

REVISED DEPOSIT DRAFT THANET LOCAL PLAN
Representations of the Save Dreamland Campaign

Report Produced by

Nick Laister BA (Hons) DipTP MRTPI MIPI MIHT

May 2003



Save Dreamland Campaign

The Shell Grotto
Grotto Hill
Margate
Kent
CT9 2BU

Tel/Fax: 01843 220008
Email: info@savedreamland.co.uk

CONTENTS

1. Introduction	1
2. The Importance of Dreamland	2
- Margate's Tourism Economy	
- Dreamland's Viability	
- A Way Forward	
3. National Planning Policy Background	8
- PPG15: Planning and the Historic Environment	
- PPG21: Tourism	
4. Objections	11
- Background to Policy T11 (Dreamland)	
- Recent Changes to Policy T11	
- The Response of the Save Dreamland Campaign	
- Proposed Changes to Policy T11	
5. Conclusions	19

APPENDICES

- Appendix 1:** Photographs of Adventure Island, Southend-on-Sea
- Appendix 2:** Dreamland: Comparable Sites
- Appendix 3:** Request for Spot Listing of the Scenic Railway Roller Coaster, Dreamland, Margate (Nick Laister, May 2001)
- Appendix 4:** Information on the Proposed Redevelopment of Dudley Zoo.
- Appendix 5:** Letter from the Save Dreamland Campaign to Thanet District Council dated 12 February 2003
- Appendix 6:** Letter from the Save Dreamland Campaign to Thanet District Council dated 3 March 2003
- Appendix 7:** Letter from Thanet District Council to the Save Dreamland Campaign dated 6 March 2003
- Appendix 8:** Letter from Save Dreamland Campaign to Thanet District Council dated 10 March 2003

1.0 INTRODUCTION

- 1.1 This report has been prepared by Nick Laister BA (Hons) DipTP MRTPI MIPI MIHT on behalf of the Save Dreamland Campaign. The Campaign speaks on behalf of 13,000 people who are concerned about the impact that the redevelopment of Dreamland will have on Margate's heritage and future prosperity. Our members include local residents and businesses, visitors to Margate, and a number of organisations, including the Margate Civic Society, the Margate Hotel and Guest House Association, the Margate Historical Society and SAVE Britain's Heritage.
- 1.2 The Save Dreamland Campaign is aware that the current owner of the Dreamland Amusement Park site proposes to close the attraction and apply for planning permission for its redevelopment, potentially to different land uses (retail and leisure, as opposed to its current tourism/amusement park use). Policy T11 of the Isle of Thanet Local Plan will be the primary consideration in the determination of any planning application for the redevelopment of the site. It is of the greatest importance to our members that this policy continues to protect the Amusement Park from redevelopment that would be damaging to Margate's tourism economy and its status as a seaside resort.
- 1.3 This report sets out in detail the Campaign's objections to the proposed changes to Policy T11 (Dreamland).
- 1.4 Section 2 of this report sets out why the retention of a major tourist attraction – ideally the Dreamland Amusement Park – is important for the future of the town as a seaside resort. Section 3 provides the national planning policy context for our objections. Section 4 sets out the background to the development of Policy T11 and our proposed changes to the policy. Section 5 provides the Conclusions.
- 1.5 Nick Laister is a Chartered Town Planner and a Technical Director at RPS Planning, Transport and Environment, the UK's largest planning consultancy. He has significant experience of working within the tourism industry as a planning consultant, and advises a number of the UK's biggest tourist attractions. He has been invited to speak at a number of conferences on planning for tourism and leisure and he has written a number of articles for professional journals. He also runs the online bookstore www.joylandbooks.com and is a partner in the company Skelter Publishing LLP, which specialises in amusement park, fairground, circus, specialist entertainment and entertainment history books. In his free time he writes on the subject of amusement park history for a number of magazines.

2.0 THE IMPORTANCE OF DREAMLAND

Margate's Tourism Economy

- 2.1 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 for 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 inland theme parks). Dreamland is of major importance to the Thanet tourism economy and is a symbol closely associated with Margate (SEETB, 1998).
- 2.2 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. A survey undertaken in 2002 by Arkenford, at the request of Thanet District Council, showed that 25% of visitors to the town were visiting Dreamland. This is despite the lack of investment that the site has suffered from in recent years (in comparison to other similar amusement parks elsewhere in the UK).
- 2.3 The Campaign has investigated general UK amusement park visitor data to understand the national context for the Dreamland site. 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 Table 2.1 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'.

Table 2.1: Visits to UK Seaside Amusement Parks (ETC, June 2002)

Amusement Park	Seaside Resort	Visitors 2001	Visitors 2000
Adventure Island ¹	Southend-on-Sea	1,500,000 (est)	1,500,000
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

- 2.4 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. There are a number of reasons for this, including:
- their respective owners have continually invested in and upgraded the parks' infrastructure, resulting in attractive, 'family-friendly' environments;
 - they have good facilities for visitors: cafes, gift shops, etc;
 - care and attention is given to the presentation of the rides and attractions to ensure that the parks do not appear like travelling fairs (there are attractive fences, queue lines and stations);

¹ Information from Southend Borough Council

- they have websites and advertise regularly;
 - they have marketing staff placing reduced entry vouchers in newspapers and magazines;
 - they offer 'pay-one-price' rail tickets from surrounding stations;
 - they issue regular press releases; and
 - they have coach and group booking teams.
- 2.5 It is for these reasons that Dreamland has under performed in terms of visitor numbers over the past seven or eight years (although even in its current neglected state it is still by far the Isle of Thanet's biggest tourist attraction and plays a very important role in attracting visitors to the area).
- 2.6 The parks in the tables above 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. We have therefore investigated the contribution that Dreamland could play to Margate's tourism economy under a new, committed owner/operator.
- 2.7 In recent years it has been proven that amusement parks can be the focus for the regeneration of seaside resorts. Taking one example from the south east region, we have looked into the recent successful regeneration of Southend-on-Sea. This 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 less than 10 years ago attracted 750,000 visitors, now attracts over 1.5 million visitors a year, boosted by the park's coach and group bookings team. The amusement park is privately owned (by the Miller family) and the park – which less than ten years ago was a very similar, but smaller, operation to Dreamland – now differs from Dreamland in the following ways:
- Committed ownership involved in the overall promotion of the town's tourism industry;
 - Regular investment in new rides, attractions and/or park infrastructure;
 - Rides are brightly painted, uniquely themed and well-maintained;
 - Rides are all "built in" to the park with attractive fencing, queue lines and permanent station buildings;
 - Colourful signage around the park to consistent theme;
 - Attractive park environment, with well-maintained landscaping and quality boundary treatment;
 - Website and regular advertising across London and the south east;
 - Joint promotion with regional railways offering free rail travel from anywhere in the region;
 - All-year-round opening;
 - Well-presented supporting attractions and facilities, such as cafes, ticket booths and gift shops.
- 2.8 Appendix 1 is a series of photographs taken earlier this year when the Save Dreamland Campaign visited Adventure Island. These show clearly the significant difference in the environment of the two parks.

- 2.9 Under its previous ownership, Dreamland also displayed many of these characteristics (or at least as many of these characteristics as would have been expected in the 1980s/early 1990s), but the park has increasingly abandoned these over the past seven years. So whilst Dreamland has declined over the past seven years, Southend's Adventure Island has prospered.
- 2.10 At Southend, 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 photographs of Adventure Island at Appendix 1 show how Dreamland might look under a committed owner. (Note: Adventure Island is smaller than Dreamland so it is clear that not all of the Dreamland site would be required to achieve the positive benefits that Southend has experienced).
- 2.11 Appendix 2 provides statistics showing the increase in visitor numbers at Southend-on-Sea and another similar seaside town elsewhere in the UK: Southport, Merseyside. Both of these towns and their respective amusement parks display similar characteristics to Dreamland and Margate (i.e. the towns have similar populations, similar-sized amusement parks, and have broadly similar catchment populations). The statistics in Appendix 2 show that, over the last decade, both parks have significantly increased their visitor numbers. It can also be seen that visitors to both these towns as a whole have also increased. The contribution played by the two amusement parks in achieving these increases is significant and has been confirmed by the respective councils.
- 2.12 We believe that Dreamland could attract similar visitor numbers and the effects of a committed owner/operator investing in the site will have similar benefits to Margate's tourism industry.
- 2.13 This Campaign is of the opinion that if the use of the site were to be changed from tourism to leisure and/or retail, then this would represent a huge loss to the town. Tourist attractions by definition draw visitors to a town. Retail and leisure uses normally only serve the local population (although they can provide incidental facilities for visitors already in a town). It is unlikely, in the view of the Save Dreamland Campaign, that a retail or leisure use can be found for the site that could be a comparable tourism draw to Dreamland.
- 2.14 Dreamland is a well-known symbol of Margate across much of the south-east of England, including large parts of London. It is, in our view, the most famous landmark in the town. It is also our view that Margate's tourism potential is at least as good as, if not better than, that of Southend-on-Sea. Margate is in a more attractive location, with Seaside Award-winning beach and Viking Coastal Trail. The town also offers a wide range of attractions such as the Droit House, Shell Grotto, Margate Caves and Margate Museum, as well as good quality entertainment venues at the Theatre Royal and Winter Gardens. The proposed Turner Centre and regeneration of the Old Town as a Cultural Quarter also mark Margate out as a tourism destination with much to offer. Therefore, on the basis of the information presented in this document, the Council must think long and hard before making the proposed modifications to the local plan policy for Dreamland as this opportunity will be lost.

Heritage

- 2.15 The Dreamland site is an important part of Margate's seaside heritage. The relationship of the amusement park site (unchanged in size and shape since the 'Lord' George Sanger years in the first two decades of the Twentieth Century), centred on the Scenic Railway roller coaster (1920) with the Dreamland Cinema (1935), its fantastic fin tower acting as a beacon for the Dreamland complex. Together, the component parts of Dreamland define Margate.
- 2.16 Margate is also 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.
- 2.17 The Scenic Railway 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 awarded heritage status, and still Britain's only listed amusement park ride. (The report issued by Nick Laister to English Heritage in May 2001, which resulted in the Scenic Railway becoming a listed building, is enclosed as Appendix 3). We consider this ride to be of international importance². If this ride were to be demolished, it would mean the loss of the only unaltered scenic railway roller coaster in the country.

Dreamland's Viability

- 2.18 The information presented above on other similar parks around the UK that are thriving, and that are playing a major role in the regeneration of their respective resorts, demonstrates that in the right ownership, Dreamland could not only be a viable amusement park, but could actually form the basis of the regeneration of Margate's entire seafront area. With such a unique and well-known landmark as the Scenic Railway at the centre of the park, Dreamland arguably has more going for it than most other seaside fun parks outside of Blackpool.
- 2.19 The Save Dreamland Campaign has always believed that, should the park not be economically viable for an operator to run and invest in its rides,

² The international importance of the ride is illustrated by the fact that membership of the Save Dreamland Campaign includes the American Coaster Enthusiasts, the European Coaster Club and the Roller Coaster Club of Great Britain. We have a number of leading international amusement park and roller coaster historians actively advising the Campaign.

attractions and infrastructure, then there is very little basis on which to suggest that the amusement park should be saved. We have seen no evidence whatsoever that the park is not viable. On the contrary, the information presented in this report suggests that Dreamland is a viable tourist attraction.

- 2.20 In addition to the above, we can confirm that the Campaign has been approached by a number of established operators who have expressed a serious interest in operating some, or all, of the park, including the Scenic Railway. These operators originate both from the UK and overseas. Over the past few weeks, the Campaign has been working closely with one particular established operator based in France to present proposals for the site to the Council (we return to this in Section 4). Other operators are also interested. Even the fairground operator who has taken the lease on the site for the 2003 season has publicly stated that he considers the park to be a viable operation and would be prepared to operate the park on a long-term basis.
- 2.21 All the evidence before the Council suggests that Dreamland is a viable tourist attraction. Clearly the site would have more development value for commercial leisure and retail, but this consideration is not a planning consideration. The tourism, economic and heritage issues put forward above are planning matters which should be taken into account by Thanet District Council in deciding on the most appropriate development plan policy for the Dreamland site.

A Way Forward

- 2.22 The Save Dreamland Campaign believes that there is a way forward that will allow for the comprehensive upgrade of the entire site, including potentially the introduction of new land uses. Our research on other similar sites around the UK has confirmed that it is not essential for the entire site to remain in amusement park use. But this should remain the main focus (we believe that the amusement park can still be the focus of the site even if 50% of the land area was given over to other uses). We consider that redevelopment of the site is the opportunity for the site's enhancement and upgrade.
- 2.23 We consider that the example of Dudley Zoo (West Midlands) could be a model for the redevelopment of the Dreamland site. This long-established zoo has, in recent years, suffered a decline in visitor numbers and increasing costs. It is, however, an attraction that the local residents and the local council do not want to lose for similar reasons that the people of Margate (and its visitors and, presumably, the council) do not want to lose Dreamland. Dudley Metropolitan Borough Council has therefore put together a redevelopment package with developers (St. Modwen Properties and Bellway Urban Partnerships) for the comprehensive redevelopment of the entire site, to include residential development, specialist retail uses and a significantly upgraded zoo. There is no reason why this cannot be the case at Margate. Information on the Dudley Zoo example can be found at Appendix 4.
- 2.24 It is therefore essential that an appropriate development plan policy is put in place that ensures that the amusement park remains the central attraction on the Dreamland site, but allows other development to be permitted as part of an overall comprehensive masterplan for the site. We have spoken to amusement park operators who have confirmed that such an approach would be the most appropriate way forward for the site. In the following sections, we

set out how we believe Policy T11 should be changed to enable this comprehensive redevelopment.

3.0 PLANNING POLICY BACKGROUND

- 3.1 As stated in PPG12 (Development Plans), in preparing local plans, local authorities must have regard to policies set out in PPGs and in the structure plan. Relevant policies are set out below.

PPG15: Planning and the Historic Environment (September 1994)

- 3.2 PPG15 is relevant for the consideration of the Dreamland site, particularly with regard to the site's listed buildings (the Scenic Railway and Dreamland Cinema). 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.

- 3.3 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."

- 3.4 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."

- 3.5 This case should be made by any owner of the Dreamland site before demolition of the Scenic Railway could be considered. Furthermore, 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..."

- 3.6 In the February 2003 issue of industry magazine Park World, the owner of Dreamland admitted 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 revealed 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”*. Policy T11 as drafted – on the basis of late representations made by the owner that the site should be redeveloped – clearly does not comply with PPG15.

- 3.7 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.

PPG21: Tourism (November 1992)

- 3.8 Paragraph 1.1 of PPG21 states that ***“Tourism makes a major contribution to the national economy and to the prosperity of many cities, towns and rural areas. Its continuing growth generates a range of economic activity and new job opportunities.”*** This is certainly the case in Margate; tourism is vital for the local economy, and the site that plays the largest single role in that economy is Dreamland.

- 3.9 The paragraph goes on to state:

“Many areas have important natural, historical or architectural features which serve to attract tourists. It is important to identify and consider ways of protecting these, as well as to consider ways in which new development can help the industry grow.”

This is also the case at Margate. Dreamland’s Scenic Railway and Cinema are two symbols closely associated with the town over a wide area. It is essential that these two structures are protected, and form the basis of imaginative proposals to further enhance the tourism potential of the site. The Save Dreamland Campaign strongly supports proposals to enhance the tourism potential of the Dreamland site, and believes that this is best served by the retention and upgrading of the amusement park, a formula that has recently proved very successful in other towns.

- 3.10 Paragraph 2.1 provides a definition of ‘tourism’ that is very useful in considering the Dreamland site. This paragraph defines tourism as:

“The temporary short-term movement of people to destinations outside the places where they normally live and work and the activities during their stay at these destinations”.

It is important that Thanet District Council pays close attention to the definition of tourism, as it is our opinion that the council has consistently confused tourism with ‘leisure’. Leisure is an activity that people do both within the places where they normally live and work as well as away from these places. Tourist attractions draw people into an area (although, as paragraph 3.3 of PPG21 states, tourism can overlap with sport, entertainment, the arts or leisure). It is an important distinction, and we consider that this distinction

needs to be fully understood by the council in drafting the policy for the Dreamland site, an important tourist attraction.

- 3.11 Paragraph 5.22 notes the importance of seafront architecture, which is something that defines Margate as a leading resort:

“The seafront architecture of such resorts is increasingly appreciated and in a well preserved resort can help to achieve regeneration. Local plan policies should take account of this heritage, and may include an action plan for its improvement...”

The Dreamland site plays an important role in the heritage of Margate and – as demonstrated above – is likely to play an equally important role in its regeneration, in a way that other amusement parks have in other similar towns.

- 3.12 Paragraph 6.1 specifies that in preparing their development plans local authorities should consult “local business organisations, amenity groups and other bodies concerned with development or conservation.” The Save Dreamland Campaign falls into this category, and we ask that the changes we propose in the next section – which are backed up by significant amount of research and consultation with amusement park operators – are seriously considered.

4.0 OBJECTIONS

Background to Policy T11 (Dreamland)

- 4.1 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."***
- 4.2 More recent thinking on the importance of the Dreamland site was contained in the First Deposit Draft Thanet Local Plan (FDDTLP, June 2001). This contained a section specific to the Dreamland site. Paragraph 8.49 stated 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."*
- 4.3 Paragraph 8.50 acknowledged 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 stated:
- "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."*
- 4.4 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."***
- 4.5 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 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 then read:

"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."

- 4.6 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.

Recent Changes to Policy T11

- 4.7 The owner of Dreamland announced in December 2002 that he intended to retire, and that he had reached an agreement with Stadium Developments Ltd that the site would be redeveloped for a retail and leisure scheme. The Council announced that they would undertake a public consultation exercise jointly with Stadium Developments for the redevelopment of the site.
- 4.8 The Save Dreamland Campaign was very concerned about this, particularly the harm the redevelopment of this *"important asset"* (paragraph 8.50 of FDDTLP) would have on Margate's tourism economy. The Save Dreamland Campaign wrote to Thanet District Council on 12 February 2003, setting out the concerns of the various organisations the Campaign represents, asking that these be taken into account in the forthcoming public consultation. This letter (attached at Appendix 5) provided evidence that showed the park would be viable, and demonstrated the likely effects that the loss of this major visitor attraction would have on Margate's economy.
- 4.9 On 16 January 2003, Thanet District Council decided to change Policy T11 following representations received by the owner of Dreamland, despite these representations being received after the statutory consultation period had ended, and despite the fact that the results of this consultation had resulted in the policy being strengthened, not weakened. The revised policy was handed to representatives of the Save Dreamland Campaign at a meeting with the Council Leader on 28 February 2003. The proposed replacement policy read:

"PROPOSALS THAT SEEK TO EXTEND, UPGRADE OR IMPROVE THE ATTRACTIVENESS OF DREAMLAND AMUSEMENT PARK WILL BE PERMITTED. PROPOSALS FOR REDEVELOPMENT, EITHER IN PART OR FOR THE WHOLE SITE, WILL BE REQUIRED TO DEMONSTRATE HOW THE PROPOSAL CONTRIBUTES TO THE ECONOMIC WELLBEING, VITALITY AND URBAN CHARACTER OF MARGATE AND TO SHOW HOW THOSE PROPOSALS IMPACT ON OTHER PROPOSALS CONTAINED WITHIN THE PLAN. THE COUNCIL WILL THEREFORE REQUIRE ANY SUCH PROPOSALS, DEPENDING ON THE SCALE OF REDEVELOPMENT PROPOSED, TO BE ACCOMPANIED BY A FULL

MASTERPLAN/ACTION PLAN, TRAFFIC IMPACT ASSESSMENT AND ECONOMIC ASSESSMENT FOR WHATEVER IS PROPOSED, IN RELATION TO THE SITE AND TO THE SURROUNDING AREAS. A SIGNIFICANT COMPONENT OF ANY PROPOSALS FOR THE SITE WILL ENTAIL LEISURE USES OF A TYPE APPROPRIATE FOR BOTH A SEASIDE AND EDGE OF TOWN CENTRE LOCATION.”

The Response of the Save Dreamland Campaign

4.10 The Save Dreamland Campaign wrote to Thanet District Council on 3 March 2003, expressing its concern about the changes made to the plan (the letter is attached at Appendix 6). The letter made the following points:

1. That the policy appeared to be a ‘U-turn’ by the Council, precipitated only by the Council’s recent meetings with the owner of Dreamland and the developers.
2. That the policy in the FDDTLP had been put in place because the Council had seen little evidence of investment at the site and therefore predicted a pressure for the site’s redevelopment. It therefore seemed contradictory that as soon as the site’s owner announced such a redevelopment the council inserted a completely new policy potentially allowing for the site’s complete redevelopment.
3. It sought clarification of the status of the replacement policy, and asked for an explanation as to why the report containing the policy was excluded from the Council’s website, when other committee reports were made available. This meant that the Campaign lost the opportunity to lobby members.
4. It asked why the replacement policy no longer makes reference to the viability of the amusement park, nor the requirement for a legal agreement to tie any developments of part of the site with improvements to the amusement park.
5. It asked the Council why, despite the statutory consultation process resulting in a strengthening of the Dreamland policy, the policy resisting development that would lead to a reduction in the attractiveness or tourism potential of the amusement park had been deleted.
6. It also asked why the policy which only allowed part of the site to be redeveloped in exceptional circumstances, had been deleted to be replaced by a policy which allows the redevelopment of the entire site.
7. We also pointed out to the Council that the new policy bears no relation to the one that was prepared and consulted on over the last few months. We asked how the policy related in any way to either the policy in the First Draft Local Plan or the results of the public consultation on that plan.

4.11 The Campaign received a reply from the Council, dated 6 March 2003 (the letter is attached at Appendix 7). Very few of the above questions were answered directly, however the letter made the following points:

- It confirmed that the change in stance in relation to the policy in respect of Dreamland did come about following the representations by the owner of the site.
- It stated that the Council considers it unlikely that another amusement park operator would wish to take over the Dreamland site, but that the new policy would not preclude that from happening should one turn up.

- It also said that the town does not have either the catchment or visitor numbers of parks such as Thorpe Park or Blackpool Pleasure Beach that is required to provide for an amusement park on the scale of the existing facility.
- It stated that in the Council's view an amusement park on the Dreamland site would be unlikely to be viable.
- It stated that the change in policy was to "make the best of a difficult situation".
- It said that commercial reality tells the council that there is little prospect of being able to retain Dreamland.
- The council would like to see some leisure activities retained on the site including, if it is possible, the scenic railway, but that the 16-acre site presents an opportunity for a different set of land uses.

4.12 The Save Dreamland Campaign then wrote to the Council (letter dated 10 March 2003, see Appendix 8), both responding to and correcting a number of points in the letter:

- The Campaign was disappointed with the lack of evidence that Dreamland is not a viable amusement park, especially given the information presented to the Council in the letter dated 12 February 2003. It was, and still is, the view of the Save Dreamland Campaign that the fact that the current owner has chosen to retire and secure some redevelopment value from the site is irrelevant in planning terms.
- We asked for sight of the evidence on the amusement park's viability on which the Council based its decision to change the policy.
- We noted the references to Thorpe Park and Blackpool, but pointed out that the Campaign has always been careful not to refer to parks of this type (international leaders drawing visitors from huge catchments) as examples.
- We also corrected the reference in the letter to the fact that Dreamland is a similar scale of operation to Blackpool Pleasure Beach and Thorpe Park. Thorpe Park is an inland theme park charging an admission price. Blackpool, the main attraction at which is the Blackpool Pleasure Beach amusement park, was a more appropriate comparison only to the extent that it is an amusement park in a seaside town. But that is where the comparison ends. Blackpool Pleasure Beach attracts more than 7 million visitors per year, more than the whole of Margate (and is positioned in the Top Ten most visited amusement parks in the world). The Pleasure Beach has 145 rides and attractions, including Europe's biggest roller coaster, 4 theatres, 33 restaurants/cafes/bars and a similar number of shops. In short, it is a tourist attraction on a scale that is almost unparalleled elsewhere in the world (and is the UK's most visited tourist attraction). The Save Dreamland Campaign considers that to compare the scale of operation of Dreamland to that of Blackpool Pleasure Beach was to display a complete lack of understanding of the theme park industry on the part of the Council. Dreamland is a much smaller operation and should not be expected to (nor does it need to) draw anything like this number of visitors.
- We pointed out that the Campaign has always compared Dreamland with similar-sized parks, in similar towns, with similar catchments. The evidence is that these parks are viable, and that (when properly run) attract significantly more visitors – by orders of magnitude - than Dreamland has under its present ownership. In almost all cases, these

parks are the biggest attraction in their respective towns (just as Dreamland is Margate's biggest tourist attraction) and have had positive regenerative effects (see Section 2 of this report).

- We therefore rejected the Council's ill-informed position on the park's viability.

4.13 Since we wrote that letter, the Campaign has been working very closely with one of the operators that had expressed an interest in taking on the park and operating it. This particular company is a major international operator, which runs a large and successful chain of theme parks and amusement parks in several European countries. The Director of Development of this Company has visited the Dreamland site with representatives of the Save Dreamland Campaign and has confirmed that the park is one that it would want to operate. This Company would – if it were given the opportunity to operate the park – completely change the park's environment, bringing in new rides and attractions and revamping the park's infrastructure to make it an attractive destination for day visitors. This Company has also confirmed that it would build upon the park's strong heritage, and the Scenic Railway would remain the central attraction of the park. A visit to any of this company's theme parks – large or small – on the Continent will reveal a standard of operation and attention to detail that would without a doubt put Margate firmly back on the map as a family destination.

4.14 This Company has confirmed its willingness work with the Council and developers to enable a comprehensive redevelopment and upgrade of the site. The Company is also content for the site's developers to introduce new, but complementary, land uses to the site.

4.15 On the basis of the advice we have received from operators, the Save Dreamland Campaign is satisfied that the site does not have to be entirely in amusement park use. There is flexibility within the site's 16 acres for retail and leisure uses to be developed alongside the amusement park, but as a comprehensive masterplan that ensures that the entire site is upgraded. The redevelopment should link with surrounding land uses to create a tourist attraction that integrates seamlessly with the rest of Margate, whilst at the same time protects and enhances the site's heritage. Since the seafront fire that destroyed part of Margate's Marine Terrace, there is now also potentially the opportunity for a more prominent entrance to the site from the seafront. This would increase the viability of the refurbished amusement park and other land uses that would make up the redeveloped site.

4.16 We believe that to have an operator of this calibre committed to Margate as a major tourism destination will be the step change required to regenerate the town's tourism industry and should offer at least the benefits that the Adventure Island redevelopment offered to Southend-on-Sea. Margate will become a regional "first choice" for families looking for a short break or day out.

Proposed Changes to Policy T11

4.17 It is clear from the above paragraphs that the Council's sole reason for amending Policy T11 – their belief that an amusement park on the Dreamland site is no longer viable – has now been proved to be incorrect. Indeed, not only is it viable, the site is attracting interest from major international operators of a calibre that will enhance the status of not only the Dreamland

site, but Margate as a whole. These operators have stated their willingness to work with the Council on proposals for the site. The Campaign is currently working with one of these companies – a major international operator with a large chain of theme parks and amusement parks on proposals for the site. As stated above, these proposals can form part of a comprehensive redevelopment, which will introduce new, complementary land uses to the site, significantly upgrade the amusement park and improve linkages to the rest of Margate, including the seafront (potentially using the gap recently created in Marine Terrace by the fire in early April 2003). To ensure that this is achieved, policy T11 should, in our view, revert to its original wording.

- 4.18 We set out in Section 2 of this report the benefits that having a major tourist attraction such as Dreamland can bring to Margate.
- 4.19 Our model for Dreamland is one that is successful up and down the country: an attractive family amusement park, similar to (or potentially even better than) Southend's Adventure Island, operated by a committed owner. We have seen the huge regenerative effects that refurbished amusement parks have had on seaside resorts of the last 5 to 6 years. We have seen no evidence that a refurbished and significantly upgraded Dreamland would not have similar regenerative effects on Margate. In fact, in our view, Margate has more in its favour than many comparable seaside resorts. The amusement park operator that is currently working with the Save Dreamland Campaign is fully committed to this vision. We know the model is a realistic and viable one; it simply needs policy support from the Council to achieve it.
- 4.20 We therefore suggest that the following changes (text to be deleted shown with strikethrough, text to be added shown shaded):

Paragraph 8.49:

8.49. The long established amusement park known as 'Dreamland', is an important asset to the tourist attraction of Margate. However, the park is perceived as having become '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:

~~**8.50.** The Council's preference will be for Dreamland to continue to provide a core leisure facility to underpin the holiday destination that is Margate. Any proposal for redevelopment, either in part or in whole, will need to demonstrate to the Council how any new development proposals will contribute to the long term wellbeing of the Margate economy and in particular demonstrate how any development proposals will integrate with the character and urban grain that is traditionally Margate. In that respect the Council would expect to see the development of a Masterplan/Action Plan for the site, and surroundings, as part of any development proposals, which would justify to the Council, the benefits of any redevelopment proposals and which should have as a central core a significant element of leisure development, in view of the site's relationship with Margate seafront.~~

The Council, however, acknowledges that for there to be investment, part of the site may have to be redeveloped for non-leisure related uses that are compatible to the continued use of the amusement park. 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 into 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 the improvements to the amusement park.

8.50b. Any proposal for the redevelopment of part of the site will also need to demonstrate to the Council how it will integrate with the character and urban grain that is traditionally Margate. In that respect the Council would expect to see the development of a Masterplan/Action Plan for the site, and surroundings, as part of any development proposals, which would justify to the Council the benefits of the redevelopment proposals and which should retain as a central core the amusement park and Scenic Railway, in view of the site's strong historical association with Margate seafront.

Policy T11:

POLICY T11 DREAMLAND

PROPOSALS THAT SEEK TO EXTEND, UPGRADE OR IMPROVE THE ATTRACTIVENESS OF DREAMLAND AMUSEMENT PARK WILL BE PERMITTED.

~~**PROPOSALS FOR REDEVELOPMENT, EITHER IN PART OR FOR THE WHOLE SITE, WILL BE REQUIRED TO DEMONSTRATE HOW THE PROPOSAL CONTRIBUTES TO THE ECONOMIC WELLBEING, VITALITY AND URBAN CHARACTER OF MARGATE AND TO SHOW HOW THOSE PROPOSALS IMPACT ON OTHER PROPOSALS CONTAINED WITHIN THE PLAN. THE COUNCIL WILL THEREFORE REQUIRE ANY SUCH PROPOSALS, DEPENDING ON THE SCALE OF REDEVELOPMENT PROPOSED, TO BE ACCOMPANIED BY A FULL MASTERPLAN/ACTION PLAN, TRAFFIC IMPACT ASSESSMENT AND ECONOMIC ASSESSMENT FOR WHATEVER IS PROPOSED, IN RELATION TO THE SITE AND TO THE SURROUNDING AREAS. A SIGNIFICANT COMPONENT OF ANY PROPOSALS FOR THE SITE WILL ENTAIL LEISURE USES OF A TYPE APPROPRIATE FOR BOTH A SEASIDE AND EDGE OF TOWN CENTRE LOCATION.**~~

DEVELOPMENT THAT WOULD LEAD TO A REDUCTION IN THE ATTRACTIVENESS OR TOURIST POTENTIAL OF THE DREAMLAND SITE WILL 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 AMUSEMENT PARK. THE APPLICANT 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. PROPOSALS FOR THE DREAMLAND SITE MUST RETAIN THE LISTED BUILDINGS ON THE SITE, NAMELY THE SCENIC RAILWAY AND CINEMA BUILDING.

- 4.21 Our proposed changes are broadly the same as the original policy, but we have added reference to the retention of the Scenic Railway, which was not a listed building at the time of the original policy. We consider it important that

the most notable elements of Margate's heritage are protected to underpin the resort's regeneration.

5.0 CONCLUSIONS

- 5.1 The Save Dreamland Campaign speaks on behalf of over 13,000 people who are concerned about the future of the Dreamland site and the Grade II listed Scenic Railway roller coaster.
- 5.2 We have demonstrated in this report that the Dreamland site is of critical importance to Margate as a seaside resort, and must be retained and enhanced. The park has been run down over recent years, but this Campaign has evidence that demonstrates that the park would not only be viable under a committed owner, but could be the focus of the town's regeneration. We have presented evidence that shows that similar sized parks in other towns, with broadly the same size of catchment area are thriving and drawing many more visitors than Dreamland. We have also drawn attention to Southend-on-Sea, which has an amusement park on the main seafront area, which is smaller than Dreamland, and which has been upgraded over the last few years and has resulted in a huge increase in visitors to both the park and the town as a whole.
- 5.3 We have also drawn attention to the heritage of the Dreamland site, which is unique in this country and should therefore be protected for the benefit of the town as a whole. The Scenic Railway roller coaster is the UK's oldest operating roller coaster and is the country's only listed amusement park ride. It is considered to be of international importance.
- 5.4 The Campaign is also aware that there is operator interest in taking on the park. We have been approached by a number of established operators, one of which (a major international theme park operator) is now working closely with Campaign members to bring forward proposals for the site. These proposals are for the redevelopment of the site, potentially with new, but complementary, land uses alongside an upgraded amusement park, and with improved linkages to the rest of the town and seafront area.
- 5.5 Policy T11 was recently amended by the Council following representations from the owner of Dreamland. The Council has confirmed to the Save Dreamland Campaign that these changes were made solely because the Council did not believe that Dreamland would be viable. It was also based on the premise that Dreamland required a similar catchment to Thorpe Park or Blackpool. We have now provided evidence that conclusively demonstrates that both of the above assumptions are incorrect.
- 5.6 We have therefore proposed changes to Policy T11 and supporting paragraphs 8.49 and 8.50, which essentially revert to the original wording of the policy, as amended following the consultation. This wording will ensure that proposals that would lead to a reduction in the attractiveness or tourism potential of the amusement park will be resisted. Exceptionally, development of a limited part of the site may be accepted as part of a comprehensive scheme for the upgrading of the amusement park. We have also suggested that reference is now added to the need to retain the Scenic Railway, as the ride was not a listed building when the First Draft Local Plan was published.
- 5.7 We confirm that the Campaign will be represented at the public inquiry and will wish to make the above points to the Inspector.