

# **Dartford Town Centre Area Action Plan**

## **PPS25 Flood Risk Sequential Test Assessment for the Dartford Town Centre Area Action Plan**

## **1. Introduction**

This paper sets out the sequential test that has been applied to proposed site allocations in the Dartford Town Centre Area Action Plan (DTC AAP) 2008. In accordance with PPS25 the most appropriate uses on each of the identified development sites are identified. The appraisal assesses the town centre sites in the context of potential future development in the Borough, taking into account information regarding flood risk, vulnerability of uses and potential sustainability and regeneration benefits of the sites.

The sequential test has drawn upon the findings of the Dartford Town Centre Strategic Flood Risk Assessment (DTC SFRA) July 2008<sup>1</sup>. This SFRA was undertaken by Entec to address the Environment Agency's concerns that the joint SFRA for Dartford and Gravesham Boroughs (2005 and 2008 update) was not sufficiently robust in relation to modelling of the River Darent water flows. Further work was required to get a better understanding of flood risk in the Darent Valley so as to support site allocations and sequential testing in relation to the Town Centre Area Action Plan. This document should be read alongside the SFRA.

The DTC SFRA represents a combined Level 1 and Level 2 SFRA. Level 1 assesses flood risk at a town centre wide scale. Level 2 considers the detailed nature of the flood hazard. It allows a sequential approach to site allocation to be adopted and facilitates application of the Exceptions Test.

Some sites covered by the DTC SFRA fall outside the Area Action Plan boundary. These sites are not considered in this assessment but will be considered in the Borough-wide Sequential Test Assessment in support of the Core Strategy.

The Town Centre SFRA was carried out in consultation with the Environment Agency Southern Area and received their endorsement.

## **2. Context**

The two primary sources of flood risk in the town centre are fluvial and tidal. The town centre SFRA identifies that groundwater and surface water are thought to be less significant in terms of flood risk.

Ten town centre opportunity sites are covered by this assessment, falling within Flood Risk Zones of 1,2 and 3a. Nine of them lie wholly or partly within Flood Zones 2 and 3.

## **3. Consideration of Dartford Town Centre against Other Alternatives**

Dartford's Core Strategy Preferred Options (Jan 2008) considered preferred locations for development in the Borough and considered a number of alternatives. A pattern of development focussing on three key areas was identified as follows (Preferred Approach 2):

- Dartford Town Centre

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<sup>1</sup> The Dartford Town centre SFRA is one of the background documents to the Area Action Plan.

- The east-west corridor from Ebbsfleet through to Stone, including development of former chalk quarries
- Thames Waterfront

These locations were also specifically identified as priority locations for housing development (Preferred Approach 12). In the case of Dartford Town Centre, it was considered critical to the success of the town centre that new housing development moves forward apace with new retail and leisure developments, so that an expanded customer base is embedded from the outset and helps support the enhanced town centre offer.

Focus on these three areas was considered to provide the best opportunity to create mixed and sustainable communities, with housing supported by jobs, means of sustainable travel and community facilities such as schools and health facilities. Housing development at all these locations is needed in order to meet draft South East Plan (2006) requirements.

The Council carried out an evaluation of the Core Strategy Strategic Options, taking into account findings from the evidence base documents, the Sustainability Appraisal and responses to consultation. This assessment found that a mix of town centre, strategic (large sites north of the A2), riverfront and some already permitted urban infill sites could achieve regeneration objectives by providing new community, transport and water infrastructure. They were also considered to create a sustainable pattern of development, protect the natural environment and have less impact on existing communities than other options.

Alternative locations considered were infill sites within the urban area, but outside of the three identified preferred areas. These were generally considered a lower preference to the other options because they were less likely to provide adequate infrastructure in a co-ordinated manner and they would have more impact on existing neighbourhoods during construction. The assessment identified greenfield sites outside the urban area as the least preferable option as this would not facilitate development of previously-developed land, would increase travel and would impact on the openness of the countryside and risk coalescence of villages. The Sustainability Appraisal of the Preferred Options concluded that a mix of sites could be considered to meet the sustainability objectives but that rural sites in the Green belt performed least well.

In line with the assessment carried out through the Core Strategy, Dartford Town Centre is identified as a priority area for development. Critically, this includes housing development. The sites identified in the DTCAAP are those that are available or likely to become available for development over the lifetime of the Plan. These sites will provide opportunities to put the Plan strategy into effect, ensuring that the town centre continues to fulfil its role as an accessible centre servicing the wider needs of the community. This will be delivered through an improved shopping offer, expansion of non-shopping attractions, enhancement of Dartford's assets to develop its unique identity and the provision of more jobs and homes to support the town's economy.

The range of potential uses anticipated at the opportunity sites is essential to the revitalisation of the town centre. Retail activities are vital to the core function of the town and these need to be supported with complementary uses. Residential development is required to increase the customer base of the town centre and provide activity and passive surveillance outside of the core shopping hours, making

the town feel safer. The town centre provides one of the most sustainable residential locations in the Borough, with its wide range of facilities and high levels of public transport accessibility. Residential development at alternative sites will lead to less sustainable development patterns. Failure to take up the opportunity sites within the town centre is likely to undermine the economic viability of the town centre and lead to its decline.

National and sub-regional policies set out a number of approaches which support the objectives of the Area Action Plan:

PPS1	<ul style="list-style-type: none"> <li>• Sustainable patterns of development</li> <li>• Focussing developments that attracts a large amount of people in existing centres</li> <li>• Bring forward development land in suitable locations to improve access for all</li> <li>• Make more efficient use of land</li> </ul>
PPS3	<ul style="list-style-type: none"> <li>• Ensure housing located close to community facilities and with good access</li> </ul>
PPS6	<ul style="list-style-type: none"> <li>• Positively plan for the growth, regeneration and investment of existing centres</li> <li>• Requirement to apply a sequential retail assessment in identification of locations for shopping, with preference given to town centre locations</li> <li>• Retail development to be directed to suitable sites within the existing Primary Retail Area</li> <li>• Encourage a mix of uses and services</li> </ul>
PPG13	<ul style="list-style-type: none"> <li>• Focussing major generators of travel demand in town centres and near public transport interchanges and identifying town centres as preferred locations for retail, commercial leisure, office and residential development</li> </ul>
Draft South East Plan (2006)	<ul style="list-style-type: none"> <li>• Dartford identified as a secondary regional centre acting as a focus for major retail development, cultural, tourism, social and community venues, large-scale leisure and office development and a range of housing, where possible provided as part of wider mixed use developments.</li> </ul>

#### 4. Sequential and Exceptions Test

PPS25 says that the overall aim of decision –makers should be to steer new developments to Flood Zone1. Where there are no reasonably available sites in Flood Zone 1, decision makers should take into account the flood risk vulnerability of land uses and consider reasonably available sites in flood Zone 2 and where there are no reasonably available sites in Flood Zones 1 and 2, consideration can be given to the suitability of sites in Flood Zone 3. Within each Flood Zone, new development should be directed first to sites at the lowest probability of flooding and the flood vulnerability of the intended use matched to the flood risk of the site .e.g higher vulnerability uses located on parts of the site at lowest probability of flooding.

The Exceptions Test, as provided by PPS25, allows some scope for departures from the sequential approach. This is for circumstances where development is necessary to meet the wider aims of sustainable development and urban regeneration. For the Exception Test to be passed, the development must:

- 1) provide wider sustainability benefits to the community that outweigh flood risk
- 2) be on developable, previously-developed land, unless there are no reasonable alternatives
- 3) be safe and not increase flood risk elsewhere

Section 3 of this paper demonstrates that, in the case of Dartford Town Centre, and taking into account alternative locations in the Borough, the sustainability benefits are such that, should sequentially preferable sites not be available within the town centre itself, town centre sites may have to be considered under the Exceptions Test.

Table 1 below considers each of the available town centre opportunity sites, with the exception of the former Co-op store which already has planning permission. The sites are identified on Map 1. The table summarises the land use proposals for the sites as contained in the Area Action Plan, the level of vulnerability of this use, as defined by PPS 25 and whether the proposed use is compatible with the level of flood risk. Uses on sites that would require passing of the Exceptions Test are also identified.

**Table 1  
Town Centre Opportunity Sites : Proposed Uses and PPS 25 Compatibility**

Site No	Site Name	Flood Zone(s)	Potential Uses	PPS25 Vulnerability	PPS25 Compatibility	
					Zone 2	Zone 3a
9	Lowfield Street	1, 2 and 3a	Retail, Community (non – residential), Business, Leisure	Less Vulnerable	Yes	Yes
			Residential, Health services (non residential), Hotel	More Vulnerable	Yes	Exceptions Test required
3	Northern Gateway West	2 and 3a	Business, Retail	Less Vulnerable	Yes	Yes
			Residential, Nightclub	More Vulnerable	Yes	Exceptions Test required
1	Northern Gateway East	1, 2	Residential, Health services (non residential)	More Vulnerable	Yes	Yes
			Community (non – residential), Retail, Business	Less Vulnerable	Yes	Yes
			Open space	Water-compatible	Yes	Yes

2	Mill Pond	1,2 and 3a	Residential, Health services (non residential), Hotel	More Vulnerable	Yes	Exceptions Test required
			Retail, Community (non – residential), Leisure, restaurants/cafes, Business	Less Vulnerable	Yes	Yes
4	Station Approach	2	Residential, hotel	More vulnerable	Yes	Yes
			Offices, shops, restaurants / cafes	Less vulnerable	Yes	Yes
5	Overy Street	1, 2	Residential	More Vulnerable	Yes	Yes
8	47 – 53 High Street	3a	Retail, restaurant, café, offices, community uses	Less vulnerable	Yes	Yes
			Residential, hotel	More vulnerable	Yes	Exceptions Test required
7	Acacia Hall Complex	1, 2, 3a	Leisure	Less vulnerable	Yes	Yes
			Open space, outdoor sports and recreation	Water compatible	Yes	Yes
10	Former Police Stn, Instone Rd	1	Residential	More Vulnerable	Yes	Yes
			Shops, community services (non-residential)	Less vulnerable	Yes	Yes
6	Orchards Shopping Centre	3a	Leisure, shops, restaurants, cafes	Less vulnerable	Yes	Yes
			Bars	More vulnerable	Yes	Exceptions Test required

*Note : Sites with planning permission, including the former Co-op store, have not been assessed, since they will not be subject to the sequential test.*

In the context of Dartford Town Centre, all identified sites are considered essential for development, in order to assist the regeneration of the town. Given that the town falls within an area of flood risk and available sites cover the range of flood risk zones from Zone 1 to 3a, the objective is, as far as possible, to steer the more vulnerable uses to the lower flood risks zones, taking into account wider sustainability and regeneration objectives. There are no proposed town centre uses falling into the

'essential infrastructure' or 'highly vulnerable' categories. Proposed uses falling into the 'more vulnerable' category include residential, hotels, health services (non-residential), bars and nightclubs. The Exceptions Test is required where these uses fall within Flood Zone 3a. The Exception Test is not required for the 'Less Vulnerable' uses. Vulnerability categories are as defined in PPS25.

## 5. Site Assessment

### Sites wholly within Flood Zone 1:

**Site 10, Former Police Stn, Instone Road** – The site is allocated predominantly for residential uses. A very limited amount of shops and community services is envisaged to create an active frontage.

The use of this site for residential meets the sequential test in that a more vulnerable use is directed to a site at a low risk of flooding.

### Sites within Flood Zone 1 and 2:

**Site 5, Overy Street** – The major part of the site is within Zone 2 with limited sections of Zone 1. It is allocated entirely for residential. An 8m safeguarding strip alongside river to allow access to flood defences will need to be provided, limiting development within Zone 2.

Residential use on this site is compatible with directing the more vulnerable uses to sites with lower flood risk in the town centre.

**Site 3, Northern Gateway East** – The major part of this site is within Zone 1 but with a portion is Zone 2. The site is allocated predominantly for residential uses. Other uses on the site are proposed to support the new residential community and are an essential component of a sustainable residential community. The northern part of the site is contaminated as a result of landfill activities. Open space is proposed on this part of the site. Part of the north section is also affected by a COMAH zone<sup>2</sup> limiting its potential for residential use. Business use is proposed for this part of the site.

The predominantly residential use of the site is consistent with the comparatively low flood risk at this site, as compared to other town centre sites.

### Sites wholly within Flood Zone 2

**Site 4, Station Approach** – The presence of the station on this site predisposes it towards certain uses and limits the degree to which it can be used for the more vulnerable uses. Residential uses and a hotel are, however, proposed alongside other uses. By its nature, the site, needs to accommodate interchange facilities and a limited amount of facilities to support the station and its users, including ancillary shops and eating places. Offices are a highly sustainable use at this location, given the proximity of the train station and are also proposed for the site.

The more vulnerable uses, including residential and hotel are compatible with the relatively low level of flood risk on the site as compared to other town centre locations. Other less vulnerable uses are, however, an essential mix of uses on the site, given that the site includes the train station.

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<sup>2</sup> COMAH : Control of Major Hazards Regulations 1999. Statutory Instrument 1999 No 743

**All sites that follow are subject to the Exceptions Test, where they are proposed for 'More Vulnerable' Uses**

Sites within Flood Zone 1, 2 and 3a

***Site 9, Lowfield Street***

The town centre SFRA identifies that the site is crossed by several flood risk zones, Flood Risk Zone 3a being the highest risk, and that the flood risk is greatest in the northern section of the site. The SFRA advises that the range of Flood Zones makes it possible to propose many uses across the site with land use vulnerabilities being located within the site to reflect the identified flood risk zones.

The Area Action Plan proposes that residential uses are located on the southern part of the site. This area lies largely within Flood Risk Zones 1 and 2 and meets the requirement that this more vulnerable use is located in the part of the site at lowest risk of flooding.

The less vulnerable uses, predominantly retail, but potentially also community, business and leisure uses, are to be located in the northern part of the site, which lies within Flood Zone 3a.

Residential and hotel uses are also proposed on northern part of the site, which lies within Flood Zone 3a but here they are proposed on upper floors only. The SFRA advises that the more vulnerable land uses may be placed on the upper floors providing that the development is designed to allow safe evacuation from all storeys to a lower risk flood zone. As the site is not surrounded by Flood Zone 3a, it is considered feasible that safe escape routes can be provided to the lower risk zones to the south and west.

*Conclusions:* The more vulnerable uses are proposed for the ground floor of the lower flood risk zones and upper floors of Zone 3a. The less vulnerable uses are directed to the lower floor of the part of the site which is most at risk of flooding. The site is previously-developed land. A Flood Risk Assessment will be required to be submitted with a planning application for the site. However, the SFRA advises that safe escape routes are available. Additionally, the open space in the adjacent Central Park offers the opportunity to attenuate water run-off through the use of SUDS.

***Site 2, Mill Pond***

The SFRA identifies that the site is predominantly within Flood Zone 2, with a small area in the east lying in Flood Zone 1, with the Mill Pond itself and a small area to the west lying within Zone 3a.

The Area Action Plan proposes the location of less vulnerable uses at the ground floor level, including ancillary retail, restaurants and cafes and leisure facilities, so as to promote an active frontage at this attractive location adjacent to the Mill Pond and with potential for direct access to the railway station. The more vulnerable uses, including residential, are to be located on the upper floors. Community facilities, including the more vulnerable health facility, are proposed for the eastern end of the sites, which lies within zone 1.

The SFRA advises that safe evacuation from the site would need to be demonstrated given that there are potential barriers to safe escape from the site, particularly with regard to that part of the site to the west of the River Darent. However, as part of the

redevelopment of the wider area north of the railway line, a new access over the railway is proposed. This has the potential to be designed so as to provide a safe escape route.

*Conclusions:* Given that the site is predominantly in Zone 2, it is one of the more sequentially preferable sites in the town centre for the more vulnerable uses, including residential. In addition, residential uses are proposed at the upper levels. A potential issue with regard to safe escape routes has been identified. This may be addressed through the proposed new bridge across the railway line.

The site is previously-developed land. An FRA submitted with a planning application would need to demonstrate safe evacuation routes. The SFRA advises that it may be possible to manage any potential increase in run-off through discharge to the River Darent or to the local drainage network, although this would need to be agreed with the appropriate authorities.

### **Site 7, Acacia Hall Complex**

The SFRA identifies that about two thirds of the site is within Flood Zone 3a with the majority of the remainder in Zone 1. A very small part of the site is in Zone 2. The SFRA cautions that high hazard classifications on the western part of the site and the fact that the central portion of the site is effectively an island, increases the flood risk on these parts of the site. It recommends that these areas are used for less vulnerable and water compatible uses only.

The Area Action Plan proposes the retention of the green setting, together with proposals for an enhanced sports, leisure, cultural and recreational offer on the site. The proposed built uses fall within the less vulnerable category, with open space and outdoor recreation being water compatible uses. This accords with the requirement to direct less vulnerable uses to areas of higher flood risk.

Additionally, Policy 36 of the AAP requires that there is no increase in the building footprint between the two channels of the River Darent. This will prevent increases in surface water run-off.

As part of the creation of a recreational complex on the site, a swimming pool/ sports centre is proposed for the part of the site which lies in Flood Zone 1. This is classified as a less vulnerable use. This part of the site has the potential to accommodate more vulnerable uses such as housing, which might otherwise need to be located on sites at a higher level of flood risk.

The enhancement of leisure facilities, however, forms a key part of the Plan's regeneration strategy. The location of this sport and leisure complex close to the heart of the town centre will encourage linked trips to the town centre for shopping and leisure uses, resulting in a reduction in trips. The direct link between the complex and the High Street will increase town centre activity and vitality, bringing more people into the town centre and the shopping area. There are no alternative sites at a lower level of risk which can provide a sufficiently large footprint at ground level for a swimming pool and which provide such a close connection with the High Street, enabling this synergy between uses to take place.

*Conclusion:* It is appropriate that less vulnerable uses are directed to this site, since the major part of it is at a high level of flood risk. There is, however, a portion of the site where, in the absence of overriding sustainability and regeneration reasons, a more vulnerable use would be preferable. The benefits of a consolidated sport and leisure complex on this site are, however, considered to outweigh the flood risk of

locating residential uses on sites at a higher risk of flooding, providing it can be demonstrated that these alternative sites will be safe.

#### Sites within Flood Zone 2 and 3a

##### **Site 3, Northern Gateway West**

The SFRA identifies this site as predominantly in Flood Zone 3a, although there is an area of Zone 2 up against the channel. The flood depths attained on this site are the highest of any of the Area Action Plan sites. The sites location between the railway embankment and the river results in no obvious safe evacuation route from the site. The SFRA advises that the site is appropriate for less vulnerable land uses, such as employment.

The Area Action Plan proposes predominantly employment and possibly a relocated retail warehouse on the site. Some car parking is proposed on the site, which is assumed to be a less vulnerable land use. These uses are the consistent with the level of flood risk on the site.

An economically viable redevelopment of the site may, however, require a limited element of residential uses. The site could also provide potential for relocation of town centre night clubs to a location where they would not cause nuisance to adjoining residential uses. The SFRA advises that these more vulnerable land uses might be considered appropriate, providing safe escape routes can be provided. This would need to be demonstrated as part of a Flood Risk Assessment accompanying a planning application.

Redevelopment of the site will contribute to the regeneration of the town centre through bringing back into use largely vacant sites in a gateway to the town centre, thus improving the environment and image of the town centre and creating an increased customer base for the town centre.

*Conclusion:* Less vulnerable uses are primarily proposed on this relatively high flood risk site. However, consideration may need to be given to a limited element of more vulnerable uses, to enable the redevelopment of this site, thus contributing to the regeneration of the town centre. The site is previously-developed land. Should more vulnerable uses be essential on the site, an FRA submitted with a planning application would need to demonstrate safe evacuation routes.

#### Sites within Flood Zone 3a

##### **Orchards Shopping Centre**

The SFRA identifies this site as almost exclusively Zone 3a. As such, less vulnerable uses should preferably be directed to the site.

The site lies within the Primary Shopping Area identified within the Area Action Plan. Shops, leisure uses, restaurants and cafes are proposed on the site. These are less vulnerable uses and are consistent with the relatively high level of flood risk on the site. In these circumstances an Exceptions Test is not required.

##### **47-53 High Street**

This comparatively small site lies in the heart of the Primary Shopping Area. It lies within Flood Risk Zone 3a. Less vulnerable uses should preferably be directed to this site.

The Area Action Plan proposes retail uses, restaurants and cafes at ground floor level. These less vulnerable uses are consistent with the relatively high level of flood risk on the site.

On the upper levels a mix of uses is considered appropriate, including residential, office uses, a small hotel or community uses. Residential uses and a hotel are more vulnerable uses which are required to pass the Exceptions Test. A mix of all or some of these uses at the upper level would contribute to the vitality of the town centre outside of shopping hours. It would help to generate a safer feel in the town centre through additional activity and surveillance in the evenings.

*Conclusions:* The proposed less vulnerable uses on the ground floor are consistent with the relatively high flood risk of this site. More vulnerable uses are proposed on upper floors only. Nonetheless, this requires that they pass the Exceptions Test. Residential uses and /or a hotel would add to the vitality of the town centre contribute to meeting regeneration objectives. The site is previously-developed. An FRA submitted with a planning application would need to demonstrate safe evacuation routes.