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Contact: Mike Dawson  
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Our ref: MGD/JR/FP/DA12/Westwood  
Your ref:  
Date: 9th April 2001

**By Fax and 1st Class Post - 01843 290906**

Dear Trevor,

**Consultation on Retail and Leisure Development  
Westwood Thanet - TH/00/0850**

I refer to our earlier correspondence, and in particular, receipt of the Retail and Leisure Assessment and Sequential Approach Assessment on 15th March 2001. In a subsequent fax I advised you that we would be taking independent retail advice and I can now inform you that the matter was reported to the District Council's Planning Committee on 5th April 2001. That Committee not only had the benefit of the retail advice, but was aware of the deliberations of the Kent County Council's Planning Application Sub Committee and the Canterbury Council's Development and Planning Committee.

The District Council formally objects to the Westwood Cross development on the following grounds:-

1. The proposed development occupies an out of centre location and, therefore, conflicts with the guidance in PPG 6, RPG 9, the policies of the approved Kent Structure Plan and the adopted Isle of Thanet Local Plan all of which encourage retail and leisure development in existing centres;
2. The applicants have not demonstrated a compelling need for this nature and scale of development, in either retail or leisure terms, on the application site;
3. The sequential test has not been complied with in so far as an insufficiently thorough and flexible assessment has been undertaken which should consider, in particular, the disaggregation of the component elements of the scheme amongst a number of locations and/or centres. Specifically, the sequential search did not encompass sites in Deal or Dover, despite the former being within the identified catchment area of the development.
4. The proposal is premature, being promoted in advance of the establishment of an appropriate retail strategy for Thanet and beyond through the emerging Structure and Local Plan reviews;

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5. Having regard to the results of the household survey carried out for the Council last Summer, it is considered there is significant potential for trade to be drawn from the northern and eastern parts of Dover District to the proposed development, which would have a potentially greater adverse impact on those parts of the District than acknowledged by the applicant. It is considered that the impact on Deal is more likely to be between 5% and 10% based on a more realistic assessment of trade draw which, in our view, could adversely affect the vitality and viability of the town centre;
6. The proposed development does not appear to be supported by specific and confirmed retail or leisure operator interest. There is no named department store anchor tenant and no confirmed cinema operator for the application site. There would therefore appear to be a lack of serious demand from potential operators for the two key elements of the scheme;
7. There is insufficient capacity to support the proposed 8 screen multiplex cinema, even on the applicant's own, generous, assessment. It is considered a more realistic evaluation of cinema capacity would give a requirement for between 1.6 and 2.6 new screens at 2006; and
8. Taken together the proposals, given their scale, out of centre location and composition, have the potential to frustrate, prejudice and delay emerging developments in Dover District. In particular, the willingness of developers to invest in Dover town centre is likely to be seriously threatened if Westwood Cross goes ahead.

The Committee also noted that the formal response of the County Council in their letter dated 23rd March 2001 identifies a number of proposed improvements in public transport infrastructure. As indicated, these have been agreed with the Highway Authority and relate amongst other matters to the enhancement to public transport provision to the adjacent Thanet towns. The proposed improvements do not include services that extend beyond the Thanet towns to link to locations in Dover District.

Retail advice available to the District Council identifies the likely degree of potential trade draw-off from Dover District and from Deal in particular. In transportation terms, the District Council would not raise objections, providing there is a commensurate increase in public transport accessibility through enhancements to services in the 100/200 Series. The impending improvements flowing from East Kent Access will improve drive times between Sandwich and Deal, especially during peak hours. Specific provision is being made within the context of the East Kent Access scheme for enhanced public transport facilities, e.g. the bus lane / high occupancy lane. Opportunities should be taken to key into this infrastructure to limit the length and number of car journeys that would otherwise be made. These highway observations are, of course, made without prejudice to the objections set out above.

I hope this is clear. Please do not hesitate to contact me in the event of any queries.

Yours sincerely,



**Michael G. Dawson**  
Chief Planning and Building Control Officer  
c.c.  
Kent County Council  
Canterbury City Council  
Government Office for the South East  
Steve Wilson, CgMs