includes exceptional circumstances which relate to the unique nature or type of development being proposed. For example, exceptional circumstance 3 allows different standards to ensure the successful restoration, refurbishment, and reuse of listed buildings, or buildings affecting the character of a conservation area. Exceptional circumstance 4 also accepts lower standards to allow the appropriate reuse of the upper floors of existing buildings in

town centres or above shop units, where it can be demonstrated that this reuse will have wider planning benefits. Consequently, it is considered that this provides further suitable flexibility to depart from the proposed parking standards depending on the unique nature of some specific proposals.

#### The availability of and opportunities for public transport

9. As above, the Residential Parking Standards Topic Paper included an assessment of the use of public transport (and all other modes of transport) for travel to work in all areas across the borough which has subsequently informed the different requirements for each Zone identified. This assessment, as above, identified that Royal Tunbridge Wells Town Centre has a comparatively higher use of public transport than elsewhere in the borough (train being the most common public transport used, with very little borough-wide variation in use of buses). As explained within the Topic Paper, this is mirrored by the high percentages in some Royal Tunbridge Wells wards of both short distance (correlating with high active travel use) and long distance (correlating with high public transport use) travel, which implies that the need for the private car in this location is far lower than everywhere else in the borough.
10. However, while the availability and opportunities for public transport in central Royal Tunbridge Wells is far greater than elsewhere within the borough, and that there is a need to continue to further encourage these sustainable modes of transportation, there is also an expectation that residents in the borough will remain using the private car as the primary mode of transport. This reliance on the private car is likely to increase within the plan period as based on current trends discussed within the Topic Paper. Consequently, a lower standard has been proposed for Zone A compared to Zones B and C, albeit set at a mandatory level rather than maximum.
11. It should also be noted that, while some other wards within the borough have relatively high levels of public transport use, private car use remains higher in these areas as compared to Royal Tunbridge Wells, and therefore, as previously mentioned, there is a need to ensure sufficient parking in these areas to accommodate this need for private car use. In addition, the analysis within the topic paper identified that the rural locations of the borough have a relatively high percentage share of the working population traveling long distances to work, thus also emphasising the importance of ensuring

adequate parking provision which will not hinder working residents' ease of travel to work.

12. It should be noted however, that the availability and opportunities for public transport use and active modes of transport should be analysed alongside the average car/van ownership levels (discussed further below).
13. In addition, as above, the Policy incorporates an exceptional circumstance (no.6) that may allow a different standard to that proposed within the Policy where approval is obtained from both KCC and the Local Planning Authority for the development of advanced technology vehicle systems (including those that are autonomous) that will provide for transport needs within the community being served, and which may link and contribute to existing or new similar systems servicing other nearby towns, town centres, and transport services. As such, the Policy allows flexibility to lower standards if opportunities for innovative and advanced public transport initiatives can be achieved during the course of the plan period.

#### Local car ownership levels

14. The Residential Parking Standards Topic Paper includes extensive analysis on the average car/van ownership levels across LSOAs within the borough using 2011 Census Data (ONS). This assessment was further supported by analysis on average car/van ownership by number of bedrooms and accommodation type, as noted above. Ultimately, this determined that the lowest levels of average car/van ownership can be found within the Royal Tunbridge Wells Town Centre, followed by slightly higher averages within the rest of Royal Tunbridge Wells, Southborough, Rusthall, Pembury, Paddock Wood, Cranbrook, and Hawkhurst. Beyond these areas, in predominantly rural locations/parishes within the borough, average car/van ownership levels are the highest.
15. The parking standards proposed within Policy TP3 therefore reflect these average car/van ownership levels (alongside differentiations in averages based on the number of bedrooms within, and accommodation type, of houses within each area) and propose varying standards within three separate zones accordingly (while at the same time giving consideration to the accessibility of the location and the availability/opportunities for public transport).

## The need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles

16. The need to ensure an adequate provision of spaces for electric vehicle charging points is embedded throughout the Plan. Most notably, Policy EN21 - Air Quality (but see also criterion 9 of Policy TP2 (Transport Design and Accessibility)) states that, in the interests of improving air quality borough-wide, all relevant development is required to install electric vehicle charging infrastructure (points and cabling, or any new technology requirements). These requirements are to be in accordance with the Council's [Electric Vehicle Charging Points for New Development Guidance Notes for Applicants](#) document, which specifies the minimum electric vehicle charging requirements for minor and (different types of) major development.
17. Notwithstanding this positive policy, it is noted that new Building Regulations on required infrastructure for the charging of electric vehicles comes into effect on 15 June 2022, and as such the Council's Guidance Note document will be updated accordingly in due course. The Council does not envisage that there is a need for alterations to the policy, or supporting text, to reflect the new Building Regulations. The Council therefore considers that the Plan will ensure an adequate provision of electric vehicle charging points within the borough.

### **Conclusion**

18. Given the above consideration, the Council is therefore confident that the factors outlined within Paragraph 107 of the National Planning Policy Framework have been sufficiently taken into account in setting the proposed residential parking standards in Policy TP3.



## Inspector's Question 5: [re. evidence and justification for proposed standards]

***Are the residential parking standards based on appropriate local evidence and are they justified for each Zone?***

### **TWBC response to Question 5**

#### **Consideration**

19. The Council's response to Question 4, in tandem with/supported by the Council's Residential Parking Standards Topic Paper [[CD 3.116](#)], provides a detailed response on the approach to setting, and justification for, the proposed parking standards which is considered to also adequately address this further Question. While the car/van ownership data is primarily based on 2011 Census Data (ONS), the Council considers the data to be the most accurate and only available dataset which could be reasonably relied upon for extensive analysis which could reliably inform local planning policy. The Topic Paper assessed the data at an appropriately small scale (Lower Super Output Areas for average car/van ownership, and Ward level for the working population's distance and method of transport to work). This ensured that any localised differences were identified beyond borough-wide averages (given the varying urban/rural nature of the borough and its settlements) or a county-wide standard proposed by Kent County Council (KCC) in its emerging standards (which do not account for borough-wide nor localised differences).
20. While it is acknowledged that the data is now approximately 11 years old, Paragraph 1.6 within the Topic Paper states that:
- "It is envisaged that this Local Plan post-adoption will be reviewed every five years to assess whether these policies will need to be updated ... this is particularly important due to the expected release of the 2021 Census meaning that this paper will require an update in-line with latest car ownership levels during when the next Local Plan review takes place. It is also important to review any parking standards at this stage due to the evolving nature and trends of transport technology and use, such as car shares, car clubs, improved ease of active modes of transport, autonomous vehicles, etc., which may potentially have an impact on the need for the private car and consequent levels of parking provision".*

21. The Council consequently considers this to be a suitable approach, utilising the most appropriate and available data where possible. It is also worth noting that the Topic Paper included an assessment of other data sources where appropriate, such as Royal Tunbridge Wells public car park utilisation (occupancy) rates in discussion with the Council's Parking Services team to ascertain whether there was any capacity for some public car parks within central Royal Tunbridge Wells (Zone A) to accommodate parking space provision, should residential developments in use class C3 deliver less than a required maximum parking standard (if retained as per the 2006 Local Plan Policy TP6). Ultimately, discussions with the Council's Parking Services confirmed that there was not – at that time - spare capacity as explained in further detail in paragraphs 6.6 and 6.7 of the Topic Paper.
  
22. In addition, the proposed parking standards also broadly align with/are similar to KCC's emerging parking standards, and are supported by KCC Highways, as stated within the Statement of Common Ground between Tunbridge Wells Borough Council and KCC [\[CD 3.168\]](#).

## **Inspector's Question 6: [re. maximum parking standards for C2 and non-residential development]**

***Where maximum standards are concerned, paragraph 108 of the Framework states that standards should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport.***

***What is the justification for requiring development proposals within Use Class C2 (and all non-residential developments) to accord with maximum standards in Kent County Council's latest guidance?***

### **TWBC response to Question 6**

#### **Introduction**

23. As noted in responses to previous questions, Policy TP3 proposes new residential parking standards for dwellings under use class C3 (as informed by data analysis within the Residential Parking Standards Topic Paper [[CD 3.116](#)]). On the other hand, the Policy currently requires that all residential institutions (use class C2) and non-residential developments across the borough will be required to provide the maximum parking standards in accordance with Kent County Council's (KCC) latest guidance as appropriate. The latest adopted KCC standards are those included within KCC's [Supplementary Planning Guidance SPG 4 document](#) published in July 2006, although regard is given to KCC's emerging parking standards within the emerging Kent Design Guide (see emerging Kent Design Guide [website](#) and proposed [Parking Standards Guidance](#)). The Kent Design Guide was subject to public consultation which closed on 17 January 2022 with a consultation report due to be published.

#### **Consideration**

24. It is acknowledged that one of the representations made during the Regulation 19 consultation on the Pre-Submission Local Plan on Policy TP3 regarded the consideration that the maximum standards proposed for non-residential development do not appear to comply with Paragraph 108 of the NPPF. As the Council noted within its response (as found on page 424 of the Consultation Statement for the Submission

Local Plan (Part 2 of 2) [[CD 3.134b](#)]), the “*maximum standards are currently, and are expected to be, justified within KCC’s latest guidance. The current KCC guidance (as per TWBC’s current parking policy) is SPG4*”. However, it is noted that this SPG4 guidance was published in 2006, prior to the NPPF.

25. Paragraph 108 of the NPPF states that “*maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport*”.
26. The Council notes that the emerging KCC guidance within the emerging Kent Design Guide (see emerging Kent Design Guide [website](#) and proposed [Parking Standards Guidance](#)) follows suit of the SPG4 guidance by proposing maximum standards for C2 and non-residential uses. However, the Council concedes that, as this emerging Kent Design Guide is not yet finalised and adopted, the maximum standards proposed may not be supported by the compelling justification necessary for their inclusion in accordance with the NPPF.
27. Given the above, the Council therefore proposes a minor modification to remove the two references to “*maximum*” C2 and non-residential parking standards within Policy TP3. Accordingly, for consistency and clarity, the Council also proposes the following minor amendment to the supporting text of Policy TP3 relating to non-residential development (paragraph 6.564) (deleted text is shown as ~~struck through~~, additional text is shown underlined):

~~“For non-residential development, this Local Plan seeks to limit the amount of on-site parking provided for new non-residential/commercial development across the borough. All proposed non-residential development will therefore be required to provide parking space at the standards outlined within Kent County Council’s latest guidance as appropriate. It is intended that this will maximise development potential in these locations, and enable opportunities for active travel and the use of public transport options where at present they are readily accessible, as well as other alternative modes of sustainable transport to the private car, particularly in the Main Urban Area. However, should specific problems with overspill commercial car parking in these areas into~~

*residential areas occur, the Local Planning Authority will support Controlled Parking Zones as an option to address these problems”.*

28. This proposed modification will not prejudice the standards within the emerging Kent Design Guide, which may will deviate from those currently proposed as maximum for C2 and non-residential development.

## Inspector's Question 7: [re. parking standards in SPDs]

***Is it appropriate and justified to set out future parking standards in SPDs, which, according to Policy TP3, would 'have primacy' over the requirements in the Local Plan?***

### **TWBC response to Question 7**

#### **Introduction**

29. Within the exceptional circumstances list in Policy TP3, the Local Planning Authority may allow proposals to depart from the vehicular and cycle parking standards of both residential and non-residential developments if *“a bespoke parking standard is included as part of a site-specific Supplementary Planning Document, including in those to be determined by a masterplanning approach, or in a made neighbourhood plan that seeks to take into account specific local circumstances in that area. These parking standards will have primacy over the requirements within this Policy. In relation to masterplanning, this is especially recommended as there is the potential that Paddock Wood and east Capel, and particularly Tudeley Village, could be designed with highly sustainable transport links/permeability/accessibility”*.
30. This is considered to be appropriate and justified, as outlined below.

#### **Consideration**

31. As explained within the Policy, in relation to sites determined via a masterplanning approach, the reference to primacy of different parking standards to those within Policy TP 3 may be allowed by the Local Planning Authority where justified for such specific sites and where considered suitable and agreed between all relevant parties including the Local Highways Authority. In particular, this is recommended (for the delivery of the Strategic Sites at Paddock Wood and east Capel (STR/SS 1), and Tudeley Village (STR/SS 3), as these sites will be designed to facilitate a modal shift away from the private car. These new settlements will incorporate highly sustainable transport links/permeability/accessibility, thus allowing potential for a lower level of parking provision to be required. This is reflected through point a)2) of Policy STR6, which states that active travel will be prioritised through the development and delivery of the strategic sites proposed in the Local Plan and will have integrated active travel as a

fundamental element to their layout and design, so that settlements are easy to navigate on foot or by bike. In addition, b)1) of Policy STR6 outlines that the Council will work with partners to maximise use of public transport (rail, bus, car club, car share, and taxi), as an alternative means of transport to the private car by establishing rapid bus/transport links, including from Paddock Wood to Royal Tunbridge Wells, Paddock Wood to Tonbridge (via Tudeley Village), and Royal Tunbridge Wells to Tonbridge, and ensuring that the design of these strategic sites provides for attractive bus services with convenient access to the highway network. As such, the Plan seeks to facilitate a reduced dependence on private car use within these strategic sites and increased active travel and public transport use. The SPDs for these strategic sites will also be produced by the Council in collaboration with site promoters, Kent County Council (Highways), and other key stakeholders and be subject to consultation. This will then be a material consideration in the determination of planning applications, and the current wording of Policy TP3 makes it clear that these standards will be applied. It is noted that these are the only sites proposed to be allocated for which this exception applies.

32. It should also be noted that, while Paddock Wood's provisional Limits to Built Development (LBD) is within Zone B, Capel parish (where Tudeley Village is located) is currently within Zone C and therefore subject to the highest minimum parking standards of Policy TP3. Tudeley Village will be more suitability required to deliver a lower level of parking provision than Zone C's minimum standards given that it will be designed in a way to maximise active travel and public transport use and therefore reduce the dependence on the private car use. As mentioned above, while Paddock Wood is within Zone B (and therefore subject to lower standards than Zone C), there will also be the possibility to further reduce the level of car dependence below existing levels for Paddock Wood.
33. However, it is recognised that given the nature of a SPD relative to the policy in Local Plan, that it would be more appropriate for the wording of the policy to be adjusted, to set out that regard will be had to the SPD.

## **Conclusion**

34. In consideration of the above, the Council therefore considers it to be appropriate and justified to set out future parking standards within SPDs. The Council acknowledges,

however, a) that it would be appropriate to have a bespoke parking standard included as part of a site-specific SPD where justified and agreed with by the Highways Authority and that it would be more appropriate to adjust the wording of the policy to remove the requirement that it “will have primacy” . As such, the Council proposes a minor modification below for clarity:

*“a bespoke parking standard is included as part of, and justified within, a site-specific Supplementary Planning Document which is agreed with by the Local Highways Authority, including in those to be determined by a masterplanning approach, or in a made neighbourhood plan that seeks to take into account specific local circumstances in that area. Regard will be had to these bespoke parking standards when considering relevant applications. In relation to masterplanning, this is especially recommended as there is the potential that Paddock Wood and east Capel, and particularly Tudeley Village, could be designed with highly sustainable transport links/permeability/accessibility” .*



## Inspector's Question 8: [re. level of detail of Policy TP3]

*What is the justification for the level of detail in Policy TP3? For example, what are the reasons for restricting tandem parking, specifying sizes and stating that car barns must be open on three sides?*

### TWBC response to Question 8

#### Consideration

35. The level of detail provided within Policy TP3 (beyond the proposed parking standards and exceptional circumstances) is primarily to provide clarification on what the Local Planning Authority considers to be acceptable design and what it would generally support to aid the development of suitable planning applications. The policy covers practical matters which have been found to contribute to the success of suitable and effective parking provision. The policy wording has also been written on the advice of the Council's Development Management officers, whereby achieving appropriately designed parking areas can be important in the overall design of developments, and is therefore considered prudent to set specific design requirements considered best to achieve this.
36. Parking space dimensions have been specified within the Policy as the Council considers it appropriate to require slightly higher minimum space dimensions (5.0m length / 2.6m width) for cars beyond those proposed in Kent County Council's (KCC's) emerging Kent Design Guide of 5.0m length by 2.5m width (see Table 8 of KCC's [Parking Standards Guidance](#)). Indeed, KCC within its emerging guidance acknowledge that the dimensions of a car vary considerably, and the average car size has been increasing in recent years, and as such KCC have taken this view in ascertaining the required parking space dimensions. The Council (as above) notes that it is proposing marginally higher space size requirements than KCC's which the Council considers prudent to ensure that the size of parking spaces throughout the plan period remain of a sufficient size to accommodate the likely continued increase in car sizes. Such wider parking spaces may also bring further benefits, such as enabling further ease of accessing/exiting vehicles for those with restricted mobility.
37. Moreover, the proposed restriction on tandem parking is consistent with KCC's emerging guidance (see emerging [Kent Design Guide website](#) and proposed [Parking](#)

[Standards Guidance](#)) which seeks to discourage tandem parking. This emerging guidance states that “*observations indicate that such arrangements are often poorly utilised where the rear space takes the form of a garage. However, utilisation is notably better where both spaces are uncovered or incorporated within car barns*”. Tandem parking is also supported within the emerging guidance where there is sufficient space for two vehicles to be parked with minimal consequential on-street parking, allowing for the internal road and footway network to function effectively. This approach is supported by the Council, and accordingly Policy TP3 only allows tandem parking if it can be demonstrated that the design of the development does not allow for parking on the road/street. This requirement was also incorporated following advice from Development Management officers where it is considered that tandem parking can reduce the likelihood of off-street parking (due to the need to move one car to access the other), thereby resulting in parking on internal development roads, both to the detriment of amenity and (at times) reducing pavement widths.

38. The proposed requirement that car barns, as an alternative to garages (which will not be counted toward the parking standards unless of a sufficient size as specified within the Policy), are open on three sides is consistent with KCC’s emerging parking standards guidance which states that “*open car ports and car barns are typically well-used by residents for parking vehicles, subject to good design*”, as an alternative to garages which are generally not used by residents unless there’s no alternative. It is generally considered that car barns open on at least three sides would therefore discourage use of such parking spaces for storage where they become more enclosed (as is often the case, as is common experience for garages), and as such will be encouraged for good design.

## Inspector's Question 9: [re. public car parks]

***What are the reasons for seeking to safeguard public car parking spaces through Policy TP4?***

### **TWBC response to Question 9**

#### **Consideration**

39. The Council notes that Policy TP4 replaces existing Policies TP20, TP22, TP23, TP24, TP25, TP26, and TP27 of the 2006 Local Plan which related to the retention of public car parks across the borough. A number of public car parks proposed for protection under Submission Local Plan Policy TP4 are therefore already protected under existing Policies (while noting that the boundaries for some of these car parks have been amended, as indicated within the document on proposed changes to TWBC's existing Policies Map and saved policies [[CD 3.129u](#)]). Policy TP4 also includes a number of additional public car parks which had not been previously protected in the 2006 Local Plan.
40. Generally the Council's methodology has been to protect the following public car parks (under Policy TP4):
- TWBC-owned public car parks (as listed in the latest [Parking Strategy](#));
  - TWBC-leased public car parks to Town/Parish Councils where their use is for the public and not used for the particular premises only (as listed in the latest Parking Strategy);
  - KCC/Parish/Town-Council owned/operated public car parks that do not serve a particular private premises and/or have parking restrictions in place; and,
  - Privately owned public car parks with lawful development certificates for use as public car parking.
41. All proposed public car parks for protection under Policy TP4 have been agreed and supported by the Council's Parking Team.
42. The supporting text of Policy TP4, as per paragraph 6.567, outlines the primary reasoning for protecting public car parks in the borough, being that "*it is expected that*

*the demand for private car use, particularly in the rural areas of the borough, will still increase as a result of projected growth and development. Consequently, in consideration of future development and likely trends, there will still be a need for sufficient parking provision in public car parks. It is therefore crucial with regard to the vitality of many centres in the borough that public car parks are retained”, both for residents and businesses alike.*

43. The Council therefore considers it prudent to protect the public car parks (which meet the criteria above), particularly within the rural areas/settlements which are often constrained and in need of off-street public car parking to enable access to services. Public car parks are also of significant importance, across the borough, in limiting on-street car parking which can often lead to obstructed pavements and restricted access for emergency vehicles, particularly within Royal Tunbridge Wells with historic narrow streets and existing on-street car parking issues in places, but also in rural settlements such as Goudhurst.
44. While a number of the public car parks protected under Policy TP4 are Council-owned/leased, it should be noted that the Council’s Parking, Property and Planning teams are separate, and therefore objectives may not always align. As such, the Council as Local Planning Authority considers it appropriate to protect such sites, subject to the criteria outlined within the Policy.
45. The Council notes, however, that the Covid-19 Pandemic led to a reduction in the occupancy rates for public car parks across the borough during lockdowns. Despite this, parking utilisation has started to increase over the last few months (since the lifting of the early 2022 lockdown) and as such it is difficult to ascertain the long-term trends of public car park utilisation. Consequently, the Council considers it appropriate to re-review whether all public car parks currently proposed for protection under Policy TP4 require protection within the five-year review of the Plan.