



## LICENSING REPRESENTATION FORM

### Section 1: Licence Application Details

X I wish to **object** to the following application

Name of Applicant (if known):	Sands Heritage Ltd	
Premises Name and Address:	Dreamland Amusement Park	
	Marine Terrace	
	Margate	
	Postcode:	CT9 1XJ

### Section 2: Your Details

(If you are acting as a representative, please go to Section 3)

Title

- Mr  
 Mrs  
 Miss  
 Ms  
 Other (please state)

Surname:	Forenames: John	
Address	Arlington House	
	All Saints Avenue	
	Margate	
	Postcode:	CT9 1XR

Telephone		Email	
-----------	--	-------	--

(You must provide your full residential address (or business address, if your objection relates to the impact of the licence upon your business premises))

### Section 3: Representative Details

(If you represent residents or businesses, please complete the details below)

<i>Name of Representative/Organisation</i>		
<i>Address of Representative/Organisation</i>		
	<i>Postcode:</i>	

<i>Telephone</i>		<i>Email</i>	
------------------	--	--------------	--

I AM (Tick as appropriate):

- Representative or Residents Association
- Representative of Trade/Business Association
- Ward Councillor
- MP
- Other (please specify)

### Section 4: Reason(s) for Representation

Under the Licensing Act 2003, for a representation to be relevant, it must set out the likely effect of granting the application on the promotion of the four licensing objectives. Any representations that are considered to be frivolous or vexatious will not be accepted.

Please fill in the reason(s) for your representation in the space provided below under each of the Licensing Objectives (where relevant). You need to give as much detail as possible so that the Licensing Authority can assess the relevance of your representation. Please attach any supporting documents/further pages as necessary, numbering all additional pages. Try to be as specific as possible and give examples, where possible.

<b>Licensing Objective</b>	<b>Reason for Representation</b>
<b>Prevention of Crime &amp; Disorder</b>	<p>With alcohol being sold across the Dreamland site throughout the course of music events, an increase in the number of such events taking place and an extension of the time over which such events are held will undoubtedly lead to an increase in crime and disorder.</p> <p>I have witnessed a number of occasions when fights have broken out on the Dreamland site during events and the Police and/or ambulance service have attended in addition to the on-site security and first aid staff.</p> <p>Most of the outdoor events have been attended by many thousands of people. Crowd sizes are difficult for me to estimate but I would guess that events have been</p>

attended by some 3,000 to 4,000 people. (I understand that the current licence provides for such events to be attended by up to 9,999 people so the numbers I have suggested are well within the permitted capacity). Both the Dreamland and Arlington car parks have been significantly full. I am aware that the Arlington car park has a capacity for 575 cars so I would estimate both car parks must contain some 800 cars between them with the more popular events.

All those cars are attempting to leave at the same time when music events, finish which has resulted in significant noise of car horns sounding as impatient drivers jostle for position in the single queue to exit. The problem is further exacerbated by those drivers who have been drinking and are intending to drive home having consumed excess alcohol – alcohol having been available throughout the event.

The front porch and foyer of Arlington House is used as a toilet by those leaving Dreamland events and returning either to Margate Railway Station or to Arlington car park, where there are no public toilets. An increase in the number and longevity of events where alcohol is served throughout will also lead to an increase in this unpleasant, antisocial behaviour at Arlington House (and undoubtedly other places in the vicinity which will similarly be used as a toilet).

The Application for this new licence has been submitted at such a time and conducted in such a manner as to avoid the likelihood of it coming to the attention of persons resident in the neighbourhood and, moreover, restricting the public access to the Application itself. My attention was only drawn to a surreptitious blue notice posted on the inside of the door to the Dreamland office on Marine Terrace a couple of days prior to Christmas. The Notice may well have been in place since 5 December 2022 but I am not aware of any Arlington resident who was previously aware of its existence. The Notice states that the Application is available to view at the Council Offices and that the closing date for submissions is 2 January 2023. However, with the Council Offices closed from 23 December 2022 until 3 January 2023 (one day after the closing date) and myself and all other Arlington residents are denied the opportunity to view the Application in order to fully comment on all aspects of it. It is therefore the case that the due Application process is seriously flawed and the Application should be withdrawn and resubmitted on the ground that to proceed to consider it would be unlawful. Arlington residents and the general public have been prejudiced by being denied the advertised right to view the Application. It cannot be just and reasonable for

	the matter to proceed in such circumstances.
--	--

<b>Prevention of Public Nuisance</b>	<p>The sound levels generated from the outdoor stage during music concerts are significantly and repeatedly above the level permitted by the current licence. These incidents are not minor or isolated infractions. They occur repeatedly and consistently throughout most events. Noise levels are regularly some 10 decibels above the permitted levels during the day and evening events and have been peaking in excess of 80dba. After 23.00hrs the noise is still clearly audible and constant until after 01.00hrs and peaking at over 60dba.</p> <p>It is my understanding that the current licence provides for events which are attended by less than 9,999 people are restricted to a maximum music level of 65dba up to 23.00hrs. Only events attended by over 10,000 persons are permitted a maximum music noise level of 75dba (although I am at a loss to understand why a greater volume at my window should be necessary or permitted purely because there are more people at the event). There has only ever been one event of that magnitude several years ago.</p> <p>The past, current and proposed music events have the greatest effect on all of the 74 flats in Arlington House that have windows on the eastern flank facing Dreamland. This, in itself, constitutes a public nuisance due to the numbers of people affected. The remaining 68 Arlington flats with west-facing windows are also affected by the music noise, but to a lesser degree.</p> <p>Additionally, the noise from stage events impacts houses and flats in All Saints Avenue at Roller Coaster House, as well as houses at Railway Terrace. I have spoken with residents who live as far away as Hartsdown Road who tell me that they also hear the music noise from the stage. It is my understanding that residents in Belgrave Road and Eaton Road are also affected by the levels of noise and that the Council has received complaints from residents in those roads. The area and number of people affected is widespread – thus underlining the extent of the public nuisance.</p>
--------------------------------------	--

I have made a number of complaints to Dreamland in respect of the noise levels – both in relation to the outdoor stage noise up to 23.00 hrs and in respect of the noise of indoor music events up to 02.00 hrs. My complains have not resulted in any noticeable reduction of the noise levels.

The noise level readings taken by the consultant appointed by Dreamland are totally spurious and irrelevant. Sound level readings are supposed to be taken at a distance of one metre from the frontage of the receptor. However, the consultants working for Dreamland have been taking their readings from a point in the middle of the residents' car park at Arlington House. I estimate that point to be some 30 metres away from the Arlington flat windows. At that point and elevation, the stage is not visible and the sound is absorbed by rows of trees within the Dreamland Park and sound is deflected by the concrete parapet walls surrounding the car park.

I have taken my own sound level readings at my flat window and at the same point in the car park used by the Dreamland consultants and found the levels to be some ten decibels lower in the car park than at my flat window. The reason for this is that the flat windows have a direct line of sight to the stage and therefore there is no mitigation of the sound.

I have also made a series of complaints to the Council's own Environmental Department. I have kept records over several months and supplied witness statements detailing the levels of sound at my flat window. Additionally, the Council's own sound recording equipment was installed in my flat to take separate recordings. Furthermore, Council Officers attended my flat on a number of occasions to witness the levels of sound for themselves.

I have attached copies of my some of my records with this objection. I am not sure if those records are complete but they certainly reflect consistent levels of excessive music noise from numerous events over a protracted period. The sound meter that I used to record the noise levels was tested by the officer installing the Council's equipment and my meter was found to be under-reading by 0.5 dba. Therefore, it is clearly the case that my recordings are a true, fair and accurate representation of the realistic levels of noise at flat windows. I have been away from my flat since October 2022 and therefore have not recorded the levels of music events that have taken place over the

last two months.

I am also aware that another Arlington resident in another Arlington flat was also taking readings on a separate device. Those readings were very similar to mine. Additionally, I am aware that the Council's own recording equipment was installed in that flat for a period of time.

It is my understanding that the recordings made by the Council's Environmental Department similarly showed that the noise levels were above those permitted by the current licence. I further understand that those results have been shared with Dreamland and that meetings have taken place between the Council and Dreamland. There has not been any noticeable reduction in noise levels from Dreamland as a result of those meetings.

The noise levels that residents have been forced to endure on numerous occasions over a prolonged period are wholly unreasonable and inappropriate. Not only do those noise levels significantly exceed the levels permitted by the current licence, the noise is intrusive to Arlington flats to the degree that it interferes with the ability to watch television or read or carry out other peaceful activity or peaceful enjoyment of the flat to which I am lawfully entitled. With the windows and curtains closed, it is necessary for me to increase the television volume to 75% in order for it to be audible. Even then, the music from the stage is still audible in the background at the same time as the television.

The nuisance of noise intrusion is not limited to the outdoor stage. There is also excessive noise from the music at indoor events. The current licence provides that the noise from the indoor events should not be audible after 23.00 hrs. However, music noise from these events is still audible within my flat after 01.00 hrs even with the windows closed and the curtains closed – thus disturbing my sleep.

During my conversations with the sound consultant appointed by Dreamland, he has claimed that the noise from the indoor stage between 23.00 hrs and 02.00 hrs is acceptable because it is no louder than noise from trains passing along the railway line that runs adjacent to the Arlington car park.

The sound consultant's stance is of course total nonsense. Trains passing along that length of track are audible for little more than ten seconds and the

number of trains between 23.00 hrs and 02.00 hrs are a mere handful – whereas the noise from the indoor event is constant throughout the period. Furthermore, the industry standard for measuring such noise is taken as the average over a 15 minute period – therefore the noise of a passing train is de minimis.

The proposal to extend the finish time of indoor music events from 02.00 hrs to 04.00 hrs merely extends and exacerbates the length of time that local residents will be subjected to this public nuisance. No Council Officers are available after midnight to monitor the level of noise, therefore it would be irresponsible of the Council to agree a further extension over which it exercises no control, monitoring or supervision whatsoever.

In particular, the Hall by the Sea indoor event space is not a suitable venue for what is essentially a nightclub use. I believe the building itself is a former railway shed. Most of the walls appear to be of a single skin brick and flint construction. A new metal roof was fitted a few years ago but I have heard the cladding vibrating when the music volume is high and the frequency is low. There is an aperture on the western flank (facing Arlington House) which has been boarded with wooden slats. There are exit doors in the western flank which are often open during events to allow ventilation and egress for smokers. Music noise is clearly audible even with the doors closed and merely increases when the doors are opened – even though the doors are below the level of the Arlington residents' car park. The building is obviously not designed or adapted to contain or sufficiently mitigate the sound of the music generated within.

The use and operation of the Dreamland site has moved away from the original and permitted use as family amusement park. The amusement park rides are only open at weekends during the summer and is only open during the week for school summer holidays. The current and proposed use of the site is now predominantly as an outdoor concert venue and as a night club. The levels, occasions and longevity of the music noise generated by this devolved operation constitutes an unacceptable degree of public nuisance.

On occasions when music concerts are taking place, the amusement park itself is closed to visiting families and only available to those having purchased tickets for the concert events. Many of those concerts have age restrictions of persons over 14 or persons over 16

	<p>– and those younger persons have to be accompanied by an adult in any event. Some events are restricted to over 18s. There is already a three-day event advertised for June 2023 on Dreamland’s web site. Tickets are currently only available for the Saturday at a cost in excess of £50 for a single ticket. That is clearly going to preclude the ordinary day tripper families who turn up in Margate expecting to take children or grandchildren for an afternoon or evening out on the rides at Dreamland.</p> <p>The proposal to increase the number of music events, to increase the longevity of such events and to permit such events to take place over four consecutive days is wholly inappropriate in a residential area and will merely lead to an exacerbation of the public nuisance which has already been proven to exist and for which the Dreamland operators have taken no effective steps to mitigate.</p> <p>It would be totally irresponsible of the Council to agree to grant any new licence or to extend any existing licence when the operators are clearly in breach of the current licence on many occasions and the operators have failed to heed the requests from the Council to reduce the level of noise and public nuisance being caused during events throughout 2022.</p>
--	--

<p>Protection of Children from Harm</p>	<p>On a number of occasions during 2022 when concerts have been in progress at the outdoor stage, I have witnessed groups of children climbing through or over the fence at Arlington car park and gaining access to the Dreamland site. I have also seen the children walking along to car park wall. There is a significant risk of severe injury from falling from the first floor parapet.</p> <p>This clearly endangers those children as the temptation to enter the venue without a ticket is too great and the security measures to prevent access are too poor with the stage being visible from the car park.</p> <p>With alcohol being available for sale across the venue throughout the day and night, there has to be a risk to children from actions by other who have been consuming alcohol. Even where events are restricted to persons over 14 or over 16, there is a likelihood that alcohol will be consumed by persons in those age groups – more particularly given the open nature and spread of the event space, the attendant crowds and therefore the resultant difficulty for the Dreamland supervision staff to oversee exactly who is drinking</p>
---	--



	<p>what and where.</p> <p>The levels of noise generated from the Dreamland site during the evening and at night have an adverse effect on children of families in Arlington House who are in bed and trying to sleep during those times.</p>
--	--

<p>Public Safety</p>	<p>As already mentioned under the heading of Crime and Disorder, I have witnessed a number of occasions when there have been fights break out during the course of events at the outdoor stage. Some of these incidents have resulted in attendances by Police and/or ambulances.</p> <p>With an increase in the number of events, an extended length of time over which these events take place, and with alcohol being sold throughout those events – the likelihood of fights and disturbances increases exponentially.</p> <p>The outdoor stage is visible (and obviously audible) from the first floor of the Arlington car park. There are no restrictions to prevent the public from entering the car park and viewing the event. Notwithstanding the comments above regarding children entering the Dreamland site from the car park, I have also witnessed crowds gathering at the first floor level of the Arlington car park to watch the concerts for free. There is no lighting whatsoever at the first floor level of the car park and therefore it provides for a potentially dangerous environment with the mix of cars and pedestrians.</p>
----------------------	--

I, John \_\_\_\_\_, hereby declare that all information I have submitted is true and correct.

Signed:	Date: 29 December 2022.
---------	-------------------------

**Please send the completed form to:**

Licensing Team  
 Thanet District Council  
 PO Box  
 Margate  
 Kent, CT9 1XZ  
 Email: [Licensing@thanet.gov.uk](mailto:Licensing@thanet.gov.uk)