

**A Strategic Urban Design Framework for Central Margate
Comments of the Save Dreamland Campaign, April 2004**

Paragraph	Page	Comments
1.1	1	States that the project is co-funded by Stadium Developments, described as “the developers of the Dreamland site”. It therefore comes as no surprise that complete redevelopment is taken as the starting point for Dreamland.
1.1	1	The background section fails to recognise the town’s biggest single commercial tourist attraction, Dreamland, as part of the town’s “appeal”. This is puzzling.
1.1	1	Accepts Dreamland as a “key attraction” until its closure at the end of 2003. This should be qualified that it was closed due to the owner wanting to sell the site for redevelopment, not because it is no longer viable. We provide evidence on its viability below.
1.2	2	Describes Dreamland as “one of the traditional pillars” of the seaside trade. We would support this.
1.2	2	This paragraph states that, as Dreamland is no longer in operation, this is an “opportune time” to look at options. We wouldn’t disagree - this is a time to consider whether the retention of a major amusement park at Margate is the best opportunity for its future, or whether an alternative use would be more appropriate. We hoped that this is what the Masterplan was going to consider; unfortunately, that was not the case.
1.3	3	This paragraph describes the Masterplan as being the outcome of a process involving a range of detailed technical studies, including discussions with landowners and other interested parties. The Save Dreamland Campaign, which represents 13,000 people, was not consulted, despite the Council promising that we would be. Nick Laister had a brief telephone conversation with Andy Karski (Tibbalds) at which he requested a meeting. This telephone conversation was cut short, and a further short telephone conversation with Chris Evans (The Tourism Company) did not result in campaign members being granted a meeting. Since then, no telephone calls have been returned by either Tibbalds or The Tourism Company, despite the fact that the Save Dreamland Campaign had important information on the viability of Dreamland, and the interest in the park of established operators, which would undoubtedly have resulted in a very different conclusion to the Study.
2.1	5	The idea of the “whole of Margate becoming a tourist attraction” is a praiseworthy vision, if it can be delivered, but the Masterplan should recognise the importance of private sector tourist attractions as one of the main foundations of Margate’s tourism trade. Southport and Southend, amongst others, have based their regeneration on successfully harnessing private sector investment. The Blackpool New Horizons Masterplan (EDAW) - a commendable piece of work; forward thinking and realistic – recognises the need to retain and enhance the town’s existing strengths and building on, not replacing, that. Unfortunately, the Margate Masterplan is not grounded in this level of realism.
2.1	5	Only two paragraphs later, Turner Contemporary is described as “an iconic building that will attract visitors...” This emphasises the need for tourist attractions that will attract visitors to the town.
2.1	5	One of the aspirations is that Dreamland “will have been developed so that [it forms] a new piece of the town centre...a place with its own identity, with streets and buildings and open spaces.” We consider this to be seriously underselling Margate. The Dreamland site is a major tourist attraction, a magnet for people

		<p>visiting the town. To replace it with just “another piece of the town centre” is to lose an important asset in the heart of the town’s tourist area, which can never be replaced. If people want to visit the “town centre”, with streets and buildings, they can already do that. Surely the Dreamland site is an opportunity for much more than just “streets, buildings and public spaces”? What would be so special about that?</p> <p>A further point in relation to this aspiration (note: ‘aspiration’ seems an odd word to use when describing something that is fairly mundane in comparison to what the site has been used for in the past!), is that – in planning terms – the site should not be described as “town centre”, as the Council would find it impossible to reject major retail development, such as supermarket or retail park, on the site. If it is described as “town centre”, then retail development in this location would meet the PPG6/PPS6 sequential test criteria.</p> <p>References to the “town centre” should be removed. This site is a tourism site, not a town centre site.</p>
3.2	10	<p>Figure 3.4: Dreamland is described as an area with “little character”. Whilst it is accepted that it is currently run down, the park has an open, amusement park, character. With its landmark Cinema entrance and one of the most important pieces of the world’s amusement park heritage, the Scenic Railway, we would strongly disagree with this narrow, ‘townscape’ approach to defining character areas, which is not a helpful approach when dealing with tourist attractions and seaside resorts. It is accepted, however, that the park is currently run down, due to the actions of its current owner preparing the site for redevelopment. The gradual removal of rides, buildings and landscaping, has undoubtedly diminished its ‘classic amusement park’ character, but important elements remain in place and amusement park operators have confirmed that it is viable to bring this character back. The park does not, however, have the sort of urban, town centre streetscape that the consultants appear to be looking for. Their lack of understanding of tourism is worrying.</p>
3.3	11	<p>Figure 3.3: This figure does not recognise the Scenic Railway as a key landmark. It is one of the only internationally important landmarks in Margate, and its exclusion from this figure is inexplicable.</p> <p>It describes the Dreamland site as an “area of poor quality townscape”. This is an amusement park, not part of the urban scene – it should therefore not have been covered by this description, as it is misleading. As a large, open tourist attraction, with an attractive wooded backdrop, it is unique in Margate, and this should have been recognised by the consultants. This open character should be retained for tourist use, not engulfed by the town centre. It is more properly described as a “tourist attraction in need of investment”.</p>
3.4	12	<p>We note that Dreamland is defined as a site at risk from flooding in the Local Plan. It is therefore not suitable for intensive development, certainly not residential use.</p>
3.4	13	<p>Figure 3.11 identifies Dreamland as one of the “key destinations” along with the Beach, Marine Terrace and Turner Contemporary. It should therefore be a priority of the Masterplan to retain the site as a key destination, not become just another part of the town centre. The proposals appear to be to break the site up, which would be a serious loss to the town.</p>
3.5	14	<p>Figure 3.13 identifies Dreamland as an “existing destination/attraction” (3. Dreamland and the Scenic Railway). Note that it is identified as a destination; compare this with the proposals for the site on page 35 – will it still remain a destination?</p>
3.6 - 3.7	15 -16	<p>Figures 3.14 and 3.15 recognise the Dreamland Cinema and Scenic Railway as “key historic/landmark buildings”. We agree with this, but</p>

		it contradicts earlier figures where these buildings are not recognised.
3.8	17	<p>On Figure 3.16 most of the Dreamland site appears to be shaded in a colour that is absent from the key!</p> <p>We quote: "...creating new pedestrian links through the Dreamland site so that this area becomes <u>another piece of the town</u>." This is one of the most worrying sentences in the document, and potentially the most damaging to Margate. This site is a major asset for Margate, much more than just another piece of the town. It should not be lost to 'masterplanning for the sake of masterplanning', which seems to be what is happening in this case. The site has a distinctive purpose and use, which will be completely lost if the proposals within this document (which we deal with below) are implemented.</p>
3.8	17	The Scenic Railway is described as a constraint. We consider it to be a major asset and opportunity (confirmed by all the theme park operators that have met with the Council Leader). With more imagination than these consultants have used, the Scenic Railway, and Dreamland in general, could be the catalyst for the regeneration of this part of Margate's sea front as a family tourism destination.
4.1	19	<p>Figure 4.1: Dreamland is labelled as a "new character area". The consultants should be trying to build on what the site has – some of the most distinctive and well-known symbols of the town to outside visitors.</p> <p>The Challenge – This recognises the role of Turner Contemporary (which is good), but surely the consultants should not wipe away the best that Margate already has (or are they fooled by the owner of Dreamland's attempts to prepare the site for redevelopment?)</p> <p>Dreamland is the biggest single commercial tourist attraction in the town and its removal would expose Margate to an unacceptable risk. Again, the acclaimed Blackpool Masterplan should be used as a model – in this Masterplan, the consultants have built on the town's existing strengths, whilst at the same time introducing something new to complement what the town already has. In Margate, the approach seems to be to wipe away the best of what Margate has (and Dreamland – under a different operator most certainly falls into this category) in the hope that a new type of visitor comes along. Why can't Margate have both? What will families do (besides the Beach – which isn't always an appropriate place to spend the day)? With this Masterplan, there is the risk that Margate will be left with nothing.</p>
4.2	20	Figure 4.2 shows a substantial part of Dreamland in use as a town centre car park. This is not very imaginative!
4.3	21	<p>We generally support the pedestrian linkages, as this is something that can definitely be improved. However, it should be identified that, for security, parts of the Dreamland site will need to be closed at certain times of the day/season. Theme park operators have already committed many millions of pounds to the development of a major regional family theme park on the site. This will represent a large private sector investment in the town, and security will therefore be needed. This constraint should be acknowledged, as will result in an overall benefit to the town.</p> <p>These new links will all provide access to the amusement park, which is a benefit. The new road frontage (created by the link road) is welcomed by prospective operators as it gives the park a new frontage from which to promote itself to car-borne visitors to the town.</p>
4.4	22	Figure 4.4: We support the identification of the Dreamland site as having a key tourism activity role (although we consider that this is not followed through later in the document). This is very important to Margate, although how it can happen if it is just "another piece of the

		<p>town” is not known!</p> <p>We support the use of the new gap in Marine Terrace caused by the fire as a link to the site. This will give the new amusement park much greater prominence. All the interested operators have confirmed to us that this will be a benefit to the park.</p> <p>The supporting text states that “the Dreamland site should create a significant new node for visitor related activities with strong links to Marine Terrace and the Beach.” Whilst we support the general thrust of this, we question the use of the word “new”, as it already acts in this way (or at least it did, until the present owner commenced its gradual closure about 4/5 years ago) and the only serious offer on the table at the time of writing is from operators wanting to acquire the site and invest in its use as an amusement park.</p> <p>The text states that existing tourism attractions should be retained and enhanced wherever possible. This is a worthy approach, but it has only been selectively implemented by the consultants.</p>
4.5	23	<p>Correction. The consultants state that the entire study area is in the town centre. This is incorrect (see the Local Plan). Nor should this be the case, as it would allow major retail development across a wide area which could undermine the vitality and viability of Margate’s town centre. Much of the study area is actually in tourism use. Perhaps this misunderstanding is the cause of the consultants’ extremely poor proposals for the Dreamland site. Certainly, it is a fundamental flaw of the entire study.</p> <p>We do, however, support the seventh paragraph, which states that retail would only be acceptable within the ‘retail zone’. It is important to concentrate this type of development in the town centre to maximise vitality and viability.</p>
4.6	23	<p>We object strongly to the identification of the Dreamland site for new build development. Dreamland is a unique site in Margate in that it is an open amusement park site close to the seafront that provides facilities that attract tourists to the town in large numbers. Whilst we accept the need for more all-weather attractions in the town (and, indeed, the Dreamland site is an ideal location on which to provide this type of facility as it would have a synergy with the amusement park). It is a major opportunity for tourism-based regeneration. But once lost, a site such as this for a major tourist attraction cannot be replaced. It should have been identified as a tourist site of open character, centred on the magnificent Scenic Railway, but with potential for development within this overall framework.</p> <p>This section goes on to state that the “form of development on opportunity sites should be based on streets and development blocks”. Fundamentally, this is an extremely disappointing approach to the site. Dreamland, as an existing open tourist site, should be an exception. It would be a completely wasted resource to put standard urban streets onto this site, which should be a top asset for the town. As stated above, this is a site for a tourist attraction and once lost to redevelopment the opportunity is lost forever. The site should be protected for tourism use, although it can be acknowledged that there is the scope for some built development if it supports the primary amusement park/tourism attraction use.</p>
4.7	25	<p>Figure 4.7 shows a new public space on the site of the Scenic Railway. This is one of Margate’s most famous landmarks, and is of international importance. We question what the purpose of the public space would be. There are enough roads/buildings/public spaces in Margate; this site should be retained as a tourist attraction.</p> <p>Further down the page, a “park” is proposed. This would seriously undersell Margate. We repeat again that this site is an important tourist attraction, not a municipal park. We question the consultants’ understanding of how Margate functions as a seaside resort, and</p>

		how it attracts visitors. This reference should be deleted.
4.8	26	<p>The summary on page 26 really emphasises how disappointing this piece of work is: a public space (e.g. a park), car parks and streets/buildings as a replacement for one of the UK's most-visited tourist attractions.</p> <p>So far, no consideration has been given to retaining Dreamland. This is due to lack of research (at the stakeholders event on 30 March the consultants revealed that they did not even know that established theme park operators had made formal offers to acquire the site and invest in new rides and attractions, nor do they appear to have considered any case studies). The consultation to date has been inadequate.</p>
5.1	27	<p>The 'Central Development Zone' really includes all the effects of the poor brief, lack of research and inadequate consultation, as they seem to be proposing (in their own words) just "another piece of the town" on an extremely popular (and extremely important) tourist site. It is very disappointing that this poor solution has been brought forward when this site represents such an opportunity for the town.</p>
5.4	34	<p>The first paragraph should be properly explained. Dreamland has only ceased operating because the owner has decided to close it for redevelopment. We have substantial evidence that it is a viable amusement park (from established UK and European theme park operators, from the person who operated the park as a concession in 2003, from the operators of the Scenic Railway in 2003, and from several other sources – if the consultants had cared to return our telephone calls, we would have supplied them with this evidence, and they could have met with interested operators). This paragraph therefore needs to be written to properly explain the context in which Dreamland is being considered.</p> <p>In relation to Dreamland and the Arlington site, the consultants state that it is necessary to consider the sites together as "neither site, considered in isolation, is capable of delivering the desired transformation in quality". Whilst we accept that the preferred option should be to deal with both sites together, had the consultants done their homework, they would know that Dreamland can be completely revitalised and upgraded as a modern family theme park almost immediately. Operators are ready to acquire the site at full independently assessed market value and invest millions of pounds in the site's infrastructure and attractions. Operators have met with the council and this has been confirmed.</p>
5.4	35	<p>The first bullet points deal with options for the future of the Scenic Railway. We deal with each in turn:</p> <p>The first bullet point is completely incorrect. They appear to rule out investment in an amusement park on the site. Are the consultants not aware of other successful seaside amusement parks that have received substantial private sector investment and which have resulted in large increases in visitor numbers (and good returns on their investment).</p> <p>Without a doubt, the market has moved on from the type of attractions that have been found at Dreamland over the past few years – that doesn't mean that the market has moved on from seaside amusement parks.</p> <p>They state that "new theme parks [are] generally larger than Dreamland". Not at the seaside. There are many successful seaside parks at sizes similar, or much smaller than Dreamland. Pleasure Beach at Great Yarmouth (1-1.5 million visitors), Pleasureland at Southport (2.5 million visitors) and Adventure Island at Southend-on-Sea (1.5 million visitors) are just some examples of similar operations.</p> <p>The consultants state that the investment would be difficult to justify.</p>

	<p>Southend's Adventure Island has had a significant investment in rides, attractions and infrastructure over the past 5 years or so, and the owners have pledged a similar investment at Dreamland in writing (see the attached letter from Stockvale Ltd, the owners of Adventure Island). Other operators, including Grevin & Cie – one of Europe's biggest theme park operating chains - have approached the Campaign with a similar interest in acquisition and investment. The statement on investment is therefore wholly incorrect. Of course, ill-informed documents such as the Margate Masterplan could result in this sort of opportunity for investment being lost by artificially inflating land values, making capital intensive operations like theme parks impossible to bring forward. Again, the consultants should have known this, as it is a fundamental reality of tourism planning and resort regeneration, but it appears that they do not. The second bullet point discusses the retention of the Scenic Railway as a "symbolic feature" within another form of development (possibly with occasional operation). Again, this demonstrates a lack of understanding on the part of the consultants. Whilst the ride proved itself as being capable of operating as a self-funding, stand-alone attraction in the 2003 season (when it was operated as a separate concession by Mr David Collard), we question where the funding for annual maintenance and insurance would come from for the ride to operate "occasionally".</p> <p>The third bullet point is to relocate it to another site in Margate or elsewhere. The Campaign has fully investigated this option by discussing it with engineers who have been responsible for the ride's maintenance over the past 25 years. They all confirm that it would not be possible to relocate the ride, as most of the wood will need to be "ripped" out of the ride, and therefore could not be renewed. The costs would also render the option unviable, especially when compared to the cost of a new wooden roller coaster from companies such as S&S or Vekoma. Also, there is no other site in Margate capable of accommodating it in a location where visitors would be likely to ride it. The fact that it is already in such a location at Dreamland – the site that is allocated for such use in the current adopted Local Plan - does raise the question as to why this option is being considered in the first place. Again, the consultants demonstrate that little work has been undertaken on this option. The final bullet point is demolition of the ride. It is clear from the way the bullet points are worded that this is the option favoured by the consultants, yet on the basis of all evidence we have gathered is without a doubt the least desirable both in terms of Margate's tourism economy and in terms of the heritage of the town. The option that is most likely and viable (i.e. retention within an amusement park) is virtually written off on purely on the basis of inadequate background work, and yet the least desirable option for Margate's future is clearly favoured.</p> <p>The final line ("the justification for the removal of the Scenic Railway should include the exceptional quality of redevelopment proposals and their benefits to Margate") is particularly exasperating because the consultants (clearly unaware of the large investment committed to the development and operation of a modern theme park) have not proposed any sort of quality <u>tourism</u> development for the site at all!</p> <p>The consultants then go on to list a number of potential uses for the site, none of which could be classed as a tourist attraction (with the possible exception of resort casino):</p> <p><u>Commercial leisure uses:</u> These facilities would, we are sure, be</p>
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		<p>welcomed in Margate, but they are leisure facilities (i.e. primarily to serve the local population), not tourist attraction (i.e. attract people into the area). There is some scope for this type of facility perhaps on part of the Dreamland site, operating alongside the amusement park.</p> <p><u>A mix of ancillary A3 uses:</u> These uses could be included within a theme park, but they are ancillary uses, so are not dealt with in detail here.</p> <p><u>A resort casino:</u> This is the only part of the proposals that might potentially act as a tourist attraction. It is not yet known whether the Gambling Bill will give any preference to seaside resorts. Whether Margate is a viable location depends therefore on whether the regional planning bodies, via the Regional Spatial Strategies (the ministerial statement of August 2003 stated that the locations of the largest casinos will be decided by regional planning bodies in their regional spatial strategies) decide to direct resort casinos to Margate and restrict development in other locations. Alternatively, the changes recently suggested by the Gambling Bill Scrutiny Committee would have to be accepted by the Government and implemented. There is no certainty of this. If there is no regional support, it is unlikely that a resort casino will be viable in Margate.</p> <p><u>Hotel development:</u> If viable, this would be welcomed on the site.</p> <p><u>Leisure retailing:</u> This type of retailing would be limited in scale and could be accommodated as part of a revitalised theme park.</p> <p><u>Public open space:</u> The use of the site for public open space would be a missed opportunity. The site is a tourist attraction. With the beach nearby, the need for public open space in this location is believed to be small.</p> <p><u>Public sector sporting facilities:</u> This is not really an appropriate site for this type of facility. This will not attract tourists to Margate.</p> <p>The consultants' proposals are completely unacceptable – the Save Dreamland Campaign, which includes many of the town's leading tourism businesses, does not support the proposals. It is based on poor research, lack of knowledge of the tourism industry and seaside regeneration, and insufficient stakeholder consultation. It is particularly infuriating because not one of the options proposed is an amusement park, yet this is the only serious proposal currently on the table, and it would also have the benefit of securing the retention of the Scenic Railway. Consultants should be asked to reconsider the Dreamland site in its entirety once they have undertaken the necessary background work, research and consultation, i.e. when they have all the facts in front of them. At the very least, an amusement park should have been one of the options.</p>
6.1	39	<p>The most surprising conclusion, given the comments we make above, is the fact that the consultants state: "in the current fragile property market, a mix of uses and form of development that is in line with client group aspirations will be difficult to achieve without intervention". Yet there is a proposal 'on the table' from an established theme park operator to acquire the site at full market value, invest in its attractions and infrastructure, restore the Scenic Railway, and create a major regional tourist attraction in the town. This can be achieved without intervention and would ensure Margate's regeneration as a major seaside resort. It really beggars belief that scenario did not make it into the list of options, and was excluded from the Questionnaire!</p>