



DULWICH HAMLET SUPPORTERS' TRUST

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To whom it may concern,

New Southwark Plan – Preferred Option: New and Amended Policies

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

We write in response to the interim consultation on the “New and Amended Policies” version of the New Southwark Plan – Preferred Option. We note that some of the comments we and many others made previously in response to the last round of consultation have been taken on board and welcome the Council’s willingness to listen to its constituents and those concerned with Dulwich Hamlet Football Club. However, there are still several outstanding concerns that we feel need to be addressed as part of this consultation.

As representatives of one of the largest community groups (325 members) 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.

New Southwark Plan Interim Consultation Report

We note that the local groups and organisations who provided responses to the interim consultation were listed in the report however, there is no mention of DHST. As representatives of one of the largest community groups in East Dulwich, we would ask that our response is acknowledged in any future reports.

New Southwark Plan Preferred Option: New and Amended Policies

We 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

We note that no amendments have been made to this section of the document however, we would reiterate our original comments which are as follows:

1. 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.
2. 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

We note the amendments to this policy. In particular, the correction to the site area which now appears to be in line with the figure we were expecting and the addition of associated stadium facilities to the site uses.

Our outstanding comments on this site allocation are as follows:

3. We 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.”

4. Apart from a small number of late-20th Century houses immediately south of the site, no element of the area conforms to this definition.
5. 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”

6. This is a far more appropriate description of Champion Hill and its surroundings and **we request that the allocation be changed to reflect this**. We note that the design guidance now omits mention of mixed-use development including taller buildings. The exclusion of this wording was not noted in the consultation report. Given that a number of the existing residential buildings surrounding the site generally go up to 5 storeys high and, that the impact of taller buildings is mitigated by the gradient of the land being as it is, on a hill, we can only conclude that this has been excluded to support a lower site capacity which we have already raised concerns with in points 3-5.
7. 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.

8. 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.
9. We previously requested 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. We acknowledge the inclusion of the associated stadium facilities in the indicative development capacity however, the existing area of these facilities (1,696 sqm) has not been included. We would assume (and hope) that this is a minor error and will be corrected? If there is a reason for its exclusion we would request that an explanation is provided.
10. We would also note that should an alternative facility for the Football Club be provided on Green Dale or elsewhere in close proximity, then we would request that the alternative facility is completed prior to any development of the existing ground such that DHFC can continue to use the stadium without interruption before moving to the new location.
11. 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.
12. 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
13. 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.
 14. 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