

Addendum Core strategy publication/submission version (excluding housing)

Comment by	Section	Comment	Proposed change	Change made yes/no
General	Report	Changes to report recommendations.	Agrees the proposed 'saved policies' for the Southwark plan (minus the housing policies) as set out in Appendix F <u>to send to Council Assembly for final agreement</u>	
General	All	Changes to headings, grammar and spelling, some paragraphs have been moved around to meet GoL objections	These have been made throughout – a tracked change version is available	
General	Section 1	Refer Southwark 2016 and how we work together with Southwark Alliance	<p>Improving our places through Sustainable Southwark 2016 and the Core Strategy</p> <p><u>We work closely with Southwark Alliance. Southwark Alliance has prepared our sustainable community strategy called Southwark 2016. The strategy sets out what people want Southwark to be like and what needs to be done to get there. It has been developed by Southwark Alliance which is a forum of opinion, reflecting the diversity of the lives of the people in the borough. It brings together the Council and other statutory organisations, with voluntary, business, faith and community sector organisations.</u></p>	

			<p><u>Southwark 2016 sets out a vision for the borough alongside objectives and priorities for how the vision will be achieved.</u></p> <p><u>Southwark 2016's objectives and priorities form the basis of our core strategy objectives. The core strategy translates these objectives into a physical reality by setting out our spatial framework of how we will design, build and plan Southwark</u></p>	
Executive member	Section 3 Old Kent Road Action Area	Designate Old Kent road as an Action Area rather than a Regeneration area with an area action plan to guide a new strategy for the area.	We will set out guidance in an area action plan regeneration plan for the provision of housing, employment and small, local shops to complement the multiple retailers already there. <u>This will include a review of the proposals map designations.</u>	
Executive member	Section 3 Old Kent Road Action Area	Designate Old Kent road as an Action Area rather than a Regeneration area with an area action plan to guide a new strategy for the area.	<u>Whilst the Mayor does not set us targets for Old Kent road, we will set targets for homes, employment and retail through the area action plan. The Mayor does not set us setting out the capacity for development and how the potential for change can be implemented.</u>	
Environment agency	Section 2 Challenges facing Southwark today	Additional challenges should be included to cover all objectives	<u>Make sure the design of developments is carefully thought through to contribute to successful places for people.</u>	
Environment	Section 2	Additional challenges should be	<u>Minimise our impact on the environment and</u>	

nt Agency	Challenges facing Southwark today	included to cover all objectives	<u>adapt to climate change by better managing energy use, waste, water use, flood risk and controlling pollution</u>	
Environment Agency	Section 2 Challenges facing Southwark today	Additional challenges should be included to cover all objectives	<u>How we can ensure the core strategy is deliverable and sustainable by taking into account the capacity of planned and existing infrastructure.</u>	
Planning Committee	Section 2 Challenges facing Southwark today	Should mention Rotherhithe as part of the area with suburban character	How we can protect the suburban character of <i>Rotherhithe and</i> the south of the borough	
General	Section 2 Southwark Today	More facts and figures on Southwark today.	<p><u>National economy</u> <u>The UK is currently experiencing the effects of the global economic crisis which is limiting the country's economic growth and is expected to continue for the next two to three years.</u></p> <p><u>The northern part of the borough, which forms part of the CAZ, would undoubtedly have been affected by the on-going recession; however the concentration of business services as opposed to financial services in this area of the borough may offer some degree of resilience.</u></p>	

			<p><u>The impact of the recession on Southwark can be measured in job losses. After four years of substantial reductions in the benefit claimant count, 2008 saw significant increases in the number of Job Seeker Allowance claims in the borough. An increase of 15.6% was experienced between May 2008 and January 2009.</u></p> <p><u>Forecasters have suggested that London's employment growth will, eventually, resume its upward trend in the medium term. Southwark will need to ensure that conditions for growth and recovery are in place to help future growth to happen.</u></p> <p><u>Southwark's regeneration programmes, at Borough, Bankside and London Bridge, Elephant and Castle, Canada Water and the Aylesbury Estate will help to significantly improve the quality of the physical environment, which will help create the conditions necessary to stimulate investment, invigorate the local economy and promote sustainable long-term regeneration.</u></p> <p><u>Enterprise check the facts -BAO still to check and give me wording</u></p>	
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			<p><u>The biggest concentration of business services in the borough is in the CAZ. These include major financial services, publishers and legal firms. Education and health are major employers in the borough, along with the council and the Greater London Authority. Southwark's business base comprises of around 12,800 businesses. In 2007, there were a total of 165,800 employees in Southwark, making the borough the 7th largest economy London (ABI, 2007). The largest business industry sector in Southwark is banking, finance and insurance (business services) which comprises of 45.8% of businesses compared to 44.1% in London. The second most dominant industry sector is Distribution, hotels and restaurants at 21.9%, compared to 23.6% in London. The business services sector has driven the expansion of the business base in Southwark since 1998 has also been responsible for the majority of jobs growth over the last decade. Since 1998 the sector has contributed 31,500 new jobs to the borough's economy, a growth rate of 102%.</u></p> <p><u>Growth in the number of jobs in Southwark has increased greatly between 2003 and 2007 and has been concentrated in</u></p>	
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			<p><u>Cathedral (+9,200 jobs or +18%), and Riverside (+7,200 jobs or +39%), wards within the Central Activity Zone. The New Business Registration rate (measured as per 10,000 population) was 96.8 in 2007 and ranks 11th out of the London boroughs. In 2007, the proportion of small businesses (less than 50 employees) showing growth stood at 13.3%, Southwark ranks 6th place against the London boroughs and has outperformed London as a whole. 96% of businesses in Southwark are micro or small businesses employing less than 50 people. 2.7% of businesses employ between 50 and 199 employees. There are 114 large or corporate sized companies in Southwark employing more than 200 people. This is equivalent to 0.9% of all companies in the borough. However despite this small figure, they provide 72,316 jobs which is 52.4% of the employment.</u></p> <p><u>Climate change</u></p> <p><u>Energy use in buildings is responsible for 85 per cent of the direct carbon dioxide emissions in Southwark. Since 1996, we have helped to increase the energy efficiency of the existing housing stock in the</u></p>	
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			<p><u>borough by approximately 5%.</u></p> <p><u>Southwark has slightly lower than the UK average for carbon dioxide emissions with 6.7 tonnes per year of carbon dioxide emissions compared with a 9.7 average for the UK. 2.4 tonnes per year are domestic emissions, compared with 2.7 as a UK average. Our local domestic emissions are due to our dwellings being more energy efficient that the average UK home.</u></p> <p><u>Within Southwark, solar energy and bio-fuels were the most popular choices of renewable energy infrastructure chosen in 2007/08 with at least 40 pieces of technology installed on buildings.</u></p> <p><u>Waste</u></p> <p><u>In 2007/08 there was a slight increase in the total amount of waste collected. The percentage of total waste recycled and composted has continued to increase. The amount used to generate electricity has fallen this year but is the second highest figure achieved so far. Last year was an</u></p>	
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			<p><u>exception as 7,620 tonnes of waste was sent to an incinerator in Kent to help test the facility. The amount of waste disposed of in landfill has continued to meet the Councils landfill targets although the figure has increased from last year as a result of the additional waste not sent to the Kent</u></p> <p><u>Crime</u> <u>The pattern of crime distribution (in terms of burglary, theft, criminal damage and violence) in Southwark has a different pattern of distribution to other indices of deprivation. Whilst some of the most deprived areas of the borough do not have the highest levels of crime, some areas in the centre of the borough experience both high income deprivation and crime deprivation.</u></p> <p><u>Over a third of Southwark falls within the 10% most deprived in terms of crime with over half of Southwark in the 20% most deprived in England. Between 2004 and 2007, nearly a third (29%) of areas in the borough had a decrease in the number of crimes. However 22% of areas elsewhere in the borough had an increase in the number of crimes. Crime rates in Peckham,</u></p>	
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			<p><u>Riverside, Rotherhithe, East Dulwich and Livesey wards had no areas that saw an increase in crime between 2004 and 2007.</u></p> <p><u>Inequalities within Southwark</u> <u>The level of wealth is very high in areas such as Herne Hill, Dulwich, London Bridge and Bankside. However, there are high levels of poverty in areas such as Peckham, Elephant and Castle and the Aylesbury Estate. Within this, in 2007, East Walworth was ranked as the most deprived ward in Southwark, slipping from the 5th most deprived ward in Southwark in 2004. As a result, Livesey moved from being the most deprived ward in Southwark in 2004 to the 2nd most deprived ward in 2007.</u></p> <p><u>The Southwark Housing Requirements Study found that 53,500 (20%) people living in Southwark said they had health problems. So 25% of households contained at least one member with a health problem. 18,030 people had long term illness, disability or infirmity. 690 were wheelchair users and 4,460 had other walking or mobility difficulties. 4,470 had difficulties due to old age or frailty</u></p>	
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			<p><u>In 2008 there were an estimated 38,412 households living in unsuitable housing with a need to move with high levels of overcrowding, particularly in the Council's own stock.</u></p> <p><u>The most income deprived areas with children in Southwark are concentrated in the centre and towards the north of Southwark with 35% of areas (throughout the borough) having children in families in income deprivation appearing in the most deprived range. These were found in most wards except Village, Peckham Rye, Chaucer and East Dulwich. The highest childhood deprivation was an area in Rotherhithe, which had 72% of children living in income deprived families.</u></p>	
Executive	Section 3 Old Kent Road	Change to Action Area to enable scope for further development. Provide a link to an area action plan.	<p>Change Old Kent Road regeneration to <u>action area</u> throughout document.</p> <p>The Mayor does not set us <u>We will set out</u> targets for homes and employment for the Old Kent Road <u>Action area Regeneration in an Area action plan.</u> We will prepare <u>This</u> planning</p> <p>Guidance <u>will</u> set out the capacity for development and how the potential for change can be implemented.</p>	

Executive	Section 3 The Blue	Provide further clarity about the types of shops that we will welcome.	The Blue has a market place and is a busy local shopping area along Southwark Park Road. However, there are a high number of vacant units and a lack of variety on offer in shops. We own many of the shopping units and we will review the contribution they could make towards revitalising the Blue. Working with the local community, we will be preparing a strategy to improve the quality of the shops and services for local people to encourage them to use the Blue. <u>This will include limiting take aways and encouraging shops that provide local goods and cafes to add vitality.</u> We need to find niche shops that will build up momentum for rejuvenating the area and that will encourage other more mainstream local shops and services to start up.	
Planning Committee	Policy 2 Sustainable transport – we are doing this because, paragraph 7	Reword to set out: the current situation, what we are doing now, our approach to keeping what we have now, that we are open to new public transport and that we will encourage new infrastructure to improve accessibility.	The paragraph has been reworded to make it more clear. There is no change in content. The tracked changes version available shows the changes.	
Planning Committee	Policy 2 Sustainable transport – we are doing this	Take out the road user hierarchy	The tracked changes version available shows the changes.	

	because, paragraph 7			
Planning Committee	Policy 2 Sustainable transport – we are doing this because	Cross River Tram – should not be so positive about this being delivered. Should change the will to would.	<p>Changes to policy 2</p> <p>The Cross River Tram may link Camden with Peckham and Brixton via Kings Cross and Waterloo, connecting through Elephant and Castle and Aylesbury. It would help residents to easily reach central London and would also improve access to areas such as Peckham and Aylesbury.</p> <p><u>A corridor where public transport improvements are needed has been identified running from the Elephant and Castle through the Aylesbury area and north Peckham. This was identified as a possible route for the Cross River Tram linking the area with Waterloo, the West End, Kings Cross and Camden. This proposal is no longer supported by the Mayor’s Transport Strategy but Southwark will continue to work with Transport for London on identifying alternative public transport improvements to improve accessibility in these areas. We will consider the need for safeguarding land for any such project in the Peckham and Nunhead Area Action Plan.</u></p> <p>The Thameslink Programme 2000 is a massive rail investment programme which will provide many more journey options for passengers travelling through or to London</p>	

			<p>from the North and South.</p> <p>Blackfriars station is being rebuilt to span the River Thames <u>with a new entrance on the south bank.</u></p> <p>The East London line phase 2 extension will be part of the new London Overground network and this extension will connect services <u>between</u> from Surrey Quays to Clapham Junction.</p> <p>Cross Rail is a new high frequency and accessible railway which will improve rail services in the south east of London.</p> <p>We also consider a new station at Camberwell and the extension of Bakerloo and Victoria line services to be important schemes that could greatly increase accessibility.</p> <p><u>The Mayor's Transport Strategy proposes a further review of the extension of the Bakerloo Line beyond 2020. This has the potential to considerably improve accessibility in Camberwell and Peckham and the borough will support any forthcoming proposals by making appropriate land available when required. If the Bakerloo Line is not to be extended during the life of the plan, Southwark will seek alternative improvements to accessibility in these areas such as the proposed new station on the Thameslink line</u></p>	
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			<p><u>at Camberwell</u></p> <p>Changes to the delivery and implementation section as follows:</p> <p><u>Delivery and infrastructure</u> <u>Improvements to public transport accessibility from Elephant and Castle through Aylesbury area to north Peckham through segregated bus lane or similar</u></p> <p><u>Improvements to public transport accessibility in Camberwell and Peckham</u> <u>The Mayor's Transport Strategy includes a commitment to review the options for extending the Bakerloo Line.</u></p> <p><u>Southwark will continue to investigate viability of providing a new station at Camberwell on the Thameslink line.</u></p> <p>Phasing <u>Alternatives to the Cross River Tram currently being considered jointly by Transport for London and relevant boroughs</u></p> <p><u>As a long term proposal for delivery towards the end of the plan period it is not crucial for delivery of the strategy in the first 10 years.</u> <u>This will be monitored and alternatives (such</u></p>	
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			<p><u>as enhanced bus services) will be identified as necessary</u></p> <p><u>After 2020</u></p> <p><u>As a long term proposal for delivery towards the end of the plan period it is not crucial for delivery of the strategy in the first 10 years. This will be monitored and alternatives (such as enhanced bus services) will be identified as necessary</u></p> <p><u>No commitment to Camberwell Station - Southwark would wish to see this considered as an option if Bakerloo extension does not go ahead beyond 2020</u></p> <p><u>Who will be involved</u> <u>Transport for London</u> <u>Bakerloo extension not funded at present and unlikely to be funded before 2020</u></p> <p><u>No funding identified at present</u></p>	
	Policy 2 Sustainable transport – we	<u>Remove funding for Crossrail</u>	<u>, including funding for Crossrail in line with the London Plan Use of planning obligations in funding Crossrail supplementary planning</u>	

	are doing this because section		document.	
Planning Committee	Policy 2 Sustainable transport – we are doing this because	Insert the findings of the bus scrutiny review.	<u>The majority of Southwark is well served by the London Bus Priority Network. The network is particularly extensive in the northern half of the borough where there are approximately 50 high frequency and 12 low frequency bus services.</u>	
Executive	Policy 4 Places to learn and enjoy, We are doing this because	Provide further detail of the requirements for funding to be available for community facilities before they are provided with planning permission.	<u>Community facilities are a very important resource to provide places for activities. It is essential that they are planned carefully to make sure that when they are built local users can afford to manage them otherwise they can be left empty. Community facilities must have a management plan setting out who the identified users are and how they will use the community facility, ensuring that it is accessible for local groups</u>	
Executive	Policy 10 Job and businesses, we will do this by	Providing further detail on protection of employment land in development management documents particularly the development management DPD and area action plans.	<u>Providing further detail on protection of employment land in development management documents particularly the development management DPD and area action plans.</u>	
Planning Committee	Thames Policy Area fact box	Add in protection of the Thames walkway.	This includes its contribution to the history of Southwark and London, its use for recreation and transport, <i>protection and enhancement of the river walkway</i> , and its importance as a habitat and part of the city's	

			natural cycles.	
Executive	Proposals map Old Kent Road action area boundary	Change to include more sites	Boundary has been amended as set out in figure A21.	
GOL	Vision and objectives .	You provide an overall vision followed by a series of area based visions. The overall vision is not locally distinctive, nor does it set out the overall proposed quantum of development for the borough. This could make the vision look more aspirational rather than how Southwark will address identified issues.	<p>We will make sure that Southwark improves as a place where local facilities, the transport network and infrastructure is supporting the fast pace of change <u>in growth areas such as Borough, Bankside and London Bridge, Elephant and Castle, Canada Water, Peckham and Nunhead and the Aylesbury, where we are increasing homes by around 10% from 123,945 to 148,398, office space by at least 33 % from 1,255,000 to 1,674,885 and people working by at least 15 % from 165,800 to 190,800 between 2009 and 2026.</u></p> <p><u>We will make sure that this regeneration is as sustainable as possible by setting high environmental and design standards along with protecting and improving a network of open space and heritage throughout the borough.</u></p> <p>as we have more than 25,000 new residents and thousands of new businesses since 1991 and more than 24,450 homes and</p>	

			<p>thousands more jobs anticipated by 2026.</p> <p><u>Set beneath the River Thames</u> Southwark is made up of a diverse group of places with distinct identities where people who live, learn, work and have fun here can benefit from the vibrancy of our cultures and communities. We have set out unique visions to show the successful places that we want them to be.</p>	
GOL	Vision and objectives	<p>A further draft of the vision was forwarded to GOL on 18 October 2009. This does meet most of our comments in that it refers to where the main areas of growth will be and does refer to overall quantum of development in relation to housing, retail and employment. Will you have linkages to the area based vision which sets out in more detail what you are trying to achieve within the borough?</p> <p>However, our comment still stands in relation to the following: <i>“Ideally the plan should include a policy setting out the quantum of development to be provided, at borough and locality level, so that there is a policy hook for subsequent</i></p>	See revisions to vision above	

		<p>AAPs/DPDs.”</p> <p>Apart from a reference to CAZ the objectives do not come across as being locally distinctive.</p>		
GOL	New policy	<p>In relation to this - ideally the plan should include a policy setting out the quantum of development to be provided, at borough and locality level, so that there is a policy hook for subsequent AAPs/DPDs</p>	<p>New policy.</p> <p><u>Strategic policy 15 Achieving growth</u></p> <p><u>Development will improve the places we live and work in and enable a better quality of life for Southwark’s diverse population. They must contribute to our strategic vision and objectives for the borough for further protecting, enhancing and regenerating Southwark between 2009 and 2026 so that our borough continues to be successful and vibrant. We will work with our partners, local communities and developers to ensure that developments improve our places through delivery of regeneration in our growth areas to achieve our targets.</u></p> <p><u>Retail</u></p> <p><u>All major development for shopping, leisure and culture development to be in town centres</u></p> <p><u>No net loss of shopping, leisure and culture</u></p>	

			<p><u>floorspace in growth areas</u></p> <p><u>Elephant and Castle/Walworth Road - around 45,000 sqm of additional shopping and leisure space</u></p> <p><u>Canada Water - around 35,000sqm of additional shopping space and increased leisure space</u></p> <p><u>Employment:</u></p> <p><u>London Plan indicative employment capacity for OAs and AI</u></p> <p><u>Borough, Bankside and London Bridge: 400,000 -500,000 sqm of additional business floorspace</u></p> <p><u>25,000- 30,000 sqm of additional local business floorspace</u></p> <p><u>Housing</u></p> <p><u>Meeting the London Plan overall housing target and rolling this on to 2026 to meet the target of 24,450 net new homes between 2011 and 2026.</u></p> <p><u>Meeting the new London Plan targets for net</u></p>	
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			<p><u>new homes for the following areas:</u></p> <p><u>Borough, Bankside and London Bridge Opportunity Area: 1,900</u></p> <p><u>Elephant and Castle Opportunity Area: 4,000</u></p> <p><u>Canada Water action area core: 2,500</u></p> <p><u>Meet the affordable housing target of 8558 homes</u></p> <p><u>35% affordable housing (including family housing) provided on all student sites of the equivalent of 10 or more housing units</u></p> <p><u>Meeting the mix of housing required in different areas of the borough.</u></p> <p><u>Strategic policy 16 Improving places</u></p> <p><u>Development will improve the places we live and work in and enable a better quality of life for Southwark’s diverse population. They must contribute to our strategic vision and objectives for further protecting, enhancing and regenerating the places in Southwark between 2009 and 2026 so that our borough</u></p>	
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			<p><u>continues to be successful and vibrant. We will work with our partners, local communities and developers to ensure that developments ACHIEVE THE REQUIRED growth and IMPROVEMENTS TO OTHER areas to achieve our targets.</u></p> <p><u>Borough, Bankside and London Bridge</u> <u>Homes - London Plan target 1900</u> <u>Jobs - London Plan indicative employment capacity - 25000</u></p> <p><u>Elephant and Castle</u> <u>Homes - London Plan target 4000</u> <u>Jobs - London Plan indicative employment capacity - 5800</u> <u>Retail - around 45,000 sqm of additional shopping and leisure space</u></p> <p><u>Canada Water</u> <u>Homes - London Plan target 2500</u> <u>Jobs - London Plan indicative employment capacity - 2000</u> <u>Retail - around 35,000sqm of additional shopping space and increased leisure space</u></p>	
GOL	Vision and objectives .	Apart from a reference to CAZ the objectives do not come across as being locally distinctive.	We have added the quantum, rearranged the visions and objectives and changed the headings for the areas to be clearer.	

			<p>New objective: <u>Theme 5 Planning for development in growth areas -put this in relevant policies</u> <u>Objective 5A Developing in growth areas</u> We have a growth areas approach to achieving the vision to improve places prioritising development in the:</p> <ul style="list-style-type: none"> Central activities zone. Elephant and Castle opportunity area. Borough, Bankside and London Bridge opportunity area. Peckham and Nunhead action area. Canada Water action area. Aylesbury action area. West Camberwell regeneration area. Old Kent Road regeneration area. 	
GOL	Area based visions	<p>There was little reference to quantum and phasing of development. Where this was referred to it appeared to be London Plan targets for opportunity areas. If this is the case what time period were they to cover e.g. to 2017, to 2026 etc? Do you have the evidence base to justify these targets? Where areas are not given specific</p>	<p>Section 1, introduction paragraph 3 The core strategy sets out our long term vision, spatial strategy and strategic policies with an implementation plan up until 2026 to deliver sustainable development. <u>This includes targets for development from 2009 until 2026 unless specified otherwise.</u> This demonstrates our approach to development and planning across the whole of Southwark and sets out the framework for policies we</p>	

		<p>targets for housing etc you say this is because they have not been set by the Mayor. However, is there any need for housing/employment/retail etc in these areas arising from your evidence base? If so how will you be addressing this, including housing numbers/retail provision etc?</p>	<p>will use to make decisions on planning applications</p> <p>Section 3, Our vision, Area visions Southwark is a diverse set of places. We set out area visions <u>and targets</u> for between 2009 and 2026 for the very different areas below.</p> <p>We do have evidence to justify the targets. We will add a table with references to the evidence when we publish.</p> <p>Where areas do not have specific targets we say that this is because there is little potential for development. We have reorganised the area guidance to be clearer.</p> <p>Refer to new policy 15</p>	
GOL	Area based visions	<p>I still have questions around the small amount of quantum of development that is set out within these visions. You say that these are London Plan targets. Is this the extant or emerging LP? What is the time period for these targets e.g. to 2017; also from this have you re-calculated the targets to run to the end of your plans lifetime i.e. 2026 and if so how? Clarification is</p>	<p>We have added in headings to the area visions to provide this further detail. This is set out in the track changes version available.</p> <p>We have added in two new policies.</p> <p>Refer to policy 15 and 16</p>	

		<p>required here.</p> <p>If you are using emerging figures from the draft LP you should clearly state this, including their status as the emerging LP has not been subject to examination. Also, I am concerned that if you are using emerging figures this could lead to confusion as you are using current LP housing figures in policy 5. At examination you will have to provide a robust evidence base to show how you can meet these figures over the plans lifetime.</p> <p>Where areas are not given specific targets for housing etc you say this is because they have not been set by the Mayor. However, is there any need for housing/employment/retail etc in these areas arising from your evidence base? If so how will you be addressing this, including housing numbers/retail provision etc?</p>		
GOL	Section 3 Spatial Strategy for the borough	The overall spatial strategy for the borough is not evident in the draft. I would expect to see a clear strategy of what you are trying to deliver within the borough over the lifetime of the plan. I suggest that this should	<u>Section 3</u> <u>Our spatial strategy to improve Southwark through sustainable development</u> <u>Our spatial strategy is to improve Southwark through sustainable development. We are</u>	

		<p>follow on from the plans vision and objectives and prior to the section on policies - as the policies are how you aim to deliver your overall strategy on the ground. Paragraph 4.3 of PPS12 says that <i>“The strategic objectives form the link between the high level vision and the detailed strategy. They should expand the vision into the key specific issues for the area which need to be addressed, and how that will be achieved within the timescale of the core strategy”</i>.</p>	<p><u>doing this by tackling out challenges and maximising our opportunities using spatial planning. We set out our plan for achieving this in our core strategy. This includes our vision for the future development of Southwark between 2009 and 2026. We set out how we will achieve this through our themes, strategic objectives, targets, strategic policies, delivery programmes and monitoring. We provide our strategic approach to achieving this below.</u></p> <p><u>Planning sustainably</u></p> <p><u>We want Southwark to be a sustainable place where people want to live. Southwark has a very diverse population with lots of different needs. Our population is growing and there is pressure on the limited amount of land we have to provide the homes, business space and community facilities that places need. We need the right balance between different land uses. These includes considering the needs of the community in which the development occurs. Factors include helping people into jobs, providing local services, and protecting the character of areas. As well as how the development helps achieve objectives that are important</u></p>	
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			<p><u>to all of Southwark and even the world, such as climate change, population growth and managing waste. How we design and plan our places have a huge impact on people's quality of life. Understanding how places work is very important when setting out our strategy and delivery to make sure that we are making places rather than just developing buildings. Development also places pressure on the environment and the resources current and future generations rely on for a good quality of life. We need to make sure that we do not use more resources than we have or faster than they can be replaced as this will mean future generations will have a lower quality of life. It will also damage the environment.</u></p> <p><u>Working with our local communities and all of the Southwark's partners through the Local Strategic Partnership and linking to the vision and objectives set out in the community strategy Southwark 2016 is important to make sure that we understand all the wider issues and services and the physical, social and green infrastructure needed to build successful communities.</u></p> <p><u>We have set out a delivery programme to make sure that we have a comprehensive</u></p>	
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			<p><u>and ongoing set of actions that link through the core strategy to ensure that change takes place.</u></p> <p><u>Challenges and opportunities</u> <u>We have set out the main challenges and opportunities that we tackle in the core strategy to achieve our vision of improving our places for our diverse population between 2009 and 2016. This is based on what people have told us during consultation and partnership working along with our research.</u></p>	
GOL	Area based visions (Peckham and Nunhead)	<p>Suggest you state at the beginning of this section that you are preparing an AAP for the area. Also, you state that you will set targets for homes, employment and retail through your AAP. I am concerned that there is no indication of scale or predicted pace of growth within the Core Strategy which provides a sufficient 'hook' for your AAP to be produced. The PINS Lessons Learnt Examining Development Plan Documents says that <i>"The Core Strategy should provide a clear guide for the preparation of the subsequent DPDs or provide a base against which</i></p>	<p>Insert into section 3.</p> <p>We already state that we are preparing a AAP in this section.</p> <p><u>As Peckham and Nunhead is a growth area, there will be more new homes and offices built and a small increase in retail space, mainly around the Peckham town centre. The level of growth will be higher than in the residential areas that surround the town centre but not as high as in places like Canada Water, Borough, Bankside and London Bridge.</u></p>	

		<i>those DPDs can be assessed”.</i>		
GOL	Lower level DPDs	<p>I am concerned that there are insufficient hooks for proposed lower level DPDs, in particular the new ones proposed for Housing and the Old Kent Road. The latter of which has just been introduced into the Core Strategy. When are you proposing to bring this forward and are there any implications for the Core Strategy, in particular in relation to infrastructure and delivery, from what you are proposing?</p> <p>Furthermore, the 2 DPDs referred to here are not in your current LDS. Under section 20(5)(a) of the Planning and Compulsory Purchase Act 2004 an Inspector is charged with firstly checking that a plan has complied with legislation, including that it has been prepared in accordance with the LDS.</p>	We have inserted a diagram on the Local Development Framework. We will update the Local Development Scheme annually as part of the Annual Monitoring Report and we will update this before we submit the core strategy.	
GOL	Delivery and Implementation Policy 14	<p>Policy 14 Implementing the Core Strategy appears to be a key policy within the DPD. The policy wording itself is rather limited and only offers broad actions which will be taken to</p>	<p>We have added in changes to the policy and also we have added in a delivery programme summary throughout.</p> <p>We have also restructured the area visions.</p>	

		<p>assist delivery. The delivery and infrastructure detail as relevant to individual policies and proposals can be found in table 2 of the policy. There a number of factors within table 2 which prompt questions, particularly:</p> <ul style="list-style-type: none"> - For the majority of policies you say that details on infrastructure delivery, especially around funding, will be taken forward within the various AAPs you are producing. Can any further clarity be provided at this stage, particularly for Aylesbury (hearing took place in September) and Canada Water (due to publish in January 2010)? - Are there any other issues around funding, including how any gaps in funding will be addressed? - Can any more detail around (i) phasing of development, and (ii) where you are at regarding discussion with key stakeholders be given? <p>A particular issue which features in a number of areas in table 2 is the reference to future AAP or SPD which raises the question of whether</p>	<p>Changes to policy 14.</p> <p>Policy 14 – Implementation and delivery We will ensure that our strategic vision and objectives for further protecting, enhancing and regenerating Southwark are implemented between 2009 and 2026 so that our borough continues to be successful and vibrant.</p> <p>We will do this by:</p> <p><u>Working with our partners, local communities and developers to meet the targets in the vision – set them out as separate bullets – providing homes etc</u> <u>Improving our places through small scale improvements in our other areas – list them and say there are no targets</u> <u>Linking our vision, themes, objectives, policies, targets, implementation and monitoring together through our delivery programmes.</u></p> <p><u>We are doing this because</u> <u>We need to make sure that we can deliver our strategy for strengthening places in Southwark between 2009 and 2016. We are already delivering a significant amount to achieve our 5 themes of improving individual</u></p>	
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		<p>the Core Strategy tries to delegate too much detail and the difficult decisions to lower tier DPD; it would be expected that you would be able to provide robust responses to this and clearly identify that you are answering the difficult questions at this stage.</p>	<p><u>live changes, making the borough a better place for people, delivering quality public services, making sure positive change happens and strengthening areas. The Core strategy's success is based on continued delivery of a programme through partnership working, consultation, provision of infrastructure and planning obligations. We set this out as part of our strategy and linked it through the policies to the delivery plan set out in table 1.</u></p> <p><u>Delivering sustainable changes</u> <u>We have a programme to make sure that we deliver our strategy. This is made up of a number of approaches. The detail is set out in table 1, they can be summarised as:</u> <u>Setting out a strategy for implementation of each policy and each area.</u> <u>Linking the core strategy to our council-wide evidence based strategies for issues such as housing, open space and enterprise and areas such as Aylesbury and Canada Water.</u> <u>Setting out detailed guidance, allocations of sites, delivery, targets and monitoring through development plan documents on housing and development management.</u> <u>Setting out area visions, guidance,</u></p>	
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			<p><u>allocations of sites, delivery, targets and monitoring through development plan documents in area action plans for Canada Water, Aylesbury, Peckham and Nunhead and Old Kent road.</u></p> <p><u>Setting out further guidance in supplementary planning documents for Aylesbury, Dulwich, Borough, Bankside and London Bridge, Camberwell.</u></p> <p><u>Making planning decisions on sustainable development through development management.</u></p> <p><u>Bringing our own land forward for development.</u></p> <p><u>Setting out the infrastructure required and how this will be developed.</u></p> <p><u>Providing a clear, needs based borough-wide approach to planing obligations (section 106) based on the impact of development. implemented through a tariff.</u></p> <p><u>Improving our policy and decision making.</u></p>	
GOL	<p>Delivery and Implementation</p> <p>Policy 3</p>	<p>Policy 3 notes that rail and road infrastructure improvements are required to deliver additional shopping space yet there is no detail about who will be involved and funding sources.</p>	<p>We have made changes to provide this information in the implementation section that went out as appendix A to members.</p>	

GOL	Delivery and Implementation Policy 4	Policy 4 discusses the provision of new schools however table 2 fails to identify funding sources. A wider question from this is will the Core Strategy actually be seeking to provide land for new schools? If not, it is questioned how successfully the Core Strategy will be able to deliver on this policy aim.	We have made changes to provide this information in the implementation section that went out as appendix A to members.	
GOL	Delivery and Implementation Policy 11	Policy 11 – whilst the aim is laudable it is questioned how successfully the Core Strategy will be in encouraging individuals to grow their own food.		
GOL	General	A particular issue which features in a number of areas in table 2 is the reference to future AAP or SPD which raises the question of whether the Core Strategy tries to delegate too much detail and the difficult decisions to lower tier DPD; it would be expected that you would be able to provide robust responses to this and clearly identify that you are answering the difficult questions at this stage.	We have made changes to provide this information in the implementation section that went out as appendix A to members.	

GOL	Introduction (Other Southwark planning documents)	I could not see any reference here to your proposed Development Management and Housing DPDs.	We have made changes to provide this information in the version of the publication/submission that went out as appendix A to members.	
GOL	2.2 Challenges facing Southwark today	You refer to working with neighbouring London boroughs here but do not go into any detail, including whether there are any cross boundary issues that you need to have regard to.	<p>New text. We will also show this on a context diagram to show our relationship with neighbouring boroughs.</p> <p><u>Working with our neighbouring boroughs</u> <u>Southwark shares a boundary with seven other London boroughs; Bromley, City, Croydon, Lambeth, Lewisham, Tower Hamlets and Westminster. We work closely with our neighbours to make sure that our policies take into account the changes other boroughs are making through their planning documents. We will continue to work with our neighbouring boroughs including producing joint evidence documents, such as our Strategic Housing Market Assessment, our Strategic Flood Risk Assessment and our Joint Waste Management Plan.</u></p> <p><u>At the time of producing our core strategy, the key cross-boundary issues with our neighbours are:</u></p>	

			<p><u><i>Bromley</i></u> <u>Beckenham and Penge local town centres are the closest to Southwark. The focus on Penge is to protect the surrounding open spaces. Our vision for Dulwich shares this aspiration and we will work together to make sure we continue to protect the open spaces in the south of our borough.</u></p> <p><u><i>City</i></u> <u>The business cluster known as ‘the City’ extends out of the City’s administrative boundaries into the surrounding boroughs, including Southwark. This is often known as the city fringe and is an important area for financial and business growth. This covers much of Southwark’s share of the Central Activities Zone, where we are encouraging more employment growth. As we produce our Borough, Bankside and London Bridge supplementary planning document we will continue to make sure we work closely with the City.</u></p> <p><u><i>Croydon</i></u> <u>We share a very small boundary with Croydon. Croydon Metropolitan Centre is designated as an Opportunity Area in the</u></p>	
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			<p><u>London Plan.</u></p> <p><u><i>Lambeth</i></u> <u>We share a large boundary with Lambeth. The London Plan designates both Waterloo and Vauxhall as Opportunity Areas, both of which are close to our boundary. We have inputted into Lambeth’s Waterloo and Vauxhall supplementary planning documents.</u></p> <p><u>We will work closely with Lambeth to produce our Borough, Bankside and London Bridge supplementary planning document.</u></p> <p><u>We are working together with Lambeth Both Herne Hill and Camberwell town centres are shared between Southwark and Lambeth. We will continue to work closely together on the production of supplementary planning documents for both these centres.</u></p> <p><u><i>Lewisham</i></u> <u>The London Plan designates both Lewisham-Catford-New Cross and Depford Creek/Greenwich Riverside as Opportunity Areas. These are both close to our boundaries and we will continue to work closely together, especially in the development of the Canada Water and</u></p>	
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			<p><u>Peckham and Nunhead area action plans, to make sure that the planned growth in these areas complements our planned growth.</u></p> <p><u><i>Tower Hamlets</i></u> <u>Canary Wharf is the only major town centre within Tower Hamlets, and is just across the river from Canada Water. Canary Wharf and the Tower of London area will see an increase in the provision of jobs. We will work together, particularly in the development of the Canada Water area action plan to make sure that our strategies for growth complement each other.</u></p> <p><u><i>Westminster</i></u> <u>The London Plan identifies two Opportunity Areas for growth of businesses and homes within Westminster's share of the Central Activities Zone at Victoria and Tottenham Court Road. There is also lots of non-residential development along the northern end of Vauxhall Bridge Road. We work closely with all the boroughs that form the Central Activities Zone to make sure our policies complement each others.</u></p>	
GOL	Area based visions	Throughout these visions you talk of working with key stakeholders, including Network Rail and	We have made changes to provide this information in the version of the publication/submission that went out as	

		Transport for London. To make this section more robust, I suggest that you actually state where work/discussions have already taken place; how proposals will proceed etc. This could be done in a topic paper to support the submission plan, but Table 2 should address who will deliver and the funding requirement.	appendix A to members. We will provide a topic paper on implementation.	
GOL	Area based visions (Canada Water)	Suggest you state at the beginning of this section that you are preparing an AAP for the area.	We have made changes to provide this information in the version of the publication/submission that went out as appendix A to members	
GOL	Area based visions (Aylesbury)	As you are due to receive the report from the Inspector by 23 October, will you be in a position to update this section prior to formal publication?	We are due the final report on the 27 th October. The deadline for the Core Strategy going to Council Assembly will have passed so we will either require a proposed amendment if a member considers this appropriate. As the Aylesbury AAP is due to be adopted on January 27th we can update factual changes as proposed officer changes to the core strategy when it is submitted.	
GOL	Key diagram	This should show the preferred locations for growth; you could also indicate issues such as movement flows both within and out of the area and differentiate between centres in	We show these already as action areas and opportunity areas. These are our growth areas. We identify strategic movement networks on our key diagram along with planned improvements to transport and	

		terms of the scale of development proposed. It also refers to the Cross River Tram – my understanding that was that this is no-longer in TfL’s business plan for the next ten years. Please see my comment on policy 2.	cycling infrastructure (eg. East London Line and Connect 2 cycle network) See comments above on the tram.	
GOL	Section 5: The Policies – General comments	To make this document more succinct could you just list the objectives each policy relates to rather than setting them out in detail?	We will remove all of the text that accompanies the objectives in the version that goes to council assembly.	
GOL	Section 5: The Policies – General comments	There is little detail regarding proposed borough wide quantum and phasing of development e.g. policy 3 (Shopping, leisure and entertainment).	We have put this in the vision, delivery policies 15 and 16	
GOL	Section 5: The Policies – General comments	The justification that follows each policy is rather lengthy e.g. the justification for Policy 2 (Sustainable Transport) is over 3 pages long. Could any of this material be transferred to an annex or background paper with the appropriate cross references?	The transport policy has been redrafted to fix up the grammar issues. This is in the tracked change version. We consider the material important to explain our strategy.	
GOL	Section 5: The Policies – General comments	As you are not proposing a separate site allocations DPD how are non housing sites to be safeguarded/allocated e.g. waste sites or employment land?	We have inserted in section 2 that will be done can you find it and put it in	

GOL	Section 5: The Policies – General comments	Some of the policies appear more appropriate for your proposed Development Management DPD e.g. certain aspects of Policy 11(Open spaces and wildlife) and Policy 12 (Design and conservation).	We consider the detail to be important to set out our strategy and to provide hooks for future LDF documents.	
GOL	Section 5: The Policies – General comments	Some of the policies are not locally specific e.g. Policy 2 (Sustainable Transport), Policy 4 (To learn and enjoy) and Policy 11(Open spaces and wildlife).	We have made changes to provide this information in the version of the publication/submission that went out as appendix A to members	
GOL	Section 5: The Policies – General comments	You may want to add linkages to your evidence base when referred to within the justification of your policies.	We will be provide a linkages table to the evidence base as an appendix when this goes to council assembly.	
GOL	Section 5: The Policies – General comments	Within the reasoned justification to policies you may want to add, where appropriate, references to your SA and previous consultations.	We have made changes to provide this information in the version of the publication/submission that went out as appendix A to members	
GOL	Policy 2 (Sustainable transport)	What land are you safeguarding for future public transport provision and where will this be shown – second bullet point? Bullet point 4 says that you will encourage use of the River Thames for transport and improving links between Southwark and north of the river. How will this be achieved? The justification refers to the Cross River Tram – my	See comments above on changes to policy 2.	

		<p>understanding that was that this is no-longer in TfL's business plan for the next ten years. Is there a possibility that it might come forward towards the end of the lifetime of the plan. If this is so you will want to make this clear within the text. Also, have you considered any alternate options should the tram not proceed? The justification also refers to a proposed new station at Camberwell and the extension of the Bakerloo and Victoria Line services being important for the borough. Have you entered into discussions with TfL and Network Rail regarding these proposals; are they deliverable over the lifetime of the plan; also are there any implications for the delivery of the plans vision and objectives if they were not to proceed?</p>		
GOL	Policy 3 (Shopping, leisure and entertainment)	<p>This policy does not refer to the overall quantum of retail development being proposed. You are proposing that Canada Water becomes a Major shopping centre. You will need to provide a robust evidence base to justify this</p>	See new policies 15 and 16.	

		proposal, which is currently not in line with the London Plan.		
GOL	Policy 10 (Jobs and businesses)	The justification says that you will release around 20ha of industrial and warehousing land – I am assuming that this is land allocated within your UDP. How will the release of land been achieved - I could not see any reference to this within Policy 10?	This is covered in the policies that are being saved in the Southwark Plan.	
GOL	Policy 13 (High environmental standards)	<p>The justification for this policy refers to a Joint Waste Management Plan. For consistency with the other boroughs who are part of this grouping you may want to refer to the document as a Joint Technical Waste Paper.</p> <p>At the end of the justification to this policy you provide a range of targets that “<i>development must meet</i>”. To make policy 13 more robust and measurable, you may want to include these targets within the actual policy. Following on from this, some of the proposed targets relate to achieving Code for Sustainable Homes level 4. As this is ahead of national guidance, you will need to</p>	<p>Policy 13</p> <p>Increasing recycling and composting, reducing landfill and making more use of waste as a resource. By 2015 we will be recycling and composting at least 45% of municipal waste and by 2025 at least 70% of commercial and industrial waste. . We are aiming to meet the Mayor’s target of recycling or reusing 95% of construction, excavation and demolition waste by 2020.</p> <p>Requiring applicants to demonstrate how they will avoid waste and minimise landfill from construction and use of a development.</p> <p>Working jointly with Bromley, Bexley, Greenwich and Lewisham to <u>collectively manage more of our waste and meet the London Plan waste</u></p>	

		<p>provide a strong evidence base to justify that this policy is achievable and the most appropriate for your borough.</p>	<p><u>apportionment target set for Southwark of managing at least 323,000 tonnes of waste by 2015 and at least 379,000 tonnes by 2020. meet our target of processing at least 80% of our waste within Southwark by 2015 and at least 85% by 2020.</u> We are building a state of the art <u>waste centre resources centre</u> at Old Kent Road to help us meet this target and <u>together with Bromley, Bexley, Greenwich and Lewisham</u> have set aside enough <u>facilities and additional land</u> to make sure we can <u>fully meet our targets.</u> continue to process 85% of our waste beyond 2020.</p> <p>We are doing this because</p> <p>The sustainability appraisal shows that a growing population and economy can result in more waste being created and having to be processed if it is not carefully managed. Avoiding creating waste will help us save energy and natural resources. Also, rubbish sent to landfill can lead to water and air pollution and land contamination, and takes away land that could be used for habitat or other uses. Methane produced in landfill contributes to climate change. As well as</p>	
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			<p>avoiding waste, we need to be more responsible by processing it locally rather than sending it long distances and make better use of waste as a resource, such as by recycling it or using it to generate energy.</p> <p>The Mayor has set waste targets for boroughs through London Plan policies 4A.21, 4A.23 and 4A.25 . <u>For Southwark this means we need to</u> , including the need to allocate enough land to process at least 80% of our waste in Southwark by 2015 and 85% by 2020. The Mayor estimates this to be 323,000 tonnes of our waste per year by 2015 and 379,000 tonnes per year by 2020. <u>This will help meet the London-wide target of processing at least 85% of the city's waste within London by 2020.</u></p> <p><u>Policy 4A.25 of the London Plan states that boroughs can collaborate by pooling their apportionment requirements.</u> To make sure we meet our targets we have prepared a Joint Waste <u>Technical Paper Management Plan</u> with Bromley, Bexley, Greenwich and Lewisham <u>which we will agree with the Mayor and Government Office for London.</u> This provides the detail of how working together we will meet our apportionment target, including which sites and what types</p>	
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			<p><u>of facilities we will use to do this. It demonstrates that there is enough combined capacity across these boroughs to meet the Mayor's target for these boroughs. The Joint Waste Technical Paper covers the period up to 2025 and shows that we will continue to meet the apportionment target beyond 2020. –and continue to process over 85% of our waste locally until at least 2025.</u></p> <p>Within Southwark we are safeguarding 11ha of land at Old Kent Road for waste management. This is enough land to allow us to meet the waste processing target the Mayor has set for us. A new state of the art facility is being built on part of this land by our waste management partners Veolia Environmental Services which will help us meet our targets <u>by processing at least 111,940 tonnes of waste per annum. This is calculated using the methodology set out in the London Plan and it may be possible to process even more waste at the facility by turning it into biomass fuel. This will be investigated further in the Joint Waste Technical Paper along with details of how the remaining land at Old Kent Road will be developed to help us meet our target.</u> There will be enough land left to allow us to expand the waste processing</p>	
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			<p>facilities if needed—so that we <u>can process at least 307,883 tonnes of waste per annum in total on the site until 2020</u> continue to meet our targets over the plan period—, though changing technology and falling levels of waste may mean this is not required <u>to meet our apportionment target</u>. This site was chosen because it has good road access and is within an existing industrial area so will not have a detrimental impact on neighbouring uses. As well as providing our waste services, Veolia will help us reduce waste and increase recycling and composting. <u>We will also look at how we can support new construction, excavation and demolition waste facilities in accordance with London Plan Policy 4A.28.</u></p>	
GOL	Superseded policies	You should include a list of superseded policies (Section 13 (5) of the Town and Country Planning (Local Development) (England) Regulations 2004).	We have included these as appendix F to the committee report and they will be an appendix to the core strategy.	
GOL	General	I could not see any reference to strategic sites . Are you no-longer planning to include Elephant and Castle as such a site?	The Government Office for London advised that we should only include sites if they are significant and strategic and not covered by an AAP. The only site that could fall into this criteria is the Heygate and surrounding central site for the Elephant and Castle. We	

			have decided to carry forward the current proposals site as a saved site in the Southwark Plan rather than create a new site in the Core strategy.	
GOL	GLA concerns	<p>(i) <i>“Southwark Council needs to confirm it will safeguard all existing waste sites (unless appropriate compensatory provision is made) in line with London Plan Policy 4A.22.”</i></p> <p>(ii) <i>“it appears Southwark Council has confused borough apportionment with regional self-sufficiency. To comply with London Plan Policy 4A.25 Southwark needs to “identify sufficient land to provide capacity to manage their apportioned tonnages of waste as set out in table 4A.6”. It can do this by pooling its apportionment with other boroughs as proposed. This may or may not represent 85% of Southwark’s waste, as the Council claims it will manage. The 85% figure is a regional target for London. Southwark Council will also need to amend the 2nd to last paragraph on page 63 to confirm that it will meet the it’s apportionment figure.”</i></p>	<p>Policy 13</p> <p>Increasing recycling and composting, reducing landfill and making more use of waste as a resource. By 2015 we will be recycling and composting at least 45% of municipal waste and by 2025 at least 70% of commercial and industrial waste. . We are aiming to meet the Mayor’s target of recycling or reusing 95% of construction, excavation and demolition waste by 2020.</p> <p>Requiring applicants to demonstrate how they will avoid waste and minimise landfill from construction and use of a development.</p> <p>Working jointly with Bromley, Bexley, Greenwich and Lewisham to <u>collectively manage more of our waste and meet the London Plan waste apportionment target set for Southwark of managing at least 323,000 tonnes of waste by 2015 and at least 379 ,000 tonnes by 2020.</u> meet our target of processing at least 80% of our waste within Southwark by 2015 and at least 85% by 2020. We are building a state of the art waste centre</p>	

		<p>(iii) <i>“Southwark Council states that it has prepared a Joint Waste Management Plan with the adjoining Boroughs, and that this identifies sufficient capacity and land to meet pooled apportionment. The GLA has not seen this, unless the Council is referring to the technical paper sent to the GLA. Should this be the case, the GLA has responded saying there is a shortfall in the calculations (see attached). This response still stands and the Boroughs need to come back with their response. This document will not be a DPD and consequently Southwark, and the other Boroughs, will need to ensure that the Core Strategy and proposals map (or a specific DPD) safeguard and designate sites for waste management as sufficient to meet the agreed figure.”</i></p> <p>(iv) <i>“Southwark Council state at the top of page 64 that the Old Kent Road site provides enough land to meet its apportionment. I have attached the Mayor's decision and comments on the relevant application which set out how much</i></p>	<p><u>resources centre at Old Kent Road to help us meet this target and together with Bromley, Bexley, Greenwich and Lewisham have set aside enough facilities and additional land to make sure we can fully meet our targets.</u> continue to process 85% of our waste beyond 2020.</p> <p>We are doing this because</p> <p>The sustainability appraisal shows that a growing population and economy can result in more waste being created and having to be processed if it is not carefully managed. Avoiding creating waste will help us save energy and natural resources. Also, rubbish sent to landfill can lead to water and air pollution and land contamination, and takes away land that could be used for habitat or other uses. Methane produced in landfill contributes to climate change. As well as avoiding waste, we need to be more responsible by processing it locally rather than sending it long distances and make better use of waste as a resource, such as by recycling it or using it to generate energy.</p> <p>The Mayor has set waste targets for</p>	
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		<p>waste is being managed on the site (approximately 200,000 tonnes). We estimate that only about 100,000 tonnes of this would count towards Southwark's apportionment. Paragraph 4.71 of the London Plan sets out the waste deemed to be managed in London for the purposes of apportionment. As Southwark are not doing any energy recovery on site, they can only count the amount of materials going for recycling or composting on or off site e.g. all of their Materials Recovery Facility (MRF) materials would count (less rejects), but none of their Refuse Derived Fuel (RDF) from the Mechanical Biological Treatment (MBT) would. We need evidence of how the Old Kent Road site will meet the remainder of their apportionment."</p> <p>In relation to some of the above points I suggested that Julie speaks to Claire Loops at Bexley to get an update on what was discussed/agreed with the GLA when the South East Waste Group met with Wayne Hubbard in</p>	<p>boroughs through London Plan policies 4A.21, 4A.23 and 4A.25 . <u>For Southwark this means we need to</u> , including the need to allocate enough land to process at least 80% of our waste in Southwark by 2015 and 85% by 2020. The Mayor estimates this to be 323,000 tonnes of our waste per year by 2015 and 379,000 tonnes per year by 2020. <u>This will help meet the London-wide target of processing at least 85% of the city's waste within London by 2020.</u></p> <p><u>Policy 4A.25 of the London Plan states that boroughs can collaborate by pooling their apportionment requirements.</u> To make sure we meet our targets we have prepared a Joint Waste <u>Technical Paper Management Plan</u> with Bromley, Bexley, Greenwich and Lewisham <u>which we will agree with the Mayor and Government Office for London.</u> This <u>provides the detail of how working together we will meet our apportionment target, including which sites and what types of facilities we will use to do this.</u> It demonstrates that there is enough combined capacity across these boroughs to meet the Mayor's target <u>for these boroughs.</u> The <u>Joint Waste Technical Paper covers the period up to 2025 and shows that we will continue to meet the apportionment target beyond</u></p>	
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		<p>February 2009; also whether there were any subsequent meetings/discussions with the GLA. I also suggested that she may want to look at the wording of the waste part of policy 13, along with the accompanying justification. This could more clearly set out to show that the 5 South East London boroughs of Bexley, Bromley, Greenwich, Lewisham and Southwark were working together by producing a Technical Waste Paper. I understand that this shows that they can meet the LP apportionment figure for all 5 boroughs combined by 2020. Also, that they were taking this figure forward to show that they were addressing waste issues until the end of the plan period. If there are any issues regarding the 5 boroughs meeting the combined apportionment figure then please get in touch as a matter of urgency. On further consideration of the points raised by the GLA, can you address their concerns in relation to the Old Kent Road site? If not, are there any implications for the 5</p>	<p>2020. –and continue to process over 85% of our waste locally until at least 2025.</p> <p>Within Southwark we are safeguarding 11ha of land at Old Kent Road for waste management. This is enough land to allow us to meet the waste processing target the Mayor has set for us. A new state of the art facility is being built on part of this land by our waste management partners Veolia Environmental Services which will help us meet our targets <u>by processing at least 111,940 tonnes of waste per annum. This is calculated using the methodology set out in the London Plan and it may be possible to process even more waste at the facility by turning it into biomass fuel. This will be investigated further in the Joint Waste Technical Paper along with details of how the remaining land at Old Kent Road will be developed to help us meet our target.</u> There will be enough land left to allow us to expand the waste processing facilities if needed—so that we <u>can process at least 307,883 tonnes of waste per annum in total on the site until 2020</u> continue to meet our targets over the plan period—, though changing technology and falling levels of waste may mean this is not required <u>to meet our apportionment target.</u></p>	
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		South East London boroughs meeting their combined apportionment figure?	This site was chosen because it has good road access and is within an existing industrial area so will not have a detrimental impact on neighbouring uses. As well as providing our waste services, Veolia will help us reduce waste and increase recycling and composting. <u>We will also look at how we can support new construction, excavation and demolition waste facilities in accordance with London Plan Policy 4A.28.</u>	
GOL	GLA Concerns	<p>Cross River Tram</p> <p>The Cross River Tram is referred to in the Key Diagram and in policy 2 (Sustainable transport). My understanding was that this is no-longer in TfL's business plan for the next ten years. You may want to clarify, within the justification to policy 2, the position as it stands now; also, whether it may come forward towards the end of the plan period (is there any reference to the Cross River Tram in the draft LP?). One question that needs to be considered is whether the Cross River Tram is critical to bringing forward any of the Core Strategies objectives? If so are there any issues that need to be addressed if it</p>	See comments above on policy 2	

		does not go ahead?		
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