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To whom it may concern,

New Southwark Plan Area Visions and Site Allocations

Ref: NSP38: Dulwich Hamlet Football Club, Champion Hill Stadium, Dog Kennel Hill

We write as representatives of one of the largest community groups in East Dulwich. One of our key objectives is to ensure the long term, secure and community-owned future for Dulwich Hamlet Football Club in East Dulwich.

We ask that the Planning Policy team consider our comments to ensure the long-term success of the Club in the local area is not adversely affected by changes to the current stadium site allocation in the New Southwark Plan.

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.

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 21st 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 with 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. 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 also has strong links 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 the community and has teams ranging from ages 9-21 and provides players with the opportunity to progress to the first team.

Background to Dulwich Hamlet Supporters' Trust (DHST)

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. DHST 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 Football Club 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 Football Club:
 - 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 have marked International Women's Day by giving out free tickets to south London women's teams, inviting female journalists and bloggers to Champion Hill and most recently, the first team changed their kit to purple for the match against Merstham to support the colour of the 2017 campaign.

- 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 Centrepoint 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 Football Club 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.

Southwark Plan Site Allocations

13. DHST would like to make the following comments with regard to the site allocation for NSP38 and the area vision for East Dulwich. Our comments are as follows:

East Dulwich Area Vision

14. Para 10.1.1 - We welcome the support for Dulwich Hamlet and suggest that this be strengthened to explicitly reference the valuable community function played by the Club.
15. Para 10.1.2 - When referencing development in East Dulwich, it would be helpful if the Council acknowledge the need for an improved and expanded stadium for Dulwich Hamlet. Whilst we understand within the context of the outstanding planning appeal, this may be challenging, there does appear to be little dispute over the fact that an improved facility would be to the benefit of the community; the debate is simply about where this ground should be. As such, the high level strategic nature of the Southwark Plan does not need to be

prescriptive and can simply acknowledge that a bigger and better stadium would be of benefit to the local area.

Site Allocation NSP38

16. We have previously raised the inaccuracies on the plans shown which have been acknowledged as a drafting area by a policy officer. The site area is noted as 37,530m². However, the red line boundary line to be closer to 14,000m².
17. We also consider the allocation of 30 units figure for proposed residential development potential is highly questionable. This fails to optimise the capacity of the site and sets an unnecessarily low target that is not in general conformity with the London Plan and in particular, Policy 3.4 (Optimising Housing Potential) and Table 3.2 (the Density Matrix). The allocation of the site as being in a Suburban setting is extremely misleading in light of the clear urban context of the site and its surroundings. The London Plan defines Suburban context as being:

"areas with predominantly lower density development such as, for example, detached and semi-detached houses, predominantly residential, small building footprints and typically buildings of two to three storeys."

18. Apart from a small number of late-20th Century houses immediately south of the site, no element of the area conforms to this definition.
19. The London Plan definition of an Urban context is as follows:

"areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 metres walking distance of a District centre or, along main arterial routes"
20. This is a far more appropriate description of Champion Hill and its surroundings and **we request that the allocation be changed to reflect this.**
21. The methodology paper - whilst an interesting exercise - is directly in contravention of the GLA in the London Plan and we would recommend the document be found unsound if not amended to reflect the GLA's established, sound and well-reasoned methodology. This matter goes beyond local distinctiveness; it is effectively contradicting established policy that has already been found sound by the Secretary of State.
22. As a result, the allocation for NSP38 is woefully under-delivering in terms of the net housing gain it can contribute to Southwark's housing targets.

23. More concerning still is the required use of just 7,685 sqm for a "football pitch". As highlighted earlier in this letter, Dulwich Hamlet Football Club is far more than just a simple pitch; it is the beating heart of this community. To allocate only for this space and not the significant amount on ancillary space required for the club to function is a colossal oversight – for example, where is the space for stands, floodlights, turnstiles, bar and other items. Because of this lack of provision for anything other than a pitch, any development that took place in line with the allocation would in effect kill off Dulwich Hamlet Football Club as it would not have the space to function and would certainly not meet the basic requirements that the Club must reach in order to play at its current level, let alone any higher. Prior to adopting this allocation DHST would ask that further work is done to fully understand what

the needs of the growing football are and ensure that any allocation does not significantly impact the long term sustainability of the Club or potentially even lead to its closure.

24. We request that the stadium itself (not just a pitch) be added to the list of required uses within the allocation with the explicit caveat that should an alternative facility be provided on Green Dale or elsewhere in close proximity, there will be no requirement to retain the existing stadium.
25. The designation of Other Open Space (OOS) for the pitch within the allocation is counterintuitive. The initial designation was put in place to secure the future of the club from unwelcome development. However, in doing so, there is now a serious risk that it now prevents a future stadium from being built in the area.
26. Open space and a high quality public realm is clearly an essential aspect of any new development, but this should not simply be a numbers game. The OOS designation was never about size of the space, it was about the use. If a stadium that secures the future of the club can be provided elsewhere, the OOS designation should not stunt that development.

The required uses should be revisited to provide the following:

- a football stadium containing a pitch of 7,685 sqm, ancillary club facilities (Class D2) of no less than 1,696 sqm and a capacity of no less than 3,000 spectators (**should no alternative facility be provided within 250m of this site**)
 - C3 residential uses
 - Open space commensurate with the scale of development
27. We also request that the Site Vision be changed to ensure references to the retention of the OOS and the ground need only be retained should an alternative facility not be forthcoming.
 28. We would welcome a meeting with officers and ward members to discuss this matter in greater detail.

Yours sincerely,

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