

**DARTFORD TOWN CENTRE
AREA ACTION PLAN**

SUBMISSION DOCUMENT 2008

**CONSISTENCY WITH NATIONAL POLICY AND
OTHER STRATEGIC DOCUMENTS**

**PART OF DARTFORD'S
LOCAL DEVELOPMENT FRAMEWORK**

AUGUST 2008

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INTRODUCTION

This paper provides a self assessment as to whether the policies contained in the Dartford Town Centre Area Action Plan: Submission Document 2008 (AAP) are consistent with national policy and other strategic documents. It addresses the following requirements:

1. Revised PPS12 (2008) requires, as one of the Tests of Soundness, that the Plan is consistent with national policy. Section A of this document demonstrates consistency with national policy.
2. Section 24(1)(a) of the Planning and Compulsory Purchase Act 2004 requires that local development documents are in general conformity with the Regional Spatial Strategy. Section B of this document assesses conformity of the AAP with the emerging South East Plan.
3. Section 19(20)(f) of the Planning and Compulsory Purchase Act 2004 requires that the community strategy for the local authority must be taken into account in the preparation of local development documents. Conformity of the AAP with the emerging Sustainable Community Strategy for Dartford and Gravesham is considered in Section E of this document.
4. Revised PPS12 (2008) advises that local planning policy supports the delivery of outcomes in the Local Area Agreement. Section E, 'The Kent Agreement' identifies how the AAP will contribute to achievement of the Local Area Agreement targets.
5. Revised PPS12 (2008) advises that documents within the Local Development Framework are intended to deliver the spatial planning strategy for the area. In order to achieve this, they must respond to a broad framework of national, regional, sub-regional and local strategies. This analysis does not cover the whole range of policy documents that have helped to shape the AAP policies but it assesses the extent to which the AAP helps to support the key plans and strategies.

SECTION A NATIONAL GUIDANCE

This section looks at National Planning Policy Guidance Notes (PPG) and Planning Policy Statements (PPS). Not all guidance is relevant and some PPGs and PPSs have been omitted from this assessment:

- **PPG5 Simplified Planning Zones, PPG8 Telecommunications, PPG14 Unstable Land and PPG20 Coastal Planning** – the AAP policies have not been assessed against these as they are of less significance to both Dartford town centre and the borough as a whole.
- **PPS11 Regional Spatial Strategies, PPS12 Local Development Frameworks, PPG18 Enforcing Planning Control and PPG19 Outdoor Advertisement Control** – the AAP policies have not been assessed against these as they are concerned about procedural planning matters.
- **PPG2 Green Belts, PPS7 Sustainable Development in Rural Areas, PPS10 Planning for Sustainable Waste Management and PPG16 Archaeology and Planning** – the AAP policies have not been assessed against these as they are irrelevant at the town centre level. They deal with topics such as Green Belts, rural areas, waste and archaeology that are more appropriately considered against the borough-wide policies in the Core Strategy.
- **PPS3 Housing, PPG4/Draft PPS4 Industrial, Commercial Development and Small Firms, PPS6 Planning for Town Centres and PPS25 Development and Flood** – the AAP policies have only been *partially* assessed against these as some parts of the guidance are more appropriately dealt with at the Core Strategy level, e.g. i) the network and hierarchy of town and local centres, ii) the overall distribution of, and the sequential approach towards, development across the Borough and iii) supply and delivery of housing, affordable housing, retail and employment land.

The remaining PPGs and PPSs are relevant. The summaries presented below assess how well the AAP will implement Government guidance at a town centre or site specific level. In some instances PPGs and PPSs duplicate each other and cross referencing has been used where practicable to reduce repetition within the assessment.

1 PPS1 Delivering Sustainable Development

- a) PPS1 seeks a **prosperous economy** – by i) ensuring suitable locations are available for retail, commercial, public sector and leisure development, ii) focussing developments that attract a large number of people in existing centres to promote vitality and viability, iii) providing improved choice and competition and iv) supporting the efficient, competitive and innovative business and commercial sectors.

The AAP aims to regenerate the town centre and policies 1 New Shopping Floorspace, 2 Size of Units, 3 Primary Shopping Frontage, 4 Secondary Shopping Frontage, 5 Food Stores and 6 Retail Warehousing focus on providing a better retail offer, with increased choice of a wide range of shopping provision. These policies will improve vitality and viability, strengthen the role of the town as a shopping centre, improve its attraction and use and help the town centre to remain competitive. Policy 2 Size of Units encourages a broader range of shops from large multiple retailers to small independent traders, from food stores to retail warehousing and this will help to cater for the needs of small businesses and help businesses to be innovative. Policies 7 Land Uses to Complement Shopping and 9 Leisure, Culture and Recreation, 10 Hotels and 11 Employment consider other suitable uses that will complement the shopping offer and encourage visitors to stay longer in the town. These varied uses will help to bring vitality and viability to the town centre and will also ensure that developments that attract a large number of people are located centrally. Specific sites that promote a mix of uses and which support the objective of seeking a prosperous economy include Policies 29 Station Approach, 30 Northern Gateway, 32 Orchards Shopping Centre, 33 Former Co-op Store, 34 Lowfield Street, 35 Market Street and 37 47-53 High Street.

- b) PPS1 seeks to **improve social inclusion** – by i) bringing forward development land in suitable locations to improve access for all and ii) ensuring the provision of sufficient, good quality new homes.

Various policies in the AAP including 1 New Shopping Floorspace, 3 Primary Shopping Frontage, 4 Secondary Shopping Frontage, 5 Food Stores, 6 Retail Warehousing, 7 Land Uses to Complement Shopping, 8 Housing, 9 Leisure, Culture and Recreation, 10 Hotels and 11 Employment focus different types of development in the town centre, close to public transport which in turn will improve access for all. Policy 17 Access and Facilities for All Groups seeks to ensure accessibility for all population groups. Policy 8 Housing provides for a mix of accommodation from flatted developments to family housing, and affordable housing too. Specific sites that acknowledge the need for improved accessibility and/or housing include Policies 29 Station Approach, 30 Northern Gateway, 31 Overy Street, 32 Orchards Shopping Centre, 33 Former Co-op Store, 34 Lowfield Street, 35 Market Street, 36 Acacia Hall Complex, 37 47-53 High Street, 38 Holy Trinity Church Setting, 39 Instone Road and 40 Former Police Station.

- c) PPS1 seeks to **make more efficient use of land** – by i) encouraging higher densities, ii) optimising the potential of the site to accommodate development, iii) developing on previously used land and buildings, rather than on Greenfield sites and iv) promoting mixed use developments that are durable and adaptable.

AAP policy 7 Land Uses to Complement Shopping advocates a mix of additional town centre uses and seeks to broaden the range of uses that complement the shopping offer, thus optimising the potential of the town centre. Policy 8 Housing seeks a larger population living within and on the edge of the town centre by redeveloping a number of previously developed sites for housing, the majority of which will be part of mixed use schemes. It identifies a number of flatted and family housing developments which will ensure an efficient use of land whilst at the same time providing for a range in accommodation types. Assessing proposals against criteria such as communal space for flats, private amenity space and the ability to create sustainable mixed use communities will help to balance higher density developments with the needs of residents. Specific sites acknowledge the need for efficient use of land, including Policies 29 Station Approach, 30 Northern Gateway, 32 Orchards Shopping Centre, 33 Former Co-op Store, 34 Lowfield Street, 37 47-53 High Street, 39 Instone Road and 40 Former Police Station.

- d) PPS1 seeks to **improve design** - by i) protecting valued townscapes, the historic environment and the character of the urban area, ii) reinforcing local distinctiveness, iii) providing good quality public

spaces and open spaces, iv) ensuring high quality inclusive design with good architecture and v) delivering safe, vibrant and attractive development and places to live.

Various policies in the AAP address different elements of design. Policy 12 Preservation and Enhancement of the Historic Environment promotes the historic environment as part of Dartford's unique offer and seek to improve historic buildings. Policies 16 Public Realm and 18 Design of New Development seek new developments that preserve and enhance the character of the area, with the highest quality of design, responding positively to the local context and contributing to the identity of the area. Furthermore, contemporary design will be acceptable but should draw on and make reference to the historic context. High quality paving, pedestrianised areas, street furniture, public realm and new public spaces are also encouraged. Policy 19 Safety and Security seeks to design out crime in order to improve safety and security. Policy 17 Access and Facilities for All Groups emphasises the need for town centre accessibility and comfort for all population groups including for those with mobility, hearing and sight difficulties. Specific sites that acknowledge the need for improved design include Policies 29 Station Approach, 30 Northern Gateway, 31 Overy Street, 32 Orchards Shopping Centre, 33 Former Co-op Store, 34 Lowfield Street, 35 Market Street, 36 Acacia Hall Complex, 37 47-53 High Street, 38 Holy Trinity Church Setting, 39 Instone Road and 40 Former Police Station.

- e) PPS1 seeks to **adapt to climate change** - by i) reducing greenhouse emissions and improving air quality, ii) promoting renewable energy and combined heat and power, iii) reducing energy use, iv) making more efficient use of resources and v) encouraging sustainable drainage systems. *These issues are covered in PPS1 Supplement in section A:2 below, in PPS22 in section A:11 below and in PPS23 in section A:12 below.*
- f) PPS1 encourages **sustainable patterns of development** – by i) ensuring accessible public transport provision and focussing development in existing centres close to public transport interchanges, which in turn reduces the need to travel by car. *These issues are covered in PPG13 in section A:7 below.*

2 Supplement to PPS1 Planning and Climate Change

- a) The Supplement seeks to **reduce the need to travel by private car** – by i) generating patterns of growth that make fullest use of sustainable transport and reduce carbon dioxide emissions, ii) providing a realistic choice of access by means other than the private car and iii) focussing substantial new development on locations with good accessibility. *These issues are covered by PPG13 in section A:7 below.*
- b) The Supplement seeks to **control local climate effects** - by i) encouraging appropriate land uses that act as carbon sinks and ii) contributing to urban cooling. *These issues are covered in PPG23 in section A:12 below.*
- c) The Supplement seeks to **deliver less polluting development** – by i) encouraging sustainable buildings and delivering to specific levels of the Code for Sustainable Homes, ii) promoting energy efficiency and iii) encouraging sustainable drainage systems.

AAP policy 18 Design of New Development encourages district wide combined heat and power on specific opportunity sites and significantly sized windfall sites. It states that where sustainable energy supply is proposed, opportunities for supplying adjacent sites and buildings should be explored. The policy also suggests that the Council will work with developers at the Northern Gateway and Lowfield Street to achieve reductions in carbon emissions. Furthermore, it encourages energy efficiency above mandatory levels required by Building Regulations as well as highest design that incorporates sustainable construction, homes built to Level 3 and above of the Code for Sustainable Homes and the use of sustainable drainage systems. Specific sites that acknowledge the need for combined heat and power and working towards zero carbon homes include Policies 29 Station Approach, 30 Northern Gateway and 34 Lowfield Street.

3 PPS3 Housing

- a) PPS3 aims to **provide housing in suitable locations** – by i) ensuring housing is located close to community facilities and with good access to jobs, key services and infrastructure, ii) creating sustainable communities of sufficient size to justify community facilities, infrastructure and services, iii) making effective use of land including a target for housing on previously developed land, iv) considering the re-use of vacant/derelict industrial and commercial sites for housing to provide mixed-use town centre developments, v) making efficient use of land using a range of housing densities and vi) intensifying existing urban fabric where appropriate.

The AAP makes significant provision for new housing in a way which meets the suitability criteria defined in PPS3. The town centre is, by its very nature a location containing a range of community facilities, good public transport facilities and other forms of infrastructure.

AAP policy 7 Land Uses to Complement Shopping supports a range of uses to support the town centre's retail role including housing. Policy 8 Housing seeks a larger population living within and on the edge of the town centre, so that they have access to a range of facilities and a variety of non car modes of transport. Approximate housing numbers are identified for specific sites. The amount of housing proposed is of sufficient size to justify the need for community services. This is especially so in the Northern Gateway where a community hub is proposed. All sites proposed for housing are on previously developed land and some take advantage of currently vacant land. Although specific densities are not identified, the proposed mix of flatted and family housing developments will ensure an efficient use of land whilst at the same time providing for a range in accommodation types. Assessing proposals against criteria such as communal space for flats and private amenity space will help to balance higher density developments with the needs of residents. Specific sites that include housing within redevelopment schemes include Policies 29 Station Approach, 30 Northern Gateway, 31 Overy Street, 33 Former Co-op Store, 34 Lowfield Street, 37 47-53 High Street and 40 Former Police Station.

4 PPG4 Industrial, Commercial Development and Small Firms and PPS4 Sustainable Economic Development Consultation Draft

- a) PPG4 and Draft PPS4 seek a **prosperous economy** - by i) providing for the needs of small businesses and ii) providing for choice, flexibility, competition, enterprise and investment. *These issues have already been addressed in PPS1 in section A:1 above.*
- b) PPG4 and Draft PPS4 aim to **provide employment in suitable locations** – by i) encouraging employment with a large number of employees (such as offices) in locations that minimise car journeys or where there is accessibility by public transport, ii) ensuring co-ordination with infrastructure and housing provision and iii) identifying appropriate alternative uses that make optimum use of vacant urban, industrial land and buildings.

AAP policies 2 Size of Units, 3 Primary Shopping Frontage, 4 Secondary Shopping Frontage, 7 Land Uses to Complement Shopping, 9 Leisure, Culture and Recreation and 10 Hotels encourage a variety of retail and other town centre uses which will provide a varied range of opportunities for employment in a town centre location, accessible by public transport. Policy 7 Land Uses to Complement Shopping also supports office floorspace, especially small scale A2 and B1a in the town centre and B1/B8 in the Northern Gateway. Policy 11 Employment reiterates the need to maximise opportunities to provide jobs in the town centre and acknowledges that more jobs will increase the customer base and therefore strengthen the retail and leisure economy. The policy also identifies indicative floorspace estimates for two B1 sites in the Northern Gateway, which will not only redevelop and regenerate former employment land but will be phased as part of a mixed use sustainable community, whereby new housing and jobs are located side by side. Specific sites that acknowledge the need for employment and commercial uses to be included within redevelopment schemes include Policies 29 Station Approach, 30 Northern Gateway, 32 Orchards Shopping Centre, 33 Former Co-op Store, 34 Lowfield Street, 36 Acacia Hall Complex, 37 47-53 High Street and 40 Former Police Station.

- c) PPG4 and Draft PPS4 aim to **protect residential amenity** – by i) allowing industrial and commercial activities of an appropriate scale in residential areas and ii) ensuring that employment development that is detrimental to amenity or a potential source of pollution is separated from sensitive land uses. *These issues are covered in PPS23 in section A:12 below.*

5 PPS6 Planning for Town Centres

- a) PPS6 aims to **create vital and viable town centres** – by i) positively planning for the growth, regeneration and investment of existing centres, ii) defining the function of the centre's economy and how it should be strengthened, iii) identifying the extent of the primary shopping area or town centre, iv) distinguishing between primary and secondary shopping frontages, v) assessing the quantitative and qualitative need for likely additional future retail and leisure floorspace, vi) redeveloping central sites before edge of centre locations or out of centre sites, vii) ensuring the scale and format of development fits into central locations, viii) phasing the release of development sites with priority given to central sites and ix) utilising compulsory purchase powers for site assembly.

The AAP provides a comprehensive approach to strengthening the role of the town centre. Policy 1 New Shopping Floorspace seeks to strengthen the role of the town centre and increase its use by introducing major new retail development, reducing vacancies, encouraging refurbishment, increasing shopping floorspace, giving preference to retail sites within the Primary Shopping Area and consolidating the shopping core by providing anchor stores in weaker shopping areas. It acknowledges that based on the Dartford Retail and Leisure Study 2006, total new floorspace of approximately 21,000 sq m to 2016 is considered appropriate, comprising approximately 9,000sqm of food floorspace and 12,000sq m of non-food floorspace. It also specifies that Compulsory Purchase Orders will be used to assemble development sites. Policy 2 Size of Units allows for refurbishment of existing units to ensure new retail fits into central locations and meets modern requirements. Policies 3 Primary Shopping Frontage, 4 Secondary Shopping Frontage and Map 3 define a town centre boundary and the extent of the primary and secondary shopping frontages. The boundaries aim to create a compact centre. Specific amounts of retail floorspace have been identified in the AAP, and policy 5 Food Stores encourages the development of foodstores within the ring road only. It prioritises the Lowfield Street site as coming forward first. Policy 6 Retail Warehousing primarily encourages retail warehousing to concentrate at Prospect Place, which is farthest from the town centre shopping core. Specific sites that contribute to the town centre's vitality and viability include Policies 29 Station Approach, 30 Northern Gateway, 32 Orchards Shopping Centre, 33 Former Co-op Store and 34 Lowfield Street. When combined, these policies will encourage regeneration of the town centre.

- b) PPS6 aims to **encourage a mix of uses and services** - by i) assessing the capacity to accommodate other uses such as leisure, entertainment, recreation, offices, arts, tourism and housing, ii) enhancing consumer choice e.g. enhancing markets, iii) utilising above ground floors for non retail uses, iv) managing an evening and night-time economy that appeals to a wider age range and social groups, whilst tackling anti-social behaviour and v) providing easily accessible local centres to meet day to day retail needs and services.

AAP policies 1 New Shopping Floorspace, 2 Size of Units, 3 Primary Shopping Frontage, 4 Secondary Shopping Floorspace, 7 Land Uses to Complement Shopping, 8 Housing, 9 Leisure, Culture and Recreation, 10 Hotels and 11 Employment seek to enhance consumer choice by providing a broader range of shops and other activities in the town. Policies 3 Primary Shopping Frontage and 10 Hotels encourage the use of upper floors for other non retail uses such as housing and small scale hotels. The AAP identifies floorspace allocations for employment uses and identifies approximate housing numbers for specific sites. Sites for leisure uses have been identified in the AAP but specific floorspace figures have not been proposed so as to allow flexibility in responding to development proposals that come forward. Policy 8 Housing recognises the benefits of an increased population living in and on the edge of the town centre. Policy 9 Leisure, Culture and Recreation seeks to improve the leisure offer in the evenings and at weekends, with a broader range of facilities to cater for a wider section of the community. Priority is given to a leisure quarter around the Orchard Theatre as well as other A2, A3 and D2 uses at Market Street and the Northern Gateway and an improved Acacia Hall sports complex and Central Park. Policy 19 Safety and Security seeks

to ensure that the town centre is safe at all times of the day, with initiatives and new development contributing towards a safer and secure environment. Specific sites that encourage a mix of uses include Policies 29 Station Approach, 30 Northern Gateway, 31 Overy Street, 32 Orchards Shopping Centre, 33 Former Co-op Store, 34 Lowfield Street, 35 Market Street, 36 Acacia Hall Complex, 37 47-53 High Street and 40 Former Police Station. Specific sites that include residential use above ground floor retail uses within the Primary Shopping Frontage as part of their mixed use schemes include Policies 33 Former Co-op Store, 34 Lowfield Street and 37 47-53 High Street. Policy 30 Northern Gateway encourages a community hub and local centre with easy access to day to day facilities and services for the new residential community.

- c) Additionally, PPS6 aims to create developments that - i) are **accessible** and well served by a choice of means of transport, ii) make **efficient use of land**, iii) have **high quality, socially inclusive design** that contributes to an improved public realm and iv) protect **residential amenity** – *these aspects are covered in PPS1 in section A:1 above and PPG13 in section A:7 below.*

6 PPS9 Biodiversity and Geological Conservation

- a) PPS9 aims to **protect and enhance biodiversity** – by i) improving the quality and extent of natural habitats, ii) preventing harm to biodiversity using mitigation and compensation measures, iii) maintaining networks of natural habitats that form open spaces or access routes (e.g. rivers) within urban areas, iv) retaining significant biodiversity interest in the re-use of previously developed land and v) maximising opportunities to build-in beneficial biodiversity as part of good design, both in and around developments.

The AAP acknowledges biodiversity in a number of policies. In particular policies 9 Leisure, Culture and Recreation, 13 Central Park and 14 River Darent seek improvements to Central Park and Darent Valley Footpath including an enhancement of the existing biodiversity and nature conservation in these areas. Policy 22 Tree Cover on East and West Hill Ridges and Princes Road seeks to safeguard and enhance tree cover. In terms of new developments, policy 20 Trees and Greenery seeks to incorporate greenery in public spaces and new developments, whilst policy 21 Green Grid seeks the provision of green grid corridors linking to the wider network especially in the Northern Gateway and at Overy Street. This will assist in creating networks for natural habitats. Specific sites that acknowledge the need for improved biodiversity on previously developed land include 29 Station Approach, 30 Northern Gateway and 31 Overy Street.

7 PPG13 Transport

- a) PPG13 aims to **create a sustainable pattern of development** – by i) making it easier for people to access homes, jobs, services and facilities by public transport, walking and cycling, ii) focussing major generators of travel demand in town centres and near public transport interchanges, iii) identifying town centres as the preferred locations for retail, commercial leisure, office, tourism and residential developments, iv) encouraging mixed uses so as to provide vitality and viability and encourage walking as primary mode of travel, v) locating facilities including leisure, recreation and day to day retail close to housing and in local centres so that they are accessible without use of a car and vi) increasing intensity of development, with high densities in town centres and near to major transport interchanges.

The overarching rationale of the AAP is the regeneration of the town centre, a location which is supported by the infrastructure to enable fullest use of sustainable transport. Various AAP policies including 1 New Shopping Floorspace, 2 Size of Units, 3 Primary Shopping Floorspace, 4 Secondary Shopping Floorspace, 5 Food Stores, 6 Retail Warehousing, 7 Land Uses to Complement Shopping, 8 Housing, 9 Leisure, Culture and Recreation, 10 Hotels and 11 Employment focus a mix of land uses that are major generators of traffic within the town centre and close to the rail station to ensure increased accessibility by public transport, walking and cycling. Increasing the number of activities and uses within the town centre, and strengthening the ones that already exist, will help to encourage multi-purpose trips. It will also help to encourage local residents to travel to Dartford town centre rather than to travel to other shopping locations that are more distant or less well served by

public transport. Policy 8 Housing identifies housing numbers for specific sites that seek to use land efficiently whilst being in-keeping with the surrounding area. The housing numbers take into account the proximity to public transport. Policy 11 Employment maximises the opportunity for providing jobs in the town centre where they can be accessed by sustainable forms of transport, including 13,000 m² of B1 uses in the Northern Gateway. Specific sites that acknowledge a new gateway for the town centre, public transport orientated development, a sustainable community that takes advantage of the good public transport links and a community hub with easy access to facilities and services include 29 Station Approach and 30 Northern Gateway. Other specific sites that acknowledge the need for sustainable travel include 31 Overy Street, 32 Orchards Shopping Centre, 33 Former Co-op Store, 34 Lowfield Street, 35 Market Street, 36 Acacia Hall Complex, 37 47-53 High Street, 38 Holy Trinity Church Setting, 39 Instone Road and 40 Former Police Station.

- b) PPG13 aims to **ensure the provision of necessary transport infrastructure** – by i) identifying site specific projects and traffic management measures, ii) ensuring the phasing of development sites and local transport investments are closely linked, iii) ensuring Transport Assessments and travel plans accompany major planning applications and iv) seeking implementation of transport schemes via negotiating with developers, using Compulsory Purchase Orders and agreeing planning conditions/obligations.

Policies 25 Local Traffic Improvements and 28 Air Quality seek improvements to traffic circulation and local junction improvements to minimise congestion and improve air quality, with new developments being expected to fund these improvements. Similarly, policies 13 Central Park, 14 River Darent, 15 Walking Around the Town Centre, 16 Public Realm, 19 Safety and Security and 23 Walking and Cycling seek new development to contribute towards identified improvements in the pedestrian environment and walking/cycling routes. New transport infrastructure is also required to create an improved interchange at the railway station, as identified in policy 26 Buses and developments at adjacent sites are expected to contribute towards this. The AAP identifies transport schemes that are required as part of specific developments and also requires all developments to contribute to a strategic transport fund – a pooled fund which will be used for implementation of strategic transport infrastructure. Specific sites that acknowledge the need for improvements to, and investment in, transport infrastructure such as an improved transport interchange, more entrances to Dartford Station, new level pedestrian crossings, redevelopment of the Market Street area, traffic calming measures and realignment of High Street include Policies 29 Station Approach, 30 Northern Gateway, 32 Orchards Shopping Centre, 34 Lowfield Street, 35 Market Street, 37 47-53 High Street, 38 Holy Trinity Church Setting, 39 Instone Road and 40 Former Police Station.

- c) PPG13 aims to **reduce reliance on the car** – by i) by implementing lower levels of off-street parking and on-street parking controls without undermining the vitality of the town centre, ii) increasing cycle parking in developments, iii) encouraging shared parking in town centres and iv) encouraging redevelopment of existing car parks.

AAP policy 27 Public Car Parking seeks to support the regeneration of the town centre by providing appropriately managed car parking whilst also mitigating the environmental and visual impacts of car parking. This will be done by implementing a balance between long and short stay parking, using pricing plans, redeveloping surface car parks to create active ground floor uses, discouraging surface car parks in new developments and improving safety and security of existing car parks. However, it is recognised that there is a fine balance between implementing lower levels of parking and maintaining the economic viability of the town centre given the generous free parking provision at Bluewater only 2-3 miles away. Policies 1 New Shopping Floorspace, 5 Food Stores and 27 Public Car Parking promote shared parking and acknowledge that car parking should not interfere with pedestrian movements. Policy 9 Leisure, Culture and Recreation promotes the creation of a leisure quarter on the Orchard Shopping Centre surface car park. Policy 23 Walking and Cycling encourages cycle parking and other equipment in residential developments and at trip generating attractions, which will help to reduce the number of trips made by car. Specific site policy 30 Northern Gateway allocates an area of land for long term car parking to serve the station, which will allow land immediately surrounding the station to be used for more intensive uses. Policy 32 Orchards Shopping Centre encourages an extension over the existing car park to provide enhanced shopping facilities and

ensures that new car parking will not have a negative impact on the streetscene. Policy 29 Station Approach seeks cycle parking and storage facilities.

- d) PPG13 aims to **improve the quality of public transport** – by i) maximising the use of public transport by encouraging a high quality, safe, secure and reliable network of routes with good interchanges, ii) encouraging bus route improvements and bus priority, iii) improving rail travel and building new stations and iv) ensuring transport interchanges are well related to travel generating uses.

AAP policy 26 Buses emphasises a change in the pattern of bus stops and routes so that they become more convenient and draw people into the heart of the shopping area. It also seeks an improved interchange at Dartford railway station, supported by a bus gyratory system and the use of section 106 agreements to implement bus priority schemes. Policies 7 Land Uses To Complement Shopping, 10 Hotels and 11 Employment seek to ensure that development makes the most of the town centre's accessibility, with easy access to sustainable forms of transport. Policy 24 Sustainable Travel identifies a number of methods for maximising the use of sustainable forms of travel such as free and subsidised public transport for residents and employees, loyalty points for retail and leisure uses if arriving by public transport and joint ticketing of public transport and leisure uses. Specific sites that acknowledge the need for improved links/street level pedestrian crossing with the bus stops at Home Gardens and an improved interchange at Dartford Station include Policies 29 Station Approach, 32 Orchards Shopping Centre and 38 Holy Trinity Church Setting.

- e) PPG13 aims to **maximise opportunities for walking and cycling** – by i) identifying priority routes for walking and cycling, ii) creating direct walking routes in town centres to reduce walking distances, iii) prioritising pedestrians over traffic movement, iv) improving safety along roads, walking/cycling routes and in the public realm, v) placing the needs of pedestrians/cyclists before traffic in the design of developments, vi) utilising public rights of way, vii) encouraging pedestrian/cycle routes along river banks that are highly visible and integrated with other activities to maximise pedestrian safety, viii) seeking secure cycle parking/storage and changing facilities and ix) accommodating disabled travellers by providing easy access to public transport and ensuring easy access through the design of individual buildings, developments and the public realm.

A central theme running through many of the AAP policies is the need to make the town centre more pedestrian friendly by providing a pleasant pedestrian environment and public realm, a finer grain of direct walking routes and crossings, a safe town centre and an environment that has ease of access for those with disabilities. All of these measures will make it easier for the local community to access the town centre without having to use a car. Policies that emphasise this approach include 1 New Shopping Floorspace, 7 Land Uses to Complement Shopping, 15 Walking Around the Town Centre, 16 Public Realm, 17 Access and Facilities for all Groups, 20 Trees and Greenery, 23 Walking and Cycling and 25 Local Traffic Improvements. Policies 13 Central Park, 14 River Darent, 15 Walking Around the Town Centre and 21 Green Grid emphasise the need for enhanced links into the park, along the Darent Valley Path and out of the town centre through Northern Gateway as well as out to the wider Green Grid network. Policies 23 Walking and Cycling and 24 Sustainable Travel promote cycle parking including the provision of cycle storage and other facilities, especially in new developments. Specific sites that acknowledge the need for improved pedestrian and cycle links include Policies 29 Station Approach, 30 Northern Gateway, 31 Overy Street, 32 Orchards Shopping Centre, 33 Former Co-op Store, 34 Lowfield Street, 35 Market Street, 26 Acacia Hall Complex, 47-53 High Street, 38 Holy Trinity Church Setting, 39 Instone Road and 40 Former Police Station.

8 PPG15 Planning and the Historic Environment

- a) PPG15 seeks to **preserve and enhance listed buildings and the character/appearance of conservation areas** – by i) emphasising controlled and positive management in conservation areas within commercial town centres, ii) ensuring proposals for change of historic buildings and new development are judged for their effect on the character and appearance of an area, iii) carefully designing new buildings to harmonise with its neighbours and respect the setting in terms of scale, height, massing, alignment and materials, iv) reusing neglected historic buildings and replacing buildings that make no positive contribution with high quality designs, v) using the historic fabric to

act as a focus for regeneration, vi) encouraging grant schemes to help with repair and enhancement and vii) bringing vacant premises over shops back into use and encouraging a variety of ground floor uses in order to sustain a lively town centre.

The AAP recognises that Dartford's historic environment is one of its unique assets that will help define the identity of the centre and help in its regeneration. Policy 12 Preservation and Enhancement of the Historic Environment seeks to give the historic environment a higher profile in the life of the town and seeks improvements to historic buildings and their setting, through a number of means such as the Townscape Heritage Initiative, grant funding to renovate premises, Article 4 Direction, local list of listed buildings and town heritage information. Development is also expected to adhere to the principles in the Conservation Area Management Plan and Shop Front Design Guide and a range of other controls will ensure new developments consider context and setting, key frontages, views, colour, scale, massing and materials. The redevelopment of existing buildings that detract from the quality of the Conservation Area are also encouraged. Policy 18 Design of New Development will ensure that developments respond positively to the local context and that contemporary designs draw on and make reference to the historic context. Policies 1 New Shopping Floorspace, 2 Size of Units, 3 Primary Shopping Floorspace, 4 Secondary Shopping Frontage and 7 Land Uses to Complement Shopping encourage refurbishment of existing buildings and re-use for non retail uses as a way to encourage activity in the town centre, whilst also protecting the special historic features of the town. Furthermore, policy 14 River Darent encourages historical interpretation at key sites along the river. Specific sites that acknowledge the need for the protection and enhancement of the historic environment and for historical interpretation measures to be implemented include Policies 30 Northern Gateway, 31 Overy Street, 32 Orchards Shopping Centre, 33 Former Co-op Store, 34 Lowfield Street, 35 Market Street, 36 Acacia Hall Complex, 37 47-53 High Street and 38 Holy Trinity Church Setting. Lowfield Street presents a particular challenge in terms of designing the development to harmonise with the Conservation Area and Policy 34 Lowfield Street seeks to achieve this.

- b) PPG15 also aims to **improve the quality of the townscape** – by i) ensuring street furniture and street improvement schemes contribute to the townscape quality and ii) protecting existing trees and making adequate provision for the preservation and planting of trees in the development of land. *These issues are covered in PPS1 in section A:1 above and PPG17 in section A:9 below.*

9 PPG17 Planning for Open Space, Sport and Recreation

- a) PPG17 aims to **protect and enhance open spaces and sports/recreational facilities** – by i) protecting them unless they are surplus to requirements or their redevelopment will generate benefits for the community, ii) maintaining their character, amenity and biodiversity, iii) improving their value by better management, enhanced accessibility, good design and reduced crime, iv) setting local standards to take account of quantitative and qualitative deficits or surpluses in existing supply and assessments of community needs, v) ensuring local provision within new developments, especially where it will remedy deficiencies in provision or substitute losses of existing provision and vi) adding to the local open space network and rights of way network.

The emphasis in the AAP towards open spaces is that they should be protected and improved, with new open spaces being created at select locations throughout the town centre. Policies 9 Leisure, Culture and Recreation, 13 Central Park and 14 River Darent seek specific improvements to Central Park and the Darent Valley Footpath and seek to improve the value of Central Park in particular through better usage of facilities, improved accessibility and integration with the town centre. Policies 20 Trees and Greenery and 22 Tree Cover on East and West Hill Ridges and Princes Road seek to safeguard and enhance tree cover and greenery to provide a green setting for the town centre. Policy 21 Green Grid seeks to provide green spaces and corridors within developments that link to the wider Green Grid network, especially within the Northern Gateway and Overy Street. The AAP also deals with the broader issue of enhancing the public realm in policies 1 New Shopping Floorspace, 9 Leisure, Culture and Recreation and 12 Preservation and Enhancement of the Existing Historic Environment. Policy 16 Public Realm promotes a new town square adjacent to Market Street and other new public spaces throughout the town centre including at the Northern Gateway. Policy 8 Housing will ensure communal space and private amenity space within housing

developments whilst policy 17 Access and Facilities for All Groups aims to ensure ease of movement through the public realm, including for those with mobility difficulties. Further details on open spaces will be forthcoming in an SPD. Specific sites that acknowledge the need for improved open spaces and public realm include 29 Station Approach, 30 Northern Gateway, 31 Overy Street, 32 Orchards Shopping Centre, 33 Former Co-op Store, 34 Lowfield Street, 35 Market Street, 36 Acacia Hall Complex, 37 47-53 High Street and 38 Holy Trinity Church Setting. There is also an aim to extend the Green Grid network particularly at the Northern Gateway.

- b) PPG17 aims to locate **intensive recreational uses in appropriate locations** – by locating them close to town centres and highly accessible locations well served by public transport, walking and cycling. *As these types of facilities are similar in nature to tourist attractions, they are covered in the Guide for Tourism in section A:10 below.*

10 Good Practice Guide on Planning for Tourism

- a) The good practice guide aims to **maximise the benefits of tourism** - by ensuring tourism i) brings regeneration to towns and cities, ii) increases urban vitality and supports linked trips, iii) supports services and facilities, iv) is part of mixed use schemes, v) facilitates improved access by sustainable modes of travel and vi) identifying an appropriate range of sites.

In the AAP, visitors are encouraged to stay longer in the town centre in policy 7 Land Uses to Complement Shopping. Uses such as hotels, conference facilities, leisure, recreation, cultural, social and community facilities will be supported in the town centre because they will support the needs of the Borough's residential population, encourage linked trips, encourage travel by public transport, generate mixed use developments and help to regenerate the town centre as well as attracting visitors from further afield. Policy 9 Leisure, Culture and Recreation seeks the intensification of sporting and leisure facilities at Acacia Hall and the relocation of Fairfield Pool and policy 13 Central Park seeks enhancement of the park's facilities that will give more people increased reason to use it. The AAP also encourages the development of a leisure and cultural quarter to complement the Orchard Theatre and create a broader based evening economy, and this will help to increase the viability and vitality of the town centre. Furthermore, emphasis on the historic environment will also increase its attraction as a visitor destination. Specific sites that acknowledge the need for visitor attractions, intensive recreation facilities and hotels include Policies 29 Station Approach, 32 Orchard Shopping Centre, 34 Lowfield Street and 36 Acacia Hall Complex.

11 PPS22 Renewable Energy

- a) PPS22 aims to **incorporate renewable energy into new developments** – by i) promoting rather than restricting renewable energy developments, ii) recognising that small scale projects can provide a limited but valuable contribution to meeting energy needs locally, iii) allocating specific sites for renewable energy where there is current interest by developers and iv) acknowledging that renewable energy developments can be accommodated in urban areas.

AAP policy 18 Design of New Development encourages on-site renewable energy and states that where sustainable energy supply is proposed, opportunities for supplying adjacent sites and buildings should be explored. The policy also suggests that the Council will work with developers at the Northern Gateway and Lowfield Street to achieve reductions in carbon emissions and in line with the draft South East Plan, 10% of the development's energy demand should be provided from renewable sources, although for larger developments a higher percentage will be expected.

12 PPS23 Planning and Pollution Control and Annex 1 Pollution Control, Air and Water Quality.

- a) PPS23 and Annex 1 aim to **separate conflicting land uses** - by i) determining suitable locations for development which may give rise to polluting effects on health and the environment, either directly or indirectly from the traffic generated and ii) mitigating the effects from existing sources of pollution, especially in proximity to air quality management areas, ground protection zones and COMAH zones.

The AAP proposes land uses within the town centre that are unlikely to cause polluting impacts and policies 7 Land Uses to Complement Shopping and 11 Employment focus on offices (A2 and B1) and storage and distribution (B8) – types of employment that are generally non polluting. Policies 15 Walking Around the Town Centre, 23 Walking and Cycling, 24 Sustainable Travel, 25 Local Traffic Improvements and 26 Buses recognise that there may be indirect effects through traffic generation and seek to control this by reducing travel by private car as well as congestion, which in turn will reduce the amount of air pollution being generated. Policy 28 Air Quality seeks to improve air quality through environmental improvements, improved junction management and measures to offset adverse air quality impacts arising from new developments. Policy 30 Northern Gateway acknowledges the need to protect against a COMAH zone.

- b) PPS23 and Annex 1 also aim to **control and minimise pollution** to within acceptable limits – by i) ensuring remediation of contaminated land, ii) adopting the precautionary principle and mitigating against potential pollutants, iii) ensuring air and water quality standards are met and iv) alleviating water and sewerage drainage, discharge and leachates.

Policy 28 Air Quality promotes opportunities to improve air quality such as junction management and seeks new developments to offset any adverse impacts on air quality. Specific sites that acknowledge the need to provide low carbon developments include 34 Lowfield Street. Furthermore, specific sites that acknowledge the need for controlling climate effects include 29 Station Approach, and 31 Overy Street. Policy 30 Northern Gateway recognises that housing will not be an appropriate use on the north eastern section of the site, which is contaminated.

13 PPG24 Planning and Noise

- a) PPG24 aims to **minimise the adverse impact of noise** - by i) separating noise sensitive developments from existing major sources of noise, ii) ensuring new development involving noisy activities is sited away from noise sensitive land uses and iii) acknowledging that housing is considered as a noise sensitive development.

AAP policies 7 Land Uses to Complement Shopping and 8 Housing tackle the issue of noise control as they ensure the sensitive location of uses with the potential to create disturbance (e.g. late night drinking, music establishments) in relation to homes and they ensure new housing development effectively protects residents against disturbances from late night uses. Specific sites that acknowledge the need for relocating night time leisure include Policy 30 Northern Gateway.

14 PPS25 Development and Flood Risk

- a) PPS25 aims to **reduce flood risk at specific sites** - by i) managing residual risk to flooding through layout and design, locating the most vulnerable land uses in parts of the site with lowest flood risk, managing run-off through sustainable drainage systems and incorporating surface water storage and green infrastructure into developments and ii) ensuring site specific flood risk assessments are carried out.

This AAP is supported by the Kent Thameside Strategic Flood Risk Assessment and the Dartford Town Centre Strategic Flood Risk Assessment (see Background Documents). Dartford Council has carried out a Sequential Assessment of sites, in conformity with PPS25 (see Background Documents).

AAP policy 18 Design of New Development identifies the need for new development to be designed to incorporate sustainable drainage systems. Policies 20 Trees and Greenery and 22 Tree Cover on East and West Hill Ridges and Princes Road seek to safeguard and enhance tree cover and greenery to provide a green setting for the town centre and this will help to manage surface run-off too. Although flood storage is not explicitly mentioned in policies 13 Central Park and 14 River Darent and 21 Green Grid, these areas can act as a network of green infrastructure with flood storage areas that will help to protect more sensitive developments against the risk of flooding.

Specific sites that acknowledge the need for development to be guided by flood risk assessments include Policies 29 Station Approach, 30 Northern Gateway, 31 Overy Street, 32 Orchards Shopping Centre, 33 Former Co-op Store, 34 Lowfield Street, 36 Acacia Hall Complex and 37 47-53 High Street.

15 Other National Strategies

Various national strategies including the National Waste Strategy have not been assessed here, as they are more appropriately assessed within the context of the Core Strategy and are not of significant relevance to the AAP.

SECTION B REGIONAL GUIDANCE

16 Emerging South East Plan – Self Assessment of General Conformity with the Regional Spatial Strategy

This section assesses whether the AAP policies are in general conformity with the Regional Spatial Strategy (RSS) i.e., there are no inconsistencies or omissions in policy that would cause *significant* harm to the implementation of the RSS. This is particularly important for the AAP which must be in conformity with the RSS, given that no Core Strategy has yet been adopted. In this assessment the emerging South East Plan has been considered instead of the adopted RPG9 since:

- the weight to be attached to an emerging RSS depends on the stage it has reached - the Draft South East Plan has been through an Examination in Public, the Inspectors recommended changes have been published, and the Government's Proposed Changes were published in July 2008;
- the adopted RPG9 was published in 2001 and a number of partial reviews have now been completed. Some of RPG9 and its alterations now pre-date Government guidance. In particular, the housing requirements and employment guidelines for each county are out-dated.

Upon submission of the AAP to the Secretary of State, the Regional Assembly (SEERA) will provide an opinion as to the general conformity with the emerging RSS. Although this process has yet to take place, the representations received from SEERA at Preferred Options stage provide a sign as to whether they have preliminary concerns about non conformity. There was no indication of this in their representations. Annex A in "Local Development Documents: Consulting with the Regional Assembly and Conformity with the Regional Spatial Strategy" provides examples of situations which may give rise to SEERA expressing an opinion that a DPD is not in conformity with the Draft South East Plan. Many of these matters are not relevant to the AAP and are more appropriately considered against the Core Strategy. Only those that are relevant at the AAP level are assessed below:

a) A failure to clearly set out a **how the DPD will be implemented**.

Policy CC5 of the Draft South East Plan and the Draft South East Plan: Implementation Plan provide a framework within which more detailed local level implementation plans can be prepared. Appendix 3 accompanying the AAP accords with policy CC5 and the Implementation Plan as it provides detailed information on how the AAP will be implemented. Specifically, it identifies how different development types will be delivered (in terms of what, where, when it needs to happen and who needs to take action). It also identifies infrastructure and environmental improvements that are required and summarises the development contributions likely to be required by development at the opportunity sites.

b) A failure to clearly identify **necessary infrastructure required** to serve the area and to meet the needs of the development proposed, and the timing of its provision in relation to the **phasing of the proposed development**.

Paragraphs 8.29 – 8.31 of the AAP refer to the Strategic Transport Programme to be adopted through the Core Strategy. This will put into effect Policy CC5iv of the Draft South East Plan. The AAP acknowledges the need for transport improvements in 25 Local Traffic Improvements and in the section on Strategic Transport Infrastructure. Matters relating to individual infrastructure improvements and phasing of development are identified within the relevant opportunity site policies, e.g. policy 34 Lowfield Street requires the development of a replacement swimming pool at Acacia Hall site in advance of redevelopment of Fairfield Pool site. Policy 30 Northern Gateway seeks contributions towards an entrance for the railway station on the northern side and provision of land for a primary school, primary care health facilities and other community facilities.

c) A failure to provide for the levels of district **housing allocation** in the Draft South East Plan.

Policy 8 Housing identifies indicative housing estimates for the opportunity sites. These indicative estimates reflect the emerging Strategic Housing Land Availability Assessment (SHLAA) and the emerging Core Strategy housing allocations.

The Draft South East Plan (2006) Policy KTG1 identifies a housing allocation of 15,700 dwellings for Dartford between 2006 and 2026. The Inspectors Report (August 2007) supported the draft Plan's housing provision for the Kent Thames Gateway, of which Dartford forms a part, concluding that: "It would in our opinion upset this balanced strategy if housing levels were to be increased significantly. This would result in a greater use of greenfield sites since the careful phasing would be upset, and there would be a risk of increased levels of out-commuting. It could also in our view introduce unacceptable risk particularly in relation to flood risk" (para 7.76 p.100).

The Secretary of State's proposed changes (July 2008) propose an increased allocation for Dartford of 17,340 to 2026. At this stage, the housing allocation for the Borough of Dartford is not finalised. The Council will be making a response to the proposed changes.

The identification of housing capacity within Dartford Town Centre will make a contribution towards the overall housing provision identified within the Core Strategy. In advance of a final allocation, the Council considers that the town centre meets a range of suitability criteria as a location for housing, albeit the town centre is at risk of flooding. Furthermore, housing provision in the town centre will help to support its regeneration. Consequently, the identification of housing capacity in the Submission Document has been increased to approximately 2,500 dwellings, as compared to approximately 2,000 dwellings identified in the Dartford's Core Strategy preferred Options Document (Jan 2008). This increase will provide flexibility in responding to the final South East Plan allocation at the borough-wide level.

- d) A failure to provide an appropriate amount of **affordable housing** in line with regional and sub-regional policy objectives.

Paragraph 5.15 of the AAP refers to the emerging Core Strategy's 30% affordable housing requirement. This complies with policy KTG2 of the Draft South East Plan.

- e) A failure to demonstrate how the **employment and educational needs** of the population will be met.

AAP policy 11 Employment relates to the emerging Core Strategy employment floorspace figures, which is compliant with policy KTG5 of the Draft South East Plan. Dartford town centre is identified as a location for employment in KTG6. Policy 11 Employment specifies employment floorspace figures for the Northern Gateway. Policies 1 New Shopping Floorspace, 5 Food Stores, 6 Retail Warehousing, 7 Land Uses to Complement Shopping, 9 Leisure, Culture and Recreation and 10 Hotels will also generate a range of types of employment in the town centre. Policy 30, Northern Gateway, makes provision for a Primary School within the site, to meet the needs of the increased population.

- f) Insufficient emphasis on a combination of policy measures required to address the **sustainable use of natural resources** including support for sustainable construction, waste minimisation and reuse and energy efficiency and renewable energy and water efficiency.

These matters are covered in more detail in the Core Strategy. However, AAP policy 18 Design of New Development commits to development that is of the highest standard in terms of sustainable design and in particular focuses on sustainable energy, drainage and working towards zero carbon homes. Where relevant, the opportunity site policies push for innovation including the use of CHP and working towards zero carbon homes, especially policies 29 Station Approach, 30 Northern Gateway and 34 Lowfield Street. These accord in general with the draft South East Plan policies CC2, CC3, CC4, NRM1iii, NRM3ii, EN1, EN2 and M1.

- g) The absence of policies designed to rebalance the transport system in **favour of non car modes**.

Policy T1 of the draft South East Plan seeks to rebalance the structure and use of the transport system, encourage modal shift in favour of non car modes and promote an integrated transport network. Chapter 8 Getting to the Town Centre of the AAP accords with this by emphasizing that travel to the town centre should be as sustainable as possible. Specific policies that deal with encouraging alternative modes of transport include 23 Walking and Cycling, 24 Sustainable Travel and 26 Buses. Site specific policies also identify the need for transport improvements and focus strongly on improved pedestrian and cycle routes. In particular, 29 Station Approach seeks a new and improved station building as well as a bus interchange and enhanced pedestrian and cycle routes radiating out in all directions from the station.

- h) There should be continued protection and enhancement of the Region's **biodiversity** and the **built and historic heritage**.

A number of policies in the draft South East Plan address these issues. NRM4 seeks to achieve a net gain in biodiversity whilst ensuring mitigation and accessible green networks. BE1 seeks improvements in the urban environment, public realm and green infrastructure. It also supports built excellence with design solutions relevant to the context that build upon local character. BE7 supports the conservation and enhancement of the historic environment. The AAP reflects these principles. Chapter 6 making More of Dartford's Assets and Chapter 7 An Environment to Enjoy of the AAP seek to create a green town centre with pleasant environment for walking around and a high quality public realm. It seeks to make the most of the town's assets including giving the historic environment a higher profile in the life of the town, as part of Dartford's unique offer. The AAP also seeks to make the most of opportunities for improving biodiversity at Central Park and the River Darent. Specific policies that address these issues include 12 Preservation and Enhancement of the Historic Environment, 13 Central Park, 14 River Darent, 16 Public Realm, 18 Design of New Development, 20 Trees and Greenery, 21 Green Grid and 22 Tree Cover on East and West Hill Ridges and Princes Road. Site specific policies also acknowledge the opportunities for improving biodiversity along the banks of the River Darent including 30 Northern Gateway and 31 Overy Street.

- i) Critically Policy TC2 of the Draft South East Plan identifies Dartford as a Secondary Regional Centre, with a focus on major retail development, uses which attract a large number of people, employment including leisure and office developments and a range of housing. Policy KTG8 of the Draft South East Plan also refers to the provision of a mix of uses in the town centre.

The AAP is fully compliant with the Draft South East Plan in seeking to strengthen the functioning of the town centre at the appropriate level within the hierarchy, through the enhancement of retail, leisure and employment functions, as well as through an increased residential population.

To summarise, the AAP sufficiently addresses all of the issues in the emerging South East Plan that are relevant at the AAP level. It is, therefore, concluded that the AAP is in conformity with the Draft South East Plan and sufficient flexibility has been built into the AAP to respond to any final changes made to the South East Plan, particularly in respect of housing.

17 RPG9: Regional Planning Guidance for the South East

Although a full assessment of the emerging South East Plan replaces the need for assessing RPG9, it is worth noting some of the main policies in RPG9 that have been used when formulating policies in the AAP.

- a) One of the regional priorities in RPG9 is to **regenerate the Thames Gateway** - by i) focussing new development in urban areas and making better use of land (Q1 and Q3), ii) ensuring the larger town centres are the focus for major retail, leisure and office developments (Q5), iii) minimising the need to travel and developing employment sites that are accessible to public transport (T1 and RE5), iv) encouraging economic diversity and facilitating small and medium enterprises (RE10) and v) raising the quality of the urban environment (Q2).

These themes run through the AAP. Policies 1 New Shopping Floorspace, 2 Size of Units, 7 Land Uses to Complement Shopping and 9 Leisure, Culture and Recreation aim to enhance and broaden

the shopping offer, which in turn can help to revitalise the town centre, reduce the need to travel and contribute to the area's economy. All opportunity sites seek to maximise the use of vacant or under-utilised land. Policy 11 Employment identifies town centre sites with good public transport access for employment uses whilst Chapter 7 An Environment to Enjoy seeks to create a high quality, welcome and attractive environment where visitors will want to linger longer.

18 Regional Housing Strategy 2008 – 2011 (RHS)

The RHS has not been assessed here as it is more appropriately assessed against the Core Strategy.

19 Regional Economic Strategy 2006 – 2016 (RES)

- a) The RES seeks to achieve **sustainable prosperity for all**. Its main priorities of relevance to the town centre include – i) increasing the business stock, ii) ensuring employment space of the right type and size to support competitiveness and iii) encouraging mixed use developments.

AAP policy 11 Employment and many of the opportunity sites identify employment uses throughout the town centre, which will increase business stock and help to maintain economic competitiveness. Policy 2 Size of Units will help to achieve variety within the retail sector. Mixed uses are also encouraged on the majority of the opportunity sites.

20 Regional Transport Strategy (RTS)

The adopted RTS is located within Chapter 9 of RPG9 and was updated in 2004. These policies have now been updated further and are incorporated into Chapter D4 of the Draft South East Plan - forming the emerging RTS. Many of the policies are not relevant at the AAP level, but those that are have been assessed below.

- a) The RTS sets out to deliver **a high quality transport system that progressively reaches the standard of the best in North West Europe** – by i) encouraging development that is located to reduce journey lengths (T1), ii) investing in the transport system to facilitate urban renaissance as a means of achieving a more sustainable pattern of development (T1), iii) rebalancing the transport system in favour of non car modes (T1 and T5), iv) improving the extent and quality of pedestrian and cycle routes (T5), v) increasing access to rail stations (T5), vi) adopting maximum levels of parking provision linked to public transport and accessibility improvements (T7), vii) ensuring sufficient cycle parking at new developments including secure storage (T7) and viii) ensuring major travel generating developments have travel plans (T8).

The AAP encourages developments that generate traffic (such as retail, leisure and employment) to locate in the town centre, close to public transport and the railway station. This will allow multi-use trips, increase the town centre's vitality and allow a reduction in journey times. The AAP strives to rebalance the transport system in favour of non car modes and policies 15 Walking Around the Town Centre and 23 Walking and Cycling particularly support improvements in walking and cycling, including the provision of cycling facilities. Policy 24 Sustainable Travel expects significant development sites to provide a Green Travel Plan. Policy 27 Public Car Parking seeks to reduce the environmental and visual impact of car parks by making more efficient use of them and discouraging surface car parks, providing an appropriate balance between long and short stay parking and locating new car parking adjacent to the ring road. Many of the opportunity sites identify the need for improved linkages with the rest of the town centre and especially the railway station, in particular Policy 29, Station Approach, proposes improved access between the station and the town centre as well as enhanced interchange facilities.

21 Thames Gateway: The Delivery Plan

- a) The Delivery Plan sets out how to **deliver the Thames Gateway vision** – by i) enhancing the Gateway's economy and number of homes and jobs by 2016, ii) providing funding for priority projects and local transport schemes, iii) improving the Gateway's quality of life by improving design quality and investing in the urban environment and iv) developing an eco-region, taking into account climate change.

The cornerstone of the AAP is to seek a town centre renaissance. Chapter 3 Strategy for a Revitalised Town Centre of the AAP identifies a strategy for a revitalised town centre and many of the objectives will help to achieve this by ensuring that the town centre: fulfils its role as an accessible centre, improves the shopping offer, expands the evening/leisure economy and provides more homes and jobs to support the local economy. Policies 8 Housing and 11 Employment reiterate this by supporting an increased town centre working and residential population. The AAP objectives also seek an accessible town centre that is easy and convenient to get to. Furthermore, the AAP acknowledges the need for funding to support transport improvements, especially at Dartford Station where improved pedestrian linkages, a new northern entrance, an improved environment and an interchange facility are proposed. The AAP will also make an important contribution to improving the quality of life, environment and the unique identity of the town centre. One of the AAP's objectives is to give the town centre assets a higher profile in the life of the town and Chapter 6 Making More of Dartford's Assets of the AAP seeks to make more of the town centre's assets. Many of the opportunity site policies identify the need for specific environmental upgrades. Policy 18 Design of New Development commits to the highest standard in terms of sustainable design/energy and working towards zero carbon development, especially on large sites - policies 29 Station Approach, 30 Northern Gateway and 34 Lowfield Street re-emphasise this. To summarise, the AAP's objectives and policies deal with the priorities identified in the Delivery Plan in a comprehensive manner.

22 RPG9a: Thames Gateway Planning Framework

- a) RPG9a aims to **optimise development and growth in the Thames Gateway** – by i) improving economic performance, ii) making town centres the focus for a range of services and shopping facilities which can contribute to the regeneration of the wider area, iii) encouraging a sustainable pattern of development by optimising derelict/under-used sites and iv) raising the quality of the local environment and encouraging highest quality design.

The AAP encourages optimal levels of growth within the town centre. Policies 1 New Shopping Floorspace, 2 Size of Units, 3 Primary Shopping Frontage, 4 Secondary Shopping Floorspace, 5 Food Stores and 6 Retail Warehousing seek to improve Dartford's retail offer, which in turn will help to regenerate the area. Policies 7 Land Uses to Complement Shopping and 11 Employment will help to broaden the local economy. All of the opportunity sites aim to maximise the use of derelict or under-used land. Policies 12 Preservation and Enhancement of the Historic Environment, 16 Public Realm and 18 Design of New Development seek to protect and enhance the town centre's existing features, including historic buildings and public spaces and seeks new development of the highest quality design that can contribute to the identity of the area.

23 Kent and Medway Structure Plan

The Structure Plan has not been thoroughly assessed here as although it currently forms part of Dartford's "Development Plan", the policies contained in this document will only remain a material consideration until they are superseded by the Regional Spatial Strategy. Given expected timescales, it is likely that the Structure Plan will have a short life before it is superseded by the Adopted South East Plan. Nevertheless, it is worth noting that some of the principles underpinning the Structure Plan that have helped to shape the AAP.

- a) The Structure Plan emphasises **regeneration and revitalisation** of Kent's principle urban areas. Specifically policies SS4, SS5, EP14 and EP15 - i) safeguard Dartford's role as a principle town centre, ii) support enhancements in the quality, range and choice of shopping, iii) support diversification of service, leisure and business activities, iv) seek new retail and leisure development in centres on previously developed land before edge of centre sites are utilised, v) give first priority to retail, service and leisure uses within town centres and vi) support office, community, cultural and residential uses where they are part of mixed use developments.

AAP Chapter 4 Strengthening the Shopping Offer and Chapter 5 Uses to Complement Shopping form two of the key elements that will help to revitalise Dartford town centre and considers issues such as the role of the town, a strengthened and broadened shopping offer, a concentrated retail core and a mix of uses that are appropriate to a town centre location. The approach in these two chapters closely resembles the retail principles and policies in the Structure Plan and goes into depth about how these will be achieved at Dartford.

24 Local Transport Plan for Kent 2006-2011 (LTP)

- a) The LTP provides a **strategy for transport in Kent** that will – i) improve access to goods, services and opportunities (ACC1), ii) improve access for people with mobility impairment (ACC2), iii) improve safety and security on the transport network (RSA2), iv) promote the use of alternatives to the private car (DM1), v) encourage walking (DM2), vi) encourage cycling (DM3), vii) reduce congestion and pollution through parking and traffic management (DM4), viii) improve local bus services (DM5), ix) improve passenger rail services (DM6), x) improve linkage and interchange between modes (INT1), xi) reduce the need to travel (DM10), xii) reduce traffic pollution on the local road network (EHC1), xiii) ensure transport contributes to healthier communities (EHC2) and xiv) promote integration between land use and transport planning and ensure the scale, nature and location of new development helps reduce dependency on the private car (SR1).

All of the policies in the LTP noted above have been successfully incorporated into the AAP. This is particularly prevalent in the 6 policies in Chapter 8 Getting to the Town Centre as well as policies 9 Leisure, Culture and Recreation, 13 Central Park, 14 River Darent, 15 Walking Around the Town Centre, 17 Access and Facilities for All Groups and 19 Safety and Security. These policies consider issues such as improving accessibility including for those with mobility impairments, increasing safety, encourages sustainable transport usage, improving transport infrastructure, creating an interchange and the inter-relationship between transport and land uses. Many of the opportunity sites also address transport matters on a site by site basis, e.g. 29 Station Approach seeks better station access/entrance and an interchange, 30 Northern Gateway and 31 Overy Street seek enhanced walking along the River Darent and improved links to the rail station, 32 Orchards Shopping Centre seeks better linkages with the bus stops at Home Gardens, 33 Former Co-op Store seeks bus stops in Hythe Street and 34 Lowfield Street and 35 Market Street seek traffic calming.

25 Other County-wide Plans

Some county wide plans and strategies have not been assessed here because they are more appropriately dealt with in the Core Strategy, e.g. the Kent Minerals Plan and the Kent Waste Plan.

26 Emerging Dartford and Gravesham's Sustainable Communities Strategy

The emerging Dartford and Gravesham Sustainable Communities Strategy (SCS) is currently being drafted jointly by Dartford and Gravesham Councils and is being developed in tandem with the Core Strategy. The element of the SCS that relates to Dartford replicates the content of Dartford's Corporate Plan 2008/9. To avoid repetition, it is assessed here.

- a) The SCS aims to ensure that **regeneration in Dartford is sustainable** – by i) negotiating with developers, securing funding and approving planning applications for the redevelopment of key sites within the Town Centre.

Regeneration and sustainability form core themes that run throughout the AAP. The opportunity site policies identify suitable land uses for each site and identify specific requirements. These will be used as the basis for negotiating with developers and other stakeholders and when determining planning applications.

- b) The SCS aims to **promote healthier and more active lifestyles** – by i) increasing the opportunities for participating in sporting, cultural and leisure activities, ii) using community facilities such as Princes Park and Acacia Hall to encourage people to become involved in sport, iii) developing the Darent Valley footpath as a key link between the Dartford Marshes, Central Park and the Brooklands Lakes, iv) developing plans for a cultural quarter around the Orchard Theatre site and v) promoting volunteering activity such as the restoration of Central Park and the use of Acacia Hall.

AAP policies reflect these aspirations. Policy 9 Leisure, Culture and Recreation seeks improvements to Central Park and policy 13 Central Park seeks to enhance the facilities at Central Park including for both passive and active recreational pursuits. Policy 15 Walking Around the Town Centre identifies walking routes from High Street, Darent Road and Lowfield Street to Central Park. A Healthy Living Centre is proposed as a proposed suitable use in policy 34 Lowfield Street and health and fitness facilities are proposed at policy 30 Northern Gateway. 32 Orchards Shopping Centre seeks to create a cultural quarter around the Orchard Theatre. 36 Acacia Hall Complex aims to create a sporting hub adjacent to the heart of the town centre. Specific sites that acknowledge the need for improved open spaces (where informal recreation can take place) include 30 Northern Gateway, 31 Overy Street, 34 Lowfield Street and 36 Acacia Hall Complex.

The AAP has been subject to a Health Impact Assessment which demonstrates that the AAP would help to encourage healthy lifestyles.

- c) The SCS prioritises creating a **safer, cleaner Borough** – by i) tackling anti social behaviour, ii) creating designated alcohol control zones, iii) continuing to run Grabbacab and iv) improving provision for teenagers and young people in parks and open spaces.

The Dartford and Gravesham's Community Safety Plan in Section E:28 below assesses the community safety aspects of the AAP.

- d) The SCS seeks to create a **sustainable Borough which is adapted to climate change** and which provides a **realistic choice of travel options** – by i) reducing energy use and carbon footprints, ii) increasing travel options in the area and iii) ensuring that all eligible domestic and commercial developments make tariff contributions.

Climate change has been built into the AAP. Various AAP policies including 1 New Shopping Floorspace, 2 Size of Units, 3 Primary Shopping Floorspace, 4 Secondary Shopping Floorspace, 5 Food Stores, 6 Retail Warehousing, 7 Land Uses to Complement Shopping, 8 Housing, 9 Leisure, Culture and Recreation, 10 Hotels and 11 Employment focus a mix of land uses that are major generators of traffic within the town centre and close to the rail station to ensure increased

accessibility by public transport, walking and cycling. Policy 26 Buses aims to provide bus stops and routes that are more convenient. It also seeks an improved interchange at Dartford railway station, supported by a bus gyratory system, with the redevelopment at 29 Station Approach contributing towards this. Policy 24 Sustainable Travel identifies a number of methods for maximising the use of sustainable forms of travel and the majority of the opportunity sites address this issue too. The Strategic Transport Tariff is mentioned in the last section in paragraphs 8.29 – 8.31 of the AAP. In addition, policy 18 Design of New Development encourages energy efficiency above mandatory levels required by Building Regulations as well as highest design that incorporates sustainable construction, homes built to Level 3 and above of the Code for Sustainable Homes and the use of sustainable drainage systems.

- e) The SCS seeks to facilitate **quality, choice and diversity in the housing market** – by i) promoting a pattern of development which ensures close links between homes and jobs and homes and facilities.

AAP policy 7 Land Uses to Complement Shopping encourages a range of uses to support the town centre's retail role including housing. Policy 8 Housing seeks a larger population living within and on the edge of the town centre, so that they have access to a range of facilities and a variety of non car modes of transport. The proposed mix of flatted and family housing developments will ensure an efficient use of land whilst at the same time providing for a range in accommodation types. The policy seeks that the housing provided is of a high quality. Many of the opportunity sites include housing as part of mixed use development schemes.

27 The Kent Agreement 2 (Local Area Agreement)

- a) This Local Area Agreement provides a **variety of indicators** that focus on – i) new business registration rates, ii) planning to adapt to climate change, iii) flood risk management, iv) improved local biodiversity, v) improved street and environmental cleanliness, vi) dealing with concerns about anti-social behaviour and crime, vii) participation in sport and active recreation, viii) access to services and facilities by public transport, walking and cycling, ix) previously developed land that has been vacant/derelict for more than 5 years, x) net additional homes provided and xi) number of affordable homes delivered (gross).

Many of the AAP policies can help to achieve the targets that will be set for these indicators. Policies 1 New Shopping Floorspace, 2 Size of Units, 3 Primary Shopping Floorspace, 4 Secondary Shopping Floorspace, 7 Land Uses to Complement Shopping, 9 Leisure Culture and Recreation, 10 Hotels and 11 Employment will encourage new businesses into the town centre. Policy 18 Design of New Development encourages climate change adaption and many of the opportunity sites policies identify the need for renewable energy and flood risk assessments. Policies 13 Central Park, 14 River Darent, 20 Trees and Greenery, 21 Green Grid, 22 Tree Cover on East and West Hill Ridges and Princes Road, 30 Northern Gateway and 31 Overy Street aim to enhance biodiversity. Policies 16 Public Realm and 19 Safety and Security consider street safety and improvements to the public realm. Policies 9 Leisure, Culture and Recreation and 36 Acacia Hall Complex will encourage participation in sport. Policies that support sustainable forms of transport include 15 Walking Around the Town Centre, 23 Walking and Cycling, 24 Sustainable Travel and 26 Buses. All of the opportunity sites seek to maximise the use of previously developed land, some of which currently lies vacant or is underused. Policy 8 Housing seeks to encourage housing in the town centre.

28 Dartford and Gravesham's Community Safety Plan 2008-2011

- a) The Community Safety Plan seeks a **reduction in crime, and the fear of crime** – by i) reducing shop lifting, ii) reducing vehicle crime, iii) reducing anti-social behaviour and street nuisance including vandalism and graffiti, iv) reducing violence in the night time economy, v) prioritises making people feel safe, especially young people and vi) reducing the fear of crime.

The AAP considers community safety in a number of policies. Policy 19 Safety and Security seeks to ensure that the town centre feels, and is, safe and secure for everyone that uses it, at all times of the

day. Also, new development will be required to demonstrate how it contributes to creating a safe and secure environment, and pay a contribution towards town centre safety and security initiatives. Policy 7 Land Uses to Complement Shopping seeks a wider range of uses in the town centre to provide vibrancy and safety throughout the day and evening. Policy 8 Housing highlights that residential development in the town centre can help to improve safety, by providing natural surveillance of the streets. Policy 13 Central Park seeks to improve community safety in the park and that development sites adjacent to the park will be expected to contribute towards this. Policy 18 Design of New Development acknowledges that new development should improve community safety through designing out crime. Policy 20 Trees and Greenery acknowledges that the design, location and choice of vegetation should consider the needs of community safety and that adequate sight lines are to be maintained. Policy 23 Walking and Cycling aims to ensure the safety and security of routes into the town centre. Policy 27 Public Car Parking seeks improvements to car park safety.

SECTION F LOCAL GUIDANCE

29 Dartford's Corporate Plan 2008/9

The Corporate Plan forms part of the emerging Dartford and Gravesham Sustainable Community Strategy and has therefore been assessed in Section E:26 above.

30 Dartford's Playing Pitch Study, Play Strategy and Youth Strategy

- a) A number of Council strategies seek to **protect, enhance and increase sporting and play facilities, especially for youths** – by i) reducing deficits in junior pitches, mini soccer pitches and hockey astro turf pitches (Playing Pitch Study), ii) seeking an increase in participation in sport, (Playing Pitch Study), iii) improving the quality of existing pitches, (Playing Pitch Study), iv) providing safe play space for young children including water play in Central Park (Play Strategy), v) improving provision for teenagers and young people including the Central Park Skate Park (Play Strategy), vi) making Central Park an alcohol control zone to reduce anti-social behaviour and increase the feeling of safety (Play Strategy), vii) providing a wider range of opportunities for physical activity outside of school time (Youth Strategy) and viii) ensuring young people live in a safe environment (Youth Strategy).

AAP policy 9 Leisure, Culture and Recreation seeks improvements to Central Park and policy 13 Central Park seeks to enhance the facilities at Central Park including for both passive and active recreational pursuits as well as to improve community safety and improve integration with the Acacia Hall Complex. Policy 15 Walking Around the Town Centre identifies walking routes from High Street, Darent Road and Lowfield Street to Central Park. Specific sites that acknowledge the need for integration of key town centre sites with Central Park include 34 Lowfield Street, 35 Market Street and 36 Acacia Hall Complex. In addition, the community safety aspects of the AAP have already been assessed in Section E:28 above, under Dartford and Gravesham's Community Safety Plan.

31 Dartford Town Centre Conservation Area Appraisal and Management Plan (CAMP)

- a) The CAMP identifies a number of overarching principles to **protect and enhance the town centre's historic character** – by ensuring development i) preserves/enhances the character of historically significant spaces, ii) does not overawe historic buildings and respects building frontage lines, iii) protects the setting of the Conservation Area and key long views, iv) allows 'Above the shop' uses, v) provides interpretation measures where appropriate, vi) respects the adjacent buildings, vii) including shop fascias respect and be subordinate to the architectural design of the buildings and preserves the historic integrity of the building, viii) does not diminish the distinct historic character of individual areas, ix) is built using good quality architectural design and x) retains buildings and features that are key to the character of the Conservation Area.

The AAP aims to increase the profile of Dartford's historic environment. Policy 12 Preservation and Enhancement of the Historic Environment seeks improvements to historic buildings and their setting. Development is also expected to adhere to the principles in the Conservation Area Management Plan and Shop Front Design Guide. Policy 18 Design of New Development will ensure that developments respond positively to the local context and that contemporary designs draw on and make reference to the historic context. Policy 14 River Darent encourages historical interpretation at key sites along the river. Specific sites that acknowledge the Conservation Area and/or Listed Buildings include 33 Former Co-op Store, 34 Lowfield Street, 35 Market Street, 36 Acacia Hall Complex, 37 47-53 High Street and 38 Holy Trinity Church Setting.

32 Corporate Equality Action Plan and Disability Equality Scheme 2006-2009

- a) These two documents **embed equality into the Council's services** by - i) working towards wider arts and cultural provision, ii) encouraging the use of parks, open spaces and recreation facilities among disadvantaged groups and iii) improving access for disabled people to facilities.

AAP policy 17 Access and Facilities for All Groups seeks to ensure that the town centre is accessible to allow ease of movement, especially for those with mobility, hearing and sight difficulties and that adequate disabled toilet provision is provided in new developments. Policy 19 Safety and Security seeks to ensure that the town centre feels and is safe for everyone that uses it. Policy 32 Orchards Shopping Centre encourages a leisure quarter to complement the Orchard Theatre and policies 9 Leisure, Culture and Recreation, 9 Central Park and 16 Public Realm encourage greater use of leisure, recreational facilities and open spaces as well as enhanced facilities and improved security in Central Park, for use by all visitors to the town centre.

33 COMAH Zone Maps

- a) The Health and Safety Executive have identified two COMAH Zones within the AAP area and both are located within the Northern Gateway including – i) Transco Dartford Holder Station and ii) GlaxoSmithKline.

The COMAH Zone Maps have been used when formulating AAP policy. Specifically, policy 30 Northern Gateway recognises the COMAH Zones as constraints and identifies that the appropriate use for the part of the site to the west of the River Darent will be predominantly employment and possibly night-time leisure economy uses. On the northern part of the site to the east of the River Darent, employment and/or open space uses have been identified as acceptable.