

Tunbridge Wells Borough



Residential Parking Standards Topic Paper for Draft Local Plan – Regulation 18 Consultation

August 2019

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Executive Summary

This paper researches 2011 UK Census data from the Office for National Statistics (ONS) for the purposes of developing new residential parking standards for new developments under use class C3 (dwellings). Within this paper, data analysis is included on average car or van ownership per household, average car or van ownership per household per number of bedrooms as well as per accommodation type at the Lower Super Output Area (LSOA) level. Moreover, data is analysed on the percentage of working residents' method and distance of travel to work at the ward level in order to understand the use and implied need of particular modes of transportation by residents in the borough. Ultimately, this paper sets out recommendations based on the analysis for new residential parking standards to take forward into the new Local Plan (2016-2036) in the parking standards development management policy. These parking standards will consequently be used when deciding planning applications rather than the maximum parking standards previously used by Tunbridge Wells Borough Council based on Kent County Council's adopted standards.

The data analysed within this paper indicates that areas within the main urban area of Royal Tunbridge Wells (RTW) and Southborough, as well as Rusthall, Paddock Wood, Cranbrook, Hawkhurst, and Pembury all have particularly lower levels of average car or van ownership per household than of those areas outside of these settlements. Furthermore, the lowest levels of average car or van ownership are found in the RTW town centre area. The town centre is currently covered by the Central Access Zone (CAZ; see **Appendix A**) as of the 2006 Local Plan policy TP6 whereby a maximum parking standard of 1 space per dwelling was required. The predominantly rural locations of the borough and smaller settlements located outside of these aforementioned settlements have notably higher levels of average car or van ownership per household.

Based on specially commissioned Census data from the ONS, this paper also demonstrates that, across the borough, the more bedrooms there are in a dwelling, the more cars or vans there are in ownership for the household. Indeed, this is apparent in all categories across 1 bed, 2 bed, 3 bed, 4 bed, and 5 or more bedroom houses. However, within the settlements aforementioned, as well as particularly in the RTW town centre area, there are notably lower average car or van ownership levels per household than in areas outside of these settlements (with the exception of the larger dwelling sizes where some dwellings have similar levels of car or van ownership to those surrounding predominantly rural locations). However, there is also an understanding that from dwelling sizes of three bed houses and larger, the average car or van ownership increases above 1 car or van per household, thus suggesting that perhaps 1 car or van per dwelling inside the RTW town centre area for all dwelling sizes is unsuitable.

This paper also analyses the average car or van ownership per household per number of bedrooms per accommodation type (house or bungalow; or, flat, apartment, or maisonette). Across the borough, it is found that in each dwelling size based on number of bedrooms, the average car or van ownership per household is higher for houses or bungalows than for flats, apartments, or maisonettes. However, the most notable differences in average car/van ownership is found in those dwelling sizes of 4 bedrooms and 5 or more bedrooms where

houses or bungalows have over 0.5 more cars or vans per household than for flats, apartments or maisonettes.

This paper also shows that car or van use as a means for travelling to work (and consequently the implied need for) is particularly lower in the central RTW ward areas in comparison to elsewhere in the borough. This was also matched by notably high levels of active travel (walking and cycle) and travel by public transport (buses, trains, etc.) in these central RTW areas which reflects the aforementioned low car or van use relative to elsewhere across the borough. Additionally, there is a high percentage of the working population travelling longer distances in central RTW than these other areas, most likely commuting to London. However, many of the wards outside of the central RTW wards have high levels of car or van use as a means of travelling to work. This consequently means that, despite the settlements of Rusthall, Paddock Wood, Cranbrook, Hawkhurst, and Pembury having relatively lower average car or van ownership levels compared to elsewhere in the borough, the use and implied need for the private car is still relatively high (despite some areas outside the central RTW wards also having similarly high levels of public transport use). Regarding the distance of travel to work, the data generally shows mixed results whereby the differentials between areas were less clear (i.e. between particular settlements and predominantly rural wards).

In conclusion, in accordance with the average car or van ownership levels per household per number of bedrooms by accommodation type, it is recommended in this paper that Tunbridge Wells Borough Council require mandatory parking standards in the RTW town centre area under a new proposed Zone A that will replace the CAZ. Prior to ruling out the retention of the maximum parking standard in the RTW town centre area, this paper explored the possibility for public car parks to accommodate under provision on-site. However, discussions with Tunbridge Wells Borough Council Parking Services confirmed that this was not possible over the Plan period despite data analysis suggesting that there is currently spare capacity. Moreover, due to the high use and implied need for the private car predominantly across the borough, this paper recommends minimum parking standards for the settlements of RTW (excluding Zone A), Southborough, Rusthall, Paddock Wood, Cranbrook, Hawkhurst, and Pembury under a Zone B. Similarly, all areas in the borough excluding those areas under Zones A and B will also have minimum parking standards but at a slightly higher level than in Zone B (i.e., also in accordance with the above variables analysed in this paper) under a Zone C. These mandatory and minimum parking standards are considered suitable in order to ensure a sufficient level of parking provision in new residential developments and to prevent and/or alleviate particular issues such as lack of parking, congestion, and on-street parking issues and which will be reflective of existing car or van ownership levels. This represents a change to the previous approach, which recommended maximum standards across the whole borough.

This paper also recommends that the Traffic Regulation Orders are amended to exclude all new residential developments inside a Controlled Parking Zone (CPZ) from that CPZ (as they will be meeting their parking provision on site and many CPZs are already at or over capacity). A future purchaser/occupier of any such residence will be aware of this through the use of an informative on the Decision Notice. As such, it is proposed that there is an expectation that the developer meets the costs of advertising and administering any change to the Traffic Regulation Order in association with this.

1. Contents

Executive Summary	1
1. Contents	3
2. Figures and Tables	4
3. Introduction	7
4. Policy Context.....	13
5. Tunbridge Wells Borough Car or Van Availability per Household (2011).....	16
6. Tunbridge Wells Borough Car or Van Availability by Number of Bedrooms and Accommodation Type (2011)	27
7. Tunbridge Wells Borough Working Population's Method and Distance of Travel to Work (2011)	39
8. Residential Parking Standards Recommendations.....	48
9. Appendices	56
9.1. Appendix A – Royal Tunbridge Wells Central Access Zone (2006 Local Plan Policy TP6).....	56
9.2. Appendix B – Royal Tunbridge Wells Central Access Zone (2006 Local Plan Policy TP6) and Controlled Parking Zones	58
9.3. Appendix C – Royal Tunbridge Wells Public Car Park Utilisation (Occupancy) Rates	60
9.4. Appendix D - Methodology: Royal Tunbridge Wells Proposed Zone A Boundary.....	67

2. Figures and Tables

Figures

Figure 1 – Tunbridge Wells Borough LSOA Boundaries (2011)	10
Figure 2 – Tunbridge Wells Borough Ward Boundaries (2011)	11
Figure 3 – Tunbridge Wells Borough Settlement Map Overlaid with LSOA Boundaries (2011)	12
Figure 4 – Average Car or Van Ownership per Household (2011; LSOA)	21
Figure 5 – Percentage of Households That Own No Cars or Vans (2011; LSOA)	22
Figure 6 – Percentage of Households That Own One Car or Van (2011; LSOA)	23
Figure 7 – Percentage of Households That Own Two Cars or Vans (2011; LSOA)	24
Figure 8 – Percentage of Households That Own Three Cars or Vans (2011; LSOA)	25
Figure 9 – Percentage of Households That Own Four or More Cars or Vans (2011; LSOA)	26
Figure 10 – Average Car or Van Ownership per Household in a One Bedroom Dwelling (2011; LSOA)	31
Figure 11 – Average Car or Van Ownership per Household in a Two Bedroom Dwelling (2011; LSOA)	32
Figure 12 – Average Car or Van Ownership per Household in a Three Bedroom Dwelling (2011; LSOA)	33
Figure 13 – Average Car or Van Ownership per Household in a Four Bedroom Dwelling (2011; LSOA)	34
Figure 14 – Average Car or Van Ownership per Household in a Five or More Bedroom Dwelling (2011; LSOA)	35
Figure 15 – Average Car or Van Ownership per Household per Number of Bedrooms by Accommodation Type in the Tunbridge Wells Borough (2011)	36
Figure 16 – Percentage of Working Population's Method of Travel to Work (2011; Ward)	44

Figure 17 – Percentage of Working Population’s Distance of Travel to Work (2011; Ward).....	46
Figure 18 – Residential Parking Standard Zones	55
Figure A1 – Royal Tunbridge Wells Central Access Zone (2006 Local Plan Policy TP6)	57
Figure B1 – Royal Tunbridge Wells Central Access Zone (2006 Local Plan Policy TP6) and Controlled Parking Zones.....	59
Figure C1 – Utilisation (Occupancy) Rates (%) In Tunbridge Wells Borough Public Car Parks	63
Figure C2 – Capacity in Public Car Parks in the Royal Tunbridge Wells Town Centre/Central Access Zone Area	66
Figure D1 – Boundary Based on Output Areas with Less than 1.04 Cars/Vans Owned per Household (2011 Census).....	69
Figure D2 – Output Area Boundary (2011 Census) Overlaid with Typical Urban Character Areas.....	71
Figure D3 – Example: Rounding off Output Area (2011 Census) by Character Area	72
Figure D4 – Proposed Zone A Boundary	73
Figure D5 – Proposed Zone A Boundary Relative to the Output Area Boundary (2011 Census) and the Central Access Zone Boundary	75

Tables

Table 1 – Tunbridge Wells Borough Council 2006 Local Plan Residential Parking Standards	15
Table 2 – Car or Van Availability per Number of Bedrooms per Household in England (2011)	28
Table 3 – Car or Van Availability per Number of Bedrooms per Household in Tunbridge Wells Borough (2011)	28
Table 4 – Percentage of Working Population’s Method of Travel to Work (2011; Ward)	45
Table 5 – Percentage of Working Population’s Distance of Travel to Work (2011; Ward)	47
Table 6 – Residential Parking Standard Recommendations.....	54

Table C1 – Utilisation (Occupancy) Rates (%) in Tunbridge Wells Borough Public Car Parks.....	62
Table C2 – Average Number of Spare Parking Spaces per Month (2018) in Public Car Parks with Spare Capacity	64
Table D1 – Typical Urban Character Area Codes.....	70

3. Introduction

- 3.1. Tunbridge Wells Borough Council is in the process of preparing a new Local Plan which will guide development within the borough to 2036. An integral part of this preparation is the production of an evidence base to inform key policies including those at strategic, place-making, site allocation, and development management levels. These policies will replace those within the 2006 Local Plan and will be used by Tunbridge Wells Borough Council when determining all planning applications that may come forward in the borough throughout the Plan period.
- 3.2. This Residential Parking Standards Background Paper has been produced by Tunbridge Wells Borough Council to set out the results of research on key parking and car ownership-related data based on the 2011 Census (Census day 27th March 2011). The analysis of the data obtained will inform the recommendations provided at the end of this document that are to be taken forward in the new Local Plan's parking standards development management policy. This policy will then be applied to all new residential development proposals under use class C3 (dwellings) only. As such, the recommendations outlined within this paper will not relate to residential institutions (use class C2) as well as all other non-residential development (which are to be dealt under Kent County Council's latest adopted standards and will be detailed further on and within the policy).
- 3.3. The data obtained and analysed within this paper for the borough of Tunbridge Wells includes households' average car or van availability, households' average car or van availability per number of bedrooms as well as by accommodation type (i.e. house or bungalow, or flat, maisonette or apartment) at the Lower Super Output Area (LSOA) level, and the percentage of the working population's distance and method of transport to work analysed at the ward level. Further analysis on average car or van availability was made in **Appendix D** specifically for the Royal Tunbridge Wells (RTW) town centre area at the output area level.
- 3.4. LSOA's are generally defined as boundaries to improve the reporting of small area statistics and are defined as having a minimum and maximum population of 1,000 and 3,000 respectively; likewise, they also have a minimum and maximum number of households of 400 and 1,200 respectively¹. Output areas are the lowest geographical level at which estimates are provided and are as such particularly useful for specific small-scale area analysis. They are generally designed to have similar population sizes (the average being 309) and be as socially homogenous as possible based on tenure of household and dwelling type. Due to the particularly small size of output areas, LSOAs were considered most appropriate for borough-wide analysis. On the other hand, the ward is defined as the primary unit of English electoral geography for civil parishes, Borough and District Councils² which is the largest geography level analysed within this paper. **Figure 1** represents the LSOA boundaries whereas **Figure 2** illustrates the ward boundaries in the Tunbridge Wells borough (see **Figure**

¹ Census Geography: <https://www.ons.gov.uk/methodology/geography/ukgeographies/censusgeography#super-output-area-soa>

² Ward Definition: <https://data.gov.uk/dataset/b1a57d4f-d678-4444-ad3b-03e8e7577cbf/ward>

D1 in **Appendix D** for output area boundaries in the RTW town centre area). For a borough-wide settlement map overlaid with the LSOA boundaries, see **Figure 3**.

- 3.5. Data analysis in this paper will therefore be particularly important in determining a suitable level of parking provision for residents of new residential developments. At the strategic level the new Local Plan will give priority to firstly active modes of transport (such as walking and cycling) and secondly public transport over the private car. This is to ensure that sustainable modes of transport are given priority consideration in new residential development proposals that encourages reduced dependence on the private car with consequent benefits for public health, air quality, and traffic and parking associated issues, especially in urban areas. However, alongside this remains the need for an appropriate provision of parking in new residential developments that reflects existing local car ownership requirements. This is necessary to ensure that parking overspill onto on-street and/or an adjacent neighborhood location is prevented. Equally important in the analysis will be the need to ascertain whether there are sufficient levels of public transport provision in the locality as well as an assessment of what method of transport is most common in each area and therefore of the private car.
- 3.6. 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 as per the legal requirement for all Local Plans under Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012. 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.
- 3.7. Tunbridge Wells Borough Council will be responsive to specific proposals where it can be established that solutions can be fully financed to significantly reduce the use and need of private cars and hence for parking and access requirements.
- 3.8. While changing transport methods could radically change existing transport use and could do so in a short time frame, without specific proposals this Plan assumes that the use of the private car will remain high in the Tunbridge Wells borough over the course of the Plan period based on current trends³ as well as due to its rural nature and low levels of public transport infrastructure outside of the main urban area. Indeed, in the UK as a whole, there was an increase in the average of 11 cars or vans per 10 households to 12 cars or vans per 10 households between 2001 and 2011 with the average car or van ownership per household decreasing only in London⁴. This differs to an average of 1.37 cars or vans per household (or 13.7 cars

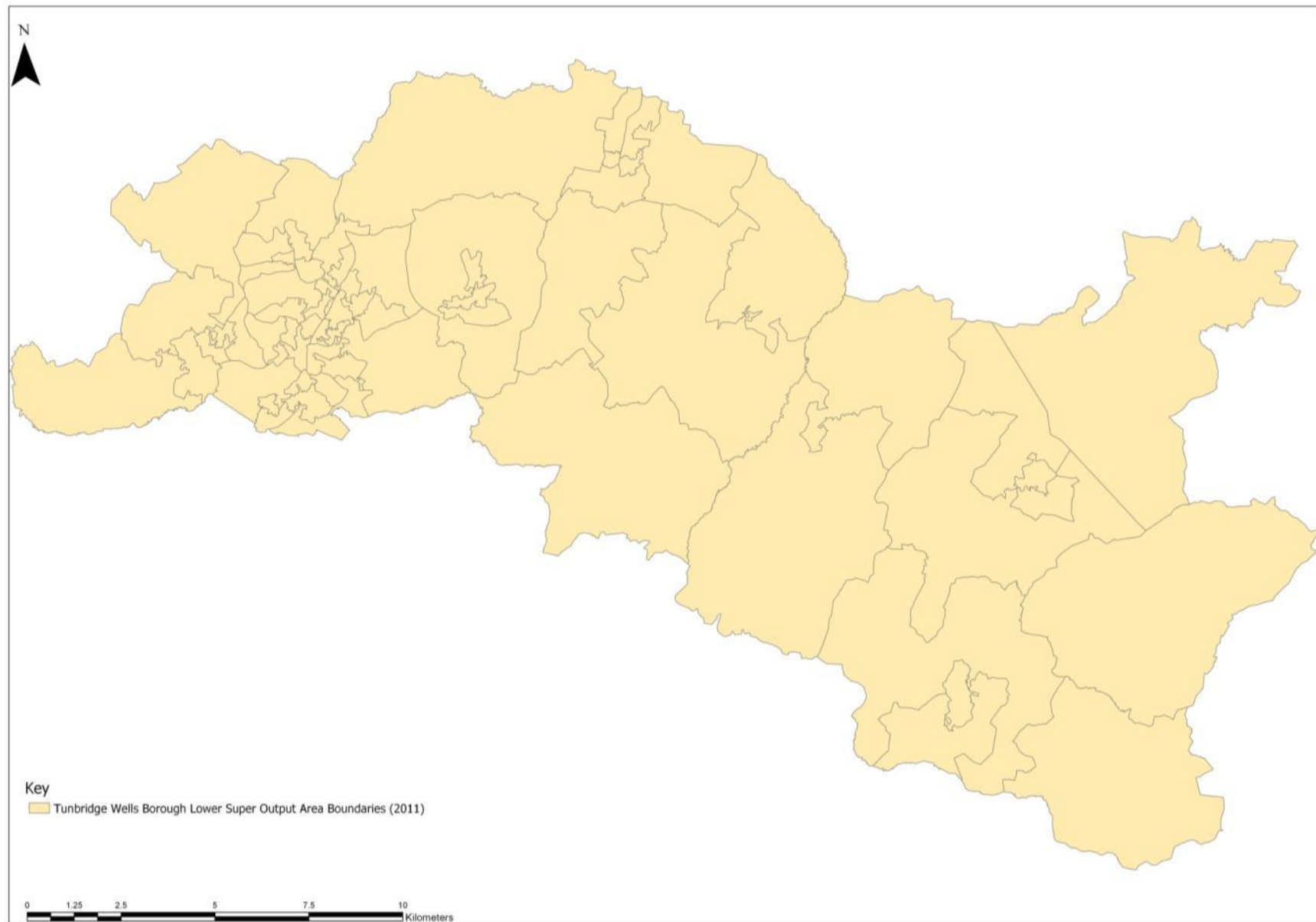
³ Road Traffic Estimates in Great Britain: 2017 Report. Department for Transport.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741953/road-traffic-estimates-in-great-britain-2017.pdf

⁴ 2011 Census: Key Statistics for England and Wales, March 2011: Car or Van Availability:

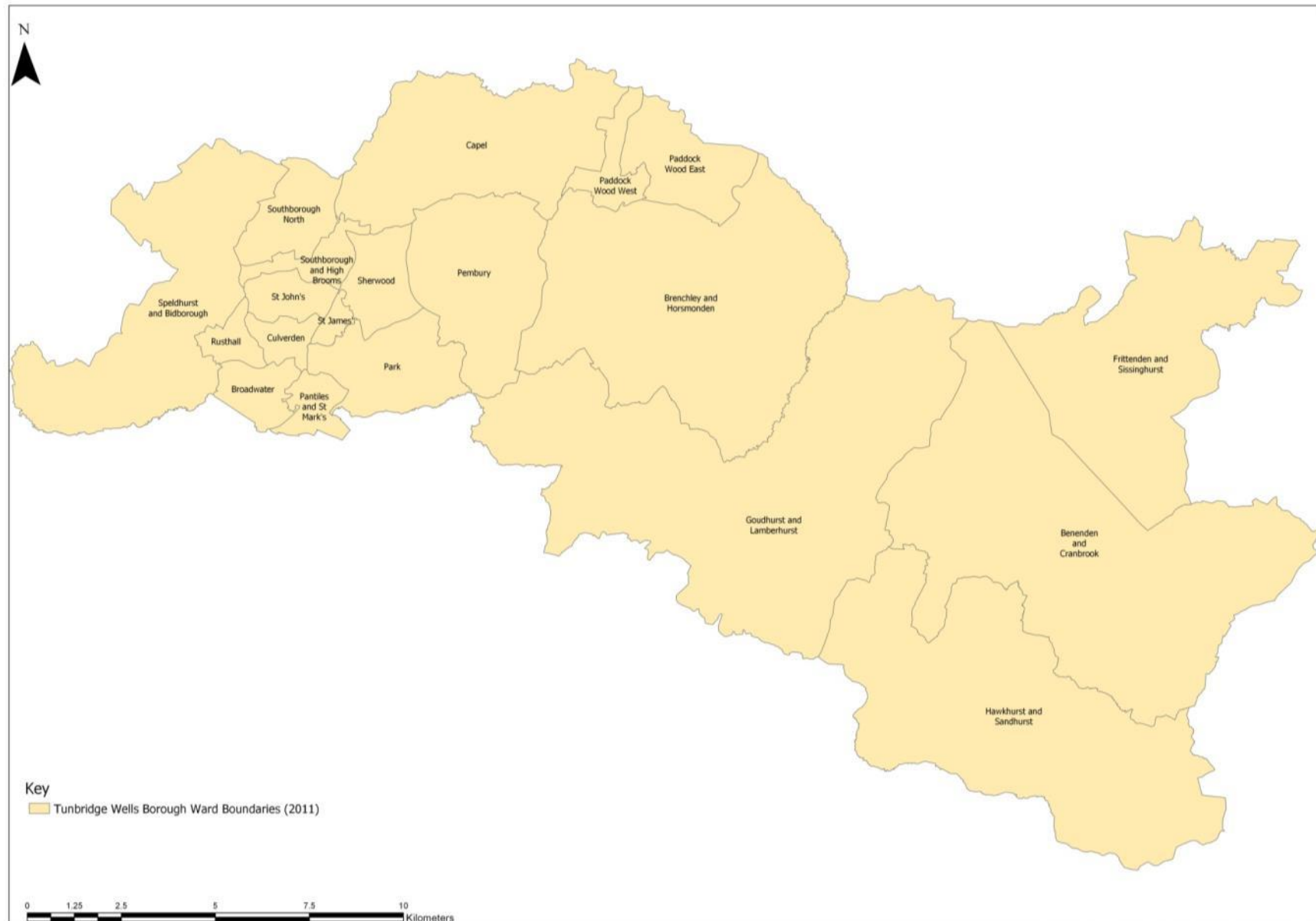
<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/2011censuskeystatisticsforenglandandwales/2012-12-11#car-or-van-availability>

or vans per 10 households) in the Tunbridge Wells borough (Source: 2011 Census Data, ONS). Hence, car or van ownership in the borough is significantly higher than the UK average and therefore parking standards must take this into consideration (while making sure active travel and public transport options are utilised where there are sufficient opportunities and provision available, and opportunities for “modal shift” are taken). It is crucial, however, to determine car or van availability at greater specification such as by area location (i.e. as ownership varies across the borough) as well as by the variables aforementioned above which this paper will consequently address. This will ensure that this paper proposes appropriate and sustainable residential parking standards.

Figure 1 - Tunbridge Wells Borough LSOA Boundaries (2011)

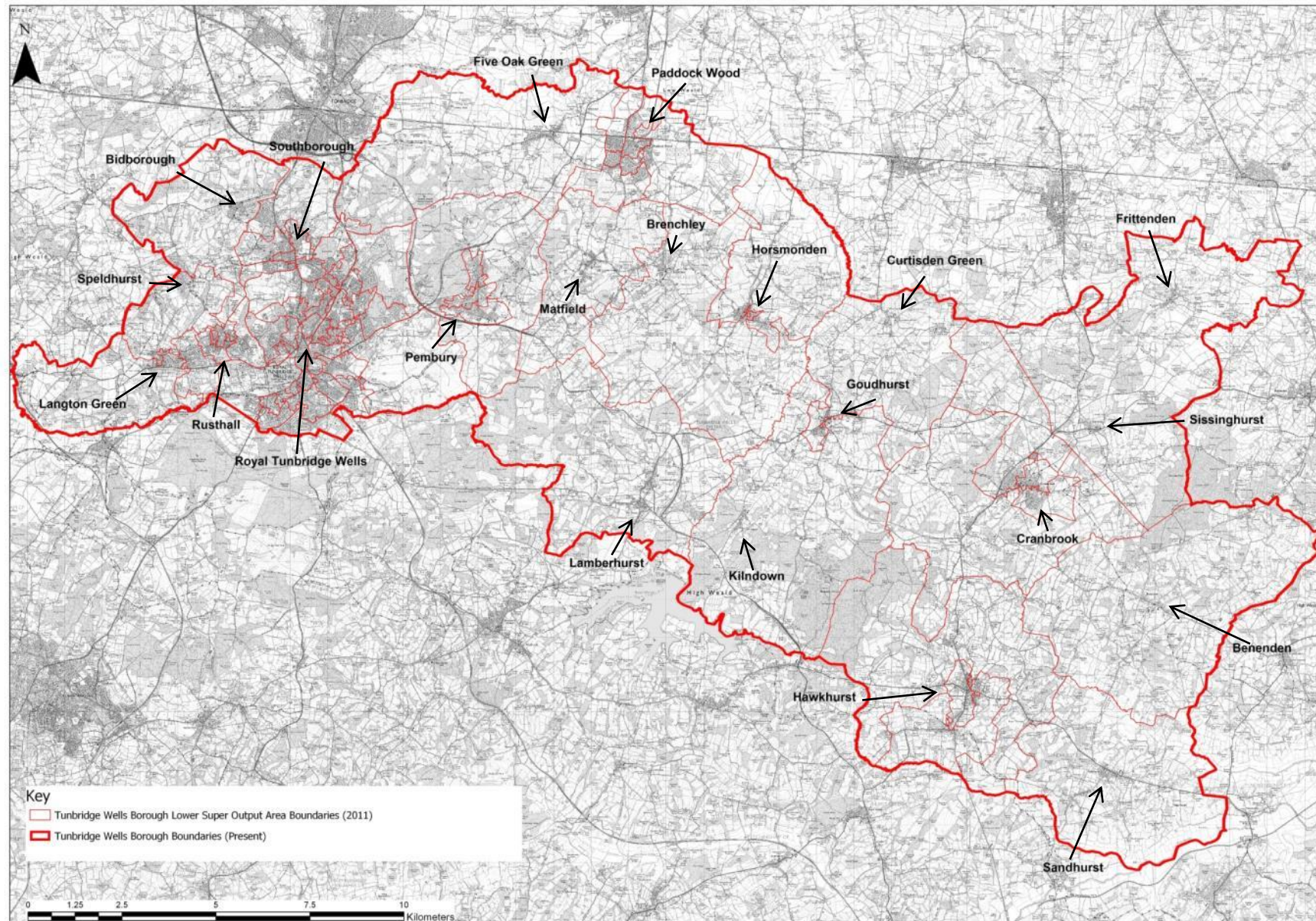
Data Source: 2011 Census Data, ONS
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Figure 2 - Tunbridge Wells Borough Ward Boundaries (2011)



Data Source: 2011 Census Data, ONS

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Figure 3 - Tunbridge Wells Borough Settlement Map Overlaid with LSOA Boundaries (2011)

Data Source: 2011 Census Data, ONS

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4. Policy Context

- 4.1. The National Planning Policy Framework (NPPF, 2018)⁵ states that parking among “other transport considerations are integral to the design of schemes, and contribute to making high quality places” and as such “should be considered from the earliest stages of plan-making and development proposals” (para. 102). Hence, it is crucial to ensure sufficient, appropriate and evidence-based residential parking standards are in adopted policy against which the requirements of the development will be assessed, and should achieve (unless, in accordance with planning legislation, there are “material indications” that indicate a departure from this policy).
- 4.2. The NPPF (para. 105) allows for Local Planning Authorities to set their own parking standards for both residential and non-residential development given that the following are taken into account in the policy:
- a) “The accessibility of the development;
 - b) The type, mix and use of development;
 - c) The availability of and opportunity for public transport;
 - d) Local car ownership levels; and
 - e) The need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles”
- 4.3. This paper on residential parking standards will therefore seek to research and address these criteria by drawing on and analysing 2011 Census Data from the Office for National Statistics (ONS) as aforementioned in the introduction which is considered crucial in providing a sufficient evidence base that will support new residential parking standards for the borough. This will ensure that any new residential parking standard accurately reflects car ownership levels in any area.
- 4.4. The NPPF (para. 106) also 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 (in accordance with chapter 11 of this Framework)”. Indeed, policy TP6⁶ of the Tunbridge Wells Borough Council’s 2006 Local Plan applied a maximum of 1 parking space per dwelling in the Central Access Zone (CAZ; shown on the 2006 Local Plan proposals map and found in **Appendix A**) in the town centre of RTW. This Zone is defined in the 2006 Local Plan as an area within a reasonable distance of the centre measured as an 800m radius from three key locations within the Primary Shopping Area. This maximum of 1 parking space per dwelling was a lower standard than the maximum standards set out in Kent County Council’s Supplementary Planning Guidance (SPG4) document⁷

⁵ National Planning Policy Framework (2018):

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf

⁶ Tunbridge Wells Borough Council Transport and Parking Policies (Local Plan, 2006):

http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0011/20171/Chapter-11-Transport-And-Parking.pdf

⁷ Kent and Medway Structure Plan 2006: Mapping out the Future: Supplementary Planning Guidance SPG 4: Kent Vehicle Parking Standards (July 2006):

(which was based on national planning policy set out in Planning Policy Guidance Note 3: Housing (PPG3)⁸ and in Planning Policy Guidance Note 13: Transport (PPG13)⁹ which have since been superseded by the NPPF). This was primarily due to consideration given to the ease of travel by walking, cycling and public transport in the town centre which reduces the need for a private car with the consequent benefit of facilitating higher density residential development within the area.

- 4.5. For all other areas of the borough (excluding the CAZ), when considering planning applications officers have, as per the 2006 Local Plan policy TP5, generally required residential parking standards at 'the maximum necessary having regard to local highway conditions' in accordance with SPG4 which had been adopted by Tunbridge Wells Borough Council (found in **Table 1** below). Although SPG4 was superseded by Kent County Council's Interim Guidance Note 3 document (IGN3, 2008)¹⁰, this has not been adopted by Tunbridge Wells Borough Council and therefore development management officers have continued to assess parking in development proposals against the maximum standards found in SPG4. Despite this, Tunbridge Wells Borough Council believes that these parking standards are out of date and in need of a localised review for the Tunbridge Wells borough, as well as reviewing the defined boundaries introduced for these parking standards - which this paper will accordingly seek to address.
- 4.6. Additionally, there have also been some instances where the maximum parking standards in Kent County Council's SPG4 document has led to insufficient parking space provision in some developments with consequent on-street parking pressures (either within the development or in surrounding roads), particularly in the main urban area of RTW (but outside the town centre area) and Southborough (as defined within the Core Strategy (2010)¹¹). This is likely to be a contributory factor to there being 50% more permit holders than spaces in some Controlled Parking Zones in town centre areas within the borough as identified in The Council's latest Parking Strategy (2016-2026)¹².

http://www.maidstone.gov.uk/_data/assets/pdf_file/0010/88984/Kent-and-Medway-Structure-Plan-2006-SPG4-Vehicle-Parking-Standards.pdf

⁸ Planning Policy Guidance 3: Housing:

<http://regulations.completepicture.co.uk/pdf/Planning/Planning%20Policy%20Guidance%203-%20Housing.pdf>

⁹ Planning Policy Guidance 13: Transport:

<https://webarchive.nationalarchives.gov.uk/20120919201915/http://www.communities.gov.uk/documents/planningandbuilding/pdf/1758358.pdf>

¹⁰ Kent Design Guide Review: Interim Guidance Note 3 (20 November 2008): Residential Parking:

https://www.kent.gov.uk/_data/assets/pdf_file/0019/15535/Supplementary-guidance-residential-parking.pdf

¹¹ Tunbridge Wells Borough Local Development Framework: Core Strategy: Development Plan Document (Adopted June 2010): http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0009/138636/Core-Strategy-adopted-June-2010.compressed.pdf

¹² Tunbridge Wells Borough Council: Parking Strategy (2016-2026): Including Royal Tunbridge Wells and Rural Areas: http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0013/131404/Final-Parking-Strategy-for-publication-on-web-21-September-2016.pdf

Table 1 – Tunbridge Wells Borough Council 2006 Local Plan Residential Parking Standards

	Royal Tunbridge Wells Central Access Zone	Elsewhere in the Borough
Parking Standard Definition	<i>Maximum</i>	<i>Maximum</i>
1 Bedroom	1	1
2 and 3 Bedrooms	1	2
4 or More Bedrooms	1	3

- 4.7. Moreover, responses resulting from the consultation process undertaken to inform the Council's latest Transport Strategy (2015-2026)¹³ revealed that some of the borough's settlements such as Cranbrook are experiencing particular traffic related issues such as on-street and unlawful parking which additionally creates issues for bus operators accessing bus stands. Constrained access to coach parking is also a noted problem in Cranbrook. Similarly in Paddock Wood, there is perceived unlawful parking on Commercial Road and commuter parking on residential roads including Warrington Road and Ringden Avenue. However, despite commuter parking being a noted issue within consultation responses, consideration is given to the fact that commuter parking will only relate to any proposed parking standard for new residential developments provided the provision is expected off-site and on-street (where this would conflict with commuter parking). As any new parking standard proposed within this paper and ultimately and parking standard within the DM policy in the new Local Plan will relate only to on-site provision, there is not an expectation that commuter parking issues will affect the parking standard proposed (and consequently parking for new residential developments). Furthermore, in both Hawkenbury and Hawkhurst there are also concerns that any allocation of additional residential development locally is a concern to local residents with fears that congestion issues will worsen. Consequently, it is imperative that any new residential parking standards makes certain that such issues will not be exacerbated.
- 4.8. This paper will therefore assess car ownership levels and other related 2011 Census data across the borough in order to determine a suitable level of parking provision that is up-to-date and more locally suited to the borough than Kent County Council's currently adopted SPG4 maximum parking standards. This paper will also ascertain whether different residential parking standards should apply to different defined areas of the borough beyond just a 'Central Access Zone' (as per 2006 Local Plan policy TP6) – or alternative central zone - in the town centre of RTW.

¹³ Tunbridge Wells Borough Development Plan: Transport Strategy: 2015-2026 (July 2015):
http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0018/212355/New_Transport_Strategy_2015-16_TW633_low-res.pdf

5. Tunbridge Wells Borough Car or Van Availability per Household (2011)

5.1. Introduction

5.1.1. In assessing the level of parking provision required in any given area it is crucial to determine the average car ownership levels per household within each area to be assessed against current local, regional or national policies in order to ascertain whether there is an under or over provision of parking spaces. Generally, in order to ensure that an adequate level of parking is provided, it is envisaged that parking standards meet existing car ownership levels except in cases where it is considered that parking standards should take into account local accessibility to active travel and public transport options.

5.1.2. Consequently, this section will analyse the 2011 Census data on car or van availability per household at the Lower Super Output Area (LSOA) level¹⁴. Associated maps have been produced as a means of illustrating this data in the most effective way. **Figures 4, 5, 6, 7, 8, and 9** will analyse the average car or van availability per household, the percentage of households that own no car or van, the percentage of households that own 1 car or van, the percentage of households that own 2 cars or vans, the percentage of households that own three cars or vans, and the percentage of households that own 4 or more cars or vans¹⁵, respectively.

5.2. Analysis

5.2.1. **Figure 4** illustrates the average car or van ownership per household across the borough. The average ownership per household ranges from 0.76 (found within the town centre area of RTW) to 2.05 (found within the Brenchley and part of Horsmonden area). Indeed, there are 4 LSOAs within the town centre area that have an average car or van ownership of less than 1, increasing slightly in surrounding LSOAs (of which some are also included within the CAZ boundaries) and which are predominantly between 0.76-1.21 with the exception of a proportion of two LSOAs at the south of the CAZ area in the ward of The Pantiles and St Marks' that have an average car or van ownership of 1.32 and 1.47). Indeed, within the town centre area, this generally low average level of car ownership accurately reflects the 2006 Local Plan maximum standard of 1 parking space per dwelling (policy TP6) which therefore suggests that this policy has been successful in a) meeting residential parking demand and b) potentially encouraging a modal shift through discouraging private car use in preference for more active forms of travel (walking or cycling) or use of public transport although the extent is undetermined.

5.2.2. Although average car ownership generally increases slightly outside of the town centre area within the main urban area of RTW and Southborough (as well as Rusthall which is adjacent to the main urban area) to a maximum of 1.56 cars or

¹⁴ Please Note: The dataset analysed in this section accounts for Households that are living in caravans or other mobile or temporary structures.

¹⁵ Please Note: Each category is mutually exclusive; for example, for a household owning 5 cars, this household will only fall into the 'four or more cars or vans' category, rather than all of the preceding categories that include car ownership.

vans per household, it is evidently apparent how this region has a lower level of average car ownership (with the exception of Pembury, Paddock Wood, Cranbrook, and Hawkhurst) than other settlements of the borough such as Five Oak Green, Brenchley, Matfield, and Frittenden, but also those settlements just beyond the main urban area such as Bidborough, Speldhurst and Langton Green. With regard to Pembury, Paddock Wood, Cranbrook, and Hawkhurst, these settlements all have relatively low levels of average private vehicle ownership that are similar to those average ownership levels within the main urban area (and Rusthall), although not as low as within the town centre area.

- 5.2.3. **Figure 5** follows a similar expected trend to **Figure 4**, representing the percentage of households in each area with no car or van ownership. The percentage across the borough ranges from 3.58% (found in small parts of Southborough North and Bidborough which predominantly includes agricultural land and farmstead developments) to 40.34% (similarly found within the town centre area of RTW). The higher percentages of no car or van ownership is found in parts of RTW, Southborough and Rusthall with other generally high percentages similarly found in the other settlements across the borough of Pembury, Paddock Wood, Cranbrook and Hawkhurst. Within other areas across the borough that are predominantly rural in nature, the percentage generally ranges from 3.58% to 9.96%.
- 5.2.4. **Figure 6** also continues this trend of low car ownership, representing the percentage of households in the borough that own only one car or van. It's important to note that single car ownership should be assessed relative to the higher categories of car ownership (i.e. 2 cars or vans, 3 cars or vans, and 4 or more cars or vans) as a higher percentage of single car ownership implies lower percentages in the higher categories and consequently contributes to a low average car ownership. Indeed, although single car or van ownership is relatively large across the whole borough, it is clearly evident from the mapping work that single car or van ownership is highest in the main urban area, Rusthall, Paddock Wood, Cranbrook, Hawkhurst and Pembury than outside of these areas (although percentages in relative terms do not differ significantly to some of these settlements). The highest percentage of households with single car or van ownership is 55.37% (found in the south of the RTW town centre area) with the lowest percentage being 25.82% (found in the Kilndown and South Goudhurst area). Moreover, single private vehicle ownership is generally highest in the main urban area (and Rusthall), with a range of 36.48%-55.37% whereas this number varies from 25.82%-37.16% elsewhere (excluding Paddock Wood, Cranbrook, Hawkhurst and Pembury).
- 5.2.5. **Figure 7** represents the percentage of households in the borough that own two cars or vans. Ownership of two private vehicles ranges most significantly of any other category from 12.43% (found in the same RTW town centre area as the lowest average car or van ownership and highest percentage of no car or van ownership) to 50.1% found in Langton Green which, considering the area is adjacent to Rusthall (which is adjacent to the main urban area), has a relatively high average car or van ownership of 1.82 per household. Despite this, Langton Green is around 3km or over from the centre of RTW and therefore the main location for access to public transport options, and is a fair distance for people to walk to employment/shopping/leisure activities. The lowest percentages of households owning two cars or vans is, perhaps

to be expected, found predominantly within the main urban area (and Rusthall), although it should also be noted that there are some relatively high percentages included (total ranges within this area are from 12.43%-37.02%). Although relatively high in parts, the other areas of the borough which have relatively low percentages of households owning two cars or vans are found in Pembury, Paddock Wood, Cranbrook and Hawkhurst (although it should be noted that percentages don't differ significantly from the adjacent areas in these areas with the exception of parts of central Paddock Wood, Cranbrook, and lower Hawkhurst). Within areas outside of these aforementioned settlements, the ranges are generally from 34.61%-50.1%. Indeed, the low percentages of ownership of two cars or vans found in the main urban area again reflects the 2006 Local Plan priority of low parking space provision and maximised building potential which consequently has an impact on average car ownership levels (which are considered to accurately correlate).

5.2.6. **Figure 8** illustrates the percentage of households in each area of the borough that own three cars or vans. The percentage of households across the borough range from 1.21% (found within the RTW town centre area) to 16.64% (Brenchley and part of Horsmonden area). From the mapping work it is clearly evident how there is a much lower percentage of households that own three cars or van in the main urban area (and Rusthall) with percentages generally ranging from 1.21%-10.05%, followed by the other settlement areas of Pembury, Paddock Wood, Cranbrook, and Hawkhurst. This differs to the other settlements in the borough that have a general range of 9.61%-16.64%. To be explored further, this may likely be due to the lack of public transport options in some of these predominantly rural locations of the borough. Particularly in the urban area of RTW, such low percentages (around 1-2%) for ownership of three cars is expected due to the concentration of built development as well as the maximum parking standard of 1 per dwelling in the town centre area (as per 2006 Local Plan policy). Existing issues of congestion and on-street parking are also likely to contribute to the reduction in want and need for a private car within this area.

5.2.7. **Figure 9** further emphasises **Figure 8** in indicating the percentage of households that own four or more cars or vans. As expected based on the other data obtained and analysed above, the areas with the lowest percentages of households owning four or more cars are predominantly within the main urban area, Rusthall, Pembury, Paddock Wood, Cranbrook and Hawkhurst. The lowest percentage is 0.16% (found in the RTW town centre area) and the highest percentage is 9.33% (found in the Goudhurst and part of Horsmonden area). Within the main urban area (and Rusthall), the percentage ranges from 0.16%-4.19%, whereas elsewhere in the borough (excluding those aforementioned settlements) the percentages range from 3.96%-9.33%.

5.3. Conclusion

5.3.1. Consequently, all of the data analysed above and in **Figures 4-9** clearly illustrate that there is a divide between car ownership levels in the main urban area, Rusthall, Pembury, Paddock Wood, Cranbrook, and Hawkhurst and car ownership in other settlements of the borough, particularly Brenchley and part of Horsmonden, as well as Kildown and part of Goudhurst and the area surrounding Cranbrook. This may

be due to multiple reasons to be further examined in other sections, including accessibility and use of public transport options, the most common distance and method of travel to work for each area, as well as the mix of housing types (including by the number of bedrooms and accommodation type) in each area.

- 5.3.2. It is important to note, however, that in many of the settlements where car ownership per household is higher, and where there is generally a higher percentage of households with a higher number of cars or vans under ownership, the maximum standards currently adopted in Kent County Council's SPG4 document may therefore be considered out of date, especially if private car transportation to work is particularly high or is the most common mode of transportation in these areas (to be explored further on). However, within the main urban area outside of the RTW town centre area, Rusthall, Pembury, Paddock Wood, Cranbrook, and Hawkhurst where car ownership is generally lower in comparison to the surrounding areas, it may be considered that maximum parking standards are still unsuitable in ensuring parking standards meet car ownership levels due to the aforementioned traffic problems and on-street car parking issues evident in some of these settlements with the likelihood that maximum parking standards would continue to underprovide. Although, it should be considered that there also remains a need to utilise active and public transportation options in these locations (where already available or in high use) as well as for a suitable and efficient distribution of space within new development.
- 5.3.3. Most interestingly, it is evident that although the average car or van ownership reflects the maximum parking standard, the extent to which the maximum standard is considered suitable at present is dependent upon other factors to be analysed within this paper and subject to further discussion due to its vulnerability to exacerbate parking issues should a developer of a new residential proposal within this area propose less than the maximum amount, or even nil provision, of parking space. Indeed, due to the distinctively low levels of average car or van ownership in this area in comparison to the rest of the borough, it is likely that this area will still require its own, separate lower parking standard as similarly found in the 2006 Local Plan.
- 5.3.4. Although it is acknowledged that there is an intention to encourage active modes of transport within this area alongside utilisation of public transport options as well as making the most optimal and efficient use of space which prioritises the maximisation of development potential (as per the 2006 Local Plan policy TP6) in the inherently high-density area of central RTW, there is also an understanding that policy needs to consider the effect that a maximum parking standard, if proposed, may have on Controlled Parking Zones (CPZ; which makes up a significant proportion of the RTW town centre area; see **Appendix B**). Consequently, the new parking policy in the new Local Plan will most likely require a parking standard that both reflects local car or van ownership levels as well as protects against exacerbation of existing issues, especially as car or van ownership is likely to remain and/or increase in the borough during the Plan period. To be discussed, this protection could potentially be accommodated within flexible policy wording that accounts for ways in which parking provision may be provided if less than a maximum standard is proposed on-site, such as in public car parks if verified research both justifies reason for providing less than the maximum standard on-site as well as that there is spare capacity in nearby public car parks. Conversely, it may be considered that mandatory parking standards on-

site are more suitable than both maximum parking standards and potential off-set provision in public car parks. These options are to be discussed and evaluated further on within the recommendations section of this paper.

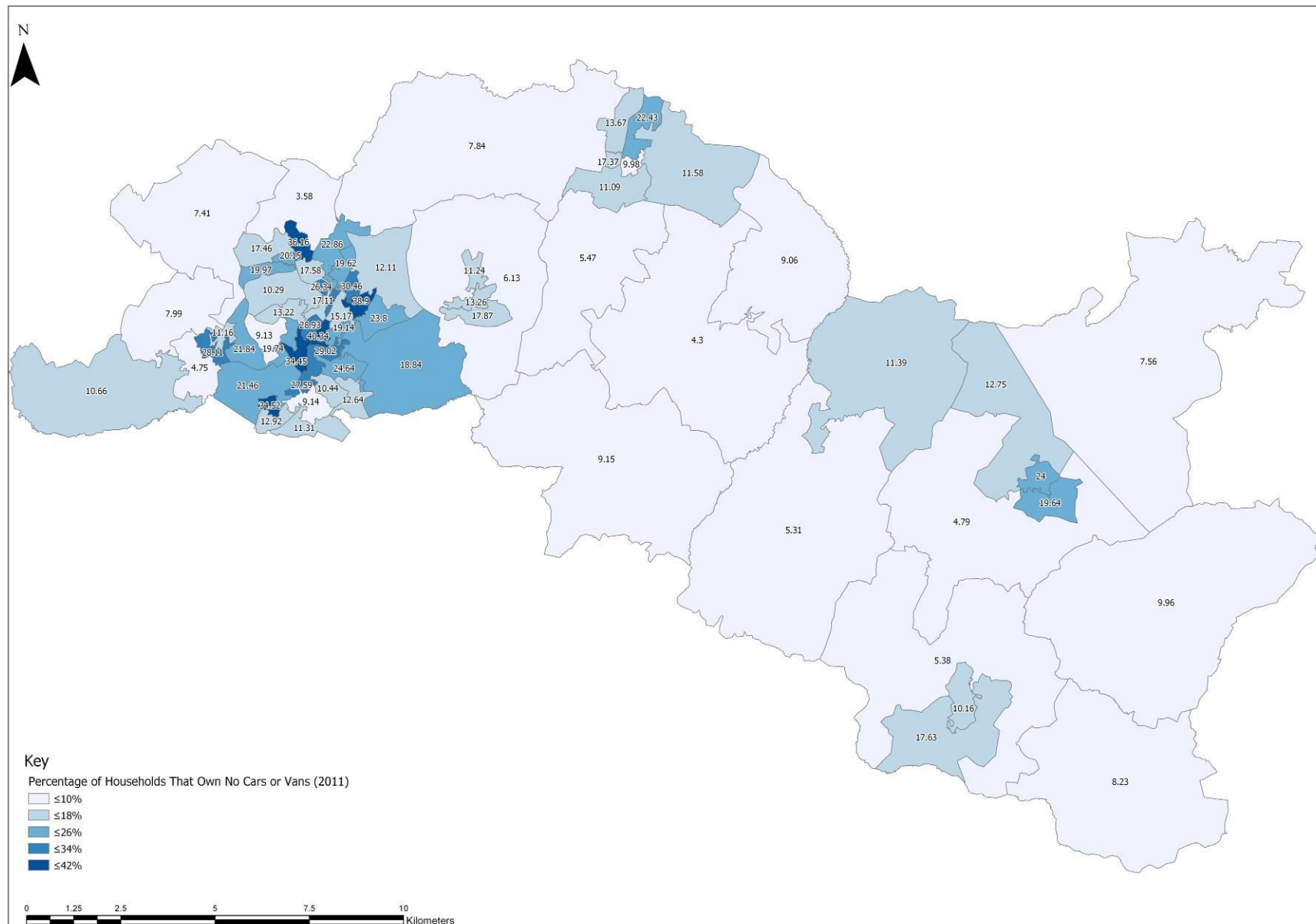
- 5.3.5. Moreover, within the rest of the main urban area (and Rusthall) which surrounds this area, there remains many areas where households have ownership of private vehicles up to over 50% higher than of those households in the town centre area (up to 1.56 cars or vans per household). Therefore, there may be a need for new parking standards to reflect that the areas immediately outside of the town centre area (including those other aforementioned settlements that have similar levels of car or van ownership) need a separate and more suitable (higher) parking standard in comparison to this area. The need for this is perhaps evident in the presence of on-street car parking problems in areas within the main urban area and other settlement areas on main and residential roads as aforementioned in the policy context section of this paper.

Key
Average Car or Van Ownership per Household (2011)

- ≤1.0
- ≤1.3
- ≤1.6
- ≤1.9
- ≤2.2

0 1.25 2.5 5 7.5 10
Kilometers

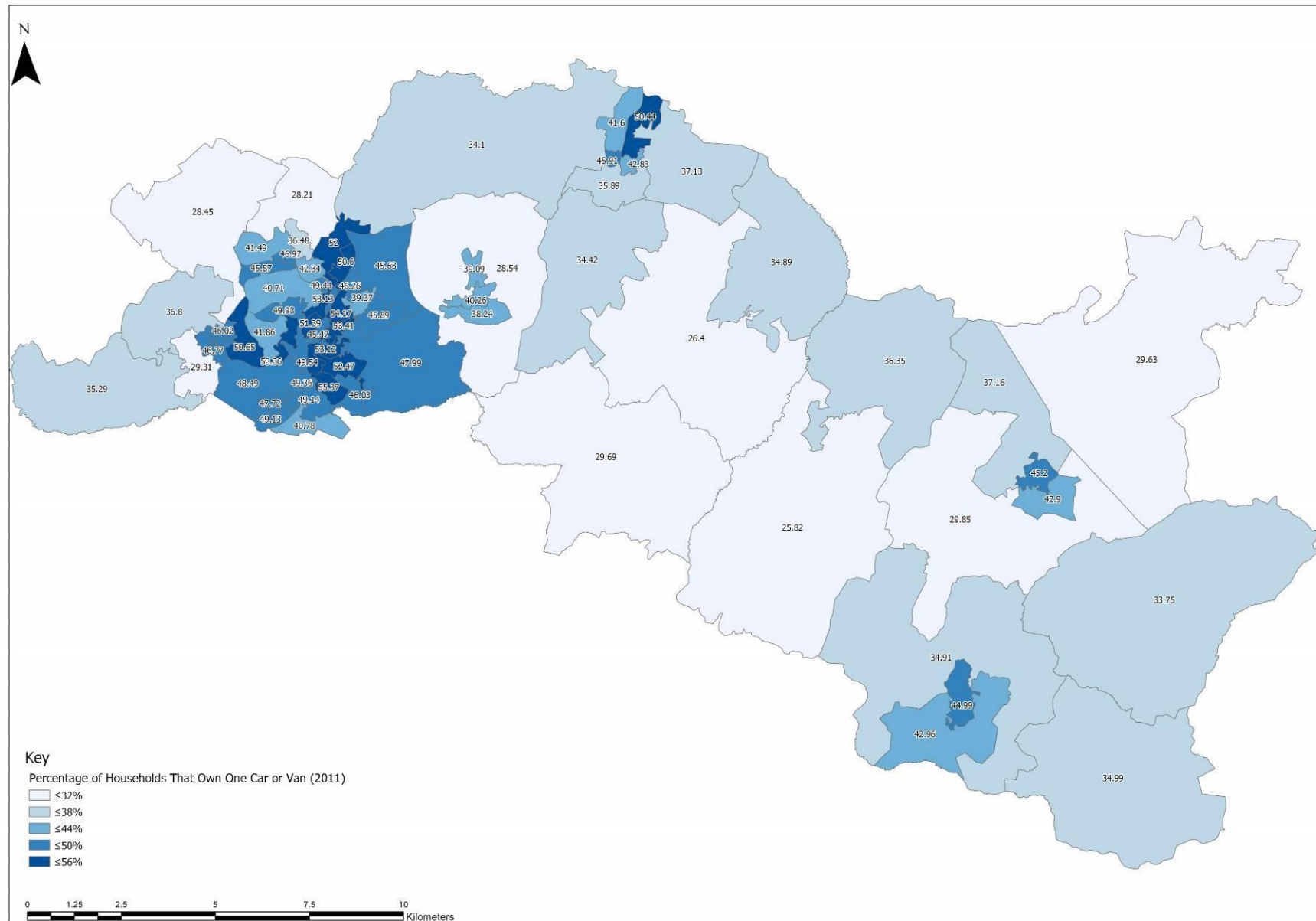
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Figure 5 – Percentage of Households That Own No Cars or Vans (2011; LSOA)

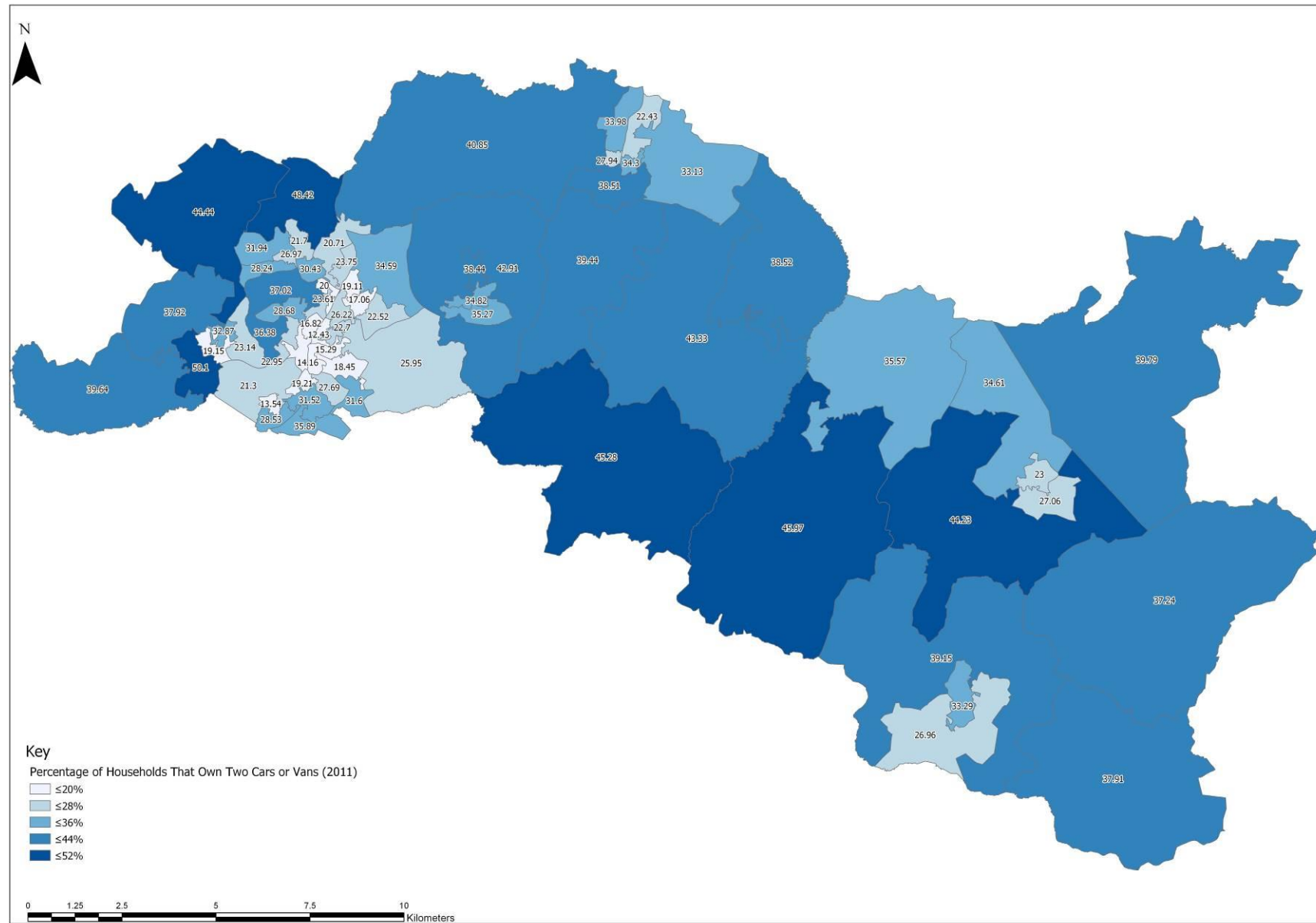
Data Source: 2011 Census Data, ONS

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Figure 6 - Percentage of Households That Own One Car or Van (2011; LSOA)

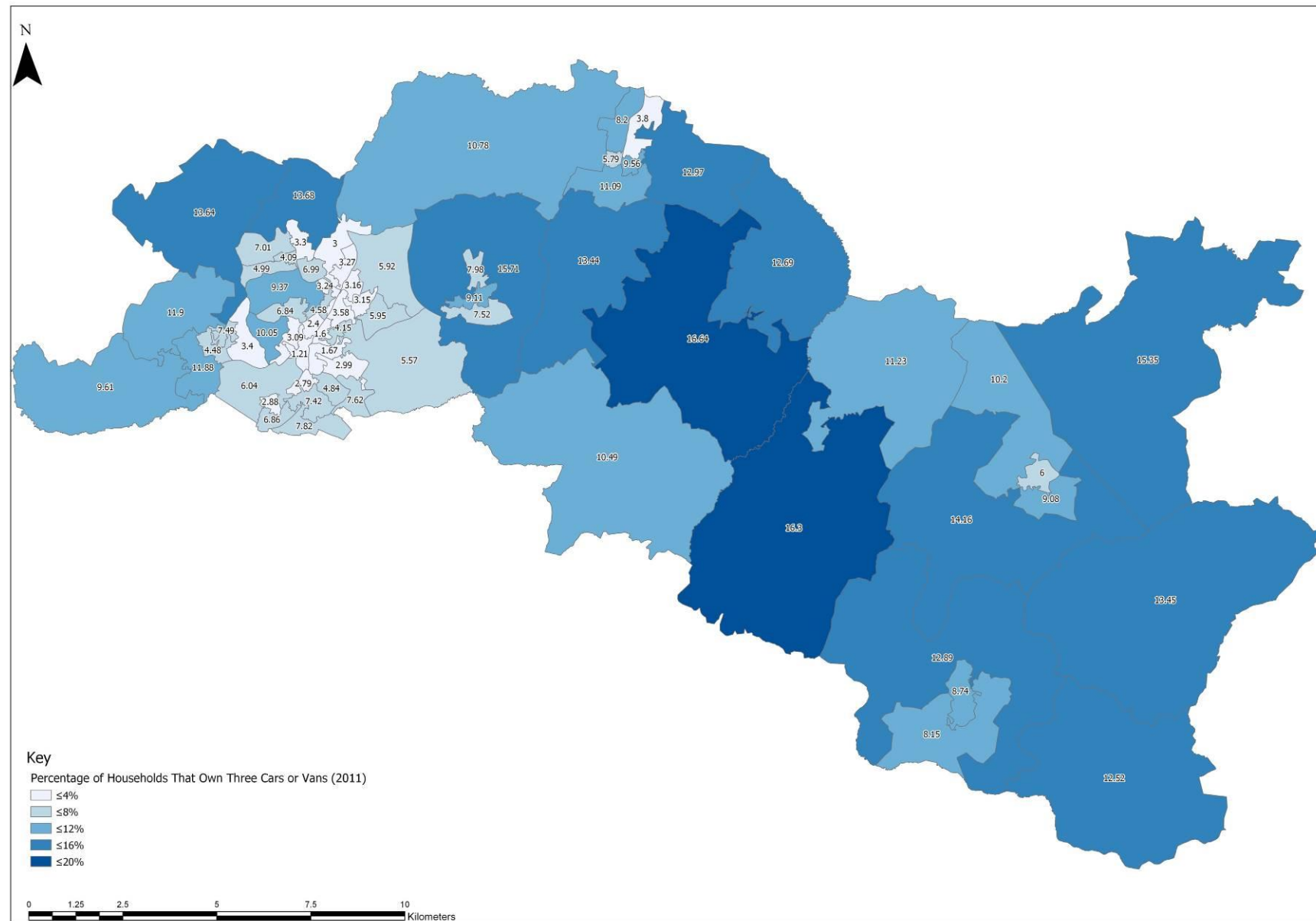


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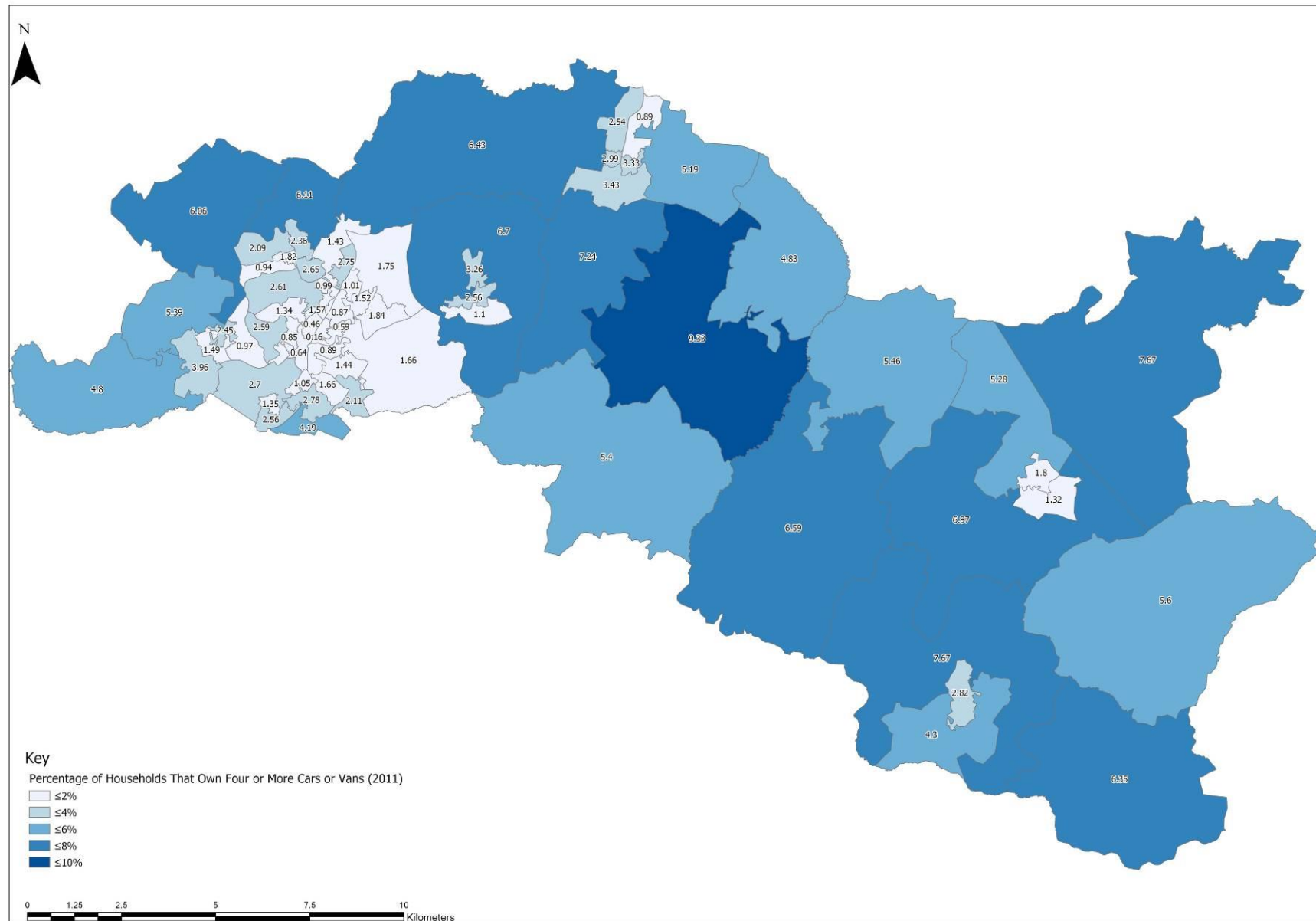
Figure 7 - Percentage of Households That Own Two Cars or Vans (2011; LSOA)

Data Source: 2011 Census Data, ONS

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Figure 8 - Percentage of Households That Own Three Cars or Vans (2011; LSOA)

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Figure 9 - Percentage of Households That Own Four or More Cars or Vans (2011; LSOA)

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6. Tunbridge Wells Borough Car or Van Availability by Number of Bedrooms and Accommodation Type (2011)

6.1. Introduction

- 6.1.1. Alongside general car ownership levels per each area within the borough, it is particularly important to determine the variability in levels by the housing type; that is, by the number of bedrooms as well as by accommodation type (house or bungalow, or flat, maisonette, or apartment). Indeed, Kent County Council, and consequently Tunbridge Wells Borough Council, has typically adopted parking standards as determined by the number of bedrooms. In SPG4, which as aforementioned was adopted by Tunbridge Wells Borough Council in the 2006 Local Plan, the maximum residential parking standards applied to dwellings sorted by 1 bedroom, 2 and 3 bedrooms, 4 or more bedrooms, and sheltered accommodation. Similarly, although not adopted by Tunbridge Wells Borough Council, Kent County Council's IGN3 (superseding residential standards in SPG4) provided guidance on residential parking standards (both minimum and maximum) by 1 and 2 bed flats, 1 and 2 bed houses, 3 bed houses, and 4 bed houses.
- 6.1.2. Consequently, in recommending new residential parking standards for the Tunbridge Wells borough in this paper, this section will determine the differences between average car ownership within each Lower Super Output Area (LSOA) by the number of bedrooms as well as by accommodation type for the whole borough based on 2011 Census data¹⁶. Although Kent County Council has provided guidance in IGN3 by each area type (city/town centre, edge of centre, suburban, suburban edge/village/rural), it is important to determine parking standards per housing type by area that are suitable for, and reflective of, car ownership levels exclusively within the Tunbridge Wells borough as well as whether they should be minimum, maximum, and/or mandatory. This will especially contribute to ensuring that there is a sufficient level of car parking provided in new residential developments in Tunbridge Wells.
- 6.1.3. As indicated within **Tables 2** and **3**, and as noted earlier on, car ownership in the Tunbridge Wells borough is particularly higher than levels found in England more generally. Within every dwelling type, differentiated by the number of bedrooms, Tunbridge Wells had a higher percentage of households in each car ownership category with the exception of the 'households with no car or van ownership' category as well as those owning 1 car or van in dwellings with 5 bedrooms or more. This emphasizes the need to acknowledge that these higher levels, perhaps due to the borough's rural and generally affluent nature, will require standards that are reflective of local car ownership levels rather than national or regional standards (as aforementioned, Kent County Council's SPG4 had been based on previous national guidance).

¹⁶ Please Note: The dataset analysed in this section excludes Households that are living in caravans or other mobile or temporary structures.

Table 2 – Car or Van Availability per Number of Bedrooms per Household in England (2011)

	Total Number of Households	No Cars or Vans in Household	No Cars or Vans in Household %	1 Car or Van in Household	1 Car or Van in Household %	2 Cars or Vans in Household	2 Cars or Vans in Household %	3 Cars or Vans in Household	3 Cars or Vans in Household %	4 or More Cars or Vans in Household	4 or More Cars or Vans in Household %
Total Number of Households	21,982,372	5,673,535	25.81	9,253,934	42.10	5,429,071	24.70	1,201,818	5.47	424,014	1.93
1 Bedroom	2,625,665	1,608,043	61.24	898,285	34.21	104,712	3.99	10,035	0.38	4,590	0.17
2 Bedrooms	6,095,103	2,060,646	33.81	2,996,652	49.16	912,826	14.98	101,089	1.66	23,890	0.39
3 Bedrooms	9,081,603	1,698,765	18.71	4,146,668	45.66	2,582,409	28.44	512,786	5.65	140,975	1.55
4 Bedrooms	3,165,649	226,520	7.16	977,313	30.87	1,406,003	44.41	401,353	12.68	154,460	4.88
5 or More Bedrooms	1,014,352	79,561	7.84	235,016	23.17	423,121	41.71	176,555	17.41	100,099	9.87

Data Source: 2011 Census, ONS

Table 3 – Car or Van Availability per Number of Bedrooms per Household in Tunbridge Wells Borough (2011)

	Total Number of Households	No Cars or Vans in Household	No Cars or Vans in Household %	1 Car or Van in Household	1 Car or Van in Household %	2 Cars or Vans in Household	2 Cars or Vans in Household %	3 Cars or Vans in Household	3 Cars or Vans in Household %	4 or More Cars or Vans in Household	4 or More Cars or Vans in Household %
Total Number of Households	47,035	8,209	17.45	20,260	43.07	13,784	29.31	3,405	7.24	1,377	2.93
1 Bedroom	6,928	3,188	46.02	3,197	46.15	480	6.93	40	0.58	23	0.33
2 Bedrooms	12,346	2,839	23.00	6,654	53.90	2,480	20.09	292	2.37	81	0.66
3 Bedrooms	15,570	1,840	11.82	7,063	45.36	5,184	33.29	1,126	7.23	357	2.29
4 Bedrooms	8,133	259	3.18	2,553	31.39	3,826	47.04	1,063	13.07	432	5.31
5 or More Bedrooms	4,058	83	2.05	793	19.54	1,814	44.70	884	21.78	484	11.93

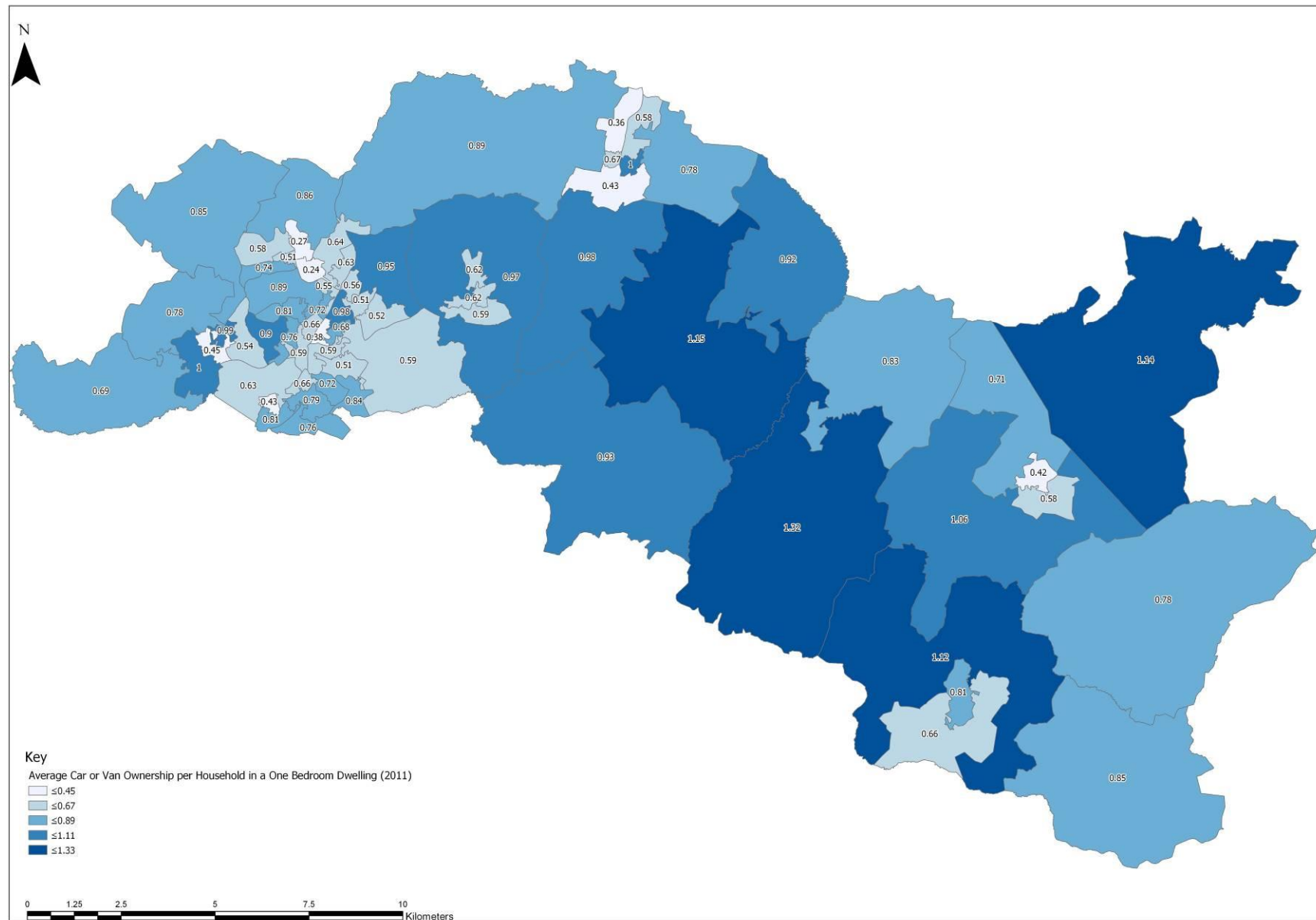
Data Source: 2011 Census, ONS

6.2. Analysis: Average Car or Van Ownership per Household per Number of Bedrooms (2011)

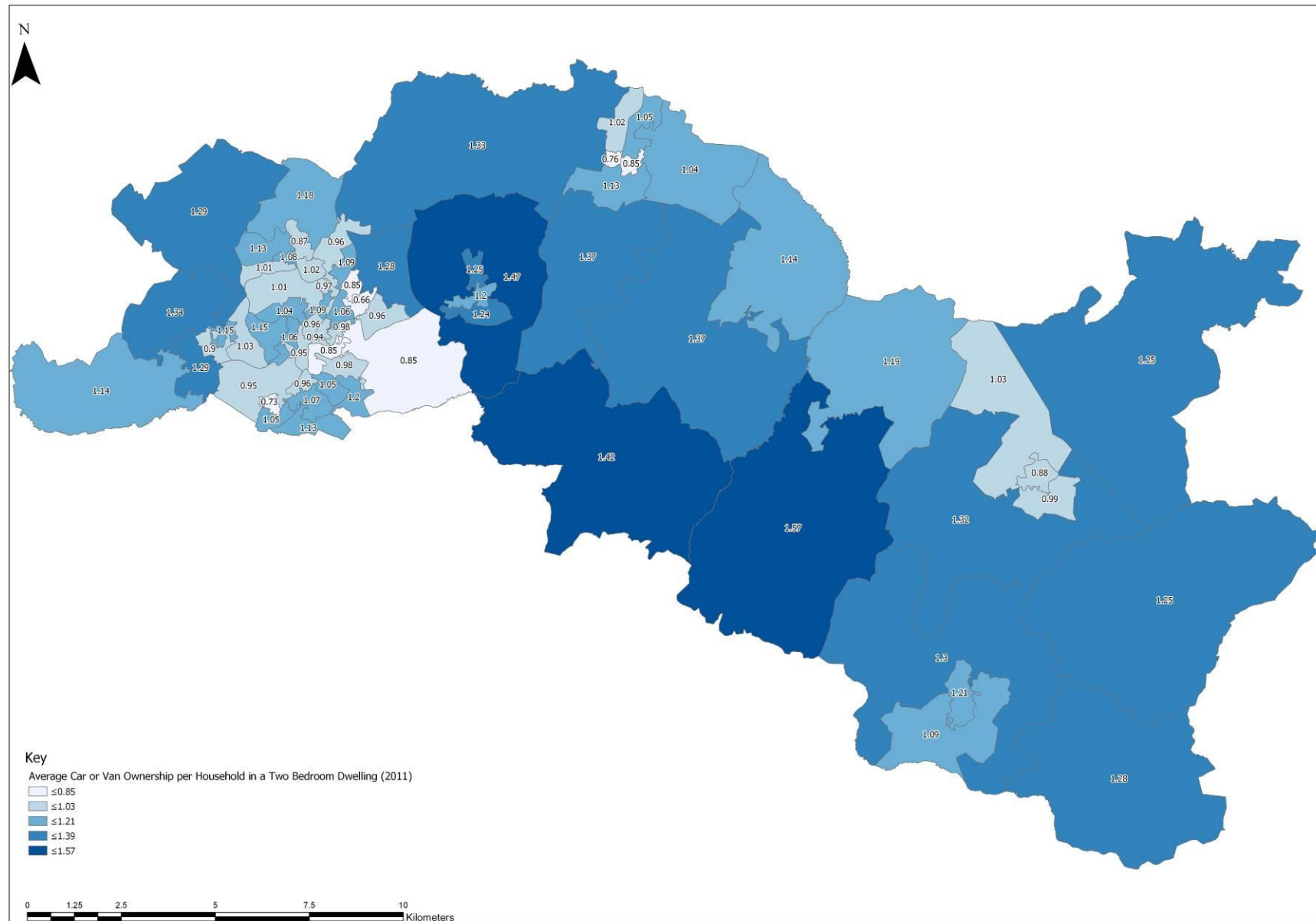
- 6.2.1. As found on the following pages, **Figures 10, 11, 12, 13, and 14** represent the average car or van ownership per household in dwellings of one, two, three, four, and five or more bedrooms for each LSOA in the Tunbridge Wells borough based on 2011 Census data. As expected, in each of the five maps, to a large extent the average car ownership in each dwelling size is lowest in the main urban area of RTW and Southborough (as well as Rusthall), followed by relatively low levels in Pembury, Paddock Wood, Cranbrook, and Hawkhurst, and highest throughout elsewhere in the borough. However, it should be noted that for larger sized dwellings generally with 4 bedrooms or more, the aforementioned settlement areas outside of the central RTW and Southborough areas have relatively similar levels (although still lower) of average car ownership to those areas of the borough considered predominantly rural. This consequently implies for the need for higher parking standards for larger dwelling sizes throughout all the settlement areas with the exception of the central RTW areas which generally retains low levels of car ownership per each dwelling size.
- 6.2.2. For one bedroom households (**Figure 10**), the average car or van ownership ranges from 0.24 (found in Southborough) to 1.32 (found in the rural area including part of Goudhurst as well as Kilndown), with only 7 out of 68 LSOAs having average car ownership of over 1 per dwelling (all areas outside of the settlements of RTW, Southborough, Rusthall, Paddock Wood, Cranbrook, Hawkhurst, and Pembury). Within these aforementioned settlements, particularly low levels of average car ownership (all below 1 car or van per dwelling) are found.
- 6.2.3. For two bedroom households (**Figure 11**), the average car or van ownership ranges from 0.66 (found in east-centre RTW (north-east of the town centre area)) to 1.57 (found in the aforementioned rural area including part of Goudhurst as well as Kilndown). Indeed, it is evident that average car ownership for dwellings with only two bedrooms in the borough is generally lowest, predominantly at around 1 car or van per dwelling, in the main urban area, Rusthall, Paddock Wood, and Cranbrook. Although Pembury and Hawkhurst have higher average car or van ownership levels, the averages are still relatively lower than the surrounding predominantly rural areas. It should be noted, however, that the highest average car ownership in the above stated settlements is found in Pembury at 1.25 per dwelling, which is still considered relatively low.
- 6.2.4. For three bedroom households (**Figure 12**), the average car or van ownership ranges from 1.01 (found in north-east-centre RTW) to 1.84 (found in the Brenchley and part of Horsmonden area). The map evidently shows that the lowest levels, although all over 1 per dwelling, are found in the central RTW town centre area, followed by the wider main urban area (as well as Rusthall) Paddock Wood, Cranbrook, Pembury, and Hawkhurst (although Pembury and Hawkhurst have similar levels to those of other areas outside of these settlements). Elsewhere in the borough, however, there are predominantly higher levels of car or van ownership (mainly east of the main urban area). Generally speaking, the central RTW areas found inside/adjacent to the existing CAZ range from 1.06-1.37 cars or vans per

household, with the other settlements of Paddock Wood, Cranbrook, Hawkhurst and Pembury generally having a slightly higher range of 1.33-1.63, with all other areas having ownership levels close to 2. Consequently, it should be noted that the average car or van ownership for households living in dwelling sizes of three bedrooms inside the RTW town centre area have an average car or van ownership level higher (although not significantly) than that of the maximum parking standard of 1 required as part of the 2006 Local Plan TP6 policy. As such, there may be the need to consider an alternative requirement to the maximum of 1 space per dwelling regardless of the number of bedrooms.

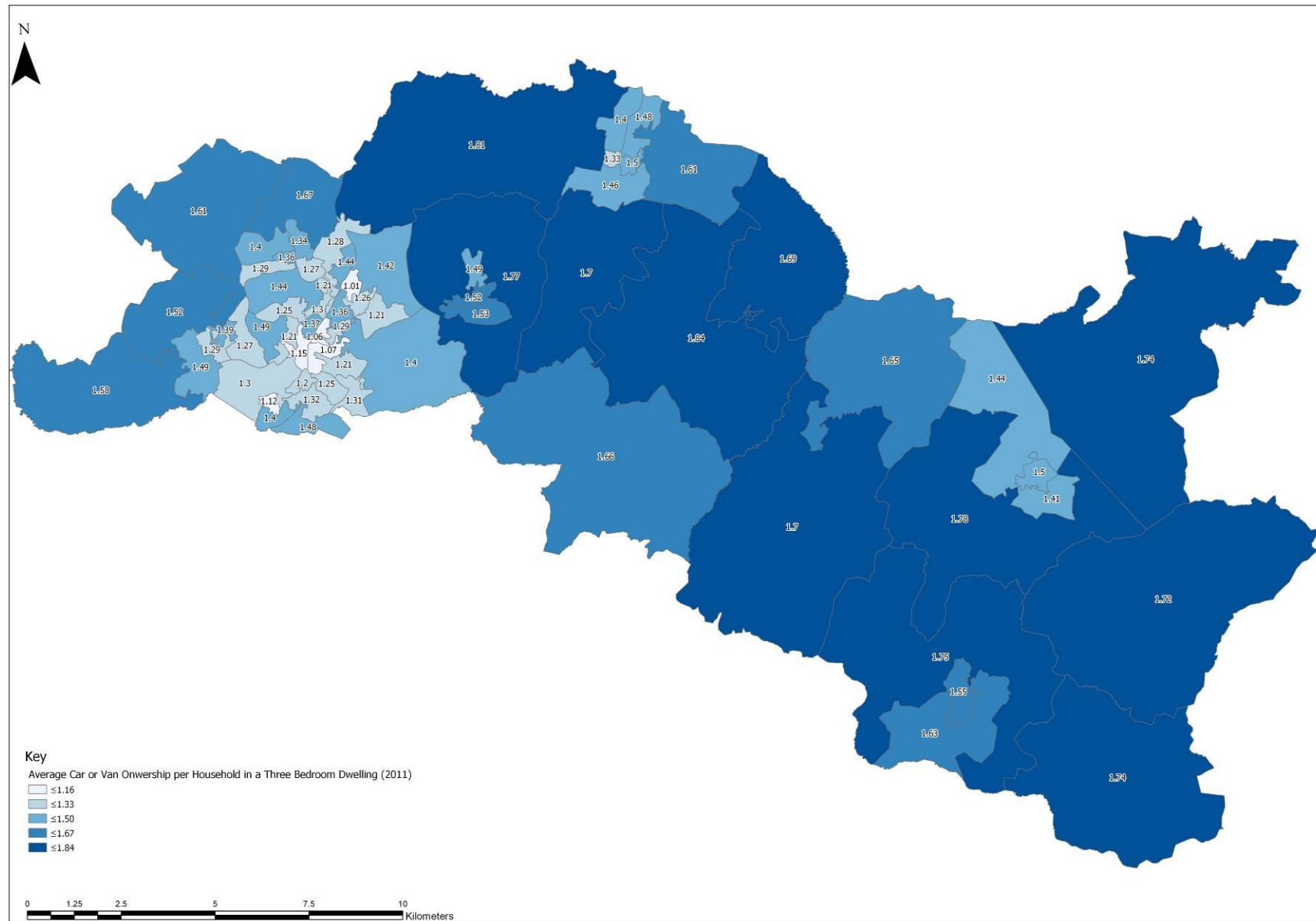
- 6.2.5. For four bedroom households (**Figure 13**), the average car or van ownership ranges from 1.31 (found in the RTW town centre area) to 2.36 (found within the Capel parish area which is inclusive of the settlement of Five Oak Green). As above, although the lowest average car or van ownership levels are generally found in central and surrounding central RTW Wells areas in relation to the rest of the borough, the average car or van ownership level is notably higher than 1 per household up to an average of 1.6. Although higher in comparison to some areas on the edge of the main urban area, in comparison to areas surrounding them there is a relatively low average car or van ownership per household in the settlements of Paddock Wood, Cranbrook, Hawkhurst, and Pembury. However, it can be stated that Pembury and Hawkhurst have slightly higher averages in comparison to a part of East Paddock Wood as well as Cranbrook that are closer to the averages of their respective surrounding predominantly rural areas.
- 6.2.6. For five bedroom households (**Figure 14**), the average car or van ownership ranges from 1.14 (found in the RTW town centre area) to 2.73 (found in Matfield and the surrounding area). Following a similar trend, the lowest averages are generally found in the central RTW area (although as above, most areas within this general town centre area (with the exception of the area with an average of 1.14) have average levels ranging from 1.5-1.95), and then increasing further towards the edge of the main urban area, with the highest averages found in the surrounding predominantly rural areas. Although parts of the settlements of Paddock Wood, Cranbrook, Hawkhurst, and Pembury are relatively lower in comparison the surrounding settlement areas, the averages are still notably high at predominantly over 2 cars or vans per 5+ bedroom dwelling with the exception of one LSOA in east Paddock Wood (1.96).

Figure 10 – Average Car or Van Ownership per Household in a One Bedroom Dwelling (2011; LSOA)

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Figure 11 – Average Car or Van Ownership per Household in a Two Bedroom Dwelling (2011; LSOA)

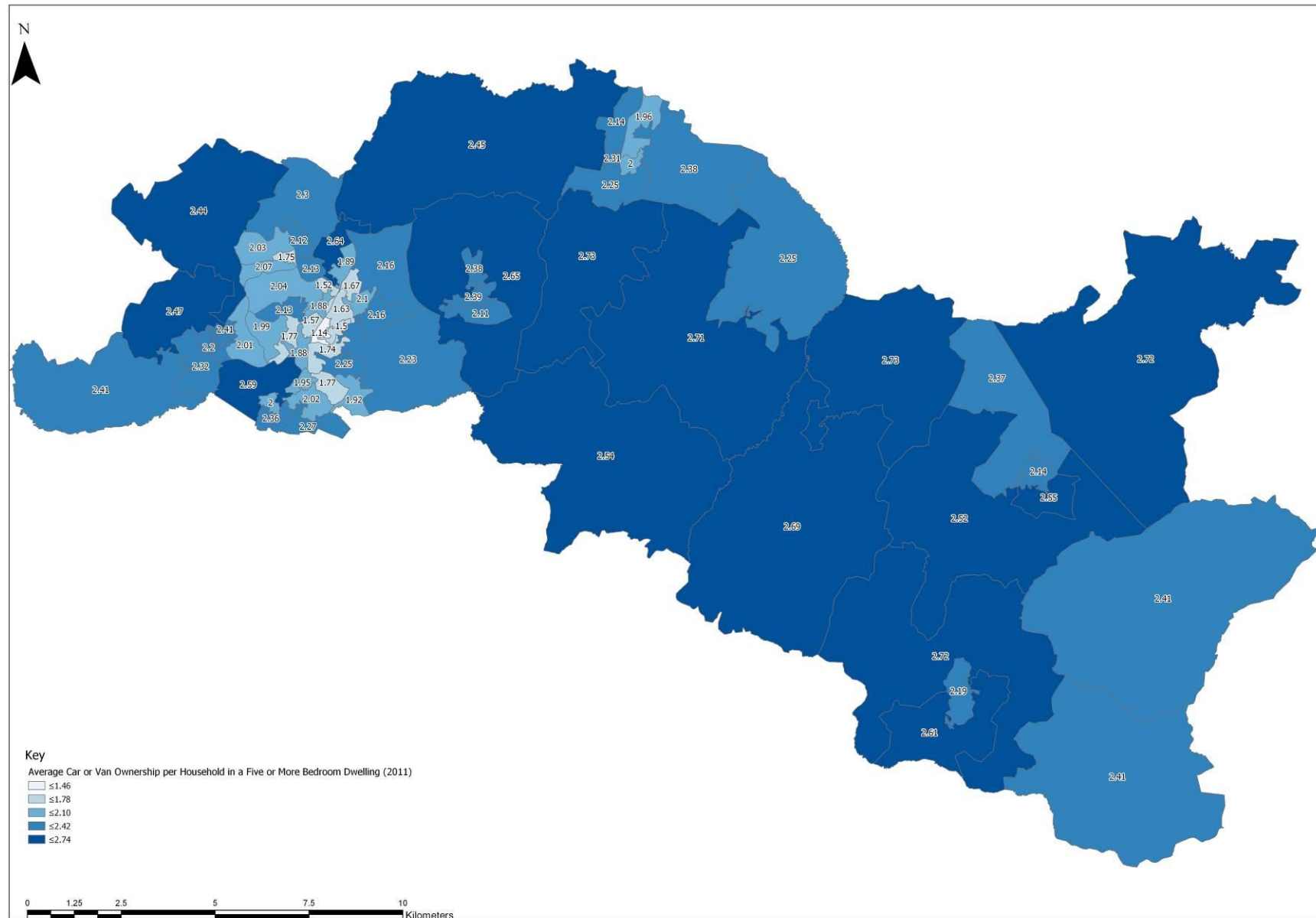
Data Source: 2011 Specially Commissioned Census Data, ONS
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Figure 12 – Average Car or Van Ownership per Household in a Three Bedroom Dwelling (2011; LSOA)

Data Source: 2011 Specially Commissioned Census Data, ONS
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Figure 14 – Average Car or Van Ownership per Household in a Five or More Bedroom Dwelling (2011; LSOA)

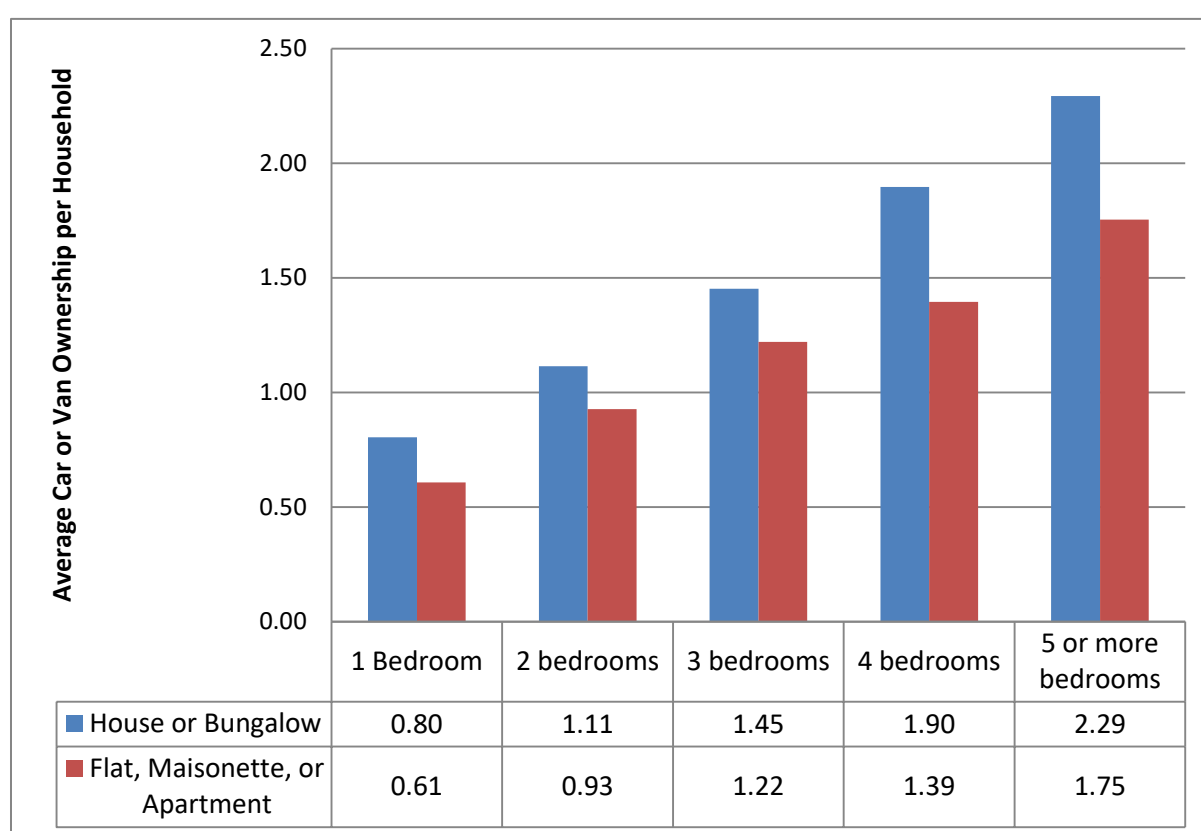


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6.3. Analysis: Average Car or Van Ownership per Household per Number of Bedrooms by Accommodation Type (2011)

6.3.1. This section will seek to analyse the variability between the type of dwelling/accommodation in the Tunbridge Wells borough as part of further analysis of car or van availability per household per number of bedrooms. As such, **Figure 15** illustrates the average car or van ownership per household per number of bedrooms by accommodation type in the Tunbridge Wells borough. The accommodation type as aforementioned is defined through two categories (House or Bungalow, and Flat, Maisonette, or Apartment).

Figure 15 – Average Car or Van Ownership per Household per Number of Bedrooms by Accommodation Type in the Tunbridge Wells Borough (2011)



Data Source: 2011 Specially Commissioned Census Data, ONS

6.3.2. Indeed, as shown in **Figure 15**, within each dwelling category defined by the number of bedrooms the houses or bungalows consistently have higher average car or van ownership per household than flats, maisonettes or apartments, with the lowest average being 0.61 per a 1 bedroom flat, maisonette, or apartment, and the highest average being 2.29 per a 5 or more bedroom house or bungalow. However, it should be noted that the difference between each accommodation type in the averages for 1, 2 and 3 bedroom dwellings are relatively small (at a maximum difference of 0.23 cars or vans per dwelling (for 3 bedroom dwellings)). However, for dwellings with 4 bedrooms or 5 or more bedrooms, the average car ownership exceeds a difference

of 0.5 cars or vans per dwelling for houses or bungalows in comparison to flats, maisonettes, or apartments.

- 6.3.3. It may be the case that the reasoning behind higher average car or van ownership for houses in comparison to flats for all categories, but notably for dwellings with over 3 bedrooms, is due to larger houses or bungalows more likely having a larger private curtilage surrounding the development (e.g. a driveway) than flats or apartments that are more likely to have no private curtilage, especially in multi-storey buildings. Consequently, there will need to be consideration given to the differences in parking standards for not only the number of bedrooms per dwelling, but also the dwelling/accommodation type to be determined in line with the analysis of other data in this paper.

6.4. Conclusion

- 6.4.1. Consequently, the data analysed above clearly demonstrates that not only does average car or van ownership increase alongside an increase in the number of bedrooms a dwelling has in general, but also that there is a difference in averages for each dwelling/bedroom size by area. Generally, the central RTW town centre area has the lowest averages per each bedroom category relative to the rest of the borough, with slightly higher averages in the main urban area of RTW (excluding the town centre area) and Southborough (as well as Rusthall), Paddock Wood, Cranbrook, Pembury, and Hawkhurst. The highest averages are found elsewhere in the borough outside of these above stated settlement areas. Indeed, this accurately reflects the overall average car ownership for each area as analysed within chapter 6.
- 6.4.2. However, although average car or van ownership levels are lower in the central RTW town centre area relative to the external main urban area and other settlements across the borough, the average is notably over 1 car or van per household per dwelling size of three bedrooms or more (each category). As such, it could be considered suitable to alter the required parking standard from a blanket requirement of 1 space per dwelling as per 2006 Local Plan policy TP6 to a slightly higher standard for larger dwelling sizes, to be considered further on within the recommendations section. This would ensure that the parking standard not only accurately reflects the overall average car or van ownership per household for the area as a whole, but also for households within each dwelling size within the area.
- 6.4.3. Furthermore, based on the analysis within the section, it should therefore be acknowledged that for each dwelling in the settlement areas of the main urban area, Rusthall, Paddock Wood, Cranbrook, Hawkhurst, and Pembury, the average car ownership per household in each dwelling/bedroom size is consistently lower than in all other areas of the borough. However, it should be noted that in some of these settlements, the average car or van ownership for dwellings with 3 or more bedrooms increases in some LSOAs over the average for the individual area as a whole, with most LSOA averages across the borough being exceeded in larger dwellings beyond 3 bedrooms in size which is to be expected due to lower than average car ownership levels in the smaller dwellings. Consequently, although the overall average for a settlement such as Paddock Wood may be relatively low as compared to surrounding

settlements, the average for larger dwelling sizes within that average will be particularly high. As a result, there will be a need for parking standards to take this factor into consideration for larger dwellings, regardless of whether they are in one of the aforementioned settlements or in an area predominantly rural in order to ensure that sufficient parking is provided that accommodates households living in larger dwellings while also taking into consideration the average for the whole area. It will therefore be appropriate for the recommended parking standards within this paper to include differentials for each area by the number of bedrooms the dwelling has.

- 6.4.4. Additionally, it is also evident that there is a general difference between average car or van ownership for each accommodation type (house or bungalow; or flat, apartment or maisonette) for each dwelling category by number of bedrooms. Houses and bungalows within each category as aforementioned have a higher average car or van ownership per household than flats, apartments or maisonettes. However, it should be noted that the differences are relatively small with the exception of dwellings with four or more houses which have a difference of over 0.5 cars or vans per household. This, alongside the other data in this paper, will also need to be taken into consideration when determining the recommended parking standards.

7. Tunbridge Wells Borough Working Population's Method and Distance of Travel to Work (2011)

7.1. Introduction

- 7.1.1. This section will analyse the 2011 Census data¹⁷ on the working population's method and distance of travel to work by ward (see **Figure 2** in the Introduction for ward boundaries) in the Tunbridge Wells borough. The working population, as per the 2011 Census requirements, is defined as those persons aged 16-74, in any given area, who were in employment in the week before the Census day (27th March, 2011). Within the context of general car ownership levels for each ward area having been analyzed at the LSOA level (LSOA boundaries make up the boundaries of wards), this data will have an implication on the level of residential car parking to be considered suitable for each area as it will determine both the use and implied need for certain modes of transport by working residents to their workplace (of which can be considered a primary reason for travelling/transportation), particularly by use of a car or van, public transport and active modes of transport, to be interpreted in-line with the distances travelled to these workplaces by working residents.
- 7.1.2. It is important to state, however, that the need for certain modes of transportation are implied from, rather than directly linked to, the level of use of these modes as using a certain mode does not necessarily mean that it is needed. For example, using a private car does not necessarily mean that it is needed as there may well be alternatives within the locality but is chosen against due to a range of factors that may include affordability, ease of access, convenience (e.g. proximity and/or waiting times for public transport), reliability, or simply due to a lack of knowledge of such alternative modes of transport. Despite this, due to the predominantly rural nature of the borough, it is likely that there is a limited range of transportation options in many locations (perhaps with the exception of larger settlements such as Royal Tunbridge Wells) meaning that the most common mode of transportation is likely the most available and consequently the most needed.
- 7.1.3. **Figure 16** visually represents the percentage share of the working population travelling to work by a range of different modes of transport for each ward in the Tunbridge Wells borough. The data for this **Figure (16)** is tabulated in **Table 4**. Moreover, **Figure 17** visually represents the percentage share of the working population travelling to work by distance for each ward. Similarly, the data for this **Figure (17)** is tabulated in **Table 5**.

7.2. Analysis

- 7.2.1. In analysing 'Mainly Homeworking' data found in both **Tables**, the data indicates that the wards in which the highest percentage of the working population found 'Mainly Homeworking' are Frittenden and Sissinghurst (22.09%), Goudhurst and Lamberhurst (21.82%), Speldhurst and Bidborough (21.64%), and Brenchley and Horsmonden (19.32%). Despite this, although slightly lower, Hawkhurst and

¹⁷ Please Note: The dataset analysed in this section accounts for Households that are living in caravans or other mobile or temporary structures.

Sandhurst (18.38%), Benenden and Cranbrook (17.88%) and Rusthall (15.65%), are also relatively high and inclusive of (or adjacent to) settlements that previous analysis has shown have particularly low average car or van ownership levels. These high levels of homeworking may be due to a number of reasons, such as fast broadband improvements/provision across the borough, the type of employment, as well as the distance required to travel to their workplace. Although there may not be any conclusive data from this, the wards that have a relatively low percentage of the working population that are 'Mainly Homeworking' are those found in the main urban area of RTW and Southborough with the exception of the Pantiles and St Mark's (16.06%) and Park (14.02%).

- 7.2.2. The generally low percentages of homeworking in the main urban area may be due to the higher level of localised employment opportunities meaning that those in employment generally don't need to travel significant distances to go to work. This is evident by the fact that the highest percentages of working people travelling under 5km to work are those in the wards of the main urban area including Southborough (Southborough and High Brooms had the highest percentage share). Rusthall (adjacent to the main urban area) also had 38.91% of working people travel less than 5km to work which is perhaps expected due to its close proximity to the main urban area. Settlements such as Pembury, Paddock Wood (East and West) and Cranbrook (included within Benenden and Cranbrook ward) also have relatively high percentages of workers working within 5km. However, Hawkhurst (included within Hawkhurst and Sandhurst ward) generally has a low percentage of workers working in close proximity to their home. The wards which are generally rural in nature, however, are those that generally have a low level of people working within close proximity to their home (such as Brenchley and Horsmonden, Frittenden and Sissinghurst, and Goudhurst and Lamberhurst).
- 7.2.3. Indeed, the short distance to work data is reflected by the high percentages of working people travelling to work by either walking or by bike. It is unsurprising that within the areas where there is a high percentage of people travelling to work under 5k, there is also a high percentage of people utilising active modes of transport (a sustainable mode of transport). These areas include Broadwater (16.65%), Culverden (27.98%), the Pantiles and St Mark's (17.19%), Park (20.91%), St James' (26.19%), St John's (21.06%), Sherwood (15.71%), and Southborough and High Brooms (15.94%). Indeed, although slightly lower, other wards that are inclusive of the settlements of Cranbrook and Paddock Wood, as well as Rusthall (adjacent to RTW) also have relatively similar levels. However, wards inclusive of Hawkhurst and Pembury have low levels of active travel to work that are similar to those found in predominantly rural wards (such as Frittenden and Sissinghurst or Goudhurst and Lamberhurst). The high level of active travel found in the main urban area (as well as Rusthall and some other settlements as discussed above), however, is evidence to support how households located within settlements that generally have a low average car or van ownership level are more likely to be working within reasonable proximity of these areas (with resultant reduced need for the private car) and therefore more so likely to travel via active modes of transport which may be due to greater local employment opportunities.

- 7.2.4. Furthermore, with regard to the underground, metro, light rail, tram, train, bus, minibus, or coach (i.e. public transport; also considered a sustainable mode of transport as an alternative to the private car)¹⁸, it is evident that there is a mixed pattern of use by residents across all the wards in the borough. Indeed, also as expected, generally urban wards found in the main urban area have a higher use of public transport than the rest of the borough, including higher than some of the wards inclusive of the settlements of, for example, Hawkhurst and Pembury. It should be noted however, that although relative to some of the high percentages of public transport use in the main urban area, some other wards also generally have similarly high levels, such as in Speldhurst and Bidborough, and Brenchley and Horsmonden and therefore does not seem too dependent upon how 'rural' or 'urban' an area may be in comparative terms. Although there is mixed public transport use across the borough, this is inherently due to the level of provision (e.g. there may be fewer bus routes going through a particular settlement as compared to another). The highest percentages found in the main urban area, however, are indicative of both a high level of public transport provision and accessibility as well as an implied lower level of need to travel to work via the private car (as also indicated by a high level of active travel).
- 7.2.5. Indeed, the central wards within RTW Wells have the lowest percentages of the working population travelling to work via car or van (i.e. Broadwater (47.92%), Culverden (35.60%), the Pantiles and St Mark's (37.07%), Park (38.41%), St James' (40.52%), and St John's (43.94%)) with the highest percentages found in the wards of Benenden and Cranbrook (53.37%), Brenchley and Horsmonden (57.33%), Capel (63.37%), Frittenden and Sissinghurst (54.84%), Goudhurst and Lamberhurst (53.87%), and Hawkhurst and Sandhurst (62.14%). However, some of the wards which are primarily composed of a settlement that has a low average car or van ownership also have particularly high levels of car or van use for travel to work (i.e. Southborough and High Brooms (within the main urban area; 52.28), Paddock Wood East (56.53%) and West (58.69%) and Pembury (64.25%)) as well as Rusthall (adjacent to RTW; 52.49%). As such, it is implied that car use in the aforementioned settlements outside of RTW that have relatively low average car or van ownership levels as analysed in the preceding sections is still very much needed and in high demand (particularly in Pembury with very low public transport use and low utilisation of active modes of transport). In the central RTW wards, however, it is apparent that car or van use in travelling to work is relatively much lower than in the rest of the borough which is supported by the higher percentage of workers travelling via public transport and active modes of transport.
- 7.2.6. Indeed, the distance of travel to work data with regard to the longer distances supports the aforementioned analysis. With regard to those workers travelling 10-20km, the wards which have the highest percentages are generally those wards which do not include settlements with a relatively low average car or van ownership level with the exception of Paddock Wood East and West as well as Pembury which

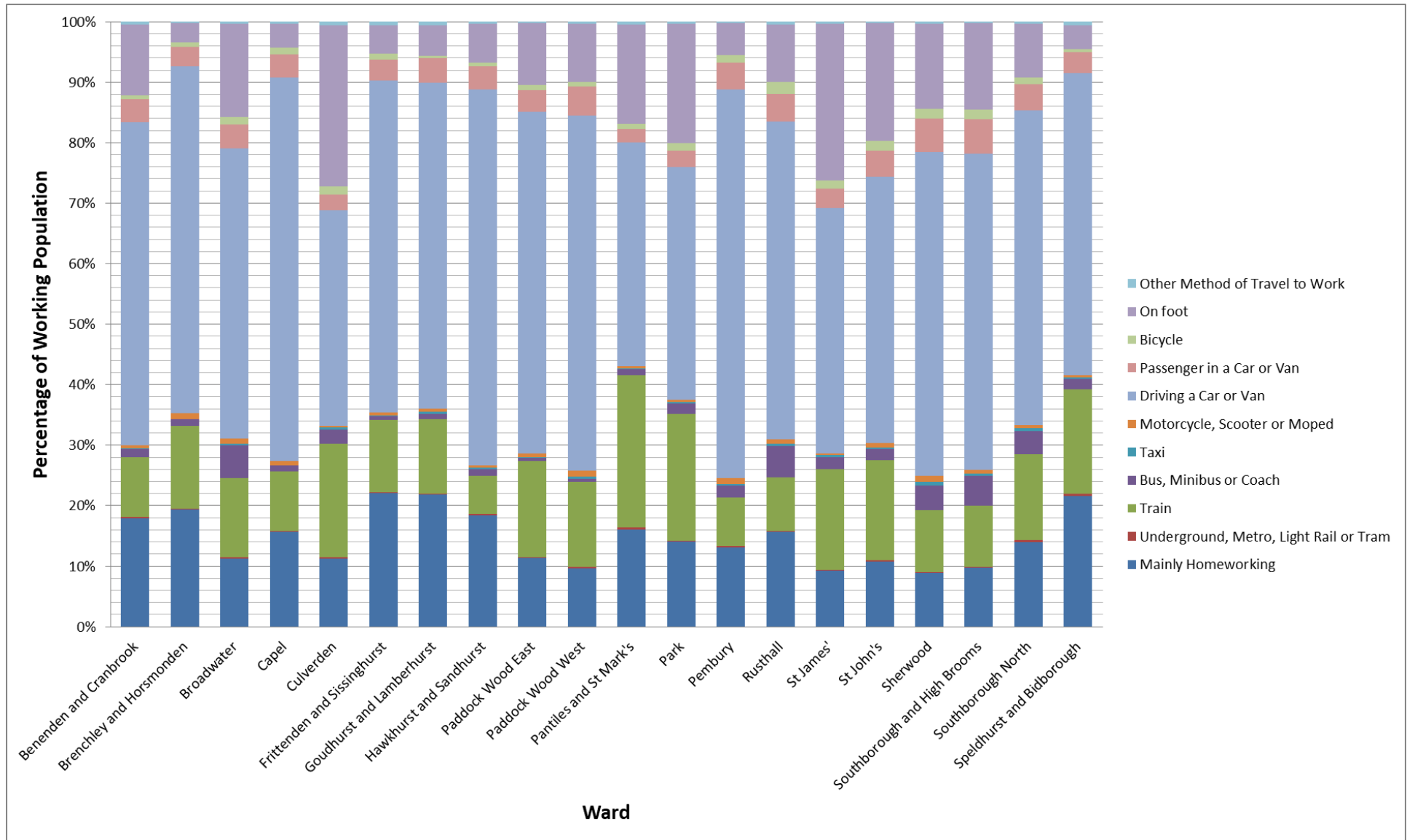
¹⁸ Please Note: Some categories as found in the Census data may include modes of transportation not physically found in the Tunbridge Wells borough. As such, some residents' main mode of transport (which accounts for the largest share of their journey to work) may be found only outside of the Tunbridge Wells borough, such as the underground (especially if commuting to London).

as aforementioned also have a similarly high use of the private car. Indeed, there is a mix in data with regard to workers travelling distances over 20km, with many in the main urban area travelling long distances most likely due to their commuting to London or another large town or city for work (indicated in the high percentage of public transport and particularly the train due to the close proximity to the Tunbridge Wells central train station). Moreover, in some wards such as Benenden and Cranbrook, Brenchley and Horsmonden, Frittenden and Sissinghurst, Goudhurst and Lamberhurst, Southborough North, and Speldhurst and Bidborough, there are also generally high percentages of people travelling to work over 40km most likely due to their predominantly rural and remote nature meaning that they're required to travel further distances for their work, which is reflected by high levels of car ownership and car use in these areas, with the exception of the settlement of Cranbrook.

7.3. Conclusion

- 7.3.1. Consequently, outside of RTW, the data analysis has evidenced that private vehicle use, regardless of average ownership levels or whether within an area inclusive of a settlement with low average car or van ownership either wholly or in part, is still particularly high in the borough and therefore a high level of reliance remains. Indeed, although public transport use is mixed within the borough perhaps due to a range of factors mainly of which may be the availability of sufficient services, its use is particularly lower in some settlements such as Pembury as well as Rusthall (adjacent to RTW) which have relatively high levels of private car transport use in comparison to the central RTW wards. Unsurprisingly, although public transport use is relatively higher in predominantly rural locations (such as Brenchley and Horsmonden), private car use remains the highest in these areas as compared to RTW and therefore parking standards will need to ensure that there is ample parking provision to accommodate this requirement in the rural areas. This is especially important due to the high percentage share of the working population travelling long distances to work from these wards.
- 7.3.2. Indeed, central RTW wards in comparison to everywhere else within the borough generally had the lowest level of private car use as well as the highest levels of active modes of transport and public transport use and is hence considered the borough's most accessible location due to its inclusivity of many bus route start and end points as well as the RTW central train station. Mirrored by the high percentages in some RTW wards of both short distance (correlating with high active travel use) and long distance (correlating with high public transport use) travel, it is clear that the implied need for the private car in this location is far lower than everywhere else in the borough.
- 7.3.3. However, it should also be considered that, despite the 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 which is likely to increase within the Plan period as based on current trends discussed earlier. As such, and as previously mentioned within this paper, it may therefore not be appropriate to impose a maximum parking standard as per 2006 Local Plan policy TP6 that restricts residents' abilities to use a private car and which forces residents into a particular mode of alternative transportation as there will

inherently remain the need for some private car travel for some residents within this location. However, the low levels of active travel and public transport use in the central RTW wards of course need to be considered alongside the low average car or van ownership levels in associated LSOAs as analysed within this paper. As a result, the central areas in RTW will likely require a lower parking standard than that of the areas outside of central RTW which have a much notable greater need to provide a sufficient level of parking that will continue to enable working residents to travel via private car and which will not hinder their ease of travel to work.

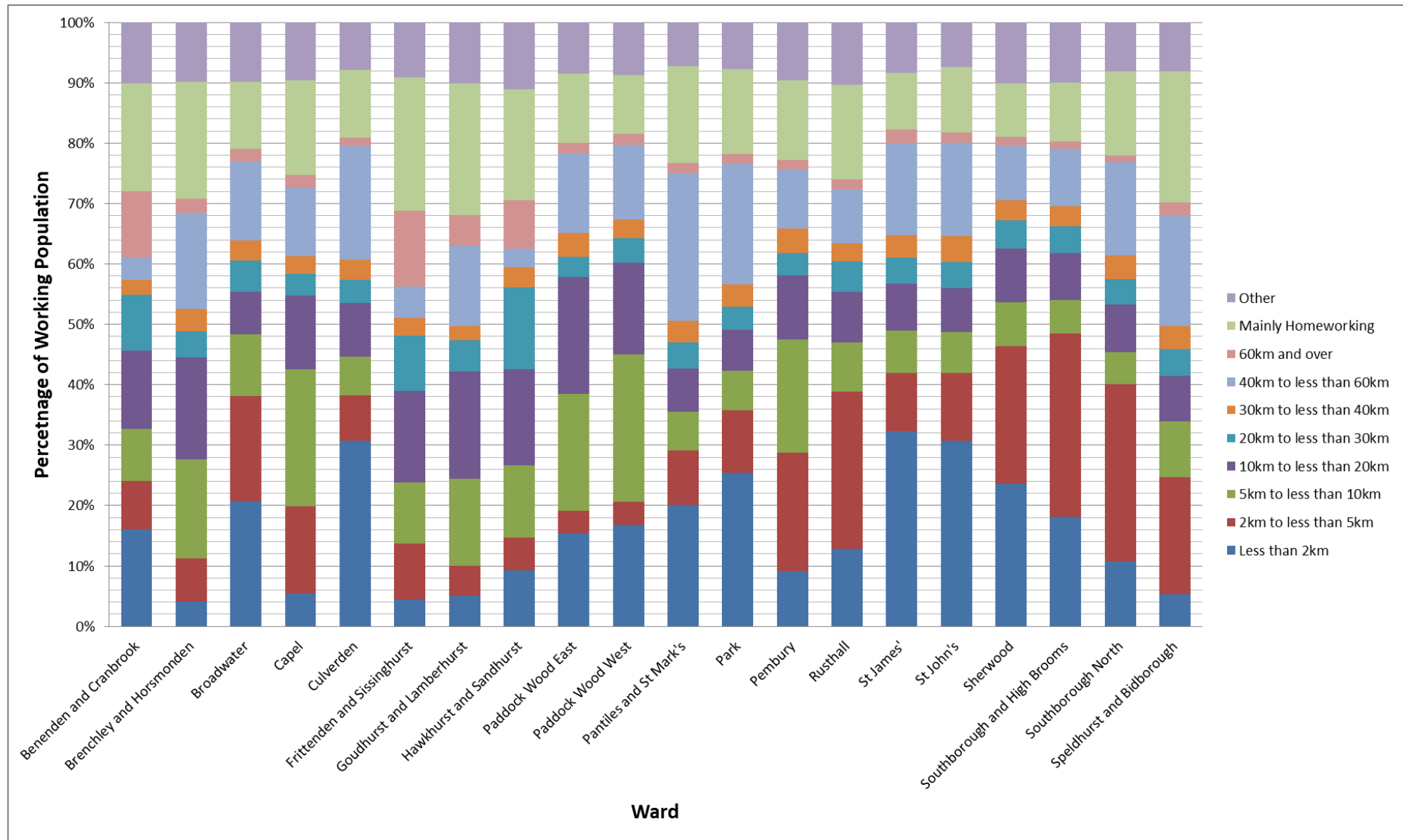
Figure 16 – Percentage of Working Population's Method of Travel to Work (2011; Ward)

Data Source: 2011 Census, ONS

Table 4 – Percentage of Working Population's Method of Travel to Work (2011; Ward)

Ward	Mainly Homeworking	Underground, Metro, Light Rail, or Tram	Train	Bus, Minibus or Coach	Taxi	Motorcycle, Scooter or Moped	Car or Van (Driver)	Car or Van (Passenger)	Bicycle	On Foot	Other Method of Travel to Work
Benenden and Cranbrook	17.88	0.24	9.86	1.34	0.15	0.57	53.37	3.78	0.60	11.74	0.48
Brenchley and Horsmonden	19.32	0.16	13.71	1.10	0.04	0.98	57.33	3.17	0.71	3.25	0.24
Broadwater	11.21	0.33	13.01	5.44	0.28	0.80	47.92	4.02	1.18	15.47	0.33
Capel	15.63	0.16	9.88	0.93	0.00	0.86	63.37	3.81	1.01	4.04	0.31
Culverden	11.18	0.32	18.75	2.32	0.38	0.24	35.60	2.64	1.28	26.70	0.58
Frittenden and Sissinghurst	22.09	0.10	12.02	0.58	0.10	0.58	54.84	3.39	0.97	4.75	0.58
Goudhurst and Lamberhurst	21.82	0.13	12.32	0.94	0.26	0.60	53.87	4.02	0.43	5.01	0.60
Hawkhurst and Sandhurst	18.38	0.19	6.29	1.23	0.16	0.42	62.14	3.81	0.68	6.32	0.39
Paddock Wood East	11.42	0.09	15.88	0.47	0.19	0.52	56.53	3.57	0.89	10.20	0.23
Paddock Wood West	9.68	0.15	14.05	0.60	0.30	0.99	58.69	4.82	0.79	9.63	0.30
Pantiles and St Mark's	16.06	0.34	25.16	0.99	0.08	0.40	37.07	2.21	0.88	16.31	0.51
Park	14.02	0.22	20.91	1.75	0.25	0.39	38.41	2.75	1.17	19.74	0.39
Pembury	13.13	0.17	8.03	2.04	0.20	0.95	64.25	4.49	1.19	5.31	0.24
Rusthall	15.65	0.16	8.88	5.14	0.36	0.80	52.49	4.62	1.95	9.44	0.52
St James'	9.31	0.08	16.58	2.01	0.41	0.28	40.52	3.22	1.38	25.81	0.39
St John's	10.79	0.15	16.53	1.83	0.32	0.77	43.94	4.33	1.63	19.43	0.27
Sherwood	8.92	0.15	10.14	4.15	0.59	1.04	53.47	5.54	1.60	14.11	0.30
Southborough and High Brooms	9.71	0.13	10.21	4.87	0.38	0.58	52.28	5.68	1.60	14.34	0.23
Southborough North	13.96	0.36	14.16	3.89	0.41	0.56	52.04	4.29	1.07	8.90	0.36
Speldhurst and Bidborough	21.64	0.36	17.22	1.79	0.18	0.43	49.95	3.37	0.57	3.91	0.57

Data Source: 2011 Census, ONS

Figure 17 – Percentage of Working Population's Distance of Travel to Work (2011; Ward)

Data Source: 2011 Census, ONS

Table 5 – Percentage of Working Population's Distance of Travel to Work (2011; Ward)

Ward	Less than 2km	2km to less than 5km	5km to less than 10km	10km to less than 20km	20km to less than 30km	30km to less than 40km	40km to less than 60km	60km and over	Mainly Homeworking	Other
Benenden and Cranbrook	16.00	8.05	8.61	12.93	9.30	2.44	3.78	10.91	17.88	10.10
Brenchley and Horsmonden	4.11	7.17	16.38	16.81	4.31	3.76	15.95	2.31	19.32	9.87
Broadwater	20.77	17.41	10.17	7.05	5.11	3.41	13.06	2.03	11.21	9.79
Capel	5.44	14.39	22.78	12.13	3.58	3.03	11.28	2.10	15.63	9.64
Culverden	30.75	7.45	6.45	8.91	3.81	3.27	18.91	1.38	11.18	7.89
Frittenden and Sissinghurst	4.46	9.30	10.08	15.12	9.21	2.91	5.14	12.60	22.09	9.11
Goudhurst and Lamberhurst	5.05	4.92	14.46	17.80	5.09	2.44	13.22	5.05	21.82	10.14
Hawkhurst and Sandhurst	9.26	5.48	11.96	15.83	13.58	3.39	3.00	8.06	18.38	11.06
Paddock Wood East	15.46	3.67	19.36	19.31	3.43	3.90	13.20	1.74	11.42	8.51
Paddock Wood West	16.78	3.77	24.48	15.14	4.02	3.13	12.36	1.84	9.68	8.79
Pantiles and St Mark's	20.16	8.91	6.45	7.15	4.38	3.48	24.46	1.72	16.06	7.24
Park	25.47	10.30	6.55	6.80	3.80	3.72	19.94	1.64	14.02	7.75
Pembury	9.12	19.69	18.74	10.61	3.61	4.12	9.69	1.67	13.13	9.63
Rusthall	12.90	26.01	8.04	8.48	4.94	3.07	8.84	1.67	15.65	10.39
St James'	32.34	9.64	7.02	7.74	4.27	3.72	15.18	2.37	9.31	8.40
St John's	30.67	11.24	6.86	7.18	4.36	4.28	15.47	1.76	10.79	7.40
Sherwood	23.62	22.73	7.35	8.77	4.71	3.32	9.10	1.39	8.92	10.08
Southborough and High Brooms	18.12	30.33	5.55	7.81	4.41	3.29	9.55	1.27	9.71	9.96
Southborough North	10.79	29.29	5.32	7.87	4.24	3.94	15.39	1.12	13.96	8.08
Speldhurst and Bidborough	5.35	19.38	9.19	7.50	4.45	3.88	18.37	2.12	21.64	8.14

Data Source: 2011 Census, ONS

8. Residential Parking Standards Recommendations

- 8.1. This paper has extensively reviewed and analysed a range of car or van ownership-related data from the 2011 UK Census for the Tunbridge Wells borough. The purpose of this research is to provide an evidence base that will underpin the determination of recommendations for residential parking standards across the borough. In this section of the paper, the recommendations as a result of the aforementioned analysis will be detailed and justified. It is proposed that these recommendations will be input into the new development management policy on parking standards that will require developers to provide parking at the indicated levels in all new residential development under use class C3 (dwellings) across the borough throughout the new Local Plan period to 2036.
- 8.2. The data analysed in this paper has drawn on average household car or van ownership levels, the percentage of households under each car or van ownership category, and the average household car or van ownership level per number of bedrooms at the Lower Super Output Area (LSOA) level as well as by accommodation type (for the borough as a whole). This paper has also drawn on the percentage of working populations' method and distance of travel to work at the ward level in order to ascertain the use of, and implied need for, particular forms of transportation.
- 8.3. As a result of this analysis, this paper recommends the following parking standards as indicated in **Table 6**. It is proposed that Tunbridge Wells Borough Council introduce **mandatory** standards inside the RTW town centre area which increase beyond 1 space per dwelling from dwelling sizes of 3 bed houses (and larger) based on local car or van ownership levels. This will consequently differ from the 2006 Local Plan *maximum* standard of 1 space per dwelling regardless of dwelling size. This will ensure that a suitable level of parking is provided that does not allow for the possibility of exacerbating traffic and congestion issues due to heavy on-street parking as the maximum parking standard can result in the under-provision, or even nil-provision, of parking spaces.
- 8.4. Moreover, due to the aforementioned over-demand of parking permits in CPZs within much of the RTW town centre area (see **Appendix B**; where at present new households can in some Zones apply for up to 2 permits each), adopting a maximum parking standard would only inherently increase this issue and increase demand for parking spaces within these Zones than there is supply (the fewer on-site parking spaces provided, the more significant the impact). Indeed, in determining the suitability of proposing a mandatory parking standard rather than retaining a maximum parking standard, discussions with Tunbridge Wells Borough Council Parking Services were undertaken. Resulting from these discussions, it is apparent that there is likely to be a need for Parking Services to reduce parking spaces within/the extent of CPZs in some locations due to present issues of limited emergency vehicle access. Taking this into account, it was consequently perceived

that a maximum standard would be particularly unsuitable and that an expected, mandatory standard would be more appropriate.

- 8.5. Additionally, prior to agreeing on a mandatory parking standard, analysis was undertaken regarding the potential for potential parking provision within the town centre area to be accommodated within public car parks if a maximum parking standard was to be retained should verified evidence both justify that a development proposal should deliver less than the maximum parking standard as well as that there is spare capacity in a nearby public car park. Although evidence as detailed within **Appendix C** on utilisation (occupancy) rates within the town centre area suggests that there is spare capacity in public car parks at present, discussions with Tunbridge Wells Borough Council Parking Services have resulted in the acknowledgement that spare capacity in reality is much more limited than the data analysed would suggest and would therefore be inappropriate for corresponding wording with the proposed parking policy (and therefore that a mandatory standard is more suitable).
- 8.6. It is also acknowledged that Parking Services do not have complete control over some of the public car parks with spare capacity and therefore cannot legislate on the number of season tickets provided (which would be required by residents of new proposals not eligible for a parking permit and in need of a permanent parking space should there be no parking provided on-site). In fact, most public car parks with spare capacity as found in the analysis at present do not provide season tickets at all (Torrington, RVP, Town Hall Yard (w/e), Yew Tree Road, Little Mount Sion, Mount Pleasant (w/e)). In addition to this, it is likely that within the Plan period, some public car parks will be removed and/or relocated or their number of spaces altered due to developments coming forward in the town centre area. Consequently, resulting from discussions, it was agreed between Planning Services and Parking Services to exclude the possibility of allowing parking provision to be offset in public car parks if the maximum standard would be retained. As such, it was agreed that the mandatory standard is most appropriate.
- 8.7. Upon review of the CAZ as per the 2006 Local Plan policy TP6 and as found in **Appendix A**, planning officers agreed that the boundaries of this area required amendment due to a paucity of methodology in relation to the extent of its boundaries and therefore its justification. Consequently, a new Zone for the town centre area for which the mandatory standard will apply has been drawn and is proposed for inclusion within the parking standards development management policy. **Appendix D** details the methodology used in drawing these new proposed boundaries which is primarily based on further detailed analysis of average car or van ownership levels per output area (smaller areas than LSOAs) as well as reviewing boundaries of typical urban character areas. This Zone will be referred to as Zone A. Due to the particularly low average car or van ownership levels within this area as well as the high accessibility to public forms of transport and the relatively low private car use for means of travelling to work, this Zone will propose the lowest level of parking provision across the borough while ensuring a suitable level is provided.
- 8.8. Within the settlements (Zone B) of the main urban area of RTW (excluding Zone A) and Southborough, Rusthall, Paddock Wood, Cranbrook, Hawkhurst, and Pembury,

there will be **minimum** parking standards required. These minimum parking standards, like the mandatory standard in Zone A, will ensure that a suitable level of parking space is provided in new residential developments that reduces the need for residents to park on-street which can contribute to congestion, accessibility problems (e.g. for emergency vehicles), impacts on the character of an area and other traffic-related issues as residents look for places to park as close as possible to their homes: it also reduces the “annoyance” factor of people having to park away from their properties and walk to the house.

- 8.9. These minimum standards differ from the maximum parking standards previously adopted by Tunbridge Wells Borough Council in accordance with Kent County Council’s SPG4 (2006) document as per TP5 of the 2006 Local Plan, which many have considered to provide less than a suitable level of parking provision. This paper therefore proposes standards that are in accordance with current levels of car or van ownership within these settlements for each dwelling size based on number of bedrooms. Indeed, within these settlements, it has been proposed that parking space will be required at minimum levels slightly above some average ownership levels within these areas to ensure that parking provision is not under-provided and considered ineffective in alleviating the aforementioned issues (predominantly within RTW (excluding in Zone A)). This will therefore make sure that a suitable and sustainable level of parking is secured.
- 8.10. Indeed, in some of these settlement areas in Zone B, particularly Pembury and Hawkhurst, it should be noted that public transport and active travel (sustainable modes of transport) use as a means for travelling to work (as indicated by the Census data) are notably low with large percentages of the working population travelling to work via the private car (at levels similarly found in the surrounding settlement areas that are predominantly rural in nature). Despite relatively low average car or van ownership levels in comparison to surrounding areas, this particularly high private car use must be taken into account and accommodated within the proposed parking standards as, outside of the central RTW wards, a high level or reliance on the private car remains evident. Consequently, it is determined that the minimum parking standards will address this need and ensure that an appropriate and viable level of parking space in new residential developments in Zone B settlements is provided.
- 8.11. Moreover, due to the proposed introduction of a mandatory parking standard in Zone A and a minimum parking standard in Zone B, to further make sure that on-street parking issues are not increased inside any CPZ regardless of the standard or Zone, it was agreed within discussions with Parking Services to propose that Traffic Regulation Orders be amended so that new residential proposals within a CPZ will not be eligible for parking permits and as such the new development will be excluded/removed from the CPZ. This is because the standard will be reflective of local car or van ownership levels and should therefore provide a sufficient level of off-street car parking for the proposal and thus removing the need for an on-street parking permit. This will also discourage residents parking one car on-site and then another on-street/off-site with a parking permit. All parking provision will therefore be provided only on-site as per this proposal and therefore any policy should make this

requirement clear. It is proposed that policy wording includes an expectation that the cost of advertising and administering any change to the Traffic Regulation Order in association with this will be met by the developer through a condition.

- 8.12. In all areas of the borough outside of Zone A and Zone B (i.e. Zone C), there will also be a minimum parking standard applied to residential developments although will be provided at a generally higher standard (from 2 bed dwellings and larger) than inside Zone B. These standards will ensure that parking spaces are provided at a suitable level that is in accordance with average car ownership levels and does not lead to similar on-street car parking issues in these areas as residents are inherently more dependent on private car use than in locations that may have a greater provision of public transport/active travel options and/or opportunities for local employment (hence the need to travel greater distances than many of the Zone B settlement areas). Consequently, to ensure that there is a sufficient level of car parking in the Zone C areas, it is considered that minimum standards will be most appropriate rather than the maximum standards adopted in the 2006 Local Plan (see **Table 1**).
- 8.13. The minimum parking standards in both Zone B and C will consequently allow the developer some flexibility in determining the level of parking provision that is considered suitable and reflective of local circumstances to be agreed with Tunbridge Wells Borough Council on a case-by-case basis. For clarification, it should be noted that in development proposals that are required to meet a total standard involving a .5 number of spaces (i.e. 1.5 or 2.5), it will be expected that the development will provide the standard rounded up; for instance, for a single 3 bed house in a Zone B settlement area, the applicant will be required to provide 2 parking spaces (above the standard of 1.5).
- 8.14. However, there is also an understanding that in particular proposals, regardless of in what Zone, there may be a necessity or reasoned desire to depart from, including both below and above, the required standard. As such, it is proposed that, if the above mandatory and minimum parking standard recommendations are to be incorporated into the new Local Plan policy, there should be a list of exceptional circumstances that will give the developer of any proposal some flexibility in determining the most suitable level of on-site parking provision. This should include (but not be limited to), for instance, where a bespoke parking standard is already in place in a site specific allocation policy including in those to be determined by a masterplanning approach within the Local Plan or in a made Neighbourhood Plan that seeks to take into account specific local circumstances in that area. Another exceptional circumstance should be where independently verified viability evidence demonstrates that achieving the required parking standard would both render the scheme unviable and that there are overriding planning benefits to justify that the development should proceed. An example of where this could apply may be in proposals that make a significant affordable housing contribution (over the minimum requirements in any affordable housing policy) that, based on verified viability evidence, could not be developed if the required standards are to be achieved but on the other hand have an overriding planning benefit (affordable housing) which may justify any under-provision of parking space and for the proposal to be permitted subject to other Local Plan policies. It is envisaged that the list of exceptional

circumstances will apply to both residential and non-residential development proposals in the new parking standards DM policy that takes into account all cases that would justify the proposed standards (whether for residential or non-residential development) to be departed from.

- 8.15. Furthermore, the boundaries for each Zone (A, B, and C) are represented in **Figure 18**. Based on the analysis work undertaken within this paper, it is considered that, although the LSOA boundaries for settlements under Zone B predominantly cover the boundaries of these settlements, the most accurate and up-to-date boundaries of each settlement are those of the Limits to Built Development (LBD; produced by Tunbridge Wells Borough Council) and have therefore formed the boundaries of Zone B and C. These LBD boundaries have been reviewed as part of the new Local Plan preparation and amendments are detailed within the Council's LBD Topic Paper¹⁹, which has taken into account the new Local Plan's site allocations. While there is no differentiation between the LBD of Rusthall and Langton Green (i.e. the LBD appears as one continuous element), there are significant differences between Rusthall and Langton Green in terms of car or van availability. Therefore, the boundary of Zone B here follows the outer edges of the LBD for Rusthall as a settlement (although there are small parts of this in the parish of Speldhurst), with the boundary to Zone C inside the LBD (i.e. between Rusthall and Langton Green) following the parish boundary.
- 8.16. Similarly, for Southborough, the outer boundaries of Zone B have been produced in accordance with the LBD of Southborough, and where there is no differentiation between the LBD (for example with Bidborough) it follows the parish boundary. For the avoidance of doubt, land inside the LBD in the parish of Bidborough is all Zone C. For Hawkhurst, the boundaries have been produced in accordance with the LBD boundaries of both Highgate and The Moor. For Royal Tunbridge Wells, the Zone B boundaries (that follow the revised LBD boundaries) have in some places been extended southwards in order to close gaps between the LBD boundaries and the borough boundary where considered logical and appropriate (excluding land that is part of a wider site extending beyond the borough boundaries). It is envisaged that all parking Zones will be incorporated into the policy maps of the new Local Plan.
- 8.17. There is the likelihood that masterplanned development at Paddock Wood, and particularly at Tudeley Garden Settlement, will be able to be planned on a basis that allows for real connectivity, use of active travel and public transport: if for example Tudeley is developed on a layout/form (even if not design) of Poundbury, then low levels of car parking may be achievable. The parking standards set out below will therefore not be applicable to the masterplanned areas of Paddock Wood and Tudeley but rather these will be developed through a masterplanning exercise.

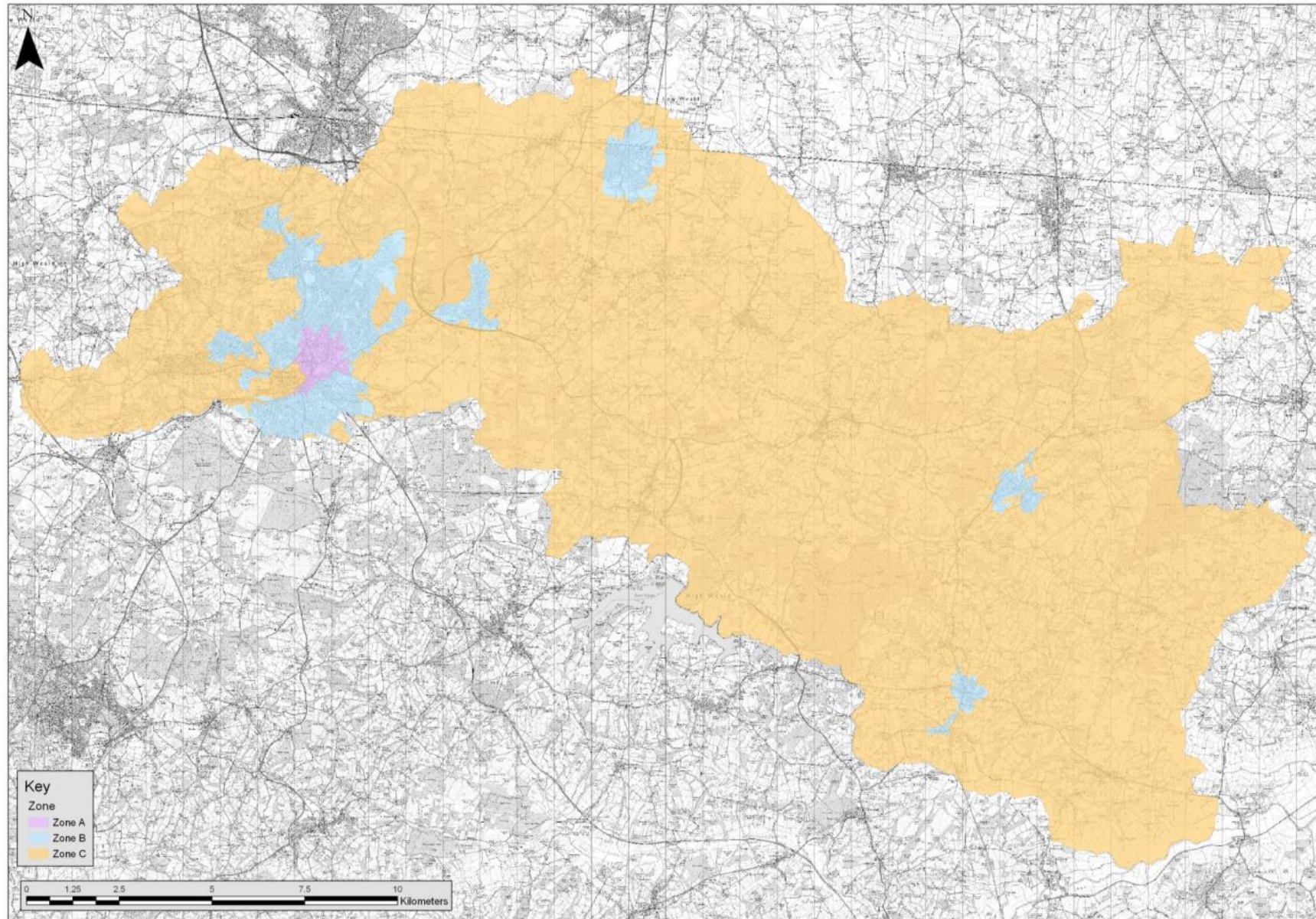
¹⁹ All Zone boundaries will be further reviewed subject to any updates made to the LBD, as detailed within the Council's LBD Topic Paper, and/or parish boundaries. As such, the boundaries in **Figure 18** are likely to change before examination of the new Local Plan and therefore should not be directly referred to in determining what Zone a particular location falls into. For the most up-to-date boundaries for each Zone, please refer to the new Local Plan policy maps and/or contact Tunbridge Wells Borough Council's planning policy department.

- 8.18. As aforementioned, the recommendations detailed above and in **Table 6** will apply to residential development under use class C3 (dwellings) only. It is expected that all other vehicle parking standards (that is, for residential institutions (use class C2) and all other non-residential proposals) will be required in accordance with Kent County Council's latest adopted standards found in SPG4, or subsequent iteration of this. Visitor parking will generally be provided at 0.2 spaces per unit for all new residential development in all Zones within the DM policy (i.e. across the whole borough). Although Kent County Council's latest IGN3 guidance indicates that public car parks should be considered appropriate for the accommodation of visitor parking within town centre locations (Zone A in the case of RTW), this would not be considered appropriate or suitable for Zone A nor the policy due to aforementioned discussions with Parking Services suggesting that spare capacity in public car parks may be limited (as well as that in fact visitors tend to park in on-street locations to minimize walking distance in any case). Moreover, the 400m catchment areas of those public car parks that analysis in **Appendix C** suggests indeed do have spare capacity does not in fact cover the whole of Zone A. As such, there will be a mandatory visitor parking requirement in Zone A and a minimum requirement in Zone B and C. For clarification, in Zone A this standard will be rounded to the nearest whole unit. For example, in Zone A, a residential development of 2 units will not require visitor parking (0.4 spaces); however, visitor parking will be required at 3 units and above (0.6 spaces+). However, in Zone B and C where there are minimum parking standards, all residential developments will require visitor parking.
- 8.19. Cycle parking for both residential and non-residential development will be required in accordance with the minimum standards in SPG4 (at one space per bedroom). Both visitor and cycle parking standards for residential (and non-residential) development will be incorporated into the vehicle parking standards development management policy in the new Local Plan. Moreover, although Kent County Council research in IGN3 has found that very few households in Kent use garages for parking, and rather for storage, it is considered that garages will be suitable as a means of accommodating parking space only if they are of a minimum of 3.6m (width)/7m (length) in size and therefore able to incorporate both parking space and storage.
- 8.20. As detailed above, it is anticipated that these parking standards will be reviewed following the 2021 Census data. It is also intended that to inform future policy, along with Tunbridge Wells Borough Council's general approach to contributions, Tunbridge Wells Borough Council will monitor car ownership in new developments, to be corroborated against Census information. This will either be achieved through developers providing information on this at different stages of a build out/occupation (dependent on the size of the site) or by Tunbridge Wells Borough Council through its ongoing monitoring of contributions: a monitoring fee is likely to be incorporated into S.106 agreements, to be based on a future Supplementary Planning Document. If necessary, it may be appropriate for subsequent phases of a particularly large development to be amended to reflect the results of monitoring.

Table 6 – Residential Parking Standard Recommendations

	Zone A	Zone B	Zone C
Zone Definition	<i>Royal Tunbridge Wells Town Centre Parking Area</i>	<i>Inside the Limits of Built Development of: Royal Tunbridge Wells (excluding Zone A), Southborough Town (within Southborough parish), Rusthall (within Rusthall and part of Speldhurst parish), Pembury, Paddock Wood, Cranbrook, and Hawkhurst (Highgate and The Moor)</i>	<i>Everywhere in the borough excluding Zone A and Zone B</i>
Parking Standard Definition	MANDATORY	MINIMUM	MINIMUM
1 Bed Flat	1	1	1
1 Bed House	1	1	1
2 Bed Flat	1	1	1.5
2 Bed House	1	1	1.5
3 Bed Flat	1	1.5	2
3 Bed House	1.5	1.5	2
4+ Bed Flat	1.5	1.5	2
4+ Bed House	2	2	2.5

Note: Garages will not be counted within parking standards unless they are of a minimum 3.6m (width)/7m (length) in size.

Figure 18 – Residential Parking Standard Zones

Note: These boundaries are subject to change (see footnote 19).

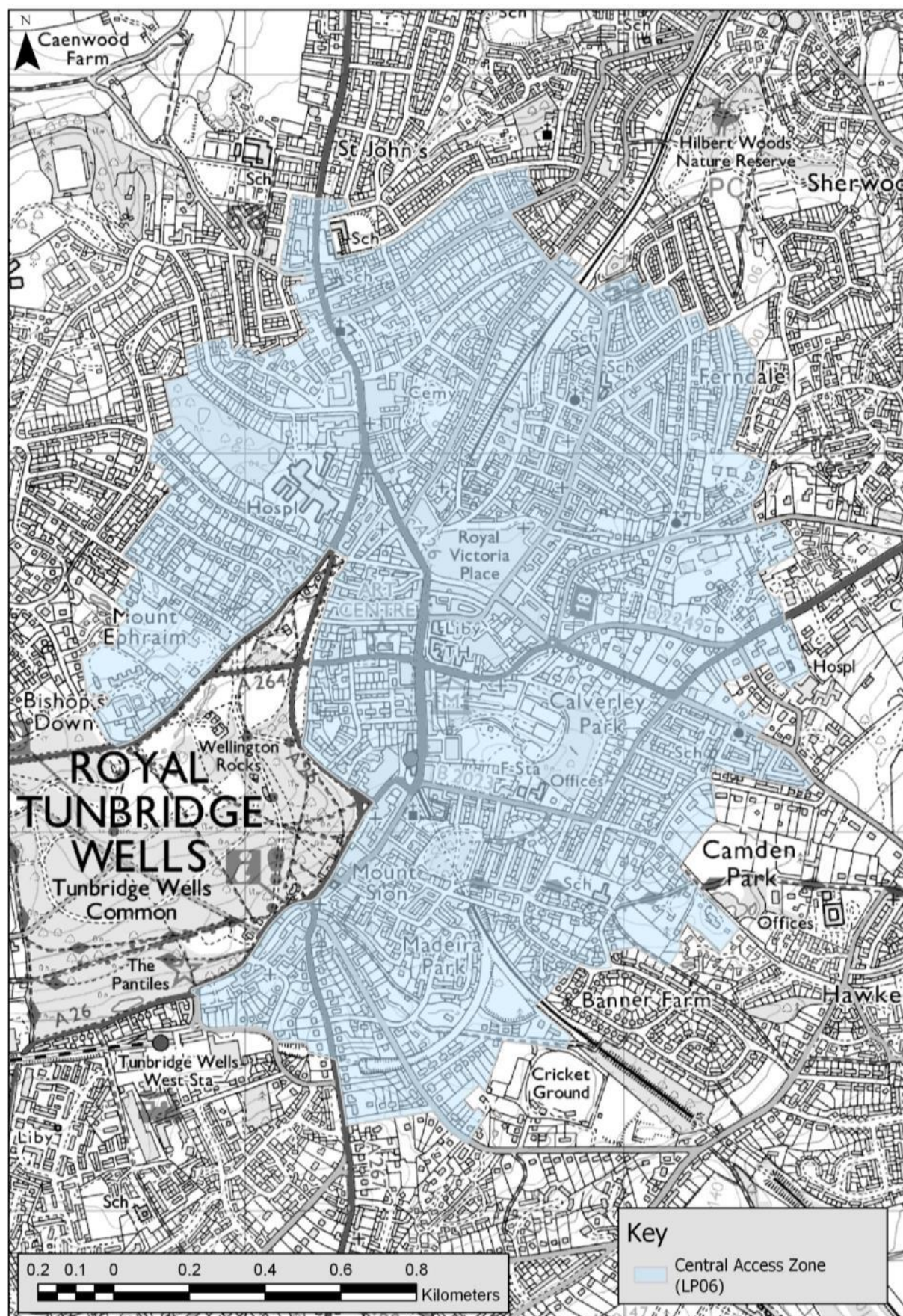
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9. Appendices

9.1. Appendix A – Royal Tunbridge Wells Central Access Zone (2006 Local Plan Policy TP6)

(See next page)

Figure A1 – Royal Tunbridge Wells Central Access Zone (2006 Local Plan Policy TP6)

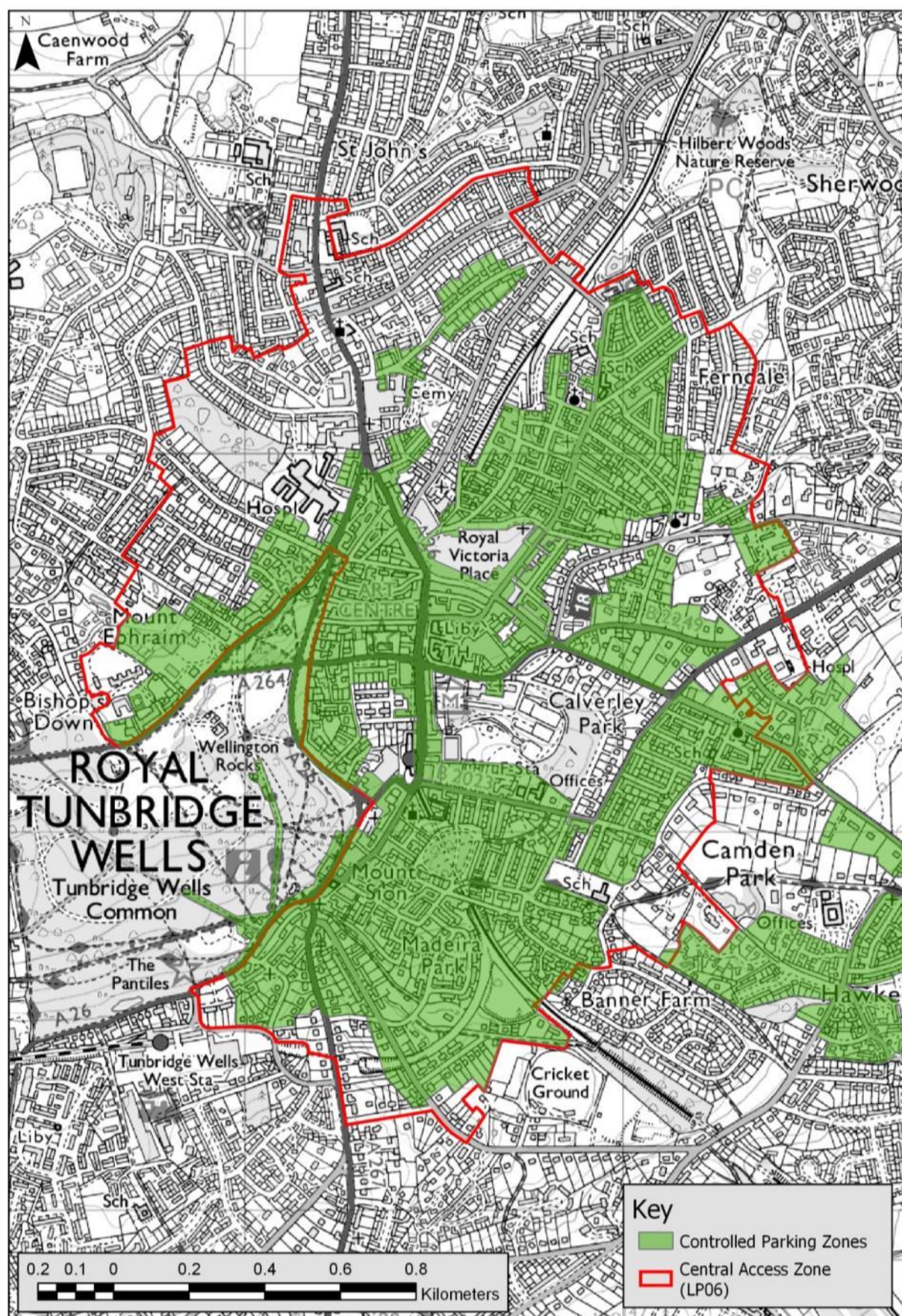


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9.2. Appendix B – Royal Tunbridge Wells Central Access Zone (2006 Local Plan Policy TP6) and Controlled Parking Zones

(See next page)

Figure B1 – Royal Tunbridge Wells Central Access Zone (2006 Local Plan Policy TP6) and Controlled Parking Zones



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9.3. Appendix C – Royal Tunbridge Wells Public Car Park Utilisation (Occupancy) Rates

(See next page)

Royal Tunbridge Wells Public Car Park Utilisation (Occupancy) Rates

Introduction

This **Appendix** item will analyse the utilisation (occupancy) rates of public car parks in the town centre area of Royal Tunbridge Wells in order to ascertain the extent to which some public car parks within this area can accommodate parking space provision should residential developments under use class C3 (dwellings) deliver less than a required maximum parking standard (if retained as per the 2006 Local Plan policy TP6). If this analysis determines that there is spare capacity in public car parks in the town centre area (based on calculating the average number of spare spaces based on utilisation rates obtained from Parking Services), then, subject to analysis and considerations within the Residential Parking Standards Topic Paper, there may be a possibility to incorporate wording into the policy taking this into account.

Utilisation (Occupancy) Rates of Public Car Parks in the Royal Tunbridge Wells Town Centre

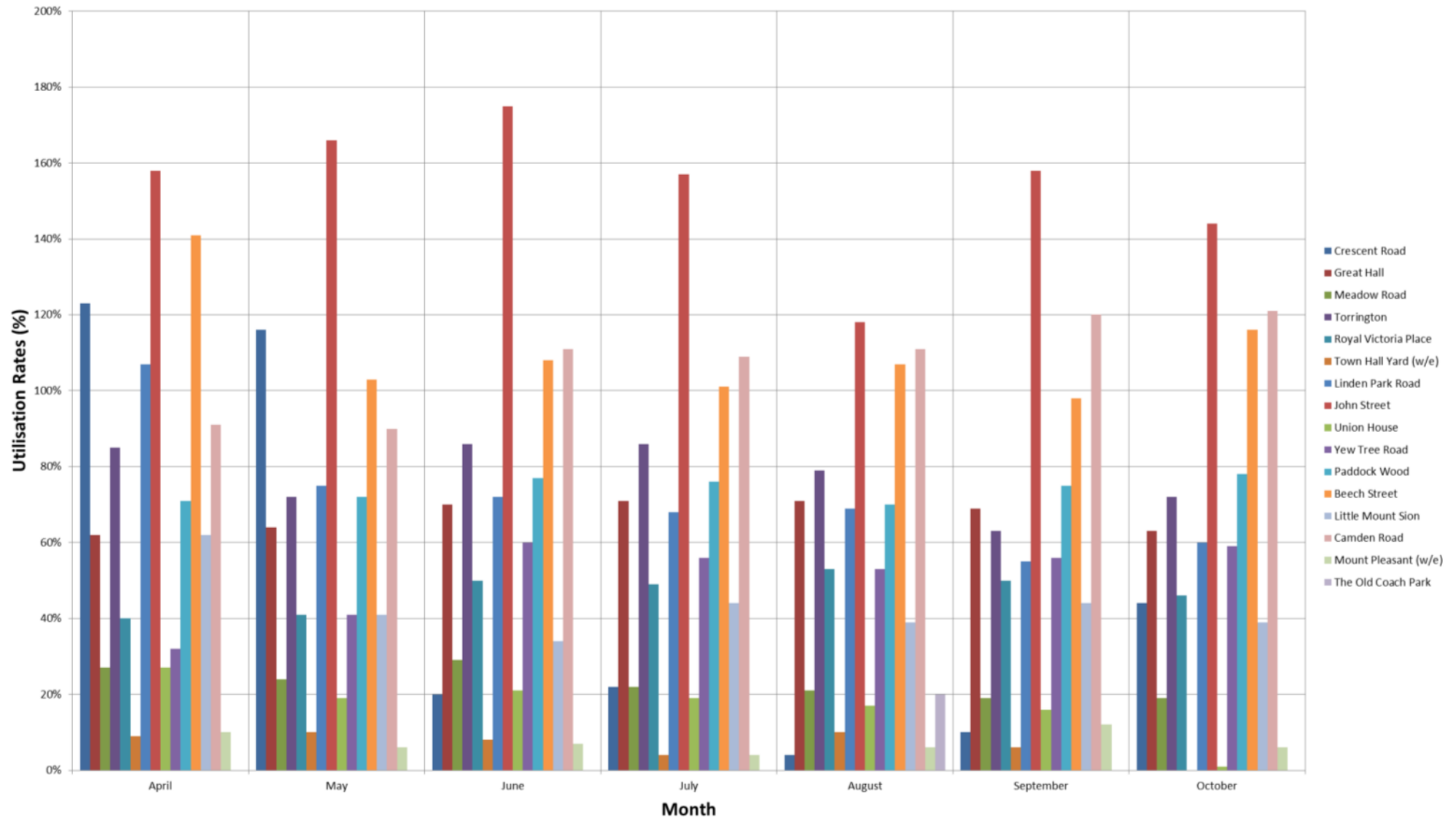
To determine which public car parks have spare capacity, **Table C1** and **Figure C1** below has been produced for all the public car parks within the borough which shows their respective utilisation (occupancy) rates for each month from April to October 2018. The public car parks within the Royal Tunbridge Wells town centre/Central Access Zone (as per 2006 Local Plan policy TP6) area are John Street, Beech Street, Camden Road, Meadow Road, Royal Victoria Place, Town Hal Yard, Crescent Road, Mount Pleasant Avenue, Great Hall, Torrington, Little Mount Sion, Linden Park Road, and Union House.

The utilisation rate is calculated by subtracting the number of season tickets from the total number of parking spaces, before multiplying the number of spaces left by the number of hours the space is available during open times for that particular month and then subtracting the hours bought each month from that number. The utilisation rate is then the percentage of the hours available that have been bought for that month.

As displayed in **Table C1** and **Figure C1**, of the public car parks within the Royal Tunbridge Wells town centre/Central Access Zone area, the car parks with spare capacity (less than 100% for all months from April to October 2018) are Great Hall, Meadow Road, Torrington, Royal Victoria Place, Town Hall Yard (w/e), Union House, Yew Tree Road, Little Mount Sion, and Mount Pleasant (w/e). The car parks that either have some or no spare capacity are Crescent Road (although has recently undergone major improvement works so low utilisation figures may not be reflective of the demand), John Street (high utilisation above 100% for each month), Beech Street (over 100% utilisation for each month with the exception of in September (98%)), and Camden Road (over 100% utilisation for each month with the exception of in April and May (91% and 90% respectively)).

Table C1 – Utilisation (Occupancy) Rates (%) in Tunbridge Wells Borough Public Car Parks

Public Car Park	Total Number of Spaces	Utilisation (Occupancy) Rates (%) per Month (2018)						
		April	May	June	July	August	September	October
Crescent Road	1061	123%	116%	20%	22%	4%	10%	44%
Great Hall	199	62%	64%	70%	71%	71%	69%	63%
Meadow Road	440	27%	24%	29%	22%	21%	19%	19%
Torrington	230	85%	72%	86%	86%	79%	63%	72%
Royal Victoria Place	1198	40%	41%	50%	49%	53%	50%	46%
Town Hall Yard (w/e)	100	9%	10%	8%	4%	10%	6%	N/A
Linden Park Road	52	107%	75%	72%	68%	69%	55%	60%
John Street	64	158%	166%	175%	157%	118%	158%	144%
Union House	114	27%	19%	21%	19%	17%	16%	1%
Yew Tree Road	64	32%	41%	60%	56%	53%	56%	59%
Paddock Wood	119	71%	72%	77%	76%	70%	75%	78%
Beech Street	38	141%	103%	108%	101%	107%	98%	116%
Little Mount Sion	18	62%	41%	34%	44%	39%	44%	39%
Camden Road	62	91%	90%	111%	109%	111%	120%	121%
Mount Pleasant (w/e)	60	10%	6%	7%	4%	6%	12%	6%
The Old Coach Park	37	N/A	N/A	N/A	N/A	20%	N/A	N/A

Figure C1 – Utilisation (Occupancy) Rates (%) in Tunbridge Wells Borough Public Car Parks

Spare Capacity in Public Car Parks inside the Royal Tunbridge Wells Town Centre/Central Access Zone Area

Table C2 has been produced below to further examine the extent of the spare capacity for those public car parks above that have spare capacity (underutilisation of parking space) inside the Royal Tunbridge Wells town centre/Central Access Zone area for every month. As such, an average number of empty spaces per day for each month has been calculated by taking away the utilisation percentage from the total number of parking spaces available (i.e. total number of space minus total number of season tickets). The resulting figure is the average number of spare parking spaces per day for each month in each public car park. A total number of average spare car parking spaces for all public car parks combined is also calculated for each day. Consequently, the data indicates that there is an average of 1279 spare parking spaces per day within public car parks with less than 100% utilisation for each month within the Royal Tunbridge Wells town centre/Central Access Zone area.

Table C2 – Average Number of Spare Parking Spaces per Month (2018) in Public Car Parks with Spare Capacity

Public Car Park	Total Number of Spaces	Average Number of Spare Parking Spaces per Month (2018)							Overall Daily Average Number of Spare Parking Spaces per Public Car Park
		April	May	June	July	August	September	October	
Great Hall	199	56	54	44	44	43	46	56	49
Meadow Road	440	270	283	262	289	293	299	301	285
Torrington	230	34	64	33	33	49	84	65	52
Royal Victoria Place	1198	717	702	600	610	563	600	643	634
Town Hall Yard (w/e)	100	91	90	92	96	90	94	N/A	92
Union House	114	61	68	67	68	70	70	83	70
Yew Tree Road	64	43	38	26	28	30	28	27	31
Little Mount Sion	18	7	11	12	10	11	10	11	10
Mount Pleasant (w/e)	60	54	57	56	57	57	53	56	56
								Total:	1279

Moreover, **Figure C2** further illustrates those public car parks with spare capacity as well as those with some or no spare capacity as listed above. Each public car park has also had a 400m buffer (radius) applied to them which is usually considered the acceptable and reasonable walking distance to expect people to walk to their preferred means of transport (roughly a 5 minute walk) and which are commonly referred to as “ped-sheds”. This is perceived to be the most appropriate way of determining the extent to which residents inside the Royal Tunbridge Wells town centre/Central Access Zone area may reasonably be expected to walk to a public car park to use their car and will therefore determine the suitability of incorporating wording for parking provision to be offset in these car parks should they be under delivered on-site.

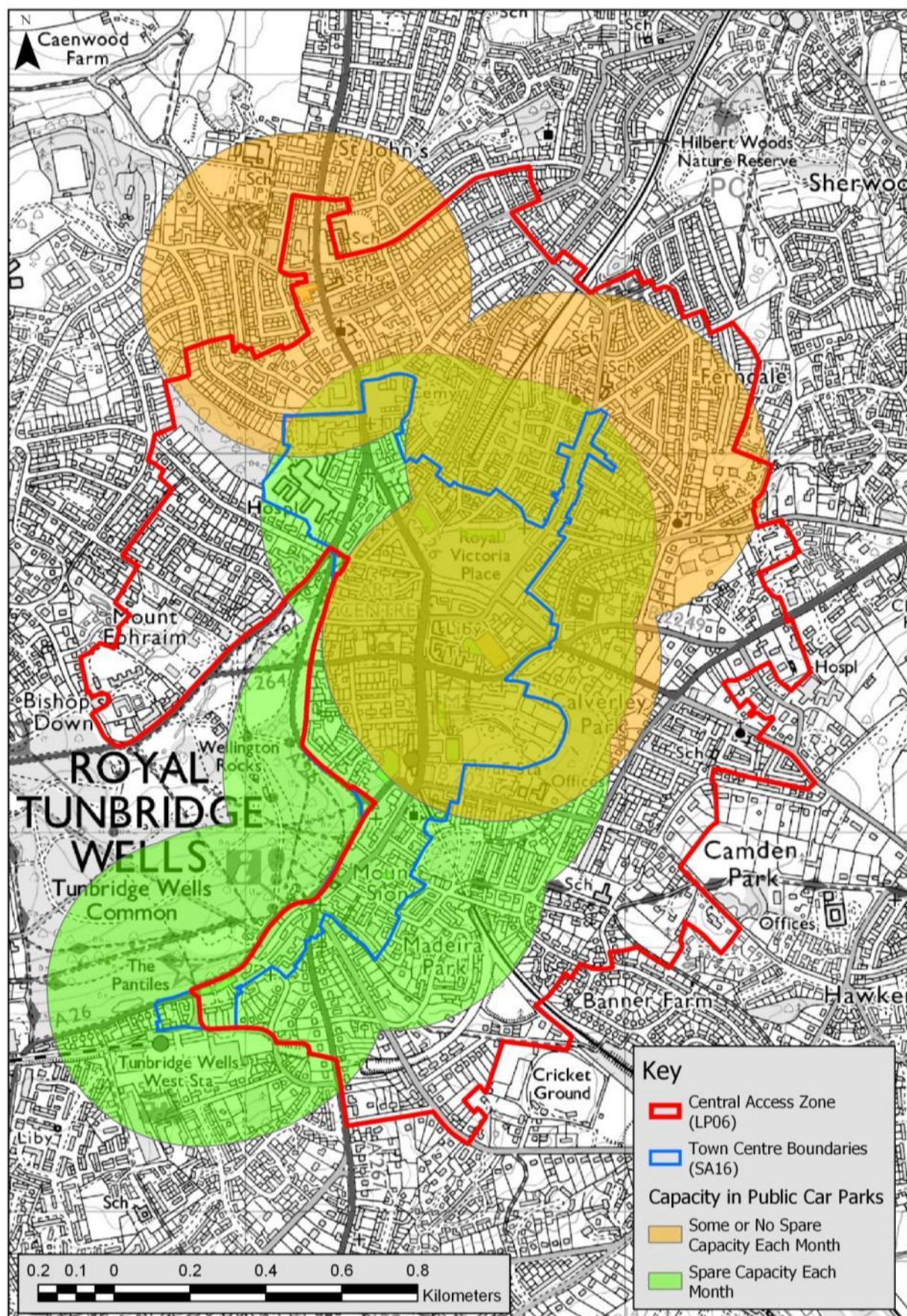
Figure C2 clearly shows that there is much more space within the Royal Tunbridge Wells town centre/Central Access Zone area within the catchment areas of public car parks with spare capacity than those that have some or no spare capacity. However, it should be noted that a significant proportion within this area is not covered by any public car park catchment area that has spare capacity each month. Consequently, this may prove that it would be unsuitable and unreasonable to expect residents of new proposals to walk such distances if located outside of a catchment area to get to their private car unless the boundaries of the Central Access Zone is dramatically reduced. Although, interestingly, there is spare public car park capacity within walking distance of essentially all of the town centre area as per the 2016 Site Allocations DPD boundaries.

Conclusion

The data obtained and analysed above suggests that there is an average daily spare capacity in public car parks inside the Royal Tunbridge Wells town centre/Central Access Zone area. However, as aforementioned, it is acknowledged that the catchment areas of the car parks with spare capacity do not cover the full extent of the Central Access Zone and therefore may not be deemed appropriate for parking provision to be offset in public car parks should they be under provided on-site if a maximum parking standard is to be retained.

This data analysis, however, will be taken into account in the Residential Parking Standards Topic Paper alongside other data analysis in order to ascertain whether both parking provision may be reasonably and suitably offset in public car parks and consequently whether a maximum parking standard, as per 2006 Local Plan policy, is considered suitable. If it is ultimately deemed that a maximum parking standard is inappropriate due to the unsuitability of public car parks to offset parking provision, then it may be proposed that a mandatory or minimum parking standard should be required. However, as part of this decision, discussions will be required between Planning Services and Parking Services to ensure a collaborative understanding of the objectives of both departments as well as the alignment of the Local Plan with future revisions of the Parking Strategy.

Figure C2 – Capacity in Public Car Parks in the Royal Tunbridge Wells Town Centre/Central Access Zone Area



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9.4. Appendix D - Methodology: Royal Tunbridge Wells Proposed Zone A Boundary

(See next page)

Methodology: Royal Tunbridge Wells Proposed Zone A Boundary

Introduction

In the Tunbridge Wells Borough Council's 2006 Local Plan policy TP6, for residential developments inside the Royal Tunbridge Wells town centre area, a maximum of 1 parking space per dwelling (below Kent County Council standards adopted by the Council in SPG4) was required. This town centre area was defined as the Central Access Zone which is described as an area within a reasonable distance of the centre measured as an 800m radius from three key locations within the Primary Shopping Area. However, due to the lack of available methodology on how these boundaries were drawn, such as what these three key locations within the Primary Shopping Area are, and whether they are still in existence today, it has been agreed by planning officers at Tunbridge Wells Borough Council that these boundaries require review due to lack of justification for their retention.

Consequently, this **Appendix** of the Residential Parking Standards Topic Paper will detail the methodology and approach taken in the drawing up of a new town centre boundary for the purpose of residential parking standards. Consequently, it is proposed that the Central Access Zone will not be retained from the 2006 Local Plan and will be replaced by a new Zone A whereby the mandatory parking standard proposed in this paper will be applied.

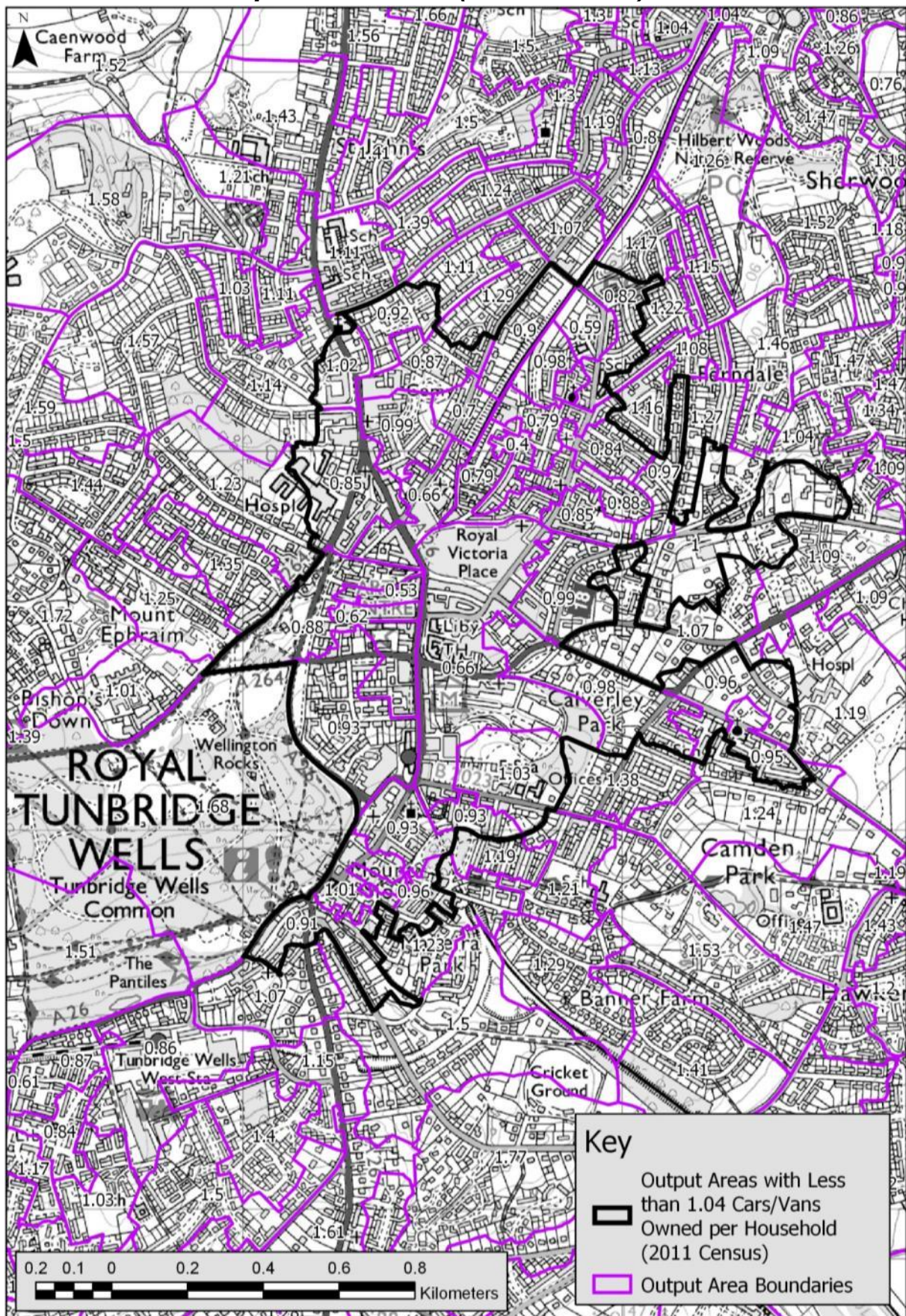
Average Car or Van Ownership Levels per Output Area

Although the data analysis within this paper has predominantly drawn on Lower Super Output Areas as well as at the ward level, for the purpose of detailing a suitable new boundary for the Royal Tunbridge Wells town centre area, data analysis is required at a much lower level. Consequently, the first step in drawing up new boundaries involves calculating the average car or van ownership levels per household per output area based on 2011 Census data (obtained from the Office for National Statistics). Output areas are the lowest geographical level at which Census estimates are provided and are generally designed to have similar population sizes (the average being 309) and be as socially homogenous as possible based on tenure of household and dwelling type²⁰.

As such, as shown in **Figure D1** below, average car or van ownership levels per household has been calculated for each output area. As a result, in order to determine a boundary whereby the averages contained within the boundary are relatively lower as compared to those averages outside of the boundary, a line has been drawn around the output areas with less than 1.04 car or vans per household. Within this area, averages range from as low as 0.4 to 1.03 car or vans per household.

²⁰ Census Geography: <https://www.ons.gov.uk/methodology/geography/ukgeographies/censusgeography>

Figure D1 – Boundary Based on Output Areas with Less than 1.04 Cars/Vans Owned per Household (2011 Census)



Data Source: 2011 Census Data, ONS

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Typical Urban Character Areas

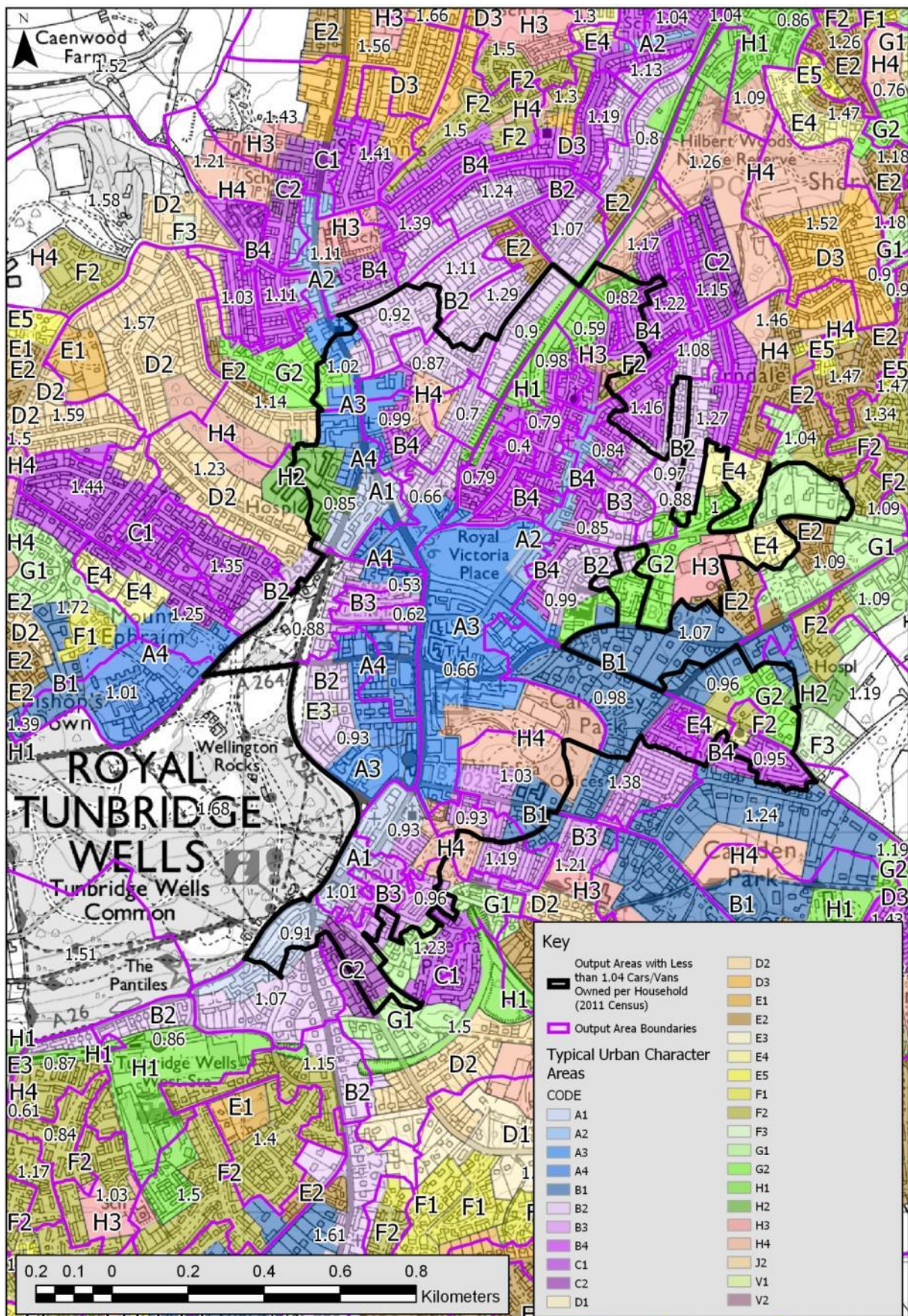
After having mapped this first boundary based on output areas, it was evident that this line required further refinement due to the way in which output areas are created. This is because some of these output areas cut across areas generally considered of the same character and as a result, the boundaries were further reviewed in relation to typical urban character areas based on the Typical Urban Character Appraisal produced by Tunbridge Wells Borough Council in April 2009²¹. This document distinguished every area within Royal Tunbridge Wells by their character area type (for example Historic Centre, Victorian Detached Villas, Edwardian Villas, Edwardian Terrace, Inter-War Spacious, Post-war Spacious Detached, Industrial/Commercial, Education, etc.). The typical urban character areas were mapped over the output area boundary which is shown in **Figure D2**. This was considered appropriate in order to ensure a logical boundary was formulated so as to reduce the likelihood that there would be two different parking standards on a single street that was seemingly non-mixed in character. **Table D1** below shows what area code in **Figure D2** refers to what character area type.

Table D1 – Typical Urban Character Area Codes

Area Code	Character Area	Area Code	Character Area
A1	Historic Centre	E3	Post-War Council Estate
A2	Retail Road Frontage	E4	Post-War High Density Terraces and Flats
A3	Town Centre	E5	Bungalows
A4	Edge of Town Centre	F1	Modern Detached
B1	Victorian Detached Villas	F2	Modern Semi/Linked
B2	Victorian 'Middle Class'	F3	Modern High Rise
B3	Victorian Three- and Four-Storey Terraces	G1	Mixed Age Detached/Semi
B4	Victorian Small Town Houses	G2	Mixed Age Medium/High Density
C1	Edwardian Villas	H1	Industrial/Commercial
C2	Edwardian Terrace	H2	Community/Health
D1	Inter-War Spacious	H3	Education
D2	Inter-War Detached	H4	Leisure/Recreation
D3	Inter-War Semi-Detached	V1	Historic Village Centre
E1	Post-War Spacious Detached	V2	Residential Village Expansion
E2	Post-War Speculative Estate		

²¹ Tunbridge Wells Borough Local Development Framework: Typical Urban Character Area Appraisal (April 2009): http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0016/26503/Typical-Urban-Character-Area-Appraisal-Apr-2009.pdf

Figure D2 – Output Area Boundary (2011 Census) Overlaid with Typical Urban Character Areas



Data Source: 2011 Census Data, ONS

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Proposed Zone A Boundaries

As a result of overlaying the typical urban character areas with the output area boundary, a new line was drawn as a means of logically rounding these output areas off by character area. The outcome of this is shown in **Figure D4**. Indeed, in some instances while drawing the new boundaries, the output area boundary as shown in **Figure D2** crossed over into large character areas (as shown on the north boundary with character areas B2 and B4). In this case, it was decided to logically round off the boundary by road/street inside the output area with an average car or van ownership of less than 1.04 per household unless logically suitable to extend beyond the output area boundary.

An example of rounding off output areas by character area type is shown in **Figure D3** below whereby the output area boundary separates both sides of a street within a single character area (code C2; Edwardian Terrace) by following the road. Consequently, when producing the proposed Zone A boundary, the boundary was extended to include the whole character area. Despite the output area inclusive of the western side of the street having an average of 1.5 car or vans per household, this particular section of that output area is likely to have a similar average to that of the eastern side of the street that is within an output area with an average of 0.91 cars or vans per household due to their similar character. It was consequently appropriate to incorporate both sides of the street rather than have two sides of the same street having two different parking standards. This was the approach applied throughout this process. After completing this, the next step was to go around the boundaries ensuring that the boundary lined up with, and did not cut through, roads, houses, gardens, dwelling curtilages, and so on.

Figure D3 – Example: Rounding off Output Area (2011 Census) by Character Area

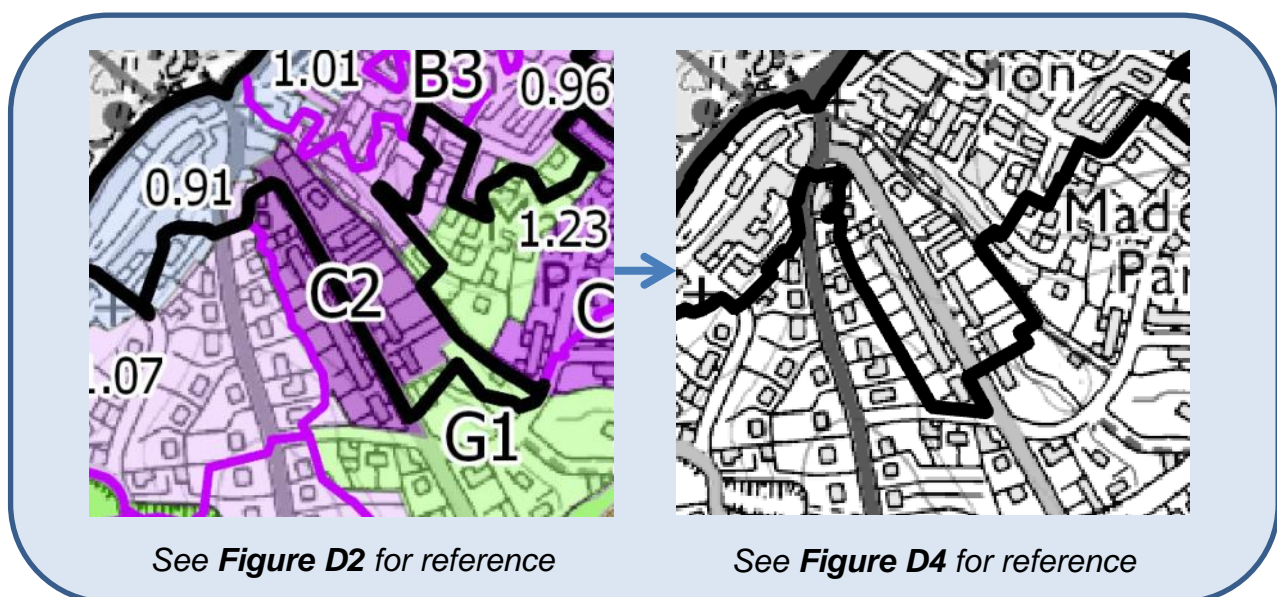
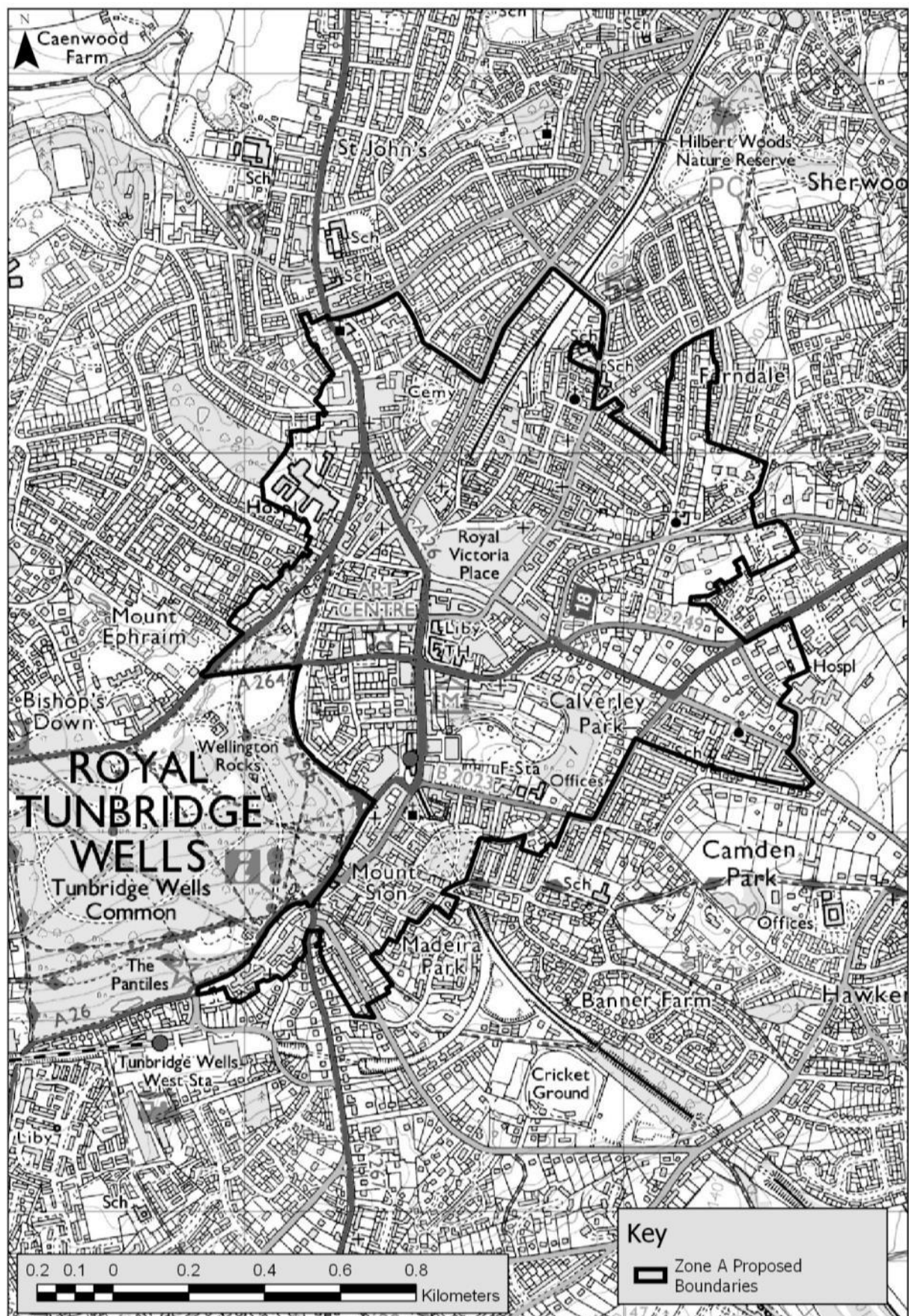


Figure D4 – Proposed Zone A Boundary

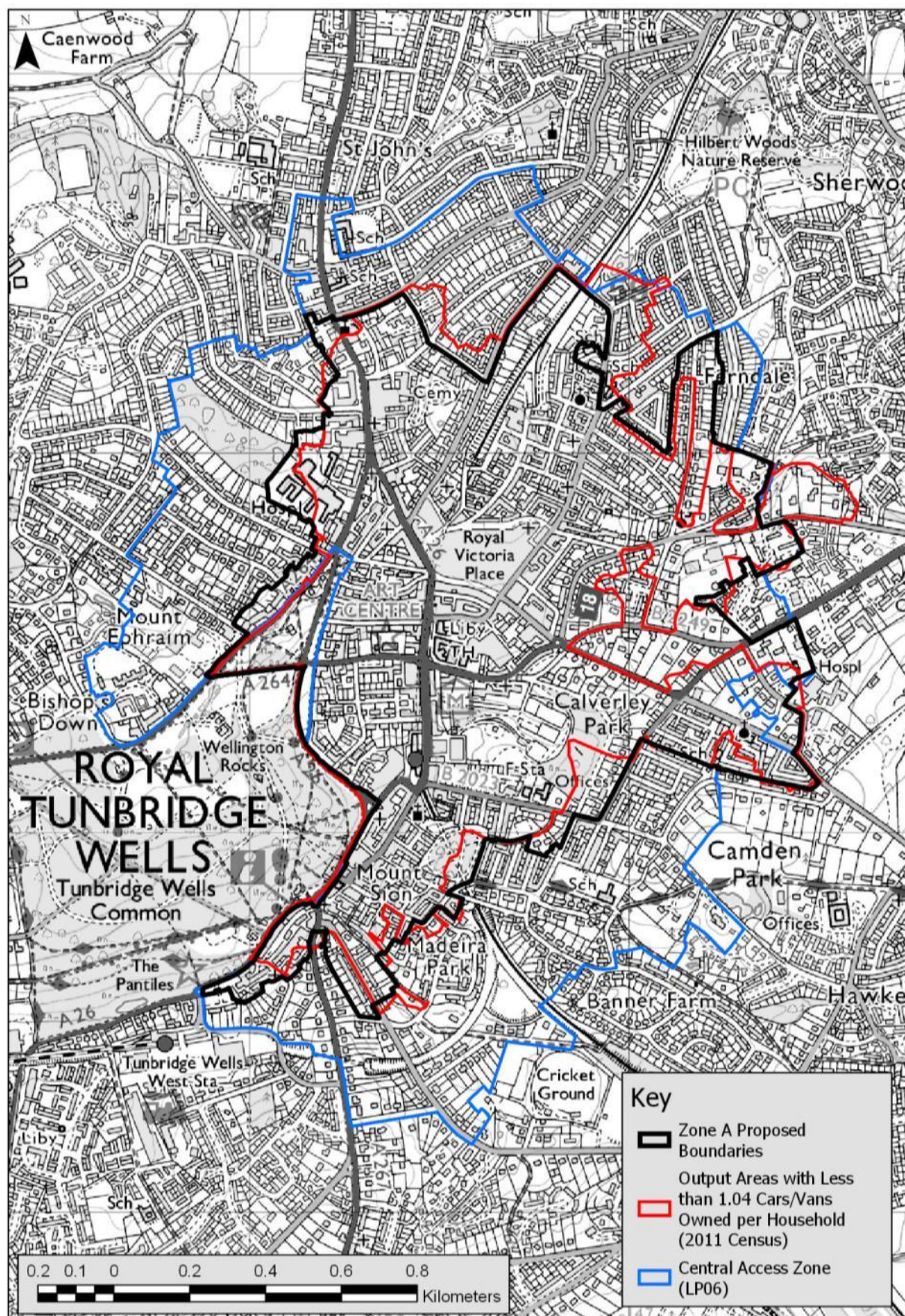
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Finally, **Figure D5** represents the proposed Zone A boundaries relative to the output area boundary as well as the Central Access Zone boundary. From this **Figure**, it is evident that, in parts, the proposed Zone A boundary is significantly smaller than that of the Central Access Zone (yet does not differ significantly from the output area boundary although is much more refined). It is also apparent that the new proposed Zone A boundary where possible logically separates streets by character type rather than cutting through houses of the same type and character on the same street.

Conclusion

The new town centre boundary produced in this Appendix is consequently proposed for incorporation into the new Local Plan as Zone A for which mandatory parking standards for residential developments under use class C3 (dwellings) will be required. Consequently, it is proposed that this Zone replaces the Central Access Zone. The methodology within this Appendix is considered far more robust and justified, underpinned by 2011 Census data and research undertaken on typical urban character areas, than the retention of the Central Access Zone.

Figure D5 – Proposed Zone A Boundary Relative to the Output Area Boundary (2011 Census) and the Central Access Zone Boundary



Data Source: 2011 Census Data, ONS

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