

**Tonbridge & Malling Borough Council**

**Position Statement in respect of Kent County Council Interim Guidance Note 3:  
Residential Parking Standards**

**August 2021**



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## Background context

Ensuring enough well-integrated parking provision across new developments throughout the Borough is of great importance to the Council in making planning decisions. Planning Committees regularly give this matter detailed consideration and Councillors are acutely aware that residents are now experiencing very real issues on the ground in terms of how such developments function day to day because of historic failings to provide sufficient parking.

The Council fully appreciates that largely these problems are a consequence of previous national planning policy. Nonetheless, the Council now has significant concerns regarding the adequacy and efficacy of Interim Guidance Note 3 (“IGN3”) for decision making purposes within the current context of how people in this Borough live and work.

## Current context

The Council has undertaken a careful review of the document and is of the view that it is based on requirements previously set out in PPS3 (Housing) which has long since been replaced by the National Planning Policy Framework (originally in 2012, most recently updated in July 2021). The introductory text to the document sets out that after the publication of PPS3, a report entitled “Residential Car Parking Research” (CLG, May 2007) considered the various influences on levels of residential parking, pointing to data from the 2001 Census as a starting point for estimating “expected levels of car ownership”. It appears to the Council that this is the evidence base for the document although the text throughout the document is not immediately conclusive in this respect.

The Council accepts that the key component of IGN3 is the “Guidance Table for Residential Parking” which sets out minimum and maximum parking levels for new developments based on size of unit and location of site. It is this part of the IGN that KCC most regularly references in making representations on planning proposals across the Borough. It is noted that the IGN does not expressly indicate what the evidence base is for the guidance table. The Council therefore assumes that it relates back to the 2001 Census data and there is no indication of this having been considered more recently to ensure any evidence base remains up to date.

## Position for decision making purposes

IGN3 has been adopted by the Council for decision making purposes. The Council in its role as local planning authority is required to determine planning applications in accordance with the adopted development plan unless material considerations indicate otherwise.

However, we are also required to establish whether adopted “local” planning policies (in this case IGN3 as adopted) conform with all latest national policy (the NPPF and associated material considerations such as the National Design Guide). Given the

above, the Council considers that the evidence base for the prescribed vehicle parking standards are out of date and relates to a policy position that no longer exists.

It is for the decision maker to determine what weight to afford to those standards within that very specific context. On this basis, substantially less weight will now be afforded by this Council to IGN3.

The Council accepts that in respect of housing development such an exercise must be undertaken in line with the presumption in favour of sustainable development (as set out in paragraph 11(d)(ii) of the NPPF) but if the decision maker considers that the quantum, layout and/or design of parking provision proposed would give rise to a poor quality development and the harms arising substantially and demonstrably outweighed the benefits arising from the provision of housing (and any other benefits arising), a refusal of planning permission could be justified. That is a matter of judgement to be made in all cases by the Council as local planning authority.

As such, whilst the Council will continue to consult Kent County Council as the statutory highway authority where required to do so, our assessments as to these aspects of proposed parking schemes will be focused on the following:

- individual detail of the development in question
- site-specific circumstances, and
- prevailing locational characteristics of any given case.

Developers and applicants will be advised of this as part of any pre-application engagement and officer reports (both delegated and committee reports) will set out in full the weighting exercise and subsequent assessment in any given case.

Kent County Council have been advised of this position in writing.