

Your Ref: 16/AP/1232

Our Ref: 70004755/AXS/160527/A

31st May 2016

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Dear Amy

Subject: DULWICH HAMLET FOOTBALL CLUB – RESPONSE TO TFL

We are in receipt of consultation comments received from Mark Day at Transport for London within their letter dated 19th May 2016 (ref: 16/1459). It is encouraging to read that the comments are largely positive in nature and are generally supportive, however we note there are a number of items which TfL currently seek clarification on. I therefore set out herein a list of queries raised with our response to them, which I trust will provide the Council and TfL with the comfort they require to support this application. Taking these items in turn:

1. PTAL Calculation

Whilst it is acknowledged that the TfL WebCAT tool calculates a high PTAL 3 for the application site, upon closer inspection it is apparent that the model does not account for walking routes through St Francis Park. When these routes are manually input in to the model, the bus stops located adjacent to St Francis Park and East Dulwich station fall within a 130-220m walking distance respectively. The result of this amendment recalculates the site at a low PTAL 4. It should be noted that this correction does not now include Denmark Hill station as a Point of Interest (POI) within the calculation.

2. Site Access

Traffic surveys deployed along Abbotswood Road recorded 85th percentile traffic speeds of between 15-20mph. In response, the proposed site accesses have been designed to provide a visibility splay of 2.4m x 25m, which is appropriate for an observed 85th percentile 20mph traffic speed in accordance with Manual for Streets guidance. This is illustrated at Drawing 4755-SK-28 (see page 1,002 of the March 2016 Transport Assessment) and therefore accords with TfL's requirements.

3. Disabled Parking for the Stadium & Community Facilities

The Southwark Plan (2007) requires a minimum of 2 disabled spaces for developments with on-site parking. The London Plan (2016) parking standards for community, leisure and stadium developments require 6% of the overall parking provision to be allocated to blue badge holders.

As requested by TfL, we have also reviewed guidance provided by Level Playing Field, a registered charity that campaigns and advises members and parties across all sports on good practice for clubs and stadia including appropriate levels of accessible parking. A review of Level Playing Field guidance, in addition to guidance provided by the FA and UEFA, mirrors the London Plan standard of 6%.

There is no general car parking provided for the stadium or leisure uses, with the only spaces provided being allocated to disabled users. Whilst it is reasonable to conclude the proposed disabled parking provision is policy compliant, a minor rearrangement to the disabled parking located adjacent to the stadium can permit an additional bay to be provided on site. This revised arrangement is illustrated at drawing DHFC-PA-03-012-C attached hereto and now provides 4 disabled spaces located adjacent to the stadium.

It may be possible on match days to allow additional ad-hoc disabled parking to take place on site, subject to appropriate management and with due regard to highway safety. If further accessible spaces are required, the Stadium, in conjunction with the Council and police, will evaluate the potential for applying for a Temporary Traffic Regulation Order (TTRO) along the site frontage to Abbotswood Road, to enable disabled people to park on-street during match times.

4. Residential Car Parking

The development proposals actually provide a total of 62 car parking spaces within the residential block serving 155 dwellings, being equivalent to 0.4 spaces per dwelling.

A total of 10% of the residential units are designed to an accessible standard and in accordance with the London Plan (2016), each accessible unit benefits from a dedicated disabled parking space, being a total of 16 disabled spaces.

The development proposals will provide electric vehicle charging facilities in accordance with current London Plan requirements, with 20% of spaces equipped from the outset, whilst a further 20% will be safeguarded within appropriate infrastructure for future implementation, if required.

Should the Council wish to evaluate the potential implementation of a Controlled Parking Zone (CPZ) on the surrounding roads, the Developer is willing to provide an appropriate contribution towards a consultation exercise as appropriate.

5. Cycle Parking

All short term cycle parking for the stadium, leisure use and residential visitors will be provided within a communal facility located adjacent to the stadium and Multi-Use Games Areas (MUGA). In response to TfL's comments, the short term stadium cycle parking provision has been increased to 80 spaces, as illustrated on the attached drawing DHFC-PA-03-012-C. A further 4 visitor cycle spaces have been provided for the residential development within an area of open space located between Block C and the stadium accessible parking spaces.

6. Stadium Trip Generation

As set out within the March 2016 Transport Assessment (TA), Regulation 8 of the Football Association (FA) Football League rules requires any club seeking promotion from the Isthmian league to the Conference to provide a stadium with a capacity of at least 4,000 seats by 1st May following promotion. Dulwich Hamlets presently benefits from 3,000 seats and therefore must be improved in order to meet the FA qualification criteria, should the club wish to progress.

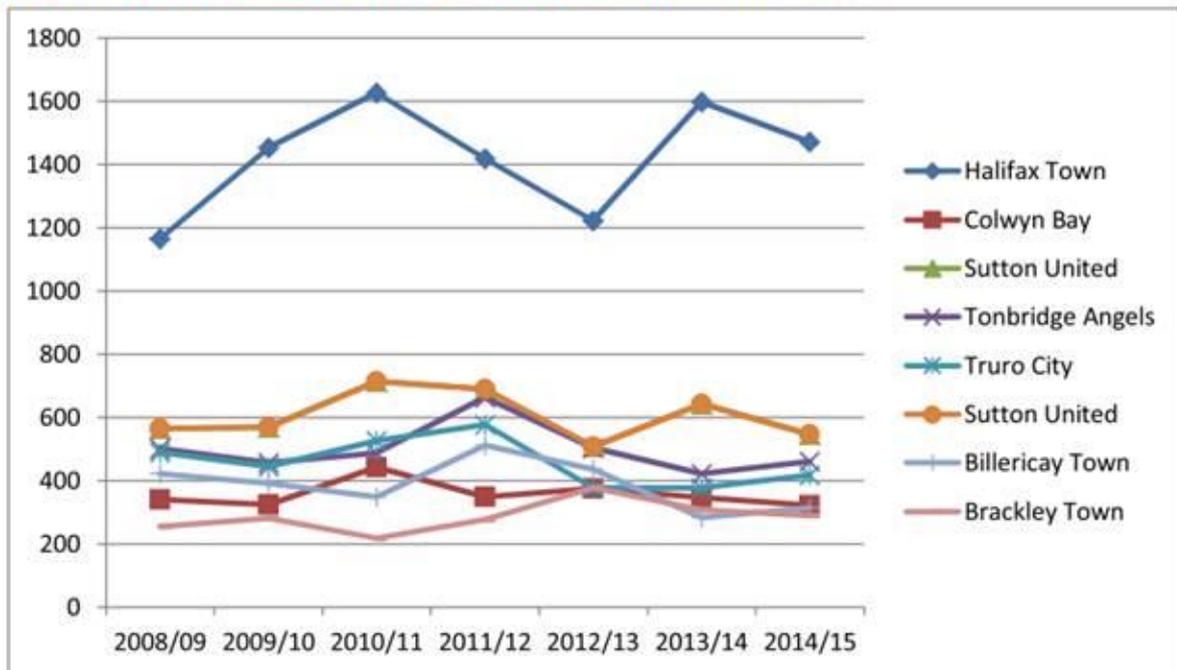
The March 2016 Transport Assessment (TA) identifies that Dulwich Hamlets presently attracts in the region of 517-1,032 spectators (most recent 2014-2015 statistics) during a weekday and weekend match respectively (17-34% capacity). The 2014-2015 season attracted unusually high levels of spectators, drawing the highest peak attendance since 1992. The use of 2015-2015 season data therefore forms a robust baseline upon which to consider junction and transport network impact.

It is important to note that current levels of attendance (baseline situation) vary throughout the Isthmian league, however the critical factor is to understand what affect, if any, promotion and increased stadium capacity may have on future attendance. To estimate levels of future demand, the FA attendance figures were interrogated for seven football league teams in tier 6, 7 and 8 that have been promoted over the last 7 years.

As illustrated within Figure 10-1 (page 60 and extract below) of the March 2016 TA, it is clear that promotion and resultant improvements to stadium capacity have little to no effect on spectator attendance within the Isthmian or Conference leagues. A breakdown of each club and their corresponding year of promotion is illustrated herein. When cross-referenced against the graph at Figure 10-1, it is clear promotion either has no effect on attendance or has a short term positive effect resulting in circa 100 additional spectators for the season immediately following promotion, with an immediate decrease back to pre-promotion levels during the following season.

In light of the evidence detailed within the TA and summarised within this letter, it is therefore reasonable to assume there will be no material increase to spectators to Dulwich Hamlets matches post-development and post-promotion.

Figure 10-1: Average Club Attendance in Tier 6, 7 and 8 Teams (2008-2015)



Note: green text = promotion; red text = relegation

F.C. Halifax Town

It is worth noting that at the end of the 2007 / 2008 season Halifax Town went into administration and the name was dissolved – they were in the Conference Premier at the time (i.e. the fifth level of the footballing pyramid) having historically been a football league side. They had to reinvent themselves and started in 2008 / 2009 to play in the Northern Premier League Division One North as F.C. Halifax Town.

2008 / 2009 – Started as a new club in the Northern Premier League Division One North

2009 / 2010 – Promoted from Northern Premier League Division One North to Northern Premier League as champions

2010 / 2011 – Promoted from English Northern Premier to Conference North as champions

2011 / 2012 – Finished 3rd (not promoted) in the Conference North

2012 / 2013 – Finished 5th and promoted via the play-offs to the Conference Premier

2013 / 2014 – Finished 5th (not promoted) in the Conference Premier

2014 / 2015 – Finished 9th (not promoted) in the Conference Premier

Therefore essentially attendances dropped significantly in 2008 when they were demoted three divisions and the attendances rose as the club became moderately successful and got back to where it had started from. As a result this can be considered to be special circumstances.

Colwyn Bay

2008 / 2009 – Finished 4th (not promoted) in the Northern Premier League Division One North

2009 / 2010 – Promoted from Northern Premier League Division One North to Northern Premier League via the play-offs

2010 / 2011 – Promoted from English Northern Premier to Conference North as runners up (to Halifax)

2011 / 2012 – Finished 12th in the Conference North

2012 / 2013 – Finished 18th in the Conference North

2013 / 2014 - Finished 12th in the Conference North

2014 / 2015 – Finished 20th and were relegated from the Conference North to the English Northern Premier

Sutton Utd

2008 / 2009 – Finished 5th (not promoted) in the Isthmian Premier League

2009 / 2010 – Finished 2nd (not promoted) in the Isthmian Premier League

2010 / 2011 – Promoted from Isthmian Premier League to English Conference South as champions

2011 / 2012 – Finished 4th in the Conference South

2012 / 2013 – Finished 6th in the Conference South

2013 / 2014 - Finished 2nd (not promoted) in the Conference South

2014 / 2015 – Finished 15th in the Conference South

Tonbridge Angels

2008 / 2009 – Finished 3rd (not promoted) in the Isthmian Premier League

2009 / 2010 – Finished 8th in the Isthmian Premier League

2010 / 2011 – Promoted from Isthmian Premier League to English Conference South via the play-offs

2011 / 2012 – Finished 9th in the Conference South

2012 / 2013 – Finished 16th in the Conference South

2013 / 2014 - Finished 21st and relegated from the Conference South to the Isthmian Premier League

2014 / 2015 – Finished 20th in the Isthmian Premier League

Truro City

2008 / 2009 – Promoted from Southern League Division One South and West to the English Southern Premier as champions

2009 / 2010 – Finished 11th in the English Southern Premier

2010 / 2011 – Promoted from English Southern Premier to English Conference South as champions

2011 / 2012 – Finished 14th in the Conference South

2012 / 2013 – Finished 22nd and relegated from the English Conference South to the English Southern Premier

2013 / 2014 - Finished 17th in the English Southern Premier

2014 / 2015 – Finished 3rd and promoted from the English Southern Premier to the English Conference South via the play offs

Billericay Town

2008 / 2009 – Finished 11th in the Isthmian Premier League

2009 / 2010 – Finished 13th in the Isthmian Premier League

2010 / 2011 – Finished 11th in the Isthmian Premier League

2011 / 2012 – Promoted from Isthmian Premier League to English Conference South as champions

2012 / 2013 – Finished 21st and relegated from the Conference South to the Isthmian Premier League

2013 / 2014 - Finished 10th in the Isthmian Premier League

2014 / 2015 – Finished 8th in the Isthmian Premier League

Brackley Town

2008 / 2009 – Finished 11th in the English Southern Premier

2009 / 2010 – Finished 5th (not promoted) in the English Southern Premier

2010 / 2011 – Finished 9th in the English Southern Premier

2011 / 2012 – Promoted from English Southern Premier to English Conference North as champions

2012 / 2013 – Finished 3rd (not promoted) in the English Conference North

2013 / 2014 - Finished 7th in the English Conference North

2014 / 2015 – Finished 18th in the English Conference North

Whilst evidence demonstrates that promotion is unlikely to give rise to any increase in spectators, for robustness and for purely sensitivity purposes, a notional increase in typical attendance to Dulwich Hamlets was assessed by assuming the same percentage of new seats will be occupied, as currently occurs (i.e. 17% of the 1,000 new seats on a weekday and 34% of the 1,000 new seats on a weekend). This assessment therefore leads to the assumption that a further 170-340 spectators could visit the site on a weekday and weekend respectively, of which around 17-34 would drive.

The cumulative impact of all elements of the development was considered to give rise to approximately a 2% impact on the Edgar Kail Way / Dog Kennel Hill signal junction with the impact falling as distance increases beyond the site. It is therefore reasonable to conclude that the development proposals will not give rise to any significant material impact.

The attendance figures obtained for Dulwich Hamlets have been provided by the club and reflect actual recorded numbers through the turnstiles for every match. These figures are freely available from the Dulwich Hamlets website and are contained in full within Appendix K of the TA.

7. Residential & Leisure Trip Generation

During pre-application discussions, the London Borough of Southwark requested the use of TRAVL to calculate total (all person) trips to the development. Interrogation of the TRAVL data however, identified that the residential sites selected which were deemed appropriate based on the location, parking provision, PTAL etc., generated no rail or underground trips. Given that the Dulwich Hamlets site is located within a 3 minute walk of East Dulwich station, an assumption that suggested no trips by rail was considered inappropriate. On that basis, an alternative to TRAVL was sought to justify modal split.

Through subsequent pre-application discussions with the London Borough of Southwark (LBS) it was agreed that a more appropriate measure of modal split would be to utilise the London Travel Demand Survey (LTDS) for the Southwark area. The resultant use of LTDS demonstrated around 22.9% of residents would be likely to utilise the bus, 13.7% on rail and underground with only 13.3% driving by car which is considered appropriate and was agreed with the Council.

8. Transport Impact

Given the justification provided within this letter, we now trust TfL will be able to take a view on junction capacity and transport impact.

It is noted that since the traffic surveys were undertaken, changes have been made to the signal timings at the junction of Dog Kennel Hill and Edgar Kail Way. It is assumed that the changes have been made either to (i) improve traffic flow, or (ii) optimise time to assist pedestrians crossing. If the changes improve traffic flow, then the result will be a higher level of baseline capacity on the network and consequently the impact of the development can be more readily accommodated, albeit as demonstrated in the March 2016 Transport Assessment the impact is considered negligible. If the signals have been optimised for the benefit of pedestrians, this would accord with sustainable transport policy and assist pedestrians to travel to and from the development. Either way, it is reasonable to assume that a model of the pre-optimised signal junction provides a robust assessment of traffic impact and network performance and is therefore acceptable.

9. Walking and Cycling

As requested, the proposed landscaping located adjacent to residential unit A-01 has been revised to ensure that the new footway situated along the western side of Abbotswood Road remains of a consistent 2m width, as illustrated on the attached drawing DHFC-PA-03-012-C.

In response to TfL comments, the Developer agrees to implement rising bollards at the entry to the stadium access road.

The design team agree that widening of the shared pedestrian / cycleway is appropriate and the attached drawing now illustrates a 3m wide route from the western end of the stadium access road to the edge of the redline boundary with Green Dale fields.

The Developer is happy to provide an appropriate contribution, in keeping with the scale of development, towards wayfinding signage both within and adjacent to the site in accordance with Legible London guidelines.

10. Travel Plans

We can confirm that CCTV will be provided to cover the proposed cycle parking located adjacent to the stadium. Details of the CCTV system can be secured via an appropriately worded planning condition.

The Framework Travel Plan (FTP) is currently focussed on the stadium, which is the main trip generator on the site. Notwithstanding this, the FTP equally applies to the residential and leisure uses and further details will be set out within the final Travel Plan, which can be secured via an appropriately worded planning condition. We note the comments relating to targets and we are happy to revisit and agree these in advance with TfL and the Council within the final Travel Plan.

We can confirm that a Construction Logistics Plan (CLP) is acceptable and can be secured via an appropriately worded planning condition.

Conclusion

I trust the above information appropriate addresses all outstanding queries and will enable the Council and TfL to support the application on transport grounds. I would be happy to meet with you or TfL to discuss further if helpful. Alternatively, should you have any further comments, please do not hesitate to contact me.

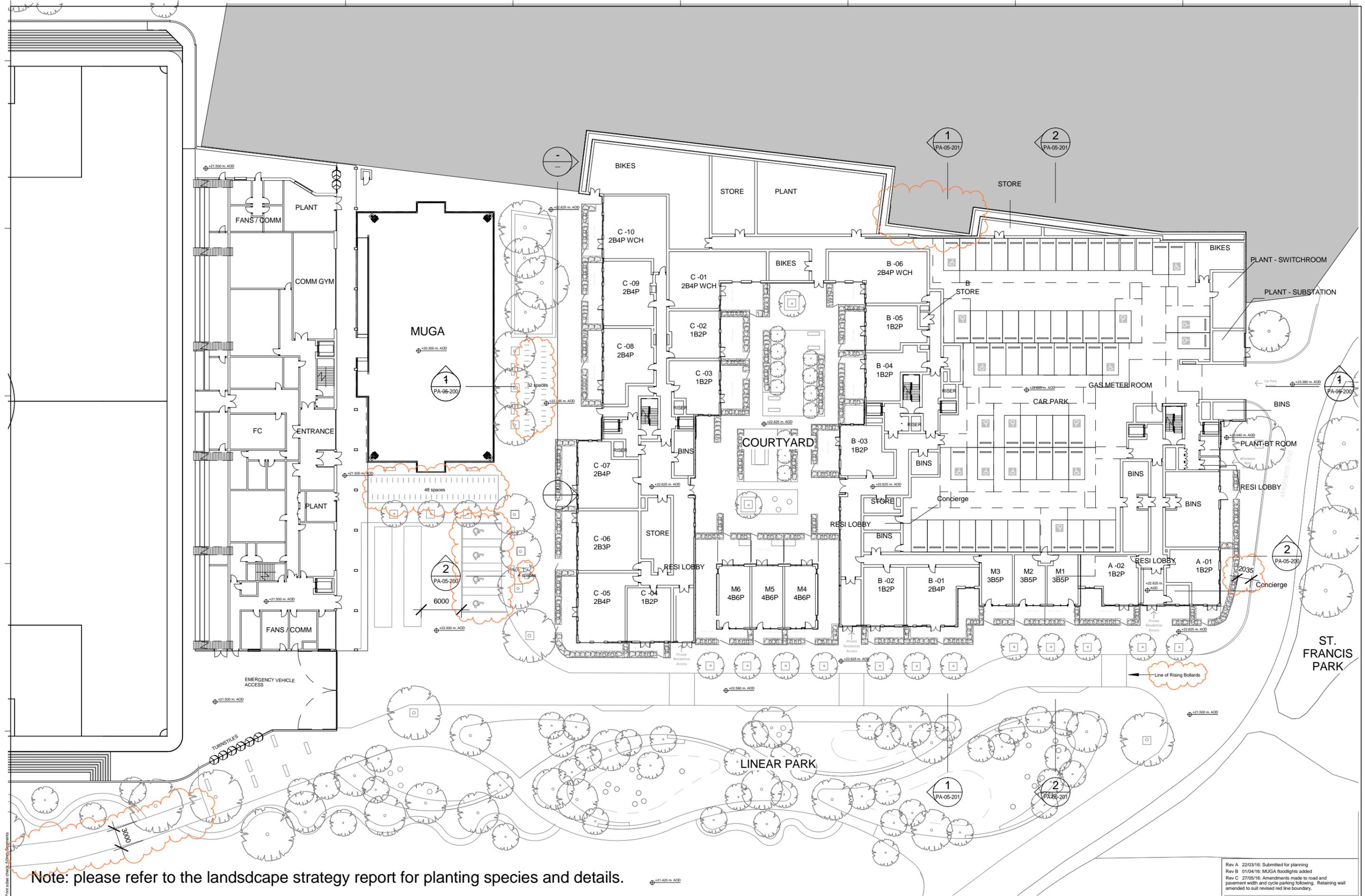
Yours sincerely,



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Encl. Drawing DHFC-PA-03-012-C



Note: please refer to the landscape strategy report for planting species and details.

Rev A 22/03/16: Submitted for planning
 Rev B 01/04/16: MUGA floodlights added
 Rev C 27/05/16: Amendments made to road and pavement width and cycle parking following. Retaining wall amended to suit revised red line boundary.