

**Matters and Issues to Examine – Revised (changes italicised)**

**Matter 1 Vision, Strategy, Spatial Approach and Procedural Compliance**

***With due regard to its means of production, does the CS provide an adequate strategic vision for the Borough leading to an effective spatial plan containing clear objectives for the plan period in accord with the aims of PPS12?***

1.	To what extent is the Core Strategy in general conformity with both the London Plan and its draft replacement?
2.	Is the evidence base in support of the chosen strategic approach robust and credible against alternatives?
3.	Does the CS reflect local distinctiveness adequately? (eg area visions?) Is the number of visions distinctive/effective/too prescriptive?
4.	Does the CS provide sufficient detail on how much development is intended to happen where and when? By what means it will be delivered? Is the delivery strategy for achieving the objectives adequate?
5.	Should the strategy and various visions include greater clarity upon the quantum of development in individual areas?
6.	Has the production of the Core Strategy followed the SCI? Has this led to timely, effective and conclusive discussion with key stakeholders on what option(s) for a core strategy are deliverable?
7.	<i>Has the effectiveness of public consultation undertaken in relation to the Core Strategy been affected unacceptably by additional consultation upon Area Action Plans? What implications, if any, does this have for the tests of soundness?</i>
8.	To what extent does the CS repeat or reformulate national or regional policy (eg London Plan)?
9.	To what extent has the production of the CS followed the LDS?
10.	Is the CS aligned and coordinated adequately with the Sustainable Community Strategy? Are there areas of discord/omission?
11.	Does the CS contain sufficient justification of its policies? Is more explanation needed of how the policies relate to the key issues and spatial objectives? Is it sufficiently clear how the policies meet the needs of the Borough identified in the course of the CS preparation?
12.	Is there a cumulative and undue burden upon development of requirements emanating from the London Plan and the CS re sustainability assessments (SP1); transport assessments (SP2); health impact assessment (SP5)?
13.	What constitutes ‘the policy’? Does it include all the text? Or just grey shaded boxes?
14.	Does the CS acknowledge adequately border issues (eg Camberwell)?
15.	Have the comments on the Scoping Study at ‘issues and options’ stage been considered adequately; (rep 140)?

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Matter 2      **Sustainability, Equalities, Proposals Map & General Presentation**

1.	To what extent is the Core Strategy in general conformity with both the London Plan and its draft replacement?
2.	To what extent does the CS accord with the advice of PPS1, PPS12 and associated guidance?
3.	To what extent has the Sustainability Appraisal informed the content of the CS?
4.	Proposals Map – are the changes proposed sufficiently clear and comprehensive? Are the saved policies of the UDP clear and referenced?
5.	<i>Does the evidence base, including the Sustainability Appraisal and the Equalities Appraisal, inform adequately the approach of the CS with regard to equality? Does the CS address adequately this issue?</i>

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**Matter 3 Sustainable Development**

*Does the CS provide the most appropriate strategy for sustainable development within the context of the Borough; is the approach in general conformity with the London Plan and evidenced adequately?*

1.	To what extent are the Core Strategy and SP1 in general conformity with both the London Plan and its draft replacement?
2.	What evidence underpins SP 1 and is this base robust and credible? Is the approach of the CS in accord with, amongst others, PPS1 and 4? Is the approach adopted sufficiently flexible and thereby effective?
3.	Is the spatial distribution of dev the most suitable option – have alternatives been considered adequately? Does SP 1 enable the positive redevelopment of other parts of the Borough?
4.	Is there a need to cross reference more clearly the provision of necessary infrastructure?
5.	Is the SA requirement proportionate and flexible? Should it be based upon a development size threshold? Evidence base for this position? Alternatives considered (how so assessed)?
6.	<i>How does the CS seek to address issues of social deprivation?</i>
7.	Should SP 1 require a Social Impact Assessment – should there be a greater reference to neighbourhoods, local needs and to development within sustainable limits?
8.	Are ‘very high standards’ measurable? If so, how?

**Matter 4 Sustainable Transport**

*Is the advocated approach to sustainable transport the most appropriate strategy within the context of the Borough? Does the evidence support sufficiently the premise that the approach will be effective?*

1.	To what extent is the Core Strategy and SP2 in general conformity with both the London Plan and its draft replacement?
2.	Is the evidence base to SP 2 robust and credible?
3.	When and how will land be safeguarded for planned public transport improvements? Are any implications for the proposals map resolved?
4.	Is there a need to clarify how the transport assessment requirement would work in practice – what does ‘...in line with LP Policy 3C.1 ...’ mean? Should there be a development size threshold?
5.	Is the strategy underpinning SP 2 adequate – should it seek to reduce car use by more than just limiting the provision of car parking? Eg examination of existing car park provision = target to reduce car use/ownership?
6.	Should the provision of car parking be linked to the economic viability of development?
7.	<i>Does the CS address adequately issues relating to alternative forms of transport to the private car, eg cycling?</i>
8.	How does the CS relate to TfL business plan? Matters of disagreement?
9.	Is there a need to cross reference CIL in the supporting text of SP2?

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**Matter 5: Jobs and Business**

*Does the CS provide the most appropriate strategy towards jobs and business given the context of the Borough? Is the approach in general conformity with the London Plan and evidenced adequately? Will the approach be effective, particularly with regard to flexibility?*

1.	To what extent is the Core Strategy and SP10 in general conformity with both the London Plan and its draft replacement? What areas of discord remain?
2.	To what extent is the content of PPS4 in particular satisfied by the Core Strategy?
3.	Is the evidence base to SP 10 robust and credible? Is the policy the best option when considered against alternatives? Does the evidence support the CS split of employment and housing land in total?
4.	Is the CS sufficiently flexible to cope with changing circumstances – to what extent does it recognise that higher value non-commercial uses (eg housing) could enable redevelopment for employment benefit eg mixed uses? Is the restriction of land uses to B2/B8 etc sound?
5.	Does the policy create a ‘blanket ban’ on using commercial sites for residential development? Is the indicated approach sound?
6.	Should office space only be protected where there is a demonstrable need for its retention, perhaps subject to criteria? Should commercial space only be retained if not more appropriately reallocated to other uses, inc housing?
7.	Should existing industrial space in centres only be protected where there is a demonstrable need for its retention and subject to criteria?
8.	To what extent has the retention of job numbers been considered as a viable alternative to floor space targets? To what extent does the CS allow for a flexible interpretation/assessment of the overall benefits of a scheme?
9.	Does the CS place adequate emphasis upon the role of the tourism and hotel sector to generate employment, esp local? Should CS set out criteria for hotel locations especially in Bankside, Borough and London Bridge? Should hotels be enabled in CAZ and Bankside/London Bridge Opp Areas – not just identified centres?
10.	Is the CS policy sufficiently flexible in its approach to releasing surplus B2/B8 land? Are the assumptions relating to the timescales for such release sound?
11.	Is the review of the Preferred Industrial Land at the Tower Bridge Business Complex adequate? Should 79-161 Ilderton Road be part of such a preferred industrial location when it lies adjacent to housing and could contribute to housing targets? Is the supporting evidence base, the Employment Land Review (ELR), credible and robust in its analysis (Table 5.7)?
12.	Does the Core Strategy focus unduly upon ‘B use’ floor space – should policy recognise the value of net employment increases? Is the implied protection of all existing business space in Bankside, Borough and London Bridge at odds with the strategic aim of increasing jobs in Southwark? (see Rep 434).
13.	Is the cluster approach adopted by the ELR to reviewing employment sites sufficiently robust? Is it effective and appropriate? Does it allow

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	sufficiently for local site variations?
14.	Does the policy take adequate account of current vacancy rates in existing industrial and business floor space? Does this warrant retaining B8 floor space at Crimscott St?
15.	Does the CS take sufficient account of cross border issues? Eg Lewisham and the Surrey Triangle?
16.	Should the objective for local employment generation have a target (eg 30%?)
17.	Does the policy/CS cater adequately for micro SMEs?
18.	Does the CS Policy seek to deliver a jobs and business strategy in accord with aims for a sustainable transport network?
19.	Does the CS respond adequately to the cultural distinctiveness and creative industries which exist and provide employment opportunities throughout the Borough?
20.	Should the definition of employment uses in the glossary include sui generis (Relationship to PPS4 et al)?
21.	Does the CS policy consider adequately and plan for social infrastructure in the reduction of industrial/warehouse space – ie police facilities?

**Matter 6: Shopping, Leisure and Entertainment**

*Does the CS provide the most appropriate and sufficiently comprehensive strategy towards shopping, leisure and entertainment in the context of the Borough and with due regard to cross border issues? Is the approach in general conformity with the London Plan and evidenced adequately with due regard to PPS4? Will the approach be effective, particularly with regard to flexibility?*

1.	To what extent is the Core Strategy and SP3 in general conformity with both the London Plan and its draft replacement; particularly in its hierarchical approach?
2.	Is the evidence base to SP 3 robust and credible? Is the hierarchical approach and the hierarchy identified justified by the evidence base? Where does the CAZ sit within the hierarchy? What alternatives considered?
3.	To what extent is the content of PPS4 satisfied by the Core Strategy and SP3?
4.	What role should the intended Enterprise Strategy have in the LDF process within Southwark?
5.	Should a quantum for new development be provided for the District and Local Centres?
6.	Does the policy identify development in Elephant and Castle plus Canada Water as sequentially preferable to other suitable town centres? (If so, why – in accordance with PPS4?)
7.	Does the policy address adequately the small scale local provision of shops and services outside of town centres?
8.	<i>With due regard to the draft London Plan, is the role of street markets considered adequately within the CS?</i>
9.	Does the policy address adequately the cross border issues? Eg Camberwell New Road?
10.	Is the protection of small scale retail units outside of identified centres intended to be prescriptive?
11.	Does the Policy and CS address adequately leisure/cultural interests?
12.	Should SP 3 refer explicitly to ‘community facilities and social infrastructure’

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**Matter 7: Education and Services**

*Does the CS provide the most appropriate and sufficiently comprehensive strategy towards education and services in the context of the Borough? Will the approach be effective, particularly with regard to flexibility?*

1.	To what extent is the Core Strategy and SP4 in general conformity with both the London Plan and its draft replacement?
2.	Is the evidence base to SP 4 robust and credible and provide an adequate consideration of alternatives?
3.	Are the interests of the arts and cultural facilities addressed adequately?
4.	Does the evidence base incorporate the needs of the community sector, particularly where resident led (rather than voluntary sector)? Is the infrastructure (buildings) in place/available to deliver the strategy? Should it have included a survey of community meeting spaces?
5.	Should the policy distinguish different types of community use and the need to achieve a balance in a given area? Rep 276, 260, 370 et al. Should 'community use' be more broadly defined? Is the existing list in the fact box adequate?
6.	Does the use of the undefined phrase 'local need' render the policy unsound and ineffective? How does the evidence base support this approach? How would this be assessed in practice?
7.	Is the policy too inflexible by 'ensuring development will provide'?
8.	Does the CS policy deal effectively with the requirements of the HMCS and the LFB?
9.	Is it sufficiently clear that the provision of facilities is linked to need and the viability to provide?
10.	Does SP 4 cover adequately the issues of religious facilities?
11.	Are issues of health addressed adequately?

Matter 8: **Housing**

*Is the Core Strategy’s approach to housing provision deliverable, sufficiently justified and consistent with the London Plan and national planning policy in Planning Policy Statement 3: Housing (PPS 3)? Is the Core Strategy effective in meeting the varied housing needs of the Borough, including students?*

1.	To what extent is the Core Strategy and its housing policies in general conformity with both the London Plan and its draft replacement? (including housing numbers and spatial distribution)? Is there flexibility within the Core Strategy to accommodate any change to the regional housing targets which may emerge in the short (or medium) term?
2.	Is the evidence base to the housing policies robust and credible? How does this relate to the PPS3 and its associated guidance? To what extent is the content of PPS1 and 3, particularly satisfied by the Core Strategy?
3.	To what extent, and in what ways, was the chosen spatial distribution of housing considered against alternatives?
4.	What is the relationship between the Southwark SHLAA and the GLA Strategic Housing Land Availability Assessment and Housing Capacity Study 2009. Why do discrepancies exist in their conclusions?
5.	Is there a demonstrable five year housing land supply within the first five years of the CS? To deliver housing targets? Is the housing trajectory robust? <i>What does it purport to illustrate?</i> Are there identified sites for years 6-10? (to deliver housing targets) Are there identified sites for years 11-15? What reliance on windfalls?
	<b>SP 5</b>
6.	Is Strategic Policy 5 too prescriptive? How would this policy lead to, or work alongside, a flexible DPD?
7.	Does the evidence base support the density approach of SP 5? Should there be a clearer relationship between density thresholds and PTAL? Is the policy in conformity with the existing and draft London Plans in this regard? Should density be design led to increase flexibility? Could exemplary design justify higher densities outside Opportunity Areas and Action Areas? Could SP Policy 5 increase density to increase housing supply? Would it create an undue constraint on delivery?
8.	Should the policy incorporate housing targets for all opportunity and growth areas?
	<b>SP6</b>
9.	To what extent is Policy 6 in conformity with the existing and draft London Plans (and PPS3)?
10.	Is there any substantive evidence to indicate that the 35% threshold would not be economically viable and act as a constraint upon housing delivery? Is such a threshold the optimum, unless otherwise stated, across the Borough?
11.	<i>What evidence indicates the deliverability of the policy aims, in terms of social rented, intermediate and private housing, over the plan period?</i>
12.	Is Strategic Policy 6 too prescriptive? How would this policy contribute to a flexible DPD?

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13.	How have migrant worker households been considered within the Housing Requirements Survey? Does this affect the robustness of the policy proposed?
	<b><u>SP7</u></b>
14.	Is Strategic Policy 7 too detailed and too prescriptive? How would this policy contribute to a flexible DPD? Could it be a constraint to housing delivery? What options were considered?
15.	To what extent does the GLA SHLAA support such an approach? Is it compliant with the draft LP?
16.	How would the policy aims be secured? To what extent does the available evidence demonstrate that the policy would not be a constraint upon housing delivery?
17.	To what extent would the policy address the need for supported housing units?
18.	To what extent is the detail of SP7 consistent with the existing and draft London Design Guides? To what extent would the policy cross reference and/or repeat information to be produced in any subsequent supporting DPD/SPD? Do the sizes indicated exceed that of the Home and Community Agency 'Housing Quality Indicators'? Would this jeopardise delivery of schemes which receive grant aid?
19.	Does SP Policy 7 adequately address supported housing units in light of the Housing Requirements Study?
	<b><u>SP 8 and SP9</u></b>
20.	Is the evidence of a need for student accommodation both robust and credible?
21.	Is policy 8 too prescriptive? How would this policy contribute to a flexible DPD?
22.	What evidence exists to indicate the extent that the requirement for affordable housing in Policy 8 would prejudice the supply of student housing?
23.	Is SP Policy 8 consistent with draft London Plan para 3.53 and 3.39 – ie not require affordable as part of student? Should SP Policy 8 require affordable housing from all sites? (eg next to campus?) Conflict with London Plan para 3.42 and draft LP3.45? Inflexible and unsound.
24.	Would the proposed change to SP 8 produce a sound policy (ie delete 'local')?
25.	Is the target for SP Policy 8 of 130 non self contained units/year too low and based on sound evidence?
26.	What is the second sentence of the final paragraph on page 87 referring to? What evidence supports this element of the document? Is it justified here?
27.	Why does Policy 9 not contain a target for pitches linked to the evidence of need? Is this consistent with the approach of the Core Strategy in other areas?
28.	Is the criteria approach consistent with Annex C of Circular 1/06?

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Matter 9: **Open Space and Wildlife/Habitats**

*Is the approach of the DPD in general conformity with the London Plan and evidenced adequately with due regard to PPS9 and PPG17? Will the approach be effective, particularly with regard to flexibility?*

1.	To what extent is the Core Strategy and SP11 in general conformity with both the London Plan and its draft replacement?
2.	To what extent is the content of PPS9, particularly paragraphs 3, 4, and 5 satisfied by the Core Strategy?
3.	Is the evidence base to SP 11 robust and credible? What evidence underpins SP 11? How does this relate to the PPS9 Good Practice Guide?
4.	To what extent has the Biodiversity Action Plan been implemented? To what extent can this be considered robust in light of its part reliance upon an ecological audit of 1995? Are the Core Strategy and SP 11 consistent with the London Biodiversity Action Plan?
5.	To what extent does the evidence base accord with the advice of PPG17?
6.	What are the open space needs of the Borough and how will they be satisfied? Given the content of CDEN3, is there an open space strategy for the Borough?
7.	Is SP 11 sufficiently flexible? For example as relates to the provision of open/play space, particularly in the CAZ? Is there any conflict with the provisions of the London Plan or its draft?
8.	Does the Core Strategy provide adequate reference to green corridors/green chains?
9.	<i>To what extent should/does the CS provide reference to local food production and related land requirements?</i>
10.	Has the proposed changes relating to N27 on the proposals map resolved fully the concerns previously expressed? Have the detailed site concerns raised with regard to open space been fully resolved? Eg Representations 733, 169, 815
11.	Have TfL concerns been resolved?

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Matter 10: **Waste and Environmental Standards**

*Is the evidence base in support of the CS approach to waste robust? Are the Core Strategy's measures for addressing climate change, air quality and water resources supported adequately by the evidence base, consistent with national policy in PPS 1's Climate Change Supplement and effective?*

1.	To what extent is the Core Strategy and SP13 in general conformity with both the London Plan and its draft replacement?
2.	To what extent is CDB12 Joint Waste Apportionment Technical Paper agreed with the GoL and the Mayor of London and to what extent does it satisfy the aims of PPS10 and its companion guide? Are the figures cited consistent in lieu of rep 560 and 679?
3.	What evidence underpins SP 13? Is the evidence base to SP 13 robust and credible?
4.	To what extent will the Development Management DPD safeguard sites to manage Southwark's waste? Will such sites be safeguarded adequately in the interim?
5.	How is hazardous waste to be managed?
6.	Should waste targets incorporate a preference for waste reduction and recycling over incineration (feasibility of clear targets in this area)?
7.	Is the Thames Tunnel referenced adequately (in supportive terms) within the CS? Should it be included as a target and Strategic Objective of the CS?
8.	Will surface and ground water quality be protected adequately by the proposed changes?
9.	Are the energy targets in SP13 actually fixed requirements? Is the policy sufficiently flexible in such terms? Should the targets be subject to tests of viability and suitability? Have alternatives been considered fully?
10.	Is SP 13 (energy) in accord with PPS1 and the Climate Change Supplement? In line with PPS22 para 8?
11.	Does SP 13 replicate unnecessarily Building Regulations and its intended changes?
12.	Does SP 13 address adequately development that affects existing buildings? Eg retrofitting?
13.	Do the CS and SP 13 address adequately the issue of air pollution, especially in the north of the Borough?
14.	Does the policy imply that all development should address existing pollution/amenity problems and is this sound?

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**Matter 11: Design and Conservation**

***Is the approach of the CS to design and tall buildings justified by the evidence base and the most appropriate strategy when considered against alternative within the context of Southwark and with particular regard to the historic environment?***

1.	To what extent is the Core Strategy and SP12 in general conformity with both the London Plan and its draft replacement?
2.	Is the evidence base to SP 12 robust and credible? How have alternatives been assessed?
3.	To what extent is the requirement for ‘highest possible standards’/‘exemplary design’ flexible and effective?
4.	To what extent is the CS approach to tall buildings in conformity with the content of the draft LP?
5.	Is the definition of a tall building appropriate? (Rep 354). Is it sufficiently flexible to allow for context?
6.	Is the evidence base in support of the tall buildings CS policy robust (see rep 775)? Is there an assumption that tall buildings are part of a key approach to achieving the Southwark Vision; is this supported by the evidence base? What is the evidence that tall buildings ‘raise the profile of an area’ or act as stimulus for regeneration or a catalyst for investment?
7.	How will tall buildings be managed in their delivery? Particularly in relation to Action Areas?
8.	Should tall buildings be permitted throughout the CAZ? To what extent would the tall building policy fetter unreasonably the development of buildings taller than their surroundings in areas outside of those identified for tall buildings?
9.	Does the policy adequately meet the aims of draft LP 7.12 concerning the ability to recognise and appreciate Strategically Important Landmarks?
10.	Is there adequate clarity upon where tall buildings may be considered appropriate, inappropriate or sensitive? Can the CS identify reasonably locations for tall buildings in advance of detailed evidence in support of AAPs or SPD? (EH/CABE advice 07)?
11.	To what extent do the proposed changes to the CS reflect adequately the content of PPS5 and have sufficient regard to the historic environment, especially in relation to tall buildings?
12.	Do the changes proposed adequately reflect government advice pertaining to archaeology; particularly as relating to APZs?
13.	Is there adequate recognition of Tower of London World Heritage Site in CS policy?

Matter 12      **Implementation and Monitoring**

*Does the CS address adequately the provision of necessary infrastructure to support the delivery of the strategic objectives? Are the Core Strategy’s monitoring targets justified adequately and of a level of detail that is appropriate to a Core Strategy?*

1.	To what extent is the Core Strategy and SP14 in general conformity with both the London Plan and its draft replacement?
2.	To what extent is the content of PPS1 and 12 satisfied by the Core Strategy with regard to implementation and monitoring?
3.	Are the targets and monitoring proposed related adequately to the Policy objectives?
4.	Does the CS provide adequate clarity upon the issue of water and wastewater infrastructure delivery?
5.	Is there sufficient clarity regarding how, when and where infrastructure will be provided (and by whom)?
6.	How will the Community Infrastructure Levy be managed within the Borough and what implications does it have for the delivery of the Core Strategy?
7.	How will transport improvements, including those sought by Transport for London, be secured? Does the Core Strategy reference Cross Rail adequately?
8.	Should Tables 1 and 2 be clearly iterative and reviewed regularly in light of the AMR and production of further DPDs (eg AAPs)?
9.	Should the CS indicate explicitly that developments in compliance with its policies will be approved?
10.	Do the CS and SP 14 deal adequately with policing and HMCS?
11.	Does the CS deal adequately with London Bridge Hospital?