

REVISED DEPOSIT DRAFT THANET LOCAL PLAN

Proof of Evidence of

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On behalf of the Save Dreamland Campaign

Objector Ref: 4006/10277-10279

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Save Dreamland Campaign

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1.0 Introduction

- 1.1 My name is Nick Laister. I am a Chartered Town Planner and a Technical Director at RPS, the UK's largest planning consultancy. I am also a member of the Irish Planning Institute and a Member of the Institution of Highways and Transportation. I have significant experience of working within the tourism industry as a planning consultant, and I advise a number of the UK's leading tourism and leisure operators/developers. I have been invited to speak at several conferences on planning for tourism and leisure and I have written a number of articles for newspapers and journals including Planning Magazine, Estates Gazette and Heritage Today.
- 1.2 In 2001 I wrote to the DCMS suggesting that the Scenic Railway roller coaster – the oldest surviving roller coaster in the United Kingdom – be considered for listing. Following a positive recommendation from English Heritage the ride was listed in March 2002.
- 1.3 In January 2003 I set up the Save Dreamland Campaign, with the help of Sarah Vickery (Vice Chair of the Isle of Thanet Tourism Association and owner of the Grade I listed tourist attraction The Shell Grotto, Margate). The Campaign now speaks on behalf of 13,000 people who are concerned about the impact that the redevelopment of Dreamland will have on Margate's economy and heritage. 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.
- 1.4 I am aware that the current owner of the Dreamland Amusement Park site proposes to close the attraction and eventually 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 this tourism site from redevelopment that would be damaging to Margate's tourism economy and its status as a seaside resort, in the way that the policy was drafted in the First Deposit Draft Thanet Local Plan.
- 1.5 In this proof of evidence I provide further information in support of the Campaign's objections to the proposed changes to Policy T11 (Dreamland).
- 1.6 Section 2 of this proof 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.

2.0 The Importance Of Dreamland

Margate's Tourism Economy

- 2.1 Dreamland is of major importance to the Thanet tourism economy and is a symbol closely associated with Margate. It opened in 1920, and has been Margate's most popular tourist attraction for 84 years. In 1981 it was acquired by the Bembom Organisation, which ran it as a pay-one-price theme park, until 1996 when it was acquired by its current owner, Mr James Godden. Since 1996, Mr Godden has gradually scaled down the attraction by removing rides and closing areas of the park. By the summer of 2003, only approximately one third of the park was in use. Since Mr Godden's acquisition of the park it has operated as a free entry attraction, which is the most common format for UK seaside amusement parks.
- 2.2 Margate as a seaside resort relies heavily on the day visitor trade. Even in its current much-reduced and run-down state Dreamland is the biggest single tourist attraction in the town and attracts several hundred thousand people to the town every year (in 2002 – the last year for which information is available - the park attracted 680,000 visitors to the town, which is a comparable number to many of the UK's leading amusement parks¹).
- 2.3 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).
- 2.4 The weekend of 9 to 12 April 2004 was Margate's first Easter without Dreamland, and the local press is reporting that businesses have been struggling. An extensive report on Margate without Dreamland was included in the Friday 16 April edition of the Isle of Thanet Gazette, and I have included this report at Appendix 1. Many of the visitors interviewed were disappointed to find Dreamland closed and said they will now visit other resorts, such as Brighton and Southend, which have facilities for children. They all complain that there is very little for the children to do, particularly older children. The reporter also interviewed a number of local businesses: the Punch and Judy Pub; the operator of the beach swings and rides; and owners of other seafront businesses. These businesses were also reporting dissatisfaction from their customers with the range of attractions on offer in the town. Local councillor Mick Tomlinson noted the significant drop in visitors and describes the Easter weekend as "the saddest start to a summer season we have ever had."
- 2.5 To investigate whether the continuation of a major amusement park in Margate is a realistic and desirable proposition, I have undertaken a significant amount of research of other seaside parks in the United Kingdom, including visits to several of them. I have researched UK amusement park visitor data to understand the national context for the Dreamland site, its viability, and its likely importance to the town. In particular, I wanted to see

¹ Reference: Visits to Visitor Attractions 2002 (Visit Britain and Insight Division, June 2003).

what sort of visitor numbers other parks in similar towns were receiving, and whether they are successful operations. I then wanted to highlight differences between Dreamland and other UK seaside parks in terms of the way they are operated.

- 2.6 Statistics on visitor numbers to coastal amusement parks are available in the most recent edition of 'Visits to Visitor Attractions' (Visit Britain, June 2003). I have extracted visitor numbers for seaside amusement parks in seaside towns. These are shown in Table 2.1 below (Ref: Table 4.5 of the Visit Britain 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 (Visit Britain, June 2003)

Amusement Park	Seaside Resort	Visitors 2002	Visitors 2001
Adventure Island ²	Southend-on-Sea	1,500,000 (est)	1,500,000
Blackpool Pleasure Beach	Blackpool	6,200,000	6,500,000
Clacton Pier	Clacton-on-Sea	1,750,000	1,000,000
Dreamland	Margate	680,000	700,000
Flamingo Family Fun Park	Hastings	900,000	900,000
Fort Fun	Eastbourne	400,000	NA
Harbour Park	Littlehampton	350,000	380,000
Mannings Amusement Park	Felixstowe	270,000	250,000
Pleasure Beach	Great Yarmouth	1,500,000	1,500,000
Pleasureland	Southport	2,000,000	2,000,000

- 2.7 This shows that Dreamland is broadly comparable with other seaside parks, although those parks which are located in larger seaside towns similar to Margate (Southend Adventure Island, Great Yarmouth Pleasure Beach and Southport Pleasureland) do attract significantly more visitors.

- 2.8 I have visited all of the amusement parks listed above, and have discussed the way in which they are operated with their owners in an attempt to see whether Dreamland could perform better than it currently does. My work has shown that there are a number of key reasons why the three parks mentioned above secure higher visitor numbers than Dreamland. They each offer some or all of the following, none of which apply to Dreamland:

- 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);
- 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

² Information from Southend Borough Council

- they have dedicated coach and group booking teams.
- 2.9 Despite the fact that Dreamland is still the Isle of Thanet's leading commercial tourist attraction, it could clearly expect to attract visitor numbers similar to the parks at Southend, Great Yarmouth and Southport, were the park to be operated in the same way.
- 2.10 The parks in the table 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 almost 700,000 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. Later in this proof, I look at the sort of developments that are likely to replace Dreamland and, with reference to the number of visitors they would be likely to attract to the town, I consider whether it is appropriate for the Local Plan policy for this tourism site to have been weakened in the way that it has over the past twelve months.
- 2.11 In recent years it has been proven that amusement parks can be the focus for the regeneration of seaside resorts. Taking an 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. In 1995, Stockvale Ltd (a family-run business which has owned the park since 1976) expanded the park onto a former boating lake to the east of the Pier, approximately doubling the park's size (the park was originally much smaller than Dreamland). Over the intervening years, following continual investment in new rides and attractions, along with general park improvements, the park grew to become one of the UK's leading seaside amusement parks. With modern rides alongside the existing vintage attractions and attractive food outlets and gift shops, it is now an extremely good family day out, and is highly regarded within the industry. It is also a highly successful, profitable business. It 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.

- 2.12 Appendix 2a is a series of photographs taken in 2003 when the Save Dreamland Campaign visited Adventure Island. Appendix 2b is a series of photographs taken at Dreamland in the same year. These show clearly the significant difference in the environment of the two parks, which is entirely a result of the differing level of investment and commitment to operating the sites by their respective owners.
- 2.13 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.
- 2.14 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 2 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).
- 2.15 Another relevant case study is Pleasureland Amusement Park, Southport (Merseyside). In the 1990s the park was acquired by the Thompson family, the operators of Blackpool Pleasure Beach. Like the aforementioned Miller family, this is an experienced and committed operator with a long history in the amusement park business. Their investment and experience has turned this languishing council-owned amusement park into a major regional tourist attraction. In 1994, the park attracted 1 million visitors; by 1999 this had increased to over 2 million. The park continues to receive investment and continues to prosper.
- 2.16 Appendix 3 provides statistics showing the increase in visitor numbers at Southend-on-Sea and Southport. 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 3 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 to the Save Dreamland Campaign by the respective councils.
- 2.17 I 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. This has been confirmed by interested operators, which I will deal with later in the report.
- 2.18 I am 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 ancillary facilities for visitors already in a town). It is unlikely - in my view - that a retail

or leisure use can be found for the site that could be a comparable tourism draw to Dreamland. Certainly, no use has yet been put forward by the site's owner, the Council or their consultants (see my comments below on the Margate Masterplan).

- 2.19 Dreamland is a well-known symbol of Margate across much of the south-east of England, including large parts of London. Dreamland (which includes the amusement park, entrance cinema and Scenic Railway) is, in my view, the most famous landmark in the town. It is also my 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, the Tudor House and Margate Museum, as well as good quality entertainment venues at the Theatre Royal and Winter Gardens. The proposed Turner Contemporary 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 redevelopment could seriously undermine the opportunity for regeneration by removing the most famous and successful tourist attraction in the town, with nothing in the pipeline to replace it.

Heritage

- 2.20 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, is historically important. Together, the component parts of Dreamland have come to define Margate.
- 2.21 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. Through the second half of the Twentieth Century, most of these were demolished. 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 does limit 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 then keeps a check on the speed throughout the rest of the ride.
- 2.22 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. (The report I issued to English Heritage in May 2001, which resulted in the Scenic Railway becoming a listed building, is enclosed as Appendix 4). The listing entry (Appendix 5) states:

“Developed by John Henry Iles, who bought the European rights for the Scenic Railway from Coney Island, New York, whence he imported the moving parts. Timber lattice structure supporting double loop of iron tracks, with pulleys and endless steel rope to two haulage slopes; the trackway sunk between railed walkways for a stable ride and sharper bends. Two trains, each of three permanently linked cars with brakeman, one of only two rides in England with a train controlled by a brakeman riding on the vehicle (the other is that of 1932 at Great Yarmouth).”

2.23 The entry goes on to set the ride in its historical context:

“This is the oldest surviving rollercoaster in Great Britain, and one of just two examples of a surviving Scenic Railway. Although repaired after fires and regularly maintained, with a repair programme of new planking each spring, the form of the ride is the original. The only rollercoaster in Europe known to be older is that at the Tivoli Gardens, Copenhagen of c.1914, which this closely resembles.”

2.24 We consider this ride to be of international importance³. Submissions on the historical importance of the ride are included at Appendices 6 and 7. Appendix 6 is a submission from Robert Preedy, the author of several books on roller coaster history. Appendix 7 is a submission from Jim Futrell, Historian at the US-based National Amusement Park Historical Association. These add to the submission I made to the DCMS and English Heritage and, I think it would be correct to say, I had probably underestimated the international historical importance of this ride in my 2001 submission.

2.25 In 2003, the Scenic Railway was operated as a concession, separate from the rest of the park, by Mr David Collard. Mr Collard has operated the Scenic Railway for a number of years, acting as engineer and brakeman. A letter from Mr Collard is attached at Appendix 8, which confirms that the ride is financially viable even as a stand-alone attraction. Taking into account the costs associated with operating the ride (the lease, insurance, maintenance, staff costs), Mr Collard had a successful year. The ride made an operating profit in the 2003 season, even with the surrounding park being in such a sorry state. In pure listed building terms (set out in PPG15, see the next section), there can therefore be no justification for the demolition of the ride.

2.26 It is clear that, if this ride were to be demolished, it would mean the loss of the only unaltered scenic railway roller coaster in the country. It is now, however, much more evident to me that its demolition would be unnecessary in policy terms. I return to this in the following section.

Dreamland’s Viability

2.27 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

³ 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.

regeneration of this part of Margate's seafront area. This would act as a balance to the 'cultural quarter', which will be based around the development of the Turner Contemporary and the regeneration of Margate's Old Town. 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.

- 2.28 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, attractions and infrastructure, then there is very little basis on which to suggest that the amusement park should be retained. 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.
- 2.29 In addition to the above, I can confirm that the Campaign has been approached by a number of established operators who have expressed a serious interest in acquiring the park, restoring the Scenic Railway and investing several million pounds in new rides and attractions. These operators originate both from the UK and overseas. Indeed more than one offer has been made for the park at full, independently-assessed, market value. I present more information about this in Section 4 of the report. However, this fact – taken with the evidence I present above on other seaside towns - does provide a pretty compelling endorsement of my view that Dreamland is viable. Even the travelling fairground operator who took 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 (Reference: Park World Magazine).
- 2.30 All the evidence before the Council suggests that Dreamland is a viable tourist attraction. Clearly the site may have more development value for commercial leisure and retail, but this 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

- 2.31 It is clear from my research that Dreamland is one of the main planks of Margate's tourism economy. It draws hundreds of thousands of people to the town every year. Its central ride, the Scenic Railway, along with the Dreamland Cinema, are hugely important parts of Margate's heritage, and are strongly associated with the town by those visiting from outside the town. The park has clearly been run down by its current owner as the site is prepared for redevelopment, but I urge the Inspector to ignore this when considering the park's viability. I have demonstrated that seaside amusement parks in other resorts are booming, and the best run parks have seen significant increases in visitor numbers. Some have been the catalyst for their respective resorts' regeneration. But can this be the case for Margate?
- 2.32 As I will demonstrate in Section 4, no other alternative use for the site has yet been found by the owner, the Council or their consultants. Yet there is still strong interest from major theme park operators to acquire and operate the site and – importantly – to revitalise it. I consider that there is no other land

use that can attract the number of visitors to Margate that Dreamland does, nor provide the same opportunity for regeneration. Indeed, without the park, Margate will struggle to compete with other seaside resorts in the region (as we have already seen this Easter, Appendix 1). Indeed, were it not for the uncertainty caused by the weakening of the Local Plan policy since early 2003, it is my view that the park would now have a new owner, and Margate would have a much brighter future. The Local Plan needs to end this uncertainty and provide a firm basis for Margate's regeneration. I return to this in more detail in Section 4.

- 2.33 As stated in my representations to the Plan, it is still my view that it is not necessary to retain all of Dreamland as an amusement park. But, even if part of the site is released for other complementary uses, it is important that the amusement park should remain the central attraction, as the site is of such importance to the town's tourism economy. I have, however, been told by operators that the best option would be to retain the entire site to create a tourist attraction of a larger critical mass.
- 2.34 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. In the following sections, we set out how we believe Policy T11 should be changed to ensure this site is protected.

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 my 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.

Proposed Alterations to Regional Planning Guidance, South East – Tourism and Related Sport and Recreation, South East England Regional Assembly (May 2003)

- 3.13 This forms one of a series of documents that form part of the proposed alterations to RPG9, and which will, under the Planning & Compulsory Purchase Act, become the Regional Spatial Strategy for the area, part of the statutory development plan for the Isle of Thanet.

- 3.14 Policy TSR5 states that:

“Priority should be given to improving the quality of all existing attractions to meet changing consumer demands and high environmental standards in terms of design and access.”

- 3.15 It states that ***“Development plans should...encourage the enhancement and upgrade of existing visitor attractions...”***. This is something that the Policy T11 was achieving until it was changed at the last minute by Thanet District Council, despite the outcome of the statutory consultation being to strengthen the policy.

- 3.16 Paragraph 1.27 provides a useful definition of a visitor attraction, which I will return to later:

“A visitor attraction is defined by the tourism industry as a ‘permanently established excursion destination, a primary purpose of which is to allow public access for entertainment, interest or education, rather than being a primary retail outlet or a venue for sporting, theatrical or film performances’ (‘Action for Attractions’, English Tourism Council, 2000).”

Destination South East, South East England Regional Assembly (May 2003)

3.17 This document is the supporting statement to the 'Proposed Alterations to Regional Planning Guidance, South East –Tourism and Related Sport and Recreation', and includes some useful statistics and guidance.

3.18 Paragraph 2.2 picks up the theme in the main document about the definition of tourism and tourist attractions, and how they differ from leisure developments:

"The English Tourism Council (ETC) suggests that tourism can be distinguished from local leisure activity by regularity of use...Tourism and related recreational activities are generally planned, non-routine or longer trips which can be overnight."

3.19 Paragraph 2.3 states:

"Many trips to tourism attractions or destinations will have considerable economic spin offs for retail and other leisure related activity (eg restaurants and bars) and can in many areas exceed the economic benefits arising directly from visitor spend at specific tourist attractions."

3.20 These definitions are particularly useful in the case of Dreamland and Policy T11, as Dreamland is a visitor attraction that undoubtedly supports the surrounding leisure and retail businesses. The number of local businesses that are members of the campaign is, I consider, testament to that. But to replace it with local leisure or retail development would – in my view - have far-reaching consequences.

3.21 Page 14 of Destination South East contains a case study which examines the economic impact of tourism. It looks at the Royal Borough of Windsor and Maidenhead, which has two of the UK's Top Twenty paid attractions (Windsor Castle and Legoland Theme Park) within its boundaries. This shows that jobs created by the tourist attractions extend outside the tourism businesses to include, for example, retailing in the nearby town centres. This results in more retail and leisure activity than would normally be expected for towns of that size. In other words, the tourist attraction brings people into the town, and these people spend their money in shops, restaurants, bars and leisure facilities. This is relevant in the case of Dreamland in terms of the wider economic benefits resulting from associated expenditure, for example on shopping and dining. If the main reason for people visiting the town is replaced by leisure or retail, then this economic benefit would be lost.

3.22 Map 2.6 of Destination South East identifies the Isle of Thanet as an 'Area of High Tourism Activity', but, as Map 2.4 shows, it only has a single attraction receiving more than 100,000 visitors per year. That attraction is Dreamland. This demonstrates the huge economic importance of Dreamland to the area.

3.23 Page 39 includes a case study of Eastbourne, from which a number of lessons could be learnt:

"Eastbourne, like many seaside resorts, recognised the potential decline of its tourism industry as markets changed during the past decades. To respond to

this and protect the town's tourism, the council has actively used planning policies to protect and enhance the industry."

- 3.24 The town has used planning policies to ensure that tourism remains central to the town's economy:

"A 'tourist accommodation area' is identified in the local plan which seeks to prevent change of uses away from tourist accommodation and developments incompatible with tourism. This has the effect of protecting the tourism sector and actively retaining tourist accommodation in the main tourist area. The approach has been vital in ensuring tourism remains central to the town's economy."

- 3.25 The Council aims to support and enhance its tourist attractions:

"This has been supported by the inclusion of 'tourist enhancement zones' in the local plan. These identify the 'preferred location' for the development of tourist attractions. In addition to helping Eastbourne maintain a sector that is vibrant and successful, the policies have also helped improve the quality of Eastbourne's urban environment. This has been a significant benefit for local residents as well as visitors."

- 3.26 Paragraph 7.5 gives clear guidance on planning for existing major tourist attractions such as Dreamland:

"Nationally the ETC has expressed concern over the long term viability of many attractions and has recommended that priority is given to funding improvements to existing attractions rather than the creation of new attractions. Within the South East, further provision of large attractions is unlikely to significantly expand the overall volume of tourism and may have adverse implications for existing attractions. 'Regionally-significant' attractions (defined as those attracting at least 250,000 visitors per annum) should only be encouraged in exceptional circumstances, where the overall market for tourism could significantly expand. Elsewhere the priority should be to invest in the enhancement and upgrading of existing attractions to ensure they meet consumer demands and high environmental standards."

- 3.27 Clearly the priority in Margate should be to enhance and upgrade Dreamland as the Isle of Thanet's only major commercial tourist attraction, not to replace it with a different land use.

Kent and Medway Structure Plan Deposit Draft 2003

- 3.28 The Revised Draft Thanet Local Plan is being prepared in the framework set by the adopted Kent Structure Plan 1996. However, the Deposit Draft Kent and Medway Structure Plan 2003 includes some relevant up-to-date policies for the Isle of Thanet which are of general relevance to the regeneration of Margate. In particular Policy EK3 relates to the Margate seafront area, and states:

"Developments which will contribute to the regeneration of the central and seafront areas of Ramsgate and Margate, including cultural and tourism-related proposals, will be supported. This includes initiatives for Ramsgate Waterfront and Margate Old Town."

3.29 Again, tourism is recognised as a key catalyst for regenerating Margate's seafront area.

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. I wrote to Thanet District Council on 12 February 2003 on behalf of the Save Dreamland Campaign, 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 9) 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 10). 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 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.
4. 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.
5. 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.
6. 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 11). 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 12), 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 tourist attraction 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 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.

Objections to the Revised Deposit Thanet Local Plan

- 4.13 The Save Dreamland Campaign's representations ('Revised Deposit Draft Thanet Local Plan: Representations of the Save Dreamland Campaign', May 2003) were duly made in the statutory consultation period. This provided evidence on the importance of Dreamland to Margate's tourism economy and heritage, and provided further evidence on its viability. It requested that Policy T11 reverts back to the Policy on which the Council had consulted, and that a reference to the listed Scenic Railway be inserted. English Heritage also made a request to insert a reference to Dreamland's listed status in its objections to the Local Plan (letter dated 8 May 2003 from Steve Williams, Land Use Planner, English Heritage).
- 4.14 The Council produced a Schedule of Responses (undated) to representations made. I think it is important to note at this stage that more representations were received on the Dreamland policy than any other policy in the Revised Deposit Local Plan, and most were asking for the Policy to revert to the wording on which the Council had consulted and which was supported by the vast majority of local residents and businesses that responded.
- 4.15 In response to the request by Save Dreamland Campaign and English Heritage to make reference to the listed building status of the Scenic Railway/Dreamland Cinema, the Council stated that it considers that general local and national policies would be sufficient to ensure that consideration is given to these issues. The Save Dreamland Campaign considers this response to be inconsistent with their approach elsewhere in the Plan (for example, paragraphs 2.88.3, 2.93.1, 2.93.6, Policy EC12, Policy H4, paragraphs 3.59, 4.33, 4.52.9, Policy TR17, paragraphs 6.31, 6.39, 6.44, 6.60, 6.66, 8.39, 8.52 and 11.34), some of which refer to specific structures. I consider that, given the landmark status of the Dreamland Cinema and Scenic Railway, and their importance to the town's tourism economy, specific reference should be made to these structures in Policy T11.
- 4.16 In its response to the other objections of the Save Dreamland Campaign and numerous other individuals, Thanet District Council stated that Policy T11 has been rewritten to allow for more flexibility and "*to ensure that appropriate opportunities for the future of the site are not lost.*" Yet, it is clear from the events of the past few months that it is the very rewording of the policy that has already meant that significant private sector investment in the tourist attraction has been lost. I deal with this point in more detail below, particularly the attempts of established theme park operators to acquire the site. In summary, however, the fact that this policy would now allow non tourist attraction development on the site is exactly the reason why no operator has so far been able to secure the site. It has created uncertainty and hope value for the site's owner. Much-needed investment in Margate as a seaside resort has therefore already been lost. We consider that this policy needs to revert back to the original wording as a matter of urgency as damage is already being done.

4.17 The Council also states that *“the current policy does not preclude the continued use of the site as an amusement park.”* It does not preclude the continued use of the site as an amusement park by the current owner but, of course, it does virtually entirely rule out an alternative operator acquiring the site due to its impact on land values. I consider this response to be both disingenuous and somewhat naive. Development plan policies have far reaching consequences for land values, most notably in the allocation of farmland for housing. The situation in Margate is no different, except that here we are talking about a land use on which the entire resort depends. In my experience of working as a planning consultant within the tourism industry, I can confirm that this policy, as drafted, does pretty much preclude the acquisition of the site for tourist attraction use and therefore its future use as an amusement park. This is an important site in tourism use, and the Development Plan needs to continue to allocate it as such or it will cease to perform that purpose in the future.

4.18 The Council’s Schedule of Responses also makes further reference to the request of the Save Dreamland Campaign and numerous individuals to make specific reference to the Scenic Railway:

“With regards to the listed scenic railway, policies relating to listed buildings are included within the Heritage chapter of the local plan, and these together with national guidelines must be fully considered if any proposals for the redevelopment of the area around the scenic railway are brought forward. In view of these, there is no need to add further prescriptive policies within the Local Plan.”

Again I wish to point out that the Council has considered it to be appropriate to make references to heritage and listed buildings considerations in many parts of the Local Plan (see paragraph 4.15 above). Given the landmark status of Dreamland and its Scenic Railway, and its importance to the town’s tourism economy, I consider that there is justification for this reference.

4.19 The Council also makes reference to the appointment of consultants to produce a Masterplan for Margate’s seafront and the Dreamland site:

“Consultants have been appointed to carry out a study of Margate seafront and the Dreamland site will form one of the key elements within the overall strategy. The revised policy sets out the important issues and criteria that would need to be considered in respect of any proposals for the redevelopment of Dreamland, and it would be inappropriate to make changes to that policy until the full outcome of the Masterplan study has been received and assessed. The Masterplan study will be completed prior to the opening of the Local Plan inquiry and it is anticipated that this will be submitted as evidence to the inquiry.”

Unfortunately, the draft Masterplan that emerged in March 2004 was extremely disappointing, as it was based on inadequate research, inadequate consultation, and does not treat the Dreamland site as a tourism site in land use terms, but as a mixed-use town centre redevelopment site. I deal with the Margate Masterplan in more detail below. I do not consider that any weight can be attached to it in this public inquiry for the purposes of considering the Dreamland site, due to its significant shortcomings (shortcomings which I hope will be rectified in the near future).

4.20 The Campaign has also viewed the representations made by Stadium Developments Limited, the development partner of Dreamland's owner. They ask for the boundary of the Town Centre to be extended to include the Dreamland site and identified for new retail development. In their objections to Policy TC1, TC3 and TC7, Stadium Developments Limited admits that this retail development would provide facilities for Thanet's residents, making no reference at all to Margate's visitors.

4.21 Thankfully, the Council stated in its Schedule of Responses that there is no merit in extending the Town Centre to include the Dreamland site as it would be *"inappropriate and detract from the core commercial town centre rather than enhancing it."* I support the Council's view on the extension of the Town Centre.

4.22 The Council also states:

"Dreamland is a key site for the future of Margate. Dreamland is not a retail destination, although a limited amount of complimentary retail development would not be considered inappropriate within the overall site. Dreamland has provided a significant opportunity to provide a major leisure/tourist facility to boost the economy of Margate with emphasis on tourism and leisure with complimentary retail facilities, rather than predominantly retail uses."

I would not disagree that some complementary or ancillary retail development would be acceptable on the Dreamland site, but we consider that it should remain a visitor attraction, not a site for leisure development.

4.23 Stadium Developments Limited supports Policy T11's *"acceptance that redevelopment of part or all of the site is acceptable in principal (sic)"*, but they object to the number of tests required to be passed as part of any redevelopment proposals. They suggest that Policy T11 is reworded to allow town centre expansion. This shows clearly that their vision for Dreamland is one where a tourism policy (T11) actually promotes non-tourism development on the site. I question why Stadium Developments Limited considers that such a policy has a home in the Local Plan's Tourism Chapter!

4.24 In their representations to Policy T10 (sic), Stadium Developments Limited objects to *"the Council's preference for Dreamland to continue to provide a core retail leisure facility to underpin the holiday destination that is Margate"* on the basis of the fact that the amusement park is "run down". We consider that to be a very poor reason for the redevelopment of the site when all the evidence suggests that the site has been deliberately run down for the sole purpose of bringing forward higher value development.

Further Evidence on Dreamland's Contribution to Margate's Future as a Seaside Resort

4.25 The Campaign has been working very closely with two of the operators that had expressed an interest in acquiring the park and operating it. I have been personally involved in meetings with these operators and my comments below are based on these meetings (both with the operators and the Council) and other discussions and correspondence between the operators and the Campaign.

Grévin et Cie

- 4.26 Grévin & Cie is France's largest and one of Europe's premier operators of family amusement parks. It runs a network of fun parks and tourist attractions across France, Germany, Holland and Switzerland. Grévin & Cie was formed in 1989 with the launch of Parc Astérix, a theme park near Paris, France's second most visited theme park.
- 4.27 Grévin is a major international operator, and it has continually confirmed its commitment to acquire and invest in Dreamland since I was approached by the Company early in 2003. I have visited the Dreamland site accompanied by Grévin's VP Development & Acquisitions on more than one occasion. He has confirmed to me that the park is one that it would want to acquire and operate, due primarily to Margate's strategic location in relation to London and the main growth areas of the South East of England (including Ashford and the Thames Gateway). He has also confirmed this at meetings with the Council. 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.
- 4.28 For the purposes of this Public Inquiry, I have agreed a statement with Grévin & Cie's VP Development & Acquisitions, which again confirms their continued interest in acquiring the site:

"Grevin & Cie has a serious interest in acquiring and operating Dreamland, Margate. We consider it to be a viable operation, and with investment it can again be a major regional tourist attraction for the Thanet area."

Stockvale Ltd

- 4.29 Stockvale Ltd is the owner of Southend's Adventure Island, which now attracts 1.5 million visitors per year. In our representations of May 2003, we made reference to this amusement park as an example of industry best practice. The park is modern and attractive (see Appendix 2a of this proof of evidence), it has seen significant investment over recent years, it has had a substantial increase in visitor numbers, and it is generally regarded as the main reason why Southend-on-Sea's seafront area has been successfully regenerated. The Managing Director of Stockvale Ltd, Mr Philip Miller, was awarded an MBE in the 2003 Queen's New Year's Honours List for services to tourism at Southend-on-Sea.
- 4.30 It therefore came as a pleasant surprise to me when I was contacted by Mr Miller in October 2003. Mr Miller said that he had been following our campaign with interest and that we might like to know that he had instructed surveyors Humberts Leisure to independently value the site. He had also funded a feasibility study of the site. An offer had been made on the basis of this independent valuation but had been refused. An increased offer had not received a response. His vision for the site is to create a sister park to Southend's Adventure Island, centred on a restored Scenic Railway. The

entire park would be upgraded to the standard of his Southend park, and operated with the same enthusiasm. It would undoubtedly create a major regional tourist attraction in Margate.

- 4.31 For the purposes of this Public Inquiry, I asked Mr Miller to confirm his interest in writing, which he has done. His letter is attached at Appendix 13, and I think it speaks volumes about the reason for the current stalemate over Dreamland's future.
- 4.32 The letter confirms that an offer has been made for £3.25m, and that the company would *"invest in many new rides over a rolling 5 year programme to create a family theme park of a similar standard to our Adventure Island at Southend-on-Sea."*
- 4.33 In his letter, Mr Miller also confirms our view that it is the Council's willingness to consider Mr Godden's proposals through last-minute changes to local plan policy (that has passed through statutory consultation) and through the co-funding of the Margate Masterplan that is stopping any sale. Mr Miller is in no doubt that if the Council protected the land use of the Dreamland Pleasure Park then Dreamland would at once be sold to an operator such as Stockvale Ltd to the benefit of Margate.
- 4.34 Further information on Stockvale's proposals for Dreamland emerged in an interview published on the front page of the Isle of Thanet Gazette on Friday 16 April 2004 (see Appendix 14). In this article Philip Miller confirms that he is willing to invest at least *"£10 million on rides and attractions to transform Margate's run-down fun park"*, and that he is convinced he can attract 1.5 million visitors per year to Dreamland.
- 4.35 It is also clear from this article that Dreamland's owner, Mr Godden, sees it not as an amusement park site, but as development land:
- "We are in negotiations with various parties for the land rather than for an amusement park."*
- 4.36 It is my view that this position would not be taken by the owner were Policy T11 to revert to the wording that was consulted on, and Margate would be able to retain and further enhance this *"important asset"*.

A Future for the Park?

- 4.37 The interest of the two operators emphasise the following:
- **Firstly, and without a shadow of a doubt, the sole reason for Thanet District Council changing the policy on which they had consulted in the First Deposit Draft Local Plan, as set out in the Council Leader's letter dated 6 March 2003 (i.e. that they believe that the park is not viable and that no operator would wish to take it on), is simply incorrect.**
 - **The second, and perhaps more important point, relates to the Council's stance (also set out in their letter dated 6 March 2003) that the new policy would not preclude another operator taking on the park should one turn up. It is this very policy, as redrafted, that has precluded operators from taking on the park because it**

has created hope value, effectively pricing tourist attractions out of the market. The policy does not protect the site for tourism use, and tourism can rarely compete directly with leisure, retail and residential when it comes to land values.

- 4.38 The planning system, when working at its best, should create certainty (see paragraph 2 of 'PPG1: General policies and principles'; this concept sits right at the heart of the UK's planning system) for landowners and developers. The revised policy does not do that, as it fails to provide a clear way forward for the Dreamland site. The Council needs to decide whether it wants to accept the overall view of local residents, businesses and organisations that the town needs to retain a major amusement park on the Dreamland site and put a policy in place that achieves that or whether it wants to allow non-tourism uses on the site. The former option would provide a much firmer basis for the town's regeneration but, to achieve this, the policy that was taken through the statutory consultation process at the First Deposit stage would need to be reinstated.
- 4.39 Further evidence that the Council has been misguided in the changes which it has made to the Policy T11 can be found in the first draft of the Margate Masterplan, which was published in March 2004. This also shows quite clearly not only the uncertainty about replacement uses for the site, but that these uses would be unlikely to act as tourist attractions.

The Margate Masterplan

- 4.40 In June 2003, Thanet District Council appointed a multi-disciplinary team led by Tibbalds Planning & Urban Design Ltd to produce a strategic masterplan for the central area of Margate. This study was co-funded by Stadium Developments Ltd, the development partner of the Dreamland site owner.
- 4.41 The first draft of this Study was published for consultation in March 2004. The Save Dreamland Campaign had a number of very serious concerns about the Study and the extremely biased public consultation process that took place in March and April 2004. It is my view, and the view of many members of this campaign, that the flaws in the Study and the consultation process are so serious that this Masterplan can carry very little weight at this Public Inquiry. Our main concerns were set out in a covering letter dated 9 April 2004 (see Appendix 15) and our detailed comments were summarised in a table (see Appendix 16).
- 4.42 Putting aside my serious concerns about the brief, the methodology employed by the consultants, the errors, and the lack of research on several important issues, and without prejudice to my view that the Masterplan document should have little – if any – weight in this Inquiry, I would like to focus on the conclusions of the Study.
- 4.43 With the exception of the resort casino, not one of the potential redevelopment options put forward by the consultants would act as a tourist attraction (see paragraphs 3.16 and 3.18 above, which deal with the important distinction between tourist attractions and local leisure development, a distinction that does not appear to be recognised by Thanet District Council or their consultants). The consultants propose a commercial leisure development (of the type seen in most towns), leisure retailing, a car park, public open space and a public sector sports centre. To make matters

worse, they admit that they have their serious doubts whether even these developments could come forward in the current climate. Yet they seem to ignore the one proposal for significant investment into Margate's tourism industry that is on the table: that of an upgraded amusement park. This isn't even listed as an option! (It was, however, admitted at the Masterplan Public Consultation Meeting on 30 March 2004 by a representative of Tibbalds Planning & Urban Design that they were not aware of the interest from established operators nor that offers had been made to acquire the park, so we can perhaps assume that their conclusions would have been quite different if they had fully researched this option).

- 4.44 We assume that the Margate Masterplan will be substantially revised following our submission (and the submissions of others with the same concerns), but it does serve to illustrate the point that the site requires some form of certainty from Thanet District Council to enable the substantial investment into the town that has already been promised by established amusement park operators to come forward. The current Policy T11 and the draft Margate Masterplan do nothing to provide this certainty. And Margate is already suffering, as it has been announced that Dreamland is not to open in 2004 "whilst its future is decided".

Proposed Changes to Policy T11

- 4.45 It is clear from the above paragraphs that the Council's sole reason for amending Policy T11 after the first deposit public consultation – 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 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 two of these companies – a major international operator with a large chain of theme parks and one of the UK's most respected operators of seaside amusement parks. To ensure that these proposals - which will have a huge benefit to Margate as a seaside town – come forward, policy T11 should, in my view, revert to its original wording, i.e. the wording on which the Council had consulted on between 2001 and 2003 in the First Deposit Draft Local Plan, before the last-minute change in early 2003.
- 4.46 I have already set out in Section 2 of this report the benefits that having a major tourist attraction such as Dreamland can bring to Margate.
- 4.47 Our model for Dreamland is one that is successful up and down the country: an attractive family amusement park, similar to 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. We have, however, through the Margate Masterplan, seen the sort of proposals that might come forward if the policy does not give the required level of certainty, proposals that will not act as tourist attractions. The future of the town as a tourism destination, the town's future prosperity, and the future of important parts of its heritage all rely on these changes being made.

- 4.48 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.

- 4.49 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 and the impact that its loss would have on Margate's local economy and heritage.
- 5.2 I 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. It is the only tourist attraction in the Isle of Thanet that draws in more than 100,000 visitors (even in its current artificially run-down state it draws almost 700,000 visitors per year, placing it in the top ten amusement parks in the country).
- 5.3 Although the park has been run down over recent years, the Save Dreamland 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. I 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. I 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. This investment has resulted in a huge increase in visitors to both the park and the town as a whole, and the business is very profitable. I have also drawn attention to a similar scenario at Southport.
- 5.4 I have also presented evidence on 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 considered to be of international importance. It is of note in terms of listed buildings policy that the Scenic Railway is viable as a stand-alone attraction.
- 5.5 I am also aware that there is operator interest in acquiring and investing in the park. I have presented a significant amount of evidence on this. I have no doubt that Dreamland could not only survive, but also prosper, under one of these interested operators. There is absolutely no reason why Dreamland should lose its biggest tourist attraction, as long as planning policies continue to protect it for this use.
- 5.6 Thanet District Council amended policy T11 in early 2003 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 or that any operators would have an interest in acquiring it. It was also based on the premise that Dreamland required a similar catchment to Thorpe Park or Blackpool. I have now provided evidence that conclusively demonstrates that both of the above assumptions are incorrect.
- 5.7 The interest of the two operators emphasise the following:
 - **Firstly, and without a shadow of a doubt, the sole reason for Thanet District Council changing the policy on which they had consulted in the First Deposit Draft Local Plan, as set out in the**

Council Leader's letter dated 6 March 2003 (i.e. that they believe that the park is not viable and that no operator would wish to take it on), is simply incorrect.

- **The second, and perhaps more important point, relates to the Council's stance (also set out in their letter dated 6 March 2003) that the new policy would not preclude another operator taking on the park should one turn up. It is this very policy, as redrafted, that has precluded operators from taking on the park because it has created hope value, effectively pricing tourist attractions out of the market. The policy does not protect the site for tourism use, and tourism can rarely compete directly with leisure, retail and residential when it comes to land values.**

5.8 The recently published draft Margate Masterplan demonstrates that it is unlikely that other tourism uses will be found for the site in the foreseeable future, and it is likely that this unique site will be lost to other forms of development, such as leisure and retail. These uses will not act as tourist attractions. The consultants who produced the Masterplan were not aware of the serious interest in the site from established operators and that offers at full, independently-assessed, market value had been made for the acquisition of the site and refused.

5.9 I 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 into the First Deposit Draft Local Plan. The policy should recognise Dreamland as an "important asset" and should create the certainty that is required to bring forward the significant private sector investment into the site as a tourist attraction that has already been promised. This wording should 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. I 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.