**The Regent Cinema and the South Street district of Deal Town Centre**

Representatives of Reopen the Regent and The Deal Society have met to consider the scope of the latest proposals presented to Dover District Council for redevelopment of the site most recently occupied by The Regent Cinema.

It is very evident that the proposal raises far more complex issues for Deal than just the Cinema itself, and local residents and businesses need to give careful consideration to these and the wider effects they could bring which potentially might not be in the best interests of the Town.

**CONTEXT**

Proposals to redevelop the site for the purposes in the Covenant between DDC and the landowners, have previously met with the approval of DDC, with only two objections from local residents to that plan; however, the 3 year period relating to that approval expired without the development taking place, and nor did the owners seek an extension to that period, say, to reflect any delays that COVID might have caused.

The new proposals present a very different proposal for the Town, including a considerable degree of change of use to the site and adjoining DDC-owned land, which there would appear to be many knock-on effects for the site itself, for neighbouring businesses, and on the nature of that locality within the Town Centre.

It is important to note that the site is not included in the DDC Local Plan and so has not been part of the DDC consultations with local people and agencies who would be concerned about, and have a stake in, the future of the site: nor subject to public inspection. That is not unique to this site as other developments in train for the Town Centre have not been subject to that process either.

There are many local people who individually, or in their community-led groups, will want to express their own views and perspectives on these proposals, both positive and negative. Reopen the Regent and The Deal Society are amongst these, but we are conscious of the need to ensure that all people are informed about the full implications, can reach better informed conclusions, and communicate these to DDC in response to the Planning application.

It is important that as many local people as possible make those responses to help ensure that decisions that will be taken by the Planning Committee are fully informed. To help inform responses, here is a list of implications identified so far, and no doubt other matters will arise in the days ahead:

**The Regent Cinema**

The proposal providing for the replication of the iconic façade of the building will be broadly welcomed though many have fears about developers delivering promises. The Regent’s façade, alongside the neighbouring Timeball Tower are key features on Deal’s promenade, and regarded as symbols of the town.

However, ….

* Concerns remain about the much-reduced size of the cinema space compared to the original agreed proposal, which begs the questions
* Does the Cinema represent a viable facility with such a small auditorium?
* How does this measure up to the very different types of audience that needs to be served across the year, including
  + visitors to the town in the summer?
  + those with second homes in the town?
  + the large numbers of residents with interests in the higher arts?
  + and those from Deal and Walmer’s less-affluent communities who want affordable access to a cinema for a family throughout the year?
* There is a restricted covenant on the site, requiring that it be used to provide cinema and associated facilities, which will require a decision by DDC if they are prepared to renegotiate this. But should they even be considering this?
* Agencies expert in the field of independent cinemas will themselves have differing professional views on the size, scale and appropriateness of the proposal to meet local needs. Do people feel that a single view is sufficient or should the advice of different agencies with different professional experience be considered together?
* If DDC were to grant planning permission, should it be on the basis that the Regent Cinema and its re-constructed iconic facade is required to be completed first, before any other developments on the site (as was the case for Out Downs and the Golf Road Centre)?

**Local Amenities**

A number of important amenities are affected, or potentially lost, as part of the proposals, and appropriate alternative provisions need to be considered including:

**Bus Shelter** –

* With South Street being Deal’s Bus Station, and Taxi Rank, and busy throughout the day and into the night, how important do people consider it is to retain a shelter for those waiting for their transport links?

**Public toilets** –

Current toilets are located beside this public transport hub, and open for long hours to serve the purpose:

* Will those hours be maintained if moved to the new proposed location?
* Is the new location sufficiently accessible?
* Is public safety compromised by a less public location?
* How will these new toilets be properly supervised and maintained?

**Parking spaces** –

* What is the expectation for accommodating the parking capacity that will be lost with the DDC-owned land here?
* With no parking spaces for the proposed new homes, how will their parking needs be accommodated within the town?
* Allied to this, what provision is being made for parking spaces for other new housing developments across the Town Centre which also do not include parking provision (Royal Snooker Hall, Factory Shop, St George’s Church Hall, etc.)?

**Middle Street Conservation Area**

The proposals fall within the Conservation Area and must be considered alongside

* the specific requirements that the guidance for the Area states,
* protection of both heritage and authenticity,

but also, the broader rule that a proposal enhances the Area rather than causes it detriment.

This applies equally to the nature and context of the respective locality within the Area, as well as to the specific structures and historical layout.

**Change of Use of the Site**

The new proposal is markedly different from the original approved proposal, which fully met with the terms of the Covenant covering the use of the site. This new proposal is looking to change the way in which most of the site will be used:

* Given that the site has never been residential, is it appropriate to change its use bearing in mind the business activities that are all around it?
* The location has for more than 100 years been a focus for leisure activities and entertainment in the town, but would introducing more residential use compromise both the historical use and the nature of local businesses?
* It sits on the border of the previous Naval Dockyard, which was sold off in the 1860’s and Victoria Town created to seek to encourage more visitors to Deal, so was always seen as a key part of that development. Is it appropriate to change that now?
* How desirable is it to build luxurious town houses on the road where the town’s bus station and main taxi rank are, where buses and taxis are often queued up along the street including buses with engines running immediately outside those houses?
* Similarly, is it appropriate given that this public transport hub is busy throughout the day, every day, including through into the early hours of the morning?
* 4 public houses/bars are within 100 metres of the proposed housing, and 3 more within a further 50 metres. Such locations are inevitably noisy in any locations, but 5 of these have regular live music and not just at weekends, including where performances continue well past midnight. Is this appropriate as an area for luxury residences rather than, say, social/affordable housing where it might be more acceptable?
* The townhouses are to include garden space behind but won’t the enjoyment of those spaces be severely compromised by adjoining one of the establishments that has regular live music late into the evening?

**National Planning Guidance and Updated Priorities**

The new Government has inherited a great many challenges such as the huge housing deficit across the country and associated homelessness, a need to invest in the country’s infrastructure, and address the growing scale of poverty and disadvantage in towns, cities, and in our rural communities too.

They have announced major revisions that are being made to the National Planning Guidance, which every planning district across the country will have to adhere to, and not least of these are ambitious targets for the building of new homes, with an emphasis on social and affordable housing as this is where the greatest need lies but where the fewest houses have been built over the past 40 or more years.

The targets allocated to the DDC area are for 789 dwellings, compared to the previous target of 559, which is an increase of 41%. Where these will be located, is intended to be subject to local consultation. However, it is notable that very few new dwellings that have been built in Deal, Walmer, Sholden, and our neighbouring villages, in recent times provide social/affordable housing.

The net effect of this is that our younger people and families have to move out of the area to where cheaper accommodation can be found, which brings a range of problems around their family and other support networks, access to employment, and more generally having to leave an area where they were born and brought up.

The Guidelines will have an emphasis on utilising “Brownfield” sites first (previously-developed land that has been abandoned or underutilized, and which may carry pollution, or a risk of pollution, from industrial use), then next what are termed “Greyfield” sites (land which is underutilized, that would be more productive if put to other uses and, unlike brownfield, usually does not require environmental remediation before it can be redeveloped). A more detailed explanation is outlined below: the intention is to restrict use of Greenfield sites to the minimum.

Bearing this in mind:

* Should any proposal for residential developments in Deal Town Centre be for anything other than affordable/social housing and better meet the needs of existing residents?
* The site is neither Brownfield nor Greyfield, indeed the recently lapsed planning permission and the restrictive Covenant make it clear that this site would continue to be for the recreation and entertainment purposes that it has historically been used for. Is it appropriate to change any of that?
* To complete this development proposed, DDC would need to sell the land which currently includes a car park, a shelter for bus passengers, and public toilets that serve the transport hub. Is it appropriate that land be used to enable luxury housing to be built rather than the Council’s own priority for affordable/social housing?
* Indeed, should it be being used for residential purposes at all?

**Deal Town Centre developments and The Local Plan**

The Local Plan recently consulted upon by DDC, and which has been through the mandatory public inspection process, is now “on hold” as the Government’s National Planning Guidance will cause many elements of it to be out-of-date and/or inappropriate: the expectation is that in due course there will be a new version of that Plan which will be subject to the proper public consultation process.

The outgoing Government, through changes outlined in the Levelling-Up legislation, were intending that greater observance would be given to the development areas highlighted in The Local Plan, and proposals not in the Plan would not receive approval unless there were exceptional circumstances. Whilst that legislation has now been superceded, the principles are important in ensuring local democratic engagement is secured where development and regeneration proposals are concerned.

Where a planning proposal includes new housing that is not part of The Local Plan, it is deemed ”Windfall Housing”: it has not been part of the full public consultation process that has determined The Local Plan, and there is only the statutory 3-week notice period attached to individual planning applications in which to submit a response to it.

A small individual site may be of limited consequence, though might cause more localised concern; but the accumulation of these Windfall developments can significantly change an area without ever having been part of an informed discussion and agreement involving the local communities. Bearing that in mind,

* most new housing developments in Deal, Walmer, Sholden, Mongeham, and surrounding villages have not been sites in The Local Plan; and similarly,
* none of the developments in Deal Town Centre are included in The Local Plan

That means that The Regent Cinema site; the apartments proposed for the redeveloped Royal Snooker Hall (already approved by DDC); apartments proposed above the redeveloped Factory Shop (also already approved by DDC); and prospective townhouses on the St George’s Hall site are not part of any Plan for Deal Town Centre, and there remain questions over the future of other locations such as the HSBC and NatWest bank buildings. This is of great concern to many people, to local businesses, and for the future of the Town:

* Do you share those concerns?
* What are your own thoughts about the future direction for our area?
* Should these be a “Vision for Deal” created, ideally built into updates to The Local Plan? (and maybe for the distinct identities of Walmer, Sholden etc?)

**IN CONCLUSION**

If you have concerns about the Regent Cinema proposal, it is important that you take the opportunity to respond to the planning application.

The proposal on the DDC Planning Portal is at [24/00817 | Erection of 2 screen cinema with restaurant, cafe and multi-function space. Erection of 9 no. dwellings with associated landscaping (existing public toilet block, indoor bus shelter and existing cinema building to be demolished) | The Regent Beach Street Deal CT14 7BP (dover.gov.uk)](https://publicaccess.dover.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=SHLHSAFZIU300), and it indicates that the deadline for responses is 9th September 2024 .

***NB*** *Please ensure that you give explanations for the issues you raise, including personal examples where relevant: responding to DDC by just saying “I object” or “It looks nice” will just be ignored, but giving detailed, informed, comments will require them to record and examine them in forming a conclusion, recommendation, and in the final decision.*

**Ian Redding**

**Deal Society Executive**

**15 August 2024**

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| **NOTE FOR INFORMATION – GREYFIELD SITES**  In a practical sense, Greyfield land is typically formerly viable retail and commercial shopping sites that have suffered from lack of reinvestment and now "outclassed" by larger, better-designed, better-anchored shopping sites. In the commercial world these are often referred to as "dead malls" or "ghost boxes", often created by the major tenants vacating followed by others as shopper footfall has dropped hugely as a consequence. They are often surrounded by a "sea" of empty asphalt concrete  The term also has a broader application in urban infill or commercial locations where previous use is outdated and no longer an asset to a town and has potential for mixed use/residential purposes that enhances the location. This kind of revitalisation should be subject to zoning changes in The Local Plan, and/or prospectively a public-private partnership of some kind to achieve the highest and best use.  An example of such re-examination and designation of land use can be found in the work of the Southwark Land Commission (<https://www.southwark.gov.uk/council-and-democracy/southwark-land-commission> ). |