

SAVE DREAMLAND CAMPAIGN

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Planning Services
Thanet District Council
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Dear Sir/Madam,

Dreamland: Proposed Public Consultation

I write on behalf of the Save Dreamland Campaign. We understand that the Council will shortly be holding a public consultation exercise on the future of the Dreamland site. I should be grateful if you would take our comments into account in preparing the consultation.

The Save Dreamland Campaign speaks on behalf of over 12,000 people who are concerned about the impact that the redevelopment of Dreamland will have on Margate's prosperity and its heritage. Our members include local residents and businesses, visitors to Margate, and a number of local, national and international organisations, including the Margate Historical Society, SAVE Britain's Heritage, the Roller Coaster Club of Great Britain and the European Coaster Club.

We wish set out the reasons why we consider it to be essential that this forthcoming consultation takes into account the two main issues facing Margate: the town's tourism economy and the town's heritage. These two issues are inextricably linked, and should not be considered in isolation.

Tourism

Margate as a seaside resort relies heavily on the day visitor trade. Dreamland is the biggest single attraction in Margate and attracts several hundred thousand people to the town every year (in 1998, the last year from which we can find any published data, it attracted 266,000 visitors to the town, which is a comparable number to many of the UK's major inland theme parks). Dreamland is of major importance to the Thanet tourism economy and is a symbol closely associated with Margate (SEETB, 1998).

The redevelopment of the Dreamland site would, in our view, result in a huge reduction in the number of people visiting the town – particularly families - and would be a fatal blow to Margate's tourism economy. The effects of closing a major attraction such as Dreamland can be seen by studying the case of Morecambe, Lancashire. The unexpected closure of Morecambe's Frontierland Amusement Park (a similar-sized operation to Dreamland) in 2000 has virtually destroyed the town's tourism industry, and it now seems unlikely to recover. A similar impact can be expected at Margate. A survey undertaken last year by Thanet District Council showed that 25% of visitors to the town were visiting Dreamland.

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Amusement parks can be the focus for the regeneration of a seaside resort. The regeneration of Southend-on-Sea has been based around the expansion and investment in its Adventure Island Amusement Park, a well-established and similar sized operation to Dreamland. The park, which only 10 years ago attracted levels of visitors comparable to Dreamland, now attracts 1.5 million visitors a year, boosted by the park's coach and group bookings team. Surrounding tourism businesses have all responded to this investment by investing in their own facilities. The changes in the overall appearance of Southend's seafront area over the past six or seven years have been marked. The fortunes of the town have been completely turned around by the continued investment in the amusement park over this period. (The park's owner was awarded an MBE for his services to Southend's tourism industry in the 2003 New Year's Honours List).

We believe that Dreamland could attract similar visitor numbers. Statistics on visitor numbers to coastal amusement parks are available in the most recent edition of 'Visits to Tourist Attractions' (English Tourism Council, June 2002). Extracts of annual visitor numbers to similar-sized parks in comparable seaside resorts to Margate are shown in the table below (Ref: Table 4.5 of the ETC report). All of the parks listed are – like Dreamland – free admission parks in which visitors can either pay per ride or purchase an 'unlimited ride wristband'.

Amusement Park	Seaside Resort	Visitors 2001	Visitors 2000
Clacton Pier	Clacton-on-Sea	1,750,000	1,000,000
Flamingo Family Fun Park	Hastings	900,000	860,000
Harbour Park	Littlehampton	385,000	365,000
Pleasure Beach	Great Yarmouth	1,500,000	1,500,000
Pleasureland	Southport	2,100,000	2,100,000

There is a very clear gulf between the levels of visitors at these 'typical' seaside parks, and those visiting Dreamland over the past few years. Two of the parks above, Harbour Park and Flamingo Family Fun Park, are much smaller parks than Dreamland yet still attract considerably more visitors. The reason for this difference is clear. If you visit any of these parks, you will see that they are attractively laid out. They have good facilities for visitors: cafes, gift shops, etc. They have websites and advertise regularly, they have marketing staff placing reduced entry vouchers in newspapers and magazines. They have regular press releases; they have coach and group booking teams. Most importantly of all, they have regular investment. These parks are generally achieving between 1.5 and 2 million visitors per year. Under its previous ownership Dreamland had comparable annual visitor numbers. It is clear to us that the loss of an attraction that brings 266,000 people per year to Margate is a serious loss. But, under a different operator, the park would bring in considerably more than that. This represents an even greater loss.

The policies for Dreamland are set out in the adopted and emerging local plans. The statutory adopted local plan is the Isle of Thanet Local Plan (ITLP, adopted April 1998). Policy BC21 of the ITLP allocates the Dreamland site for "Amusement Uses" and states: ***"Within those areas shown on the proposals map for amusement uses in Ramsgate and Margate applications for new amusement uses will be accepted. Proposals for amusement uses will be expected to retain existing significant elements of seaside architecture. Outside the defined areas, proposals for new amusement uses or the extension of such uses will be refused."***

More recent thinking on the importance of the Dreamland site is contained in the Deposit Draft Thanet Local Plan (DDTLP, June 2001). This contains a section specific to the Dreamland site. Paragraph 8.49 states that *"the long-established amusement park known as 'Dreamland' is an important asset to the tourist attraction of Margate"*. The paragraph goes on to state:

“However, the park is perceived as becoming ‘run down’ with little or no evidence of investment over the past few years. There is therefore a real concern that there may be pressure for redevelopment in the future for an alternative use, thus losing a significant attraction from the district.”

Paragraph 8.50 acknowledges that part of the site might have to be redeveloped for related uses that are compatible to the continued use of the amusement park. It states:

“However, it is important that revenue from such development is reinvested into the provision and improvement of facilities so that the attractiveness and viability of the park is maintained. To develop part of the site and not reinvest in the park is not acceptable. This would make the amusement park even less viable and would ultimately lead to the loss of the whole attraction and therefore this important asset. The Council will, therefore, require a legal agreement that will tie the development of part of the site with improvements to the amusement park.”

Policy T11 in the DDTLP states:

“Proposals that seek to extend, upgrade or improve the attractiveness of Dreamland Amusement Park will be permitted. Development that would lead to a reduction in the attractiveness or tourism potential will normally be resisted.

“Exceptionally, development of a limited part of the site may be accepted as part of a comprehensive scheme for the upgrading and improvement of the theme park. The scheme will be required to demonstrate that the future viability of the amusement park can be assured and the Council will require a legal agreement to ensure that the proposed development and the agreed investment in the amusement park are carried out in parallel.”

The Council received over 8,000 objections to the Draft Local Plan during the Plan’s statutory consultation period. A cross party Working Party of Councillors considered all of the objections and has proposed changes to the Draft Plan. Policy T11 received an objection, which is set out in the Council’s summary schedule. This objection stated that the use of the word “**normally**”, as an attempt to provide a degree of flexibility, might result in ambiguity about when the policy will apply. The Working Party agreed with the objection and removed the word “normally” from the first part of Policy T11, which now reads:

“Proposals that seek to extend, upgrade or improve the attractiveness of Dreamland Amusement Park will be permitted. Development that would lead to a reduction in the attractiveness or tourism potential will be resisted.”

The Cabinet considered the Working Party recommendations at a meeting on 3rd December 2002. The minutes of that meeting state that members expressed concern at the use of the word “**limited**” in Policy T11 and did not feel this was sufficiently restrictive. Officers were asked to consider alternatives and report back.

This policy is there for a reason. The tourism industry of Margate is based on the continued existence of Dreamland. The proposals that are being put forward by the owners of Dreamland are completely at odds with this policy. Retail and leisure uses provide facilities for local people. Tourist attractions bring people into a town. This is a crucial difference. The policy is therefore founded on clear principles: the site must remain as an amusement park, and other uses will not be permitted.

The process of public consultation has resulted in Policy T11 being strengthened, not weakened. The policy no longer allows for any redevelopment that would reduce the site’s tourism potential. It does, however, allow for a very small part of the site to be redeveloped, as long as it contributes towards the upgrading and improvement of the remainder of the amusement park. Exactly how much of the site can be redeveloped is not clear until the revised wording of the policy is presented to the Council, but it will be less than “limited”.

This policy, which has been through extensive consultation, should form the basis of the forthcoming public consultation on the future of the Dreamland site. It is important that consultees are made aware of the Local Plan and Policy T11 in particular. The consultation should be within the framework set by the Local Plan and should cover the following areas:

- How much of the site would people wish to see redeveloped, noting the restrictions in the Local Plan policy;
- What uses would people wish to see on this redeveloped part of the site; and
- It should reaffirm the town's support for the upgrading and improvement of the amusement park.

What the consultation should not do is disregard this policy and consult on completely new, non-tourism uses for the entire site, which appears to be the intention given recent statements in the press from elected members. This would render the Council's hard work in producing this excellent Draft Plan pointless. It is our view that the Local Plan policy is a robust framework for the improvement of the Dreamland site.

The consultation also needs to have regard to the other main issue facing the Dreamland site: its heritage.

Margate's Heritage

Margate is lucky to have the single most outstanding piece of amusement park heritage in the United Kingdom: the Scenic Railway roller coaster. Scenic railway roller coasters were very common in the early part of the Twentieth Century. The Dreamland Scenic Railway, which opened in 1920, is now the oldest operating roller coaster in the country, and one of only two surviving scenic railway roller coasters (the other surviving example being the 1932 Roller Coaster at Great Yarmouth, but this is much-altered). As it is a scenic railway the trains run in troughs, and do not have under-track wheels, which limits the speed and steepness of drops. The ride also has a brakeman, who sits on an elevated seat between cars 1 and 2. The train is pulled up the lift hills by a cable instead of a chain; the brakeman uses a lever to grab the cable. He then keeps a check on the speed throughout the rest of the ride.

It is undoubtedly a remarkable survival. Its importance to the history of amusement parks, and therefore the cultural heritage of the UK, is immeasurable. This was recognised last year, when the Department for Culture, Media and Sport gave the ride Grade II listed status, the first time an amusement park ride had been given heritage status, and still Britain's only listed amusement park ride. (I have enclosed for information a copy of the report I issued to English Heritage in May 2001, which resulted in the Scenic Railway being listed). If this ride were to be demolished, it would mean the loss of the only unaltered scenic railway roller coaster in the country.

The Planning (Listed Buildings and Conservation Areas) Act 1990 states that, in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority (or the Secretary of State, depending on which is making the decision) shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Planning Policy Guidance Note 15 ('Planning and the Historic Environment') sets out Government policy for the protection of listed buildings, and the role played by the planning system in their protection. Local authorities and developers must take this guidance into account.

Paragraph 3.3 of PPG15 emphasises the importance that the Government places on the protection of listed buildings:

"Once lost, listed buildings cannot be replaced; and they can be robbed of their special interest as surely by unsuitable alteration as by outright demolition. They represent a finite resource and an irreplaceable asset. There should be a general presumption in favour of the preservation of listed buildings, except where a convincing case can be made out, against the criteria set out in this section, for alteration or demolition."

Listed building controls ensure that proposals for demolition are fully scrutinised before any decision is reached. Paragraph 3.17 of PPG15 states:

"...the Secretaries of State would not expect consent to be given for the total or substantial demolition of any listed building without clear and convincing evidence that all reasonable efforts have been made to sustain existing uses or find viable new uses, and these efforts have failed; that preservation in some form of charitable or community ownership is not possible or suitable; or that redevelopment would produce substantial benefits for the community which would decisively outweigh the loss resulting from demolition."

This case will have to be made before demolition can be considered. Furthermore, and importantly for this case, paragraph 3.17 states:

"The Secretaries of State would not expect consent to demolition to be given simply because redevelopment is economically more attractive to the developer than repair and re-use of a historic building..."

In the current issue of industry magazine *Park World* (February 2003), the owner of Dreamland admits that if he were to sell Dreamland as a going concern the price he would sell at would have *"no bearing as to its true commercial development land value"*. He reveals that his plans are a *"purely commercial decision"* and says that this may well be *"the start of things to come when you are looking at a lot of coastal amusement parks and their development values"*. The current proposals clearly do not comply with PPG15.

Paragraph 3.19 of PPG15 states that listed building consent for demolition should not be granted unless the authority (or the Secretary of State himself) is satisfied that real efforts have been made without success to continue the present use. This should include: ***"the offer of the unrestricted freehold of the building on the open market at a realistic price reflecting the building's condition"***. Therefore if another operator is prepared to acquire some, or all, of Dreamland and continue to operate the park, there is no justification in planning policy terms for its demolition and redevelopment.

In addition, the ITLP also contains policies protecting listed buildings (Policy CB4 and CB5). The DDTLP also includes relevant policies. Paragraph 7.1 of the DDTLP states that *"the preservation of our Heritage is considered to be an economic asset to the district, and its maintenance and protection plays an important role in the district's economy"*. Policies HE1 and HE2 do not permit demolition of a listed building unless there is a special overriding justification. The policies also emphasise that the setting of a listed building (in the case of the Scenic Railway, its location in Dreamland) is as important as the building itself.

It is essential that the public consultation makes it clear to those being consulted that the Scenic Railway is listed and that the above policies apply. The consultation should ask, on the basis of these policies, whether the Scenic Railway should be retained.

In conclusion, it can be seen that the redevelopment of Dreamland is unnecessary and would have a damaging impact on Margate's tourism economy. Dreamland has been run down over recent years by its current owner. The emerging Local Plan recognises this and warns that this might result in pressure for redevelopment and that this could be harmful to Margate. Because of this, a policy has been included that restricts any such redevelopment to a very limited part of the site and ensures that any redevelopment that does take place results in the upgrading of the amusement park. The Council is now faced with exactly the scenario predicted by the Local Plan; it would make no sense for the Council to ignore the Plan and proceed with a public consultation that pays no regard to the Plan's policies. In addition, listed buildings policies – relevant in relation to the Scenic railway – also require a number of steps to be taken by the developer, none of which (to the best of our knowledge) have yet been carried out.

The forthcoming public consultation must therefore be undertaken within the framework set by the emerging Local Plan and national planning guidance.

I should be grateful if you would inform the Save Dreamland Campaign when the consultation commences, as we would wish to make representations.

Yours Sincerely
for the Save Dreamland Campaign

Nick Laister BA (Hons) DipTP MRTPI MIHT
Campaign Leader

Enc. Request for Spot Listing of the Scenic Railway Roller Coaster, May 2001

cc. Cllr Richard Nicholson
Cllr Iris Johnston
Roger Gale MP