



Save Dreamland Campaign

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Planning Applications Team
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Dear Sir/Madam

Listed Building Consent Applications: L/TH/05/1595, L/TH/05/1596, L/TH/05/1597
Conservation Area Consent Applications: L/TH/05/1593, L/TH/05/1594

I am writing on behalf of the Save Dreamland Campaign, which represents several thousand of Margate's residents and visitors, as well as a number of key local and national organisations. The Campaign wishes to formally object to the above Listed Building and Conservation Area applications.

I deal with the Listed Building Consent applications first. Three applications for listed building consent have been submitted relating to the Dreamland site. These are to demolish the following buildings:

- the 'Park Amusements' building (formerly the Buffet);
- the 'Bungalow' (formerly a toilet block); and
- the 'Top Sub Station' (adjacent to the Bungalow).

Park Amusements, the Bungalow and the Sub-Station are all listed buildings because they fall within the curtilage of the Scenic Railway and were built before 1948.

National policy on the demolition of listed buildings is set out in PPG15 (Planning Policy Guidance 15: Planning and the Historic Environment, 1994).

Paragraph 3.5 of PPG15 sets out the issues that are generally relevant to the consideration of all listed building consent applications. In summary, these are: the importance of the building (its architectural and historic interest and rarity); the physical features of the building; the building's setting and its contribution to the local scene (eg. where it forms an element in a group, park, garden or other townscape or landscape, or where it shares particular architectural forms or details with buildings nearby); and the extent to which the proposed works would bring substantial benefits for the community (in particular, economic regeneration or enhancement of its environment).

In our view, these buildings do have architectural and historic merit as rare examples of amusement park architecture from the first half of the Twentieth Century. In particular, the Park Amusements Building (Building 11, using the applicant's numbering system) is a unique survivor from this period, and provides enclosure to the park on its eastern boundary. There

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are very few examples of this type of amusement park architecture remaining in the United Kingdom.

Paragraph 3.16 of PPG15 is particularly relevant in the case of these three listed buildings. It states:

"The destruction of historic buildings is in fact seldom necessary for reasons of good planning: more often it is the result of neglect, or of the failure to make imaginative efforts to find new uses for them or to incorporate them into new development."

This is particularly pertinent for these applications because the condition of the buildings is entirely down to neglect. In addition, the applicant's supporting information provides no evidence that any consideration has been given to new uses, nor has any consideration been given to incorporating the buildings into new development. In fact, no information whatsoever has been provided by the applicant on their plans for any new development on the site. The applications are therefore premature.

Paragraph 3.17 is also of relevance to these applications. This 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"

Again, the applicants have failed to address these requirements. There is no evidence that reasonable efforts have been made to sustain existing uses. In fact, in the light of the Inspector's Report into the Thanet Local Plan (Report on Objections to the Thanet Local Plan, November 2005, Chapter 8 - Tourism), it is clear that the likelihood is that the amusement park - and therefore these listed buildings - can be brought back into use. The possibility of charity or community ownership appears not to have been investigated at all, and the benefits to the community of redevelopment cannot be assessed because no details have yet been made available by the applicants. Again, this demonstrates that these applications are premature.

Paragraph 3.19 sets out the considerations that the Secretaries of State would expect the local authority to consider where works are proposed that would result in the total or substantial demolition of a listed building. In summary, these are:

- i. The condition of the building, the cost of repairing it in relation to its importance and to the value derived from its continued use. This includes the clause, ***"In the rare cases where it is clear that a building has been deliberately neglected in the hope of obtaining consent for demolition, less weight should be given to the cost of repair"***.
- ii. The adequacy of efforts made to retain the building in use. This states: ***"The Secretaries of State would not expect listed building consent to be granted for demolition unless the authority (or where appropriate the Secretary of State himself) is satisfied that real efforts have been made without success to continue the present use or to find compatible alternative uses for the building. 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 (the offer of a lease only, or the imposition of restrictive covenants, would normally reduce the chances of finding a new use for the building)"***.
- iii. The merits of alternative proposals for the site. This states that there may ***"very exceptionally be cases where the proposed works would bring substantial benefits for the community which have to be weighed against the arguments in favour of preservation. Even here, it will often be feasible to incorporate listed buildings within new development..."***.

Our response to these three considerations is as follows:

Consideration 1: In the case of the listed buildings the subject of these applications, it appears that they fall into the category of 'deliberate neglect'.

Consideration 2: There is no evidence in the applicant's submission that any effort has been made to retain the buildings in use. For the past four years, this part of the amusement park has been sealed off despite the fact that experienced operators have publicly stated their willingness to acquire and operate the entire park. This Campaign is not convinced that the building cannot continue to operate in its present use as part of an amusement park.

Consideration 3: The applicants have not revealed what use they intend for the site after demolition so it is impossible to weigh the loss of the buildings with the benefits of redevelopment. Therefore, no consideration is likely to have been given to incorporating these buildings within a new development.

Local policies are set out in the Adopted Isle of Thanet Local Plan (April 1998). Policy CB4 states:

"There will be a presumption in favour of preservation of listed buildings. Demolition/partial demolition will be resisted unless there is a special overriding justification."

The only justification the applicants have given in their supporting documentation is to assist with the "short-term management" of the site, which can hardly be considered overriding.

The emerging Local Plan has exactly the same policy as the Adopted Plan, although ***"will be resisted"*** has been changed to ***"will not be permitted"***, which suggests a strengthening of the policy.

In summary, the applications for listed building consent should be refused for the following reasons:

- The buildings are of architectural and historic interest, particularly Building 11.
- The buildings appear to have been deliberately neglected.
- There is no evidence that reasonable efforts have been made to sustain the existing use, which is a major oversight as the recently issued Inspector's Report into the Thanet Local Plan states that the site should be retained as an amusement park.
- No information has been provided by the applicant on their plans for the site once the buildings have been demolished, so it is not possible to see whether the buildings could be incorporated into the redevelopment, nor is it possible to weight the benefits of the redevelopment against the loss of these buildings.
- The applicants have not provided the "overriding justification" required by the adopted and emerging local plans before demolition will be permitted.

I now deal with the Conservation Area Consent applications. Two applications for conservation area consent have been submitted. These are to demolish the following buildings:

- the former restaurant, 11-14 Belgrave Road; and
- Belgrave House.

PPG15 sets out how local authorities should deal with applications for the demolition of buildings in a conservation area. Paragraph 4.26 states that, in exercising conservation area controls, ***"local planning authorities are required to pay special attention to the desirability of preserving or enhancing the character or appearance of the area in question...this should be the prime consideration in determining a consent application"***.

The paragraph also states that ***"account should clearly be taken of the part played in the architectural or historic interest of the area by the building for which demolition is proposed, and in particular of the wider effects of demolition on the building's surroundings and on the conservation area as a whole"***. In my view, these buildings play

an important role in the character and appearance of Belgrave Road, giving a sense of enclosure, both of the street itself and the transition between street and amusement park.

Paragraph 4.27 states that the Secretary of State expects that proposals to demolish buildings within a conservation area should be assessed against the same broad criteria as proposals to demolish listed buildings (paragraphs 3.16 to 3.19 of the Guidance). In our view, these applications therefore fail for the same reasons: there is evidence of deliberate neglect; no evidence of any attempt to sustain the existing uses; no investigation of new uses that could occupy the buildings; and no evidence of an attempt to incorporate into the new development as no details of the planned redevelopment are provided. For this reason, we also cannot weigh the benefits of redevelopment against the loss of the buildings.

The paragraph goes on to state:

“In less clear-cut cases – for instance, where a building makes little or no such contribution – the local planning authority will need to have full information about what is proposed for the site after demolition. Consent for demolition should not be given unless there are acceptable and detailed plans for any redevelopment.”

Therefore, even if it were decided that the buildings contribute little to the character and appearance of the area, PPG15 is unequivocal that Thanet District Council should still not be granting consent as the Council and public have no details of what is proposed in the place of the buildings, let alone whether or not these proposals are acceptable. The normal process for granting conservation area consent is to grant it alongside the granting of planning permission for redevelopment. I can see no reason why the normal process should not take place in this case.

Even if Thanet District Council was to decide to ignore national planning policy and grant consent for the demolition of these buildings, paragraph 4.29 of PPG15 states that the Council should impose a condition under Section 17(3) of the Planning (Listed Buildings and Conservation Areas) Act 1990, providing that demolition shall not take place until a contract for the carrying out of works of redevelopment has been made and planning permission for those works has been granted. There would therefore be no benefit to the applicant by granting consent at this stage. The applications are premature.

The Adopted Local Plan also carries very clear policies for determining applications for the demolition of buildings in conservation areas. Policy CB9 states:

“Where it is clear that demolition is proposed in a conservation area in order to allow redevelopment, the District Council will normally only consider granting consent for demolition where there are acceptable and detailed plans for that redevelopment. Conditions will normally be imposed to ensure that demolition does not take place until immediately prior to development.”

This policy is entirely in line with PPG15, and it is clear that the District Council should not grant consent for the demolition of these buildings in the absence of any proposals, let alone “acceptable and detailed” ones!

Policy HE6 of the emerging Local Plan states:

“Where it is clear that demolition is proposed in a conservation area in order to allow redevelopment, the District Council will normally only consider granting consent for demolition where there are acceptable and detailed plans for that redevelopment. Conditions or, where appropriate, a legal agreement, will normally be imposed to ensure that demolition does not take place until immediately prior to development.”

I can see no justification for making an exception to this policy in this case, especially where no plans exist for the replacement of the buildings.

In summary, the applications for conservation area consent fail for the same reasons as the applications for listed building consent, plus in the case of these buildings there is a clear requirement to have acceptable and detailed plans for the redevelopment.

To conclude, the Save Dreamland Campaign does not welcome these applications for listed building and conservation area consent, especially so soon after the publication of the Inspector's Report into the Thanet Local Plan Inquiry, which states that the amusement park should be retained and the setting of the Scenic Railway protected. It may well be that in future, when plans for the revamped amusement park are finalised, consideration could be given to the demolition of one or more of these buildings to meet an overriding need (although that would be a disappointing solution). The main point is that we simply do not know at this stage – the applications are premature. We therefore ask that these applications are refused.

Yours Sincerely
for the Save Dreamland Campaign

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Campaign Leader