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To whom it may concern,

**Letter of support for refs: APP/A5840/W/16/3164823 and APP/A5840/Q/16/3166766**

### Summary of planning considerations

- Dulwich Hamlet Supporters' Trust is **in favour** of the application. With nearly 300 members (57% of which reside in Southwark), DHST is one of the largest community groups in the area. We are the only neighbourhood group to actively poll our membership to inform this position. DHST took a neutral position up to the point of the result of the poll. Our members were presented with information submitted with the planning application, as well as updates on the lease on Greendale Fields and information pertaining to the discussions DHST and Hadley Property Group had held on the future of the Club. The result of the poll was overwhelming, with **94% of members that voted being in support of the plans**.
- We believe that **securing a long term, secure, and community owned future for Dulwich Hamlet Football Club is a significant material consideration**. The Club has played their home fixtures close to the site of the existing stadium for over a century and provides an important sporting and social function that is unique in both Dulwich and the wider Southwark area. Rising attendances in recent years (over 600% increase since 2010/11) demonstrate the continuing relevance of the Club and its value as a vital community asset that brings social and economic value to the area.
- The application is considered to meet policy tests in both the Development Plan and the National Planning Policy Framework (NPPF). The proposal is considered to **strike an appropriate balance between allowing both the preservation and enhancement of open space and development**.
- Whilst the development slightly encroaches on Metropolitan Open Land, there are very special circumstances. The **sensitive design, coupled with its wider community benefit, plus the need for housing far outweighs the insignificant loss of open space** which by the Council's own assessment is not of a high standard, but will be enhanced as part of the proposal.
- We ask that the Planning Inspectorate **consider a series of conditions to ensure the long-term success of the Club** in the local area.

## **Background to Dulwich Hamlet Football Club**

1. Dulwich Hamlet Football Club (DHFC) is one of the most successful and well-loved semi-professional football clubs in the country. The Club was formed in 1893 by Lorraine 'Pa' Wilson, to provide sporting opportunity for boys of this part of Southwark. The Club's all-time record goalscorer, Edgar Kail, was the last player to play for the full England team whilst solely with an amateur club. Such is the regard that Kail is held in that the road leading to the ground is named after him and the fans still sing his name. He is also recognised with a Southwark Blue Plaque at the current ground.
2. During the interwar years, huge crowds, often into five figures, flocked to the two previous Champion Hill grounds, one of which was located exactly where the existing all-weather pitch is on Green Dale now.
3. Since the start of the 21<sup>st</sup> century, the team has returned to relevance. It has been given new life as a community-facing football club with a renewed sense of optimism and purpose and legions of enthusiastic supporters from all sections of society. Collectively, the volunteers at Dulwich Hamlet have redefined what community means in football and our model is being replicated up and down the country. This has only been possible with the help of the owners of the ground (formerly Hadley Property Group) and now Meadow Residential LLP, who have helped take forward several club and supporter initiatives at their own expense. The Club is one of the few in London to pay the London Living Wage to staff and have disbanded using the Workfare initiative.
4. Dulwich Hamlet will continue to be a club that strives for success on the pitch, a club that treats all fans and players fairly, a club that plays an active role in the community it serves and, if this development is approved; a club that will be owned by supporters and run for the community.
5. Dulwich Hamlet Football Club is home to the ASPIRE Academy. ASPIRE is an organisation which supports local youngsters by ensuring they remain in education as well as providing them with a platform on which to showcase their talents. The Academy is an intrinsic part of the Football Club and has teams ranging from ages 9-21 and provides players with the opportunity to progress to the first team and establish a career in football.

## **Background to Dulwich Hamlet Supporters' Trust**

6. DHST was set up in 2003 and is an independent, democratic, not for profit organisation. We want Dulwich Hamlet to be a leading example of a financially sustainable football club, owned by its supporters, with a secure long-term home in East Dulwich. DHST proudly represents nearly 300 members, just over 20% of the average attendance in 2015/16 – a level of supporter engagement that would be the envy of most league clubs. This level of membership makes DHST one of the largest and most active community groups in the local area.
7. The Trust acts with impartiality and transparency to represent the interest of its members. Since our inception, we have been a voice of scrutiny for the activities of the Football Club and their owners and continue to actively contribute to and promote the good work of the Club and the fans to further the Club's standing within the local community.
8. DHST's ultimate goal for Dulwich Hamlet FC is for it to be a leading example of a financially sustainable football club that is fully owned by supporters and has a secure long-term home in East Dulwich. In order to achieve this, our work is focused on five key objectives. These are to ensure that Dulwich Hamlet FC:

- A. has a secure long-term home in East Dulwich;
- B. is fully owned by its supporters
- C. is a transparent and well run football club;
- D. has a growing Supporters' Trust that communicates regularly with its members; and
- E. has a growing fan base with strong links to the surrounding community.

### **Dulwich Hamlet's charitable and community work**

9. In recent years, attendances at the Club have risen sharply, largely due to the efforts of the Club's owners, the Club's Football Committee and the Supporters' Trust who have inspired and led an active group of volunteers who have strived to build bridges between cultures and communities. This is evidenced by its work to combat issues such as homophobia in football where the Club paved the way in challenging this by organising a friendly match between the Club and Gay World Champions, Stonewall FC. The event was described by the Guardian as 'a blue print for others at the top of the game' and the proceeds were donated to a charity of our oppositions choosing, The Elton John Aids Foundation. Leading football channel Copa 90 covered the game via a video documentary and the evening was summarised nicely in an article written for the Daily Telegraph:

*"These are the moments when football is bigger than just a game. And this week, in a small corner of south east London, it happened again: football stood for something. It mattered."*

10. Other events initiated by DHST and the Club include:
- A. We marked International Women's Day by giving out free tickets to south London women's teams and inviting female journalists and bloggers to Champion Hill.
  - B. Celebrating Black History Month, where we unveiled a permanent display in our Club house honouring some of the many black players and officials to have greatly contributed to the history of the Club. This includes the current manager and head of the locally-based ASPIRE Academy, Gavin Rose.
  - C. Following the humanitarian crisis in Calais, the Club was once again in the headlines after an appeal to our supporters and the local community to drop off provisions to be delivered to Calais. It's fair to say that we were overwhelmed with the response and our supporters then made multiple trips to Calais, funded by the ground's owners, to deliver the items. This informal group of volunteers at the Club has continued to raise awareness and fundraise, and are known as Dulwich2Dunkirk. Whilst many of the larger football clubs provided some level of help, it was the Hamlet that was praised for acting first and providing such a big response as comparatively small club. ITV news and the Guardian once again paid tribute to the Clubs efforts.
  - D. We have also worked alongside local Councillor, Jasmine Ali, to organise a charity football match against FC Assyria to raise funds for Southwark Refugee Communities Forum and the British Red Cross Syria Appeal. This event raised a significant amount of money for refugees and was a great example of bringing together the community with local businesses who also supported the event.
  - E. Volunteers have also raised large amounts of money and supplies for the British Heart Foundation, Cooltan Arts, Football Beyond Borders, Southwark Foodbank and Centrepont to name but a few.
11. The Trust has been instrumental in promoting the Club on a local, national and even global level. Coverage of the Club and in particular the DHST's work in the community has included favourable write-ups in national newspapers (e.g. the Guardian, the Independent, the Telegraph and the Norwegian Financial Times), local newspapers, football magazines (FourFourTwo and 11 Freunde

in Germany) and numerous blogs and online articles. Links and examples can be found on our website at <http://dhst.org.uk/dulwich-hamlet-in-the-media/>

12. Dulwich Hamlet volunteers continue to ensure this is an inclusive club that reaches out to the local and global community, demonstrating the power of football to do good and to make a real and lasting difference. In 2016, the efforts of the volunteers who give up their time for the Club were rewarded with a Southwark Civic Award and the title of The Liberty of the Old Metropolitan Borough of Camberwell. The Club were also recently named the 2015/16 Football Foundation Non-League Community Club of the Year at the National Game Awards.

### **Poll of members**

13. Following submission of the planning application, the Trust organised a ballot of the membership to seek views from supporters as to whether or not to support the plans. The application documents, together with an array of supporting background information, were provided to enable members to make a clear judgement on the proposals. The Trust's Board remained neutral throughout this period with a moratorium on public statements in favour or against the application to allow a fair and honest vote.
14. The result of the poll saw overwhelming support for the application with 94% of responses in favour. This provided the DHST Board with a very clear mandate with which to respond to this consultation. Regardless of this mandate, it is our professional opinion that the application clearly merits approval and the following sections clearly demonstrate this.

### **Planning application 16/AP/1232**

15. It is the aim of the Trust to secure a long-term home for the Club in East Dulwich. It is our firm belief that this submission is genuinely the best solution and most realistic, cost effective and deliverable means of ensuring our future in the local area.
16. Following a thorough policy review, we consider that the application satisfies the requirements laid out in both the NPPF and the Development Plan. Most notably, the proposal clearly aligns with the Key Themes and Strategic Policies within Southwark's Core Strategy 2011, in particular Strategic Policy 4 (*Places for learning, enjoyment and healthy lifestyles*). As noted on p.71, Southwark will achieve this by:

*"Facilitating a network of community facilities that meet the needs of local communities and ensuring development provides flexible community spaces that can be shared by many groups, where there is a local need and an identified occupier for the space" by ensuring that there is "a wide range of well used community facilities that provide spaces for many different communities and activities in accessible area".*

*"...development will help create safe, healthy and mixed communities...supporting the improvement of facilities which encourage physical activity and ensuring that development promotes healthy lifestyles and addresses negative impacts on physical and mental health".*

17. Southwark are supportive of inclusive, diverse and flexible community space and in paragraph 5.44 of the Southwark Plan, note specifically a desire to develop a network of sport centres, community halls and places of worship.
18. The football stadium provides an important sporting and social function that is unique in both Dulwich and the wider Southwark area. Champion Hill stadium provides a standard of facilities

that may accommodate a team close to the top of the non-professional game – there is currently no other comparable facility in Southwark. Comparisons have been drawn with Fisher FC’s new stadium in Bermondsey. However, their facility is much smaller and caters for a less intensive community (and indeed, matchday) use.

19. Champion Hill also provides a variety of facilities for a number of other users in the community. Part of the building is used by a religious group on Sundays, the gym provides relatively cost-effective leisure facilities and the clubhouse offers bespoke community halls for everything from weddings to birthday parties. However, with so much demand, Champion Hill in its current form is over-performing, in serious need of repair, needs to be modernised and expanded.
20. The strength of the Club’s work in the community and popularity must be celebrated; and the ability of the proposed application to provide a larger, much stronger offer can only add to the sense of community and belonging in the local neighbourhood.
21. The application proposes an artificial pitch. This will unlock the potential to offer schools, community groups and private individuals increased exposure to brand new sport facilities. This is in total conformity with Strategic Theme 4 of Core Strategy and should be considered a major factor in the determination of this application.
22. Further to this, the London Plan clearly notes that the provision of outdoor sporting and community facilities should be encouraged. Indeed, Policy 3.16 provides support for new and enhanced social infrastructure proposals such as this.
23. The proposed plans are an acceptable use on Metropolitan Open Land (MOL) as stated in Policy 7.17D (b), recreational uses and their improved provision is endorsed by Policy 3.19 which provides a clear mandate to Local Authorities:

*“Development proposals that increase or enhance the provision of sports and recreation facilities will be supported”.*

The Policy continues by encouraging the provision of multi-use facilities. As detailed above, the use of a next generation artificial pitch will enable a wider use of sports and games over a much more substantial period.

### **Metropolitan Open Land**

24. It has been noted that there are several objections from local amenity groups in regard to the loss of open space at Greendale. While we do not agree with the basis of their objections, we do acknowledge that development on MOL will need to be justified. Our position with regard to this matter is broken into the following sections.
  - A. The existing status and quality of Greendale
  - B. The case for Special Circumstances as outlined in the NPPF
  - C. The emerging policy position as considered in the Housing White Paper

#### *A. The existing status and quality of Greendale*

25. Firstly, it should be noted that historically, Greendale in its entirety was sports pitches used by teams, including Dulwich Hamlet for a considerable period of the early 20<sup>th</sup> Century. Indeed, the primary area of construction identified by the application is currently in use as a sporting facility, i.e. an impermeable concrete and astroturf pitch, which is used sparingly for 5-a-side football. The area is enclosed visually by floodlighting poles and is of almost no environmental benefit. The Club, working with the applicant have undertaken to improve the quality of this space since

the ground's previous owner let the land fall into a state of disrepair. This has included the removal of Japanese Knotweed and encouraging greater public access as requested by Friends of Greendale to undertake numerous projects in the space. Thanks to these interventions, Greendale's environmental credentials, whilst insignificant at present, have an opportunity to bloom if the proposed minor and justifiable incursion onto MOL was deemed acceptable.

*B. The case for Special Circumstances as outlined in the NPPF*

26. Paragraph 88 of the NPPF notes that in very special circumstances, development on protected green spaces may be considered acceptable. This is supported by Policy 7.17 of the London Plan, which notes that appropriate development should be limited to small scale structures to support outdoor open space uses and minimise any adverse impact on the openness of MOL. To this end, the proposal is in general conformity with both National and Regional guidance.
27. The Trust maintains that the special circumstances are clearly delivered as part of this application. Whilst the London plan focuses primarily on developments on the MOL itself, the NPPF definition allows for a wider sphere of benefits to be considered.
28. Although we are mindful that this letter focuses primarily on the stadium, we are cognisant that 155 new residential units are also proposed. This is at a sympathetic density and of a high quality urban design, responding to the scale and massing of Dog Kennel Hill in a way that allows the site to be optimised but without significantly impacting on the immediate residential stock.
29. The London Plan supports ambitious densities, particularly around major transport nodes and with East Dulwich station a 5-minute walk and Denmark Hill station a 15-minute walk, plus several bus routes nearby, this is arguably a suitable location for an even higher density.
30. As referenced in the opening part of this letter, the strong sense of community that has been nurtured at Champion Hill has helped with social cohesion in this part of the borough. The potential to expand and build upon this should be considered key to the argument in favour of the application.
31. The commitment to improve - by the Council's own standards - an average open space should also be considered in the determination of this application. Policy 11 of the Southwark Plan notes the Council's objective to improve open spaces that will make the Borough attractive and provide sport, leisure and food growing opportunities for a growing population. This is supported by paragraph 5.89 which notes the Council's aims to work with the GLA to improve areas of MOL. Indeed, the London Plan itself makes a clear case for improving the quality of MOL within paragraph 7.56 of the reasoned justification of Policy 7.17 where it notes the Mayor's support for enhancing the quality and accessibility of MOL. As such a balance needs to be made between the relatively insignificant loss of MOL against the overwhelming benefits to a renewed and more publically beneficial Greendale.
32. The Council has the opportunity to impose conditions and negotiate planning obligations as part of this application to secure a high quality public realm at Greendale and as part of the linear park to ensure that the quality of the open space provides is aligned to the requirements of local residents. By mitigating any impact of the development, however negligible, the Council has an opportunity to seek funding and a clear delivery mechanism to allow these works to take place within the coming years.
33. The NPPF and sequentially, the London Plan, make openness and enclosure the primary tests for small scale development on MOL. It is noteworthy that the proposed design for the ground keeps structures to a minimum across the MOL. Although the boundary walls could in theory be argued to increase enclosure, the principle of the guidance considers openness as being more in

the medium and distant plane. As demonstrated within View 1 of the Townscape and Visual Impact Assessment, the new stadium sits comfortably below the existing treeline which currently provides the natural sense of enclosure for the area, indeed, even the new residential development, sits comfortably along the skyline. Allowing open sky views either side of the development will also help to maintain the sense of openness with Greendale. The discrete envelope of the new residential element should also be commended. Whilst this is not built on MOL, the fact it still seeks to conserve the sense of openness adds to the overall quality of the scheme.

34. At the human scale, the presence of a boundary wall does itself not manifestly increase the sense of enclosure or openness. Many boundary treatments and fences are found across MOL and Greenbelt sites across the country. In many cases, it is these structures that give the open space part of their unique character. Whilst the proposals are not aesthetically gratifying as the Queen’s Orchard in Greenwich Park or the Italianate colonnades at Brompton Cemetery, the principle remains the same. A discrete, well maintained boundary does not impinge on the overall enclosure of the MOL.

35. It is reasonable to consider similar applications for stadium development in similar circumstances. A sample of some relevant case studies are summarised below:

Year	Council	Application	Status	Reason
2004	Maidstone Borough Council	Construction of a 3,000 capacity football stadium on public open space	Granted	Overriding need for a stadium and improved access to open space
2012	Wakefield Council	Construction of a 12,000 capacity rugby stadium on Greenbelt	Granted	Harm to Greenbelt outweighed by the considerable need for a new stadium and wider sporting, health and lifestyle opportunities
2015	South Cambridgeshire District Council	Construction of a 3,000 capacity football stadium on Greenbelt	Granted	Open space was underused, views retained openness and sporting/ recreation uses were accepted Green Belt uses

### C. The emerging policy position as considered in the Housing White Paper

36. The Housing White Paper, published in February 2017, indicates a significant change in the government’s position regarding openness. Previous tests, much like that in paragraph 89 of the NPPF note the test for development is greater impact on openness. However, there is a clear shift in position from the government regarding this matter. Paragraph 4.18c of The White Paper alters the test from greater impact to ‘substantial harm’. As referenced in the section above, it is considered that the impact of the development does not affect the openness of Greendale but with that benchmark seemingly diminishing to a substantial harm, it becomes even more unfathomable that the proposal would fail the tests set by the Secretary of State.

## Conditions and obligations

37. DHST's support for this application is based on a broad principle that the site specific obligations to the s.106 agreement are met. In addition, we would seek the following alterations (underlined) to the clauses listed in the Heads of Terms.

Item	Details/Timings	Reason for change
Transfer of stadium to <u>fan ownership in the form of an appropriately established Community Benefit Society</u> , charitable and / or public ownership	Following the practical completion of the stadium and associated facilities, the ownership of said facilities will be transferred to <u>fan ownership in the form of an appropriately established Community Benefit Society</u> , a charitable leisure provider and/or LB Southwark.	To allow for maximum flexibility and allow for comprehensive fan ownership
Transfer of stadium to charitable and / or public ownership	No residential development shall commence prior to the practical completion of the stadium and <u>facilities associated with the matchday operations.</u>	To prevent protracted snagging and sign off at the leisure facility from delaying the commencement of the Football Club's operations
Construction of stadium to <u>allow for maintained access to the existing stadium for use by Dulwich Hamlet throughout the build process ensure minimal disruption to DHFC</u>	No change	Ensure the strongest possible protection is given to keeping the Football Club within their current ground, both in the Heads of Terms and in the final clauses.
Stadium made available to local schools, community and sports groups	The stadium and associated facilities shall be made available for use by local schools, community and sports groups. An indicative programme of use has been provided later in this appendix, including an element of free use to local schools. <u>The Primacy of Dulwich Hamlet Football Club for stadium use to be acknowledged</u>	To ensure that the Football Club maintains the right to use the facilities, as and when required for training, matchday and other ad hoc purposes

38. Should you be minded to recommend this application for approval, DHST also requests the following conditions:

Condition	Reason
Noise and lighting conditions to allow operation until 11pm on the main pitch	To acknowledge that occasional evening kick offs will require extra time and announcements/ floodlighting may be required.
Require sustainability/energy champion prior to occupation of the stadium and leisure facility	To ensure that wasted energy and running costs generated by lacklustre building performance is rectified

## Section 106 Application 16/AP/4051

39. We understand that the appeal for the Section 106 application is to be heard at the same time as application 16/AP/1232. The removal of these clauses must be handled with specific care to ensure the long term position of Dulwich Hamlet Football Club. We understand that it is the applicant's intention that these variations only become implementable following the signing of a new s106 agreement linked to application 16/AP/1232. However, if the obligations linked to the



1990 agreement are removed prior to a new ground being built, there is a significant risk to the club and recreational land use as the current ground could be lost to a different land use without adequate re-provision of a new stadium. As such, we would ask that additional wording be inserted to prevent the removal of these obligations until Practical Completion of a new stadium has been achieved. This would be in line with both the Council's Strategic Policy 4 within Southwark's Core Strategy, would support the broader ambitions of the London Plan and crucially, align to applicant's phasing of development as applied for in 16/AP/1232 and noted in the Heads of Terms for the new s106 agreement (para 6.155 of the Planning Statement dated March 2016).

## **Conclusion**

40. It has been said by some objectors to this application that the Club and the community are separate entities. We disagree. Dulwich Hamlet *is* the community and ensuring that the Club and its fans remain united to improve the neighbourhood and regenerate a previously unloved green space is important to the philosophy of DHST. Chiefly, the Trust is focussed on the sustainability of the Football Club which would be placed in serious and potentially grave jeopardy if this application were to be refused.
41. DHST considers that the significant benefits from the development outweigh any perceived harm to the MOL. In fact, through the application there is an opportunity to provide for an improved, more accessible open space for local residents. Therefore, the planning merits of this application should enable officers to recommend this application for approval.
42. We thank you for taking the time to consider this letter and await further correspondence regarding the timing of appeal hearing.

Yours sincerely,

Alex Crane – Chair  
James Masini MRTPI  
Darren McCreery MRTPI  
**Dulwich Hamlet Supporters' Trust**