

Representation	Officer Response
<p data-bbox="188 316 439 344">SP3 Best Start in Life</p> <p data-bbox="188 357 367 421">Derek Kinrade NSPPSV47.8</p> <p data-bbox="188 466 1075 564">SP3: Reasons, para.2, line1: 'more' - than what?. How about 'Southwark is ranked favourably for education. skills and training when measuring attainment in the local population'</p>	<p data-bbox="1140 427 2067 852">Representation noted. SP3 aims to give all our young people the best start in life in a safe, stable and healthy environment where they have the opportunity to develop, make choices and feel in control of their lives and future. The Integrated Impact Assessment (IIA) sets out how this plan will be monitored through Baseline Indicators, see Appendix 3: Baseline Data. It highlights that the proportion of young people not in education, employment or training (NEETs) is higher than London average, which demonstrates the need for training and employment opportunities for young people. P26 Education Places and P27 Access to employment and training, set out how we will ensure that each development that takes place in Southwark maximises the potential for education places, and access to employment and training.</p>
<p data-bbox="188 935 376 999">Toby O'Connor NSPPSV132.2</p> <p data-bbox="188 1040 1106 1430">Document: NSP EIP 27A Policy SP3: Best Start in Life Not positively prepared, justified or effective. The Forum support the new wording of point 8: Encouraging developments where there can be more interaction between people of different ages, particularly elderly and young people. However this should be more strongly worded and there are currently insufficient appropriate consultation evidence or mechanisms for monitoring for this to be meaningful/ achievable. We would be happy to expand on this using the example of Site Allocations NSP 50 and 51 where there is a great opportunity for new development to provide the potential for such interaction but where the weakness of the policies (both in terms of their design guidance and their</p>	<p data-bbox="1140 1040 2056 1394">Support of new wording noted. The Integrated Impact Assessment (IIA) sets out how this plan will be monitored through Baseline Indicators, see Appendix 3: Baseline Data. For example, proportion of population by broad age band, Percentage of children living in deprived households, Percentage of older people living in deprived households, the domains of deprivation, Perceptions of neighbourliness and how well local people get on well together (emerging). The baseline indicators will allow us to monitor against the NSP, including the objectives of the SP3: Best Start in Life. Interaction between people of different ages, particularly elderly and young people will be encouraged within developments.</p>

methodology/evidence) are presently failing to frame this appropriately. The council should through consultation build up an evidence base of positive	P12 Design of Places address the role of design in making sure development is accessible to all, it states that development must, 'Provide accessible and
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P27	

P27 Access to employment and training

1. Development incorporating:

1. 5,000sqm or more of gross new or improved floorspace must provide training and jobs for local people in the construction stage; and
2. 2,500sqm or more of gross new or improved non-residential floorspace must provide training and jobs for local people in the final development; and
3. 1,000sqm or more of gross new or improved floorspace must allow local businesses to tender for the procurement of goods and services generated by the development both during and after construction.

2. In exceptional circumstances where jobs cannot be provided on site, a financial contribution will be required for construction employment and training.

~~1. Developments that results in a loss of employment floorspace must provide a financial contribution towards training and jobs for local people.~~

While Safestore supports the proposed alterations to allow the option to offset a shortfall in jobs provided on site to be addressed through a payment in lieu, applying an obligation to provide training or jobs on a new scheme where it is not viable to do so would create a financial burden which could act as a barrier to any development going forward.

In addition to the above, a definition as to what constitutes 'local people' should be provided within the supporting text.

We there suggest that the policy is reworded as follows:

2. Development incorporating:

1. 5,000sqm or more of gross new ~~or improved~~ floorspace ~~must~~ should provide training and jobs for local people in the construction stage; and
2. 2,500sqm or more of gross new or improved non-residential floorspace ~~must~~ should provide training and jobs for local people in the final development; and
3. 1,000sqm or more of gross new or improved floorspace ~~must~~ should allow local businesses to tender for the procurement of goods and services

Noted.

The policy is consistent with the requirements of our Section 106 and CIL SPD. The New Southwark Plan aims to help local people and businesses benefit from opportunities which are created from development. Southwark's Economic Wellbeing Strategy 2017-22 states that 'Our strategic and cooperative approach to working with developers generates substantial local employment opportunities for our residents.' We will continue to use Section 106 and CIL obligations to ensure new developments are fully connected to the borough and its residents.

Further clarification on the nature and definition of 'local people' can be addressed during the Examination in Public.

generated by the development both during and after construction.
2. In exceptional circumstances where it is not financially viable to provide training and jobs on site, a suitable financial contribution will be required for construction employment and training.
Local people are defined as [insert definition]

Old Bermondsey Neighbourhood Forum
NSPPSV132.18

Document EIP 27A Policy P26 Education Places & 27 Access to Employment and Training. P44 Healthy developments &, P46 Community uses
Not positively prepared, effective or justified
The direction of the wording changes towards access to all members of the community are supported as a vague ambition however it is unclear how this will be achieved and what role design would play in this. Similarly, training and jobs for local people in the construction stage should have more definition and have clear high levels for larger scale developments with cases for financial contributions in place of this provision being subject to rigorous tests - there are many examples where this happens too easily. These policies along with P44 and P46 should be based on an ambitious (and robust) evidence base whereby the council should through genuine research and meaningful local consultation build a detailed and maintainable picture of local need and build up a set of positive precedents of social infrastructure. The relationship between the inside and outside of buildings (and the transitions between) in design terms is especially important given the ambition for mixed use. Is there also a potential opportunity in the current pandemic situation for example for office developments to provide more community space at ground floor?

Representation noted. It is important to recognise that the NSP should be read as a whole, P12 Design of Places address the role of design in making sure development is accessible to all, it states that development must, 'Provide accessible and inclusive design for all ages and people with disabilities'. SP201 - Infrastructure background paper, sets out our evidence and strategy for the provision of infrastructure, social, health, educational and utilities.

P26: Access to facilities for members of the community will need to be considered on a case by case basis. It will be encouraged where appropriate.

P27: The policy is consistent with the requirements of our Section 106 and CIL SPD. The SPD provides further details of the requirements.

Social regeneration charters are being prepared/have been prepared for each of the major regeneration areas within the borough. These are prepared in consultation with local people and set out how investment in social infrastructure will be spent in the area.