

Southwark Council  
Chief executive's department  
Planning division  
Development management  
PO Box 64529  
LONDON, SE1P 5LX

13 August 2019

Dear Sirs,

**Re: Application 19/AP/1867**

I am writing to you from CPRE London (70 Cowcross Street London EC1M 6EJ) in relation to the above. CPRE London is a membership based charity with 2,500 members across London concerned with the protection and enhancement of London's parks and green spaces.

We **object** to the above application on the following grounds:

- Metropolitan Open Land is a strategic asset for all Londoners and not just those in Southwark and this application constitutes loss of MOL in that access for the public is lost; openness is severely compromised; and the proposed development is inappropriate development on MOL.
- The location of the new stadium, except for the clubhouse, is on **Metropolitan Open Land** which is protected under the London Plan (Section 7.17) and Southwark Plan (Policy 3.25). The areas of the new stadium that are on MOL include the 3G pitch (with underground drainage pipes), pitch over-run, crash barrier, concrete terraces, concrete concourse and fencing. These do not constitute an essential ancillary facility nor do they maintain the openness of MOL due to its enclosing wall. It would therefore be a departure from both the Southwark and London Plans.
- **There are no special circumstances which can justify the loss of MOL.** Dulwich Hamlet FC Ltd is a private company and could and should take an alternative approach, for instance developing the site it already occupies. This application is a departure from London Plan (Policy 7.17).
- The proposed stadium would require building on 747 m<sup>2</sup> of proposed **SINC** (Site of Importance for Nature Conservation) at Green Dale Fields OS128. This SINC site has been proposed in the New Southwark Plan. In their report dated 17/12/2015 The Ecology Consultancy recommended that Green Dale Playing Fields OS128 become a SINC because "A number of Southwark BAP species have been recorded on site

including hedgehog, stag beetle, common frog and house sparrow...The site probably offers one of the few remaining accessible areas of natural habitat in the local area as most nearby open spaces are managed for amenity and recreation". The London Plan (Policy 7.19) states that new developments should "wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity". Building on an area that meets SINC status contravenes this policy.

- The provision of a "**green link**" to mitigate the loss of MOL is contrary to the London Plan (Policy 7.17), section 7.56 which states that "development that involves the loss of MOL in return for the creation of new open space elsewhere will not be considered appropriate.
- The proposed stadium would be built on a green corridor that is used by **hedgehogs and bats**, though the applicant's Ecological Assessment tries to dismiss this, hedgehogs have been seen and also footprinted where the stadium is proposed (see Appendix 6 of the council's "Green Dale Fields Ecological Report" from July 2014). Both bats and hedgehogs are listed as important indicator species in the Southwark Biodiversity Action Plan, section 2.15. The stadium and its construction would also encroach on nesting red list whitethroat birds.
- The proposed open access **MUGA** in no way compensates for the loss of the freely accessible astro turf pitch, which is used extensively by local children. The MUGA is one twentieth of the size of the current astro turf pitch. This reduction in publicly accessible sports facilities goes against policies 2.1 'Enhancement of community facilities' of the Southwark Plan 2007, Strategic policies 4 'Places for learning, enjoyment and healthy lifestyles' and 11 'Open spaces and wildlife' of the Core Strategy 2011, and Policy 3.19 'Sports facilities' of the London Plan 2016."
- The current DHFC stadium is protected by a **restrictive covenant** to ensure it can only be used for "leisure or recreational or educational purposes". This development of 224 flats goes against this covenant and would see a large, non-ancillary development on land designated as **Other Open Space**. This would therefore be contrary to policy 3.27 'Other Open Space' of the Southwark Plan (2007).
- The height and massing of the 224 flats is **overbearing** and **out of scale** with the surrounding dwellings. The surrounding area is already densely populated with large housing estates on all four sides.
- The proposed stadium has a capacity of 4000 with the **option of increasing it to 5000** in the future. How this expansion will be carried out is not clear from the plans and it is concerning that further enclosure or encroachment on MOL is already being suggested, as MOL surrounds the stadium on three sides.
- According to FA rules about football grounds for National League South, the **perimeter fence** must "prevent individuals from viewing the game from outside the ground.. and be of a minimum height of 1.83 m as measured from outside the

ground.” As there is a steep bank to the NW of the proposed stadium, the fence will have to be 1.83 m tall from the top of this bank, even when the pitch is sunk. This is a very high impermeable fence that will block views across the site and will not maintain the openness of the MOL, even if it were screened by shrubbery. This fence, as suggested on page 25 of the Landscape Design Statement, is therefore in contravention of the London Plan (Policy 7.17) and the National Planning Policy Framework (Section 145b) and yet it is a requirement of the stadium from the FA.

- The astro turf pitch does not constitute “**previously developed land**” as page 55 of the National Planning Framework clearly shows that parks and recreation grounds are exempt. The developing of a large part of the stadium provision on MOL is therefore not an appropriate land use.

Please could you place these comments before the committee in the usual way.

I would be grateful if you could acknowledge safe receipt of this email.

Yours faithfully  
Alice Roberts  
CPRE London