



AGENDA FOR THE EXECUTIVE

Members of the Executive are summoned to attend a meeting to be held in Committee Room 4, Town Hall, Upper Street, N1 2UD on **13 July 2017 at 7.00 pm.**

Lesley Seary
Chief Executive

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Despatched : 5 July 2017

Membership

Councillor Richard Watts
Councillor Janet Burgess MBE
Councillor Joe Caluori
Councillor Kaya Comer-Schwartz
Councillor Andy Hull

Councillor Asima Shaikh
Councillor Diarmaid Ward
Councillor Claudia Webbe

Portfolio

Leader of the Council
Executive Member Health and Social Care
Executive Member Children, Young People and Families
Executive Member for Community Development
Executive Member Finance, Performance and Community Safety
Executive Member for Economic Development
Executive Member for Housing and Development
Executive Member for Environment and Transport

Quorum is 4 Councillors

Please note

It is likely that part of this meeting may need to be held in private as some agenda items may involve the disclosure of exempt or confidential information within the terms of Schedule 12A of the Local Government Act 1972. Members of the press and public may need to be excluded for that part of the meeting if necessary.

Details of any representations received about why the meeting should be open to the public - none



Declarations of interest:

If a member of the Executive has a **Disclosable Pecuniary Interest*** in an item of business and it is not yet on the council's register, the Councillor **must** declare both the existence and details of it at the start of the meeting or when it becomes apparent. Councillors may also **choose** to declare a Disclosable Pecuniary Interest that is already in the register in the interests of openness and transparency. In both the above cases, the Councillor **must** leave the room without participating in discussion of the item.

If a member of the Executive has a **personal** interest in an item of business they **must** declare both the existence and details of it at the start of the meeting or when it becomes apparent but may remain in the room, participate in the discussion and/or vote on the item if they have a dispensation from the Chief Executive.

- *(a) Employment, etc** - Any employment, office, trade, profession or vocation carried on for profit or gain.
- (b) Sponsorship** - Any payment or other financial benefit in respect expenses in carrying out duties as a member, or of election; including from a trade union.
- (c) Contracts** - Any current contract for goods, services or works, between the Councillors or their partner (or a body in which one has a beneficial interest) and the council.
- (d) Land** - Any beneficial interest in land which is within the council's area.
- (e) Licences** - Any licence to occupy land in the council's area for a month or longer.
- (f) Corporate tenancies** - Any tenancy between the council and a body in which the Councillor or their partner have a beneficial interest.
- (g) Securities** - Any beneficial interest in securities of a body which has a place of business or land in the council's area, if the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body or of any one class of its issued share capital.

NOTE: Public questions may be asked on condition that the Chair agrees and that the questions relate to items on the agenda. No prior notice is required. Questions will be taken with the relevant item.

Requests for deputations must be made in writing at least two clear days before the meeting and are subject to the Leader's agreement. The matter on which the deputation wants to address the Executive must be on the agenda for that meeting.

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E.	Urgent non-exempt matters	
	Any non-exempt items which the Chair agrees should be considered urgently by reason of special circumstances. The reasons for urgency will be agreed by the Chair and recorded in the minutes.	
F.	Exclusion of press and public	
	To consider whether to exclude the press and public during discussion of the remaining items on the agenda, in view of their confidential nature, in accordance with Schedule 12A of the Local Government Act 1972.	
G.	Confidential / exempt items for information	
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H.	Urgent Exempt Matters	
	Any exempt items which the Chair agrees should be considered urgently by reason of special circumstances. The reasons for urgency will be agreed by the Chair and recorded in the minutes.	

The next meeting of the Executive will be on 28 September 2017

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London Borough of Islington

Executive - 15 June 2017

Minutes of the meeting of the Executive held at Committee Room 4, Town Hall, Upper Street, N1 2UD on 15 June 2017 at 7.00 pm.

Present: **Councillors:** Watts, Burgess, Caluori, Comer-Schwartz, Hull, Shaikh, Ward and Webbe

Councillor Richard Watts in the Chair

403 LEADER'S ANNOUCEMENTS

On behalf of the whole Council, I want to express deepest sympathies to all those affected and to the families who have lost loved ones in the Grenfell Tower fire in North Kensington. I would like to thank all the emergencies services for their swift and courageous response; we have all seen the images of them running towards danger.

The council has been providing support to Kensington & Chelsea Council since the fire, including offering accommodation to people from Grenfell Tower. It has been a very harrowing experience for all involved and we are providing counselling support to the firefighters who were at the scene and who did so much to save lives.

Understandably there are concerns about the cause of the fire, the external cladding and whether there are any possible implications for residents in tower blocks elsewhere. We are working to identify any blocks within Islington. Our commitment to making sure Islington residents are safe remains our absolute priority. We have put on hold proposals to clad further buildings and are awaiting health and safety reports.

I am confident that in Islington we have good and robust housing management policies. Since 2013, we have spent £7 million on fire safety works, with a further £38 million of works planned. All our estate tower blocks in Islington are hardwired with fire detection alarms. All dry riser and wet riser systems that help firefighters to tackle any fires are inspected every 12 months to ensure they are in a good working condition. Every council block has a robust Fire Risk Assessment at least every three years, with some blocks assessed every year, and all of these assessments are signed-off by the London Fire Brigade.

We have asked the Fire Brigade to inform us if there is any change to the advice given to residents in tower blocks in case of a fire. The advice from the Fire Brigade remains that if there is a fire elsewhere in your building then you are safer to stay in your flat, unless the heat or smoke is affecting you. It is important to remember that the Fire Brigade has stressed that people living in high rise properties are no more at risk of a fire than anyone else.

404 APOLOGIES FOR ABSENCE

None.

405 DECLARATIONS OF INTEREST

Councillor Andy Hull and Councillor Claudia Webbe declared a non-pecuniary interest in Item A4: iCo Appointments and Indemnity arrangements. The Chief Executive had issued both Councillors with a dispensation to allow them to speak on the item and to vote.

406 MINUTES OF PREVIOUS MEETING

RESOLVED:

That the Minutes of the meeting on 18 May 2017 be confirmed as a correct record and the Chair be authorised to sign them.

407 ICO APPOINTMENTS AND INDEMNITY ARRANGEMENTS

Councillor Andy Hull and Councillor Claudia Webbe declared a non-pecuniary interest in this item. The Chief Executive had issued both Councillors with a dispensation to allow them to speak on the item and to vote.

RESOLVED:

1. That the granting of indemnities to officers and Members to cover the risk of claims which may be made against them personally, or other losses or liabilities they might incur, when acting as directors of the council's trading company, Islington Limited (iCo), in the terms set out in Appendix A to this report, be approved.
2. That the process for appointing a new director to the iCo Board, as set out in the report be approved.

Reason for decision – to provide additional security for the directors of the company at no extra cost to the council and to support the management of the company and its commercial activities.

Other options considered – None other than as specified in the report.

Conflicts of interest/dispensations granted – none.

408 CONTRACT AWARD FOR PARKING SERVICES FRAMEWORK

RESOLVED:

1. That NSL Ltd be appointed to the parking enforcement framework as the sole parking enforcement service provider and awarded a contract for a seven year period, from 1 September 2017 to 31 August 2024 be agreed

Reason for decision – to ensure the continuity of the parking service, whilst making significant savings over the lifetime of the contract.
Other options considered – none other than as specified in the report.
Conflicts of interest/dispensations granted – none.

409 **CONTRACT AWARD FOR PARKING SERVICES FRAMEWORK - EXEMPT APPENDIX**

RESOLVED:

That the information in the exempt appendix to Agenda item B5 be noted (see Minute 407 for decision).

MEETING CLOSED AT 7.21 pm

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Report of: Director Youth and Community Service

Meeting:	Date:	Wards:
Executive	13 July 2017	All

SUBJECT: Knife Crime and Mobile Phone Theft Scrutiny Review – Executive Members Response

1. Synopsis

- 1.1 The Committee concluded the review on knife crime, mobile phone thefts and crime hotspots in May 2016. It made a large number of recommendations in reflection of the seriousness of the issue, that set out to assist in reducing the incidence of knife crime and mobile phone theft in Islington. This covering paper sets out the overall response from the Executive and reports back on general progress since the Scrutiny Committee reported in May 2016. A progress update to each of the recommendations is found in Appendix 1.

2. Recommendations

- 2.1 To agree the response to the Policy and Performance Scrutiny Committee's recommendations.
- 2.2 To note the progress to date and the future plans to implement the recommendations.

3. Background

- 3.1 The PPS Committee's review on knife crime, mobile phone thefts and crime hotspots ran from June 2015 until May 2016 and was established in the context of worrying increases in knife crime and very high levels of mobile phone theft in the borough. The committee heard that in 2014/15 knife crime had increased by 15% and serious youth violence increased by 40% in Islington. In addition, mobile phone theft offences had reached unprecedented levels with up to 300 phones snatched each month.

The review set out to achieve the following objectives:

- To better understand the issues and causes of knife crime and what the Council can do to reduce knife crime in the borough
- In parallel with the above, to review and improve what the Council and its partners can do to reduce mobile phone theft by thieves on bikes within the borough

The review received evidence from a variety of sources that included presentations from witnesses; police, Margate Task Force, Chance UK and Safer London and young people, as well as presentations from council officers. The review included visits to New River College PRU, the Integrated Gang Team and New Horizons Youth Centre.

The recommendations of the committee focussed principally on impacts on young people, and placed an emphasis on identification of children at an early age so that interventions can take place and support offered to families.

4. Response to the recommendations

4.1 We are grateful to the Policy and Performance Scrutiny Committee for its report and recommendations. The Committee examined a number of important issues which have a direct bearing on the safety of children and young people and the wider community in our borough. All of the recommendations have been accepted and a progress update to each of the recommendations is found in Appendix 1.

4.2 There has been a great deal of partnership activity and additional resources secured in response to the committee's recommendations reflecting the strong commitment and effort among the various partners involved in working to reduce youth crime in Islington.

Highlights include:

- The work of the Integrated Gang Team (IGT) fully co-located at Islington Police station from May 2016
- 329 practitioners trained in Safeguarding Young People in Relation to Gang and Serious Youth Violence
- Islington has seen continued reductions in first time offending rates
- Commissioning of the council investment of youth violence prevention providing additional resource to work with young people at risk and their families including mentoring and key working
- The improvement in our Youth Offending Service which has recently been taken off formal improvement processes by the Youth Justice Board
- Cllr Joe Caluori has taken a lead in London for raising the issue of County Lines as a growing safeguarding concern with the Home Office
- New guidance shared with Islington schools in April on an effective and whole school approach to preventing and addressing youth violence

4.3 Despite the good progress made in response to the recommendations, we have not achieved the impact we would like to see in tackling knife crime and mobile phone theft in our borough. In the past year Islington, like other parts of London has seen worrying increases in youth violence and increases in mobile phone theft, and there are still too many children, young people and families impacted negatively by crime. In June the council is launching the refreshed youth crime plan, 'Working Together for a Safer Islington 2017 - 2020 - A partnership response to tackling youth crime in our borough in Islington'. The plan sets out how the partnership will work together over the next 3 years to reduce youth crime, we intend to broaden our range of commitments and increase our focus to reduce the risk factors that can lead young people becoming vulnerable to being drawn into offending lifestyles and gangs. As part of this we will be piloting a new assertive outreach youth work team this summer to work on Friday and Saturday evenings in partnership with St Giles Trust.

5. Implications

5.1 Financial implications:

The response to the committee's recommendations is being delivered using existing budgets.

5.2 Legal Implications:

The Council has the power to carry out all the implementation plans under the general power of competence (Localism Act 2011, section 1).

5.3 Environmental Implications:

None

5.4 Resident Impact Assessment:

The Council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The Council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The Council must have due regard to the need to tackle prejudice and promote understanding. A RIA was done on the scrutiny recommendations and highlighted the following:

Age - the scrutiny focused primarily on young people. Under 25s are the most arrested age group in the borough and are also the majority of victims of youth crime.

Disability - young people involved or the victims of crime are disproportionately affected by mental health and young people with learning disabilities are over represented nationally within the criminal justice system

Race - Black young people are over represented in the youth justice system in our borough as they are nationally.

Gender – Males are over represented in the youth justice system, but we know that girls can be used by gangs to carry drugs and hide weapons, also there is increasing awareness of the impact of CSE and peer on peer abuse on females as well as males.

6. Conclusion and reasons for recommendations

The Committee's recommendations on knife crime, mobile phone thefts and crime hotspots are welcomed. They have further strengthened the focus on delivering a strong partnership to the issues of knife crime and mobile phone theft in our borough. Reducing knife crime and the related harm to young people, families and communities remains the highest priority for our council, and all our partners.

The focus will continue through the delivery of the refreshed youth crime plan, Working together for a Safer Islington 2017 – 2020. The plan sets out what we will do over the next 3 years to reduce the number of young people becoming involved in crime or being the victims of crime.

A key priority will be on prevention and early intervention and we will work hard to ensure that young people, families and communities are at the heart of our planning and delivery.

Appendices

- Appendix 1 – Response to recommendations

Background papers: None

Final report clearance:

Signed by:



26 June 2017

Executive Member for Children, Families and
Young People

Date

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Appendix 1

Knife Crime, mobile phone thefts and crime hotspots' scrutiny review

Progress update on each of the recommendations

Recommendation 1: That, given the concerns expressed about sentencing, a briefing meeting be held with the Clerks at Highbury Magistrates Court, with the aim of informing them of the 'local picture', in respect of gang and youth violence and the community impact it is having and to support more appropriate sentencing for these types of offences.

The YOS court lead regularly attends the court user group meetings at Highbury Magistrates Court and the court receives regular updates and information on the local picture on crime in the borough. The Chief Magistrate sits on the Youth Justice Services Management Board and therefore has very good knowledge of youth crime issues in the borough and the partnership's response. An area for development going forward will be to explore the use of knife crime impact statements between the police and council to identify the risks and violence.

Recommendation 2: That Integrated Gangs Team, together with the Police, set up an awareness raising programme for frontline practitioners working with young people in Islington, to increase understanding of the issues and the services available, with regard to gangs, violence and vulnerability of young people

Since October 2016, the Gang Coordinator who is the Social Worker in the IGT has delivered borough wide training to 329 practitioners in Safeguarding Young People in Relation to Gang Activity & Serious Youth Violence. The training was co-delivered with police and IGT partnership colleagues including St Giles. Objectives that are covered in the training;

- Understanding the mind-set of a gang member.
- Key indicators & signs of a YP involved in gangs.
- Key interventions and strategies when working with gang affected YP.
- A clear understanding of Islington procedures for YP affected by gangs and serious youth violence.

The training has been successful in raising staff awareness on the protocols and procedures around safeguarding children affected by gang activity/violence and there has been a significant increase in the number of Strategy (safeguarding) Meetings being requested in relation to gang concerns. Feedback from the training:

"This training has given me the confidence and resources to (address issues with adolescents)".

This training has now been incorporated in to the Islington Safeguarding Children Board training offer and will be delivered more frequently in the coming year.

Recommendation 3: That in view of the fact that there are significant intelligence gaps in the drugs market locally and nationally through County Lines –

- i. **The Child Exploitation (CSE) and Gangs Analyst develop a problem profile on County Lines from Islington, drawing on intelligence from statutory and voluntary sector organisations, to inform the co-ordinated response to gangs and organised crime groups controlling the drugs market**

- ii. **Whilst the Trident matrix can be an effective tool in identifying the cohort of gang members causing, or at risk of causing significant harm, it does not cater for the significant number of young people on the periphery of gangs. It is therefore recommended that the use of the ISCB Gangs Safeguarding protocol is encouraged to support agencies in identifying, referring and engaging this vulnerable cohort of young people in targeted gang prevention work, to prevent their rise to full gang status**

The CSE and Gangs Analyst has completed a problem profile on County Lines that provided both individual analysis of young people involved/suspected to be involved and wider analysis of the extent of county lines in Islington. This was taken to MOPAC and circulated to the relevant professionals, and is informing the borough's approach to county lines. It has identified previously unknown young people and trends in relation to county lines and safeguarding in our borough. The information from the problem profile will also inform the funding application for the MOPAC London Crime Prevention Fund top slice for a cross London project around County Lines. The CSE and Gangs Analyst recently contributed data and information for the recent training provided to British Transport Police on County Lines, attended by 50 BTP Officers.

The multi-agency Gangs Safeguarding Protocol and Practice Guidance has been widely promoted and is supporting practitioners in understanding the 3 risk level categories and in how to take appropriate action when risk is identified. The protocol is included in the gangs training (see recommendation 2) and its use has led to a significant increase in strategy meetings, and the earlier identification of children and young people due to gang risk.

Recommendation 4: That, as a large number of mobile phone thefts take place at busy transport hubs and at shopping centres, MAGPI officers should develop a communication strategy to alert the public to the risks of using their phone in hotspot areas, and that local businesses be encouraged to contribute to funding this

The MAGPI team has worked with the council communications team on the mobile phone theft campaign and developed leaflets that have been widely disseminated across the borough. In addition, the police have tried some innovative approaches including using messages on pavements to alert members of the public to be more careful with their phones. However, this is an area that requires a lot more work and partnership focus as mobile phone theft has continued to rise, and the phenomenon is now widespread across London. We have recently been working with council communications team to update our messaging for this summer and have involved the youth council in reviewing our communications around knife crime and mobile phone theft in particular.

Recommendation 5: That the CSE and Gangs Analyst develop a problem profile on child sexual exploitation issues in Islington to increase knowledge of offenders and victims and to enhance the safeguarding of vulnerable young people at risk

The CSE and Gang Analyst post holder works closely with Childrens Services and Police colleagues to provide analytical products that assist in mapping intelligence on CSE and gangs and youth violence in Islington. This involves providing information to Islington's Multi Agency Sexual Exploitation meeting, IGT and the

Bronze Gangs Tasking Group as well as to relevant strategic partners. The aim of the post is to increase identification and intelligence on victims and perpetrators of CSE and of young people at risk of involvement in gangs and group offending. In the past year her work has assisted with the identification of a CSE perpetrator with links to county lines, as well as helping to build a much better picture of a young person that was missing.

Recommendation 6: That the creation of the Integrated Gangs Team be supported and more cross border work take place by the Police and the Council with other neighbouring Police forces and local authorities to share information and co-ordinate activity, given that crime is not restricted to borough boundaries

The Integrated Gang Team has been operational since January 2016 and fully co-located at the Police Station since May. The coordinated tasking is happening daily and collaborative work includes joint home visits to key gang nominals and their families, welfare checks to young people in the custody suite at Tolpuddle St, and targeted work with victims and young women. The IGT has worked with 97 Young People and Young Adults (up to 24 years old) since April 2016 - including 68 gang involved and on the MPS matrix, and 15 young victims and 14 gang affected young women. After the first year of operation we are beginning to see some positive signs of impact and the IGT has assisted 15 young people to access employment since April 2016, and 9 former gang matrix nominals who have successfully completed the IGT programme have not reoffended.

With regards to cross border working the IGT has developed improved links with all, neighbouring boroughs; Hackney, City of London, Camden and Haringey. Islington & Camden borough have now merged to form Central North area. This has improved information sharing with Camden as the Camden Police are working in the Islington IGT office. The team have also developed improved links with both the proactive & reactive OP Trident police and are in discussion with them regarding their attendance at the IGT tasking meetings.

Islington hosted a Home Office funded Review in March 2017 to explore County lines/CSE/Missing/Safeguarding issues. It was attended by Police and Local Authority Gang leads from surrounding London Boroughs, Op Trident, Essex, Norfolk and Kent Police/Local Authority leads.

Recommendation 7: That whilst the Committee support the use of Stop and Search, this should only be used where appropriate and be proportionate. The Council should identify meaningful ways to involve young people in the process of holding Police to account on stop and search issues and to provide training for young people to help inform them of their rights and responsibilities

The Islington Stop and Search Community Monitoring Group (ISSCMG) is a sub group of the Safer Neighbourhood Board and is the forum for discussing the police approach on stop and search in the borough. The ISSCMG with the support of the Youth Council have conducted a Youth survey on stop and search. 1000 responses have been received and a report due this June. The ISSCMG have expressed their request from more support with this group and with engaging with young people in the borough around stop and search.

Recommendation 8: That the work carried out in relation to Early Intervention strategies, as part of the Youth Crime Strategy, be supported as this is a vital element in deterring future cohorts of young people becoming involved in criminality

The council has invested a further £2million of funding to address serious youth violence over four years and this has added capacity into the teams and allowed practitioners to work alongside the community and voluntary sector who have developed expertise in approaches to support young people at risk. Interventions are targeted at those who are at risk of becoming involved in gang activity, a perpetrator or victim of youth violence. Investment is focused on those who would benefit from specialist interventions to enable them to leave gang activity and/or support to overcome trauma and risks associated with being victims of youth violence. The objective is to adopt a stronger early intervention approach to serious youth crime. The interventions, services, along with training and resources for practitioners focus on further embedding the Think Family approach to ensure the wider systemic issues (such as parental issues) are addressed alongside intensive direct work with the young people, addressing underlying causes of their behaviour.

Funding has been allocated to the following, as part of an integrated multi-agency approach to tackling youth crime, gang activity and violence. Services delivered to date include:

- mentoring delivered by Chance UK for an additional 10 targeted primary school children (to increase reach of current mentoring contract from 2016-2020) and Safer London for 25 young people 11 to 17 years
- one to one intensive support for 75 10-18 year olds plus group work, delivered by workers from St Giles Trust who utilise their experiences as a way of connecting with young people both on the fringes of and already entrenched in gang activity. They will be based in TYS, TYS/Integrate (a Camden and Islington Foundation Trust clinical led project that engages young people involved in gangs in EC1 area) and Integrated Gangs Team (IGT)

This early intervention approach is having a good impact in our borough and we have seen significant reduction in entrants to First Time Entrants to the Youth Justice System this is down 25% on the previous year far exceeding the corporate target. In addition, 80% of Young People who are triaged did not go on to receive a substantive youth outcome within one year

Recommendation 9: That discussions take place with schools as to measures that can be taken to 'flag up' young people who are felt to be at risk or vulnerable to becoming involved in criminality, in order to ensure early intervention can take place. In addition, as it has been shown that many young people permanently excluded from school are at a higher risk of taking part in criminality, measures should be put in place to permanently exclude as few young people as possible

The council in consultation with schools, police, IGT, YOS and Early Help have developed a new guidance for Islington schools on an effective and whole school approach to preventing and addressing youth violence. Further consultation with schools took place at a consultation event February 2017 that was attended by representatives from nine primary schools, seven secondary schools and six Safer Schools Officers. The guidance was circulated to all Islington schools in May 2017

and includes information about risk and protective factors, tell-tale signs and trauma informed approaches.

Recommendation 10: That the work of the Police Safer Schools and other partners, e.g. the Ben Kinsella Trust be supported and extended to pupils in schools on crime prevention, knife crime and gangs and the CSE

There is a very good offer to Islington Schools from well-established projects such as the Ben Kinsella Trust, Victim Support and our Safer Schools police. The council is using some of the additional £2million investment in youth violence prevention to fund St Giles Trust to deliver 30 SOS+ sessions to Islington schools per year. SOS is designed to provide young people with the empowerment and tools to stay safe, resist street pressures and make better life choices. The sessions are delivered by credible ex-offenders with real first-hand experience. Feedback on SOS from Samuel Rhodes School March 2017:

“It’s been completely on point. The pupils and staff were blown away by the workshop and information learnt via it and it alleviated all of their concerns. One class who had further questions asked if they could go into the workshop a second time in order to have all of their questions answered.”

Islington police launched the London Met’s first School Engagement Programme in November 2015 and the Programme is offered to every primary and secondary school in Islington with the flexibility to tailor it to meet schools’ individual needs. Topics include personal safety, dangers of crime and in particular sessions around gangs, knife crime and the concept of joint enterprise. To date over 160 sessions have taken place within Islington Schools with over 7200 pupils taking part. The Islington Junior Citizen Programme ran for two weeks in June and July 2016 and was attended by 1185 children and teachers from 25 Primary Schools across Islington attending. The event aims to teach children how to react safely to scenarios that have been designed and adapted to suit local problems and will be running again in summer 2017.

However take up has not been consistent across all our schools, despite considerable effort to promote the programme by the Safer Schools police. This is disappointing as it means that some Islington pupils are missing out on important messages on knife crime and keeping safe.

Recommendation 11: That as the Committee heard evidence that many young people suffered from a lack of affordable sports facilities in their area, particularly the most vulnerable, it is of the view that discussions should take place with schools and the Council’s Leisure provider, to investigate the possibility of the use of school and leisure facilities in the evenings and at weekends, this to include the provision of free/low cost options at Council Leisure facilities for young people. There should also be a review of the use of current Council community facilities for youth provision to ensure these are situated appropriately and are utilised in the most effective manner to meet current needs. In addition, as some young people are vulnerable to involvement in ASB and crime, Council provision and commissioned services should be encouraged to offer more evening and weekend facilities and that the hours of youth workers should be reviewed so that they are visible in crime hotspots at appropriate times

Organisations like Arsenal in the Community and Access to Sport have a significant reach in Islington providing free and affordable sport activities across the borough including in areas impacted by youth crime. The YOS have an agreement with the Sobel centre to give free use of their facilities for young people subject to the most

rigorous monitoring in the community. Further discussion is required regarding the council leisure and community facilities and this will be taken forward through a key work stream in the Youth Crime plan which aims to co-locate more of our services in the community and extend the hours which our youth services work to include later in the evening and at weekends. We will be piloting an extended youth offer this summer to work later on Friday evenings and at weekends.

Recommendation 12: That the Committee heard evidence of the good work that Chance UK and Safer Aspire carry out in the borough in mentoring and working with vulnerable young people. The Committee noted that an evaluation of this work is currently taking place to assess its effectiveness. This evaluation should be made available when it is completed. Furthermore we noted that there are various funding sources across London that may be able to assist in supporting children in sports activities etc. and these should be looked at and accessed, where possible in relation to mentoring related activities

The Chance UK mentoring programme is undergoing a Randomised Control Trial (RCT) in order to determine the service's impact on children's behaviour and emotional wellbeing. The Social Research Unit (SRU) at Dartington is conducting the RCT, which is called the ECHO project (Evidence for Children's Outcomes). The Social Research Unit report on the trial will be available late in 2017.

In addition, we are evidencing the effectiveness of these services through our own monitoring processes:

In 2016 – 2017 **Chance UK** worked with 50 Islington children (43 boys, 7 girls).

By the end of the programme:

- 69% of ending SDQ's scored below 16 – indicating the children have no behavioural difficulty
- 63% of ending SDQ's also demonstrated an increase in pro-social behaviours (All children are assessed using Goodman's Strengths & Difficulties Questionnaire (SDQ) the acceptance score is 16 and the average score of children taken onto programme is 29).

In 2016 – 17 the **Safer London Aspire** service matched 27 young people with mentors or intensive support. A snap shot of 7 young people who completed the programme showed a 93% Improvement in engagement with EET; goals and aspirations; engagement in positive activities and services, improved confidence and self-esteem and increased understanding of risks and consequences of gangs and offending.

Recommendation 13: That, given the recent unsatisfactory report on the Youth Offending Service, we noted that measures are being put in place to address the concerns raised. However, more information sharing should take place with other boroughs with a good rating, in order to look at successful measures that can be replicated in Islington. We also recommend that given that the staff in the YOS team are probably suffering from low morale, that additional support and training should be given to them in undertaking often very stressful work

The YOS has achieved significant improvement over the past year and has recently been taken off formal improvement processes by the Youth Justice Board. We have recently been successful in recruiting a new Head of YOS / TYS, Curtis Ashton, who brings extensive experience and skills. The YJB carried out an audit / mock inspection in January which showed that the quality of case management met or exceeded the required standard for HMIP Inspection. The staff team has stabilised and permanent staff recruitment and consequently there has been a positive improvement morale. The

YOS has in addition seen continued reductions in the rate of first time entrants to the youth justice system and a recent reduction in reoffending. However, despite the positive progress it is important to acknowledge that the Islington reoffending and youth custody rates remain very high and are among the highest in the UK.

Recommendation 14: That as the Committee heard evidence of the high prevalence of mental health problems amongst young people involved in gangs and criminality, it is welcomed that there is a mental health worker situated in the Integrated Gangs Team. However we feel that more work needs to be carried out in establishing a more effective process to support young people when transferring from children to adult mental health services and investment, wherever possible, should be maintained and increased in mental health services

The YOS now has a seconded Forensic Psychologist full time and a clinical Psychologist 2 days per week to work with young people identified as having emotional and mental health support needs. These roles can support transition to adult services where needed and can also hold on to cases of young adults to provide a gradual transition if appropriate. Both workers link into and share information with the IGT Psychologist where cases are transferring to the IGT service.

Recommendation 15: That the Council's housing policies be reviewed in respect of emergency moves out of the borough for young people and their families at high risk of gang related harm, and increase the links with the Pan London Gangs service, which can provide support in moving gang members to other boroughs

This area of work is still in development at the time of writing and the IGT Manager is in the process of writing new guidance on housing moves for young people at high risk of gang related harm. Housing remains one of the biggest challenges in our work with young people, especially in the current financial climate and the recent changes to housing legislation which are having a very negative impact on young people. Providing support around housing is a key area of work for the IGT and in 2016 – 17 the team assisted 4 young people in to permanent accommodation, 7 into temporary accommodation and 7 into supported accommodation. Furthermore, we have supported 5 families to move out of the Borough following a Gangs Strategy meeting, due to Police, Social Care and Housing all working together to safeguard the young person and their families from gang retribution/ activity.

Recommendation 16: That consequent to the Crime Summit community event in April the following take place –

- i. A meeting be organised with key stakeholders to discuss the outcome of the summit and proposals for the future way forward**
- ii. An action plan be developed for the 'community' strand of the Youth Crime strategy**
- iii. Support the Safer Neighbourhood Boards in delivery of actions and to identify ways of involving young people in their work**

The main issues from the Summit were captured and shared with the Safer Neighbourhood Board who continue to focus on youth crime issues by holding the police to account. The SNB has allocated the MOPAC community project funding to projects with a focus on youth crime this year. We have carried out extensive consultation with partners over the past year including 3 events in January and February to inform the youth crime plan. These events were attended by a wide range of statutory and voluntary organisations, local residents including parents and young people. In addition the SNB continues to have regular representation from the Youth Council at their meetings.

Recommendation 17: That the IGT and YOS develop further relationships with New Horizons Centre, who have secured external funding from the lottery to work with young people at risk of gang involvement and increase the reach to Islington young people

The YOS has seconded a youth employment worker from New Horizons who has been based with the YOS at Iseldon Rd since September 2016. He provides 1:1 support to young people who are NEET and mentoring into employment. He also links lots of our young people into New Horizons Youth Centre so they can benefit from the full range of facilities and services they offer. Shelagh O'Connor the Chief Executive Officer of New Horizons Youth Centre is a member of the Youth Justice Services Management Board and contributes to oversight and strategic direction of the YOS.

Recommendation 18: That, as it has been shown that engagement in Education, Employment and Training is a key pathway out of offending, the Council should look to provide increased opportunities for young people, such as more use of apprenticeships for the Youth Offending service young people

The council's youth employment team work closely with the Youth Offending Service. In the past year there has been:

- one traineeship that started last year and ran into this year with 5 YOS YP
- one traineeship that started this year and is still running with one YOS YP
- 3 YOS on Artichoke work placement scheme this summer and all 3 went onto level 1 courses at Kings Cross Construction
- Apprenticeships – (awaiting numbers)

The employment team have promoted the Aspire (3 employer events for NEET young people with vacancies) heavily to YOS staff and young people.



Report of: Executive Member for Housing and Development

Executive	Date: 13 July 2017	Ward(s): All
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SUBJECT: Confirmation of Article 4 Directions to withdraw Permitted Development right for change of use from light industrial to dwellinghouses

1. Synopsis

- 1.1 The Government has recently introduced a new Permitted Development right to allow light industrial uses (B1(c) use class) to change to residential use (C3 use class) without planning permission. This report proposes that three non-immediate Article 4 Directions made by the Council on 3 November 2016 are confirmed to come into force on 3 November 2017. These Directions will withdraw the permitted development right which allows B1(c) light industrial units to change to C3 residential use without planning permission
- 1.2 The three Directions cover (1) the Vale Royal / Brewery Road Locally Significant Industrial Site (LSIS), (2) the Central Activities Zone (CAZ) within Islington and (3) other B1(c) locations across the borough. The Directions are considered necessary as the Permitted Development right has significant potential to harm local amenity and wellbeing. In particular it could:
- Lead to the loss of viable business space for which there is a significant identified need.
 - Lead to the loss of valuable and viable industrial uses in Islington which provide a range of job opportunities and help to support the Central London economy.
 - Undermine the viability of the remaining business and industrial clusters within the borough by introducing uses that are not compatible with these uses and would compromise their future operation
 - Create amenity issues by introducing residential accommodation in locations and buildings that would otherwise not be suitable.
- 1.3 Protecting light industrial premises falling within B1(c) is important to the borough's economy for two reasons. Firstly, these uses are important in and of themselves as part of the borough's diverse economy; secondly they also provide opportunities for conversion into modern day industrial spaces occupied by creative sector firms, such as film production, music recording facilities and artists' studios.

These often straddle office and industrial uses, referred to as 'hybrid space'.

2. Recommendations

2.1 To agree to confirm three Article 4 Directions which will withdraw the permitted development right which allows B1(c) light industrial units to change to C3 residential use without planning permission. The three Directions cover the following areas (see also Maps at Appendix 1):

- (i) the Vale Royal / Brewery Road Locally Significant Industrial Site (LSIS);
- (ii) the Central Activities Zone (CAZ) within Islington; and
- (iii) other B1(c) locations across the borough.

3. Background

3.1 In April 2016, the Government amended the Town and Country Planning (General Permitted Development) (England) Order (the GPDO) to grant a new Permitted Development (PD) right to allow Class B1(c) (light industrial) use to change to Class C3 (dwellinghouses) use. As a result of the way this right is drafted in practice it cannot be used until 30 September 2017 (see details of prior approval process below), which gives local planning authorities the opportunity to put in place Article 4 Directions to withdraw the right (see below). The PD right is temporary and will cease on 1 October 2020. The PD right has some restrictions, and prior approval of certain issues is required in order for applicants to make use of the right.

3.2 The PD right is subject to some restrictions. The following are the relevant instances where development is not permitted:

- If an application for prior approval is received by the local planning authority on or before 30 September 2017.
- If the building was not used solely for a light industrial use on 19 March 2014 or, in the case of a building which was vacant on that date, the last known use was light industrial. Any applicant intending to utilise the PD right must submit a statement setting out the evidence they are relying on to demonstrate that the building was used solely for a light industrial use on this date.
- If the gross floor space of the existing building exceeds 500 square metres.
- If the building is a listed building or is within the curtilage of a listed building.

3.3 Prior approval of the following issues is also required:

- Transport and highways impacts of the development.
- Contamination risks in relation to the building.
- Flooding risks in relation to the building.
- Where the authority considers the building is within an area that is important for providing industrial services or storage or distribution services or a mix of those services (which includes, where the development relates to part of a building, services provided from any other part of the building), whether the introduction of, or an increase in, a residential use of premises in the area would have an adverse impact on the sustainability of the provision of those services.

3.4 The Council has power to withdraw this PD right by Article 4 of the GPDO if it is satisfied that it is expedient that development should not be carried out unless planning permission is granted on the application. In determining whether it is expedient the Council should have regard to material considerations including its Local Plan, the National Planning Policy Framework (NPPF) and national Planning Practice Guidance (PPG).

Article 4 Directions – background and process

3.5 Article 4 Directions allow local planning authorities to remove PD rights that would otherwise apply by virtue of the GPDO. An Article 4 Direction does not prohibit the development to which it applies, but instead requires that planning permission is first obtained from the local planning authority for that

development. This gives a local planning authority the opportunity to consider a proposal in more detail, i.e. assessing against local planning policies and to apply conditions. The PD right in question requires prior approval of certain issues, but this determination is limited and does not allow for full consideration against adopted Development Plan policies.

- 3.6 As set out in the NPPF and PPG, Government policy/guidance is that the use of Article 4 Directions should be limited to situations where they are necessary to protect local amenity and/or the wellbeing of the area. These criteria are not further defined in the NPPF or the PPG. The PPG notes that the potential harm that the Direction is intended to address should be clearly identified. For the proposed Directions, this is set out below.
- 3.7 Provided that the local authority considers it expedient, an Article 4 Direction can cover an area of any geographic size, from a specific site to a local authority-wide area. It is open to a local planning authority to make a number of different Directions specifying particular areas. In this case the three Directions together cover the parts of the borough with the most significant clusters of B1(c) uses. PPG advises that a Direction removing PD rights where prior approval powers are available to control permitted development should have particularly strong justification.
- 3.8 Article 4 Directions can be made with immediate effect or following a defined period of notice. In this case three non-immediate Article 4 Directions with a 12 month notice period were made on 3 November 2016, with this report recommending their confirmation to come into force on 3 November 2017. A minimum one year notice period before the Direction comes into force is necessary in order to remove the Council's liability to compensate landowners affected by the removal of PD rights. This is discussed further in the financial and legal implications sections below.
- 3.9 During the majority of the 12 month notice period (3 November 2016 – 2 November 2017), the B1(c) to C3 PD right cannot be used as the GPDO does not permit any prior approval applications received before 30 September 2017. There will be a short period – around 4 weeks – where the PD right is in force prior to the Directions coming into force (if they are confirmed). The GPDO allows 56 days for determination of prior approval application and the Directions will take effect during this period. Following the Directions coming into force, the PD right would be withdrawn by the Article 4 Direction and would require a specific grant of planning permission by the Council for the change of use.
- 3.10 The Secretary of State for Communities and Local Government has the power to revoke or modify Article 4 Directions at any time.

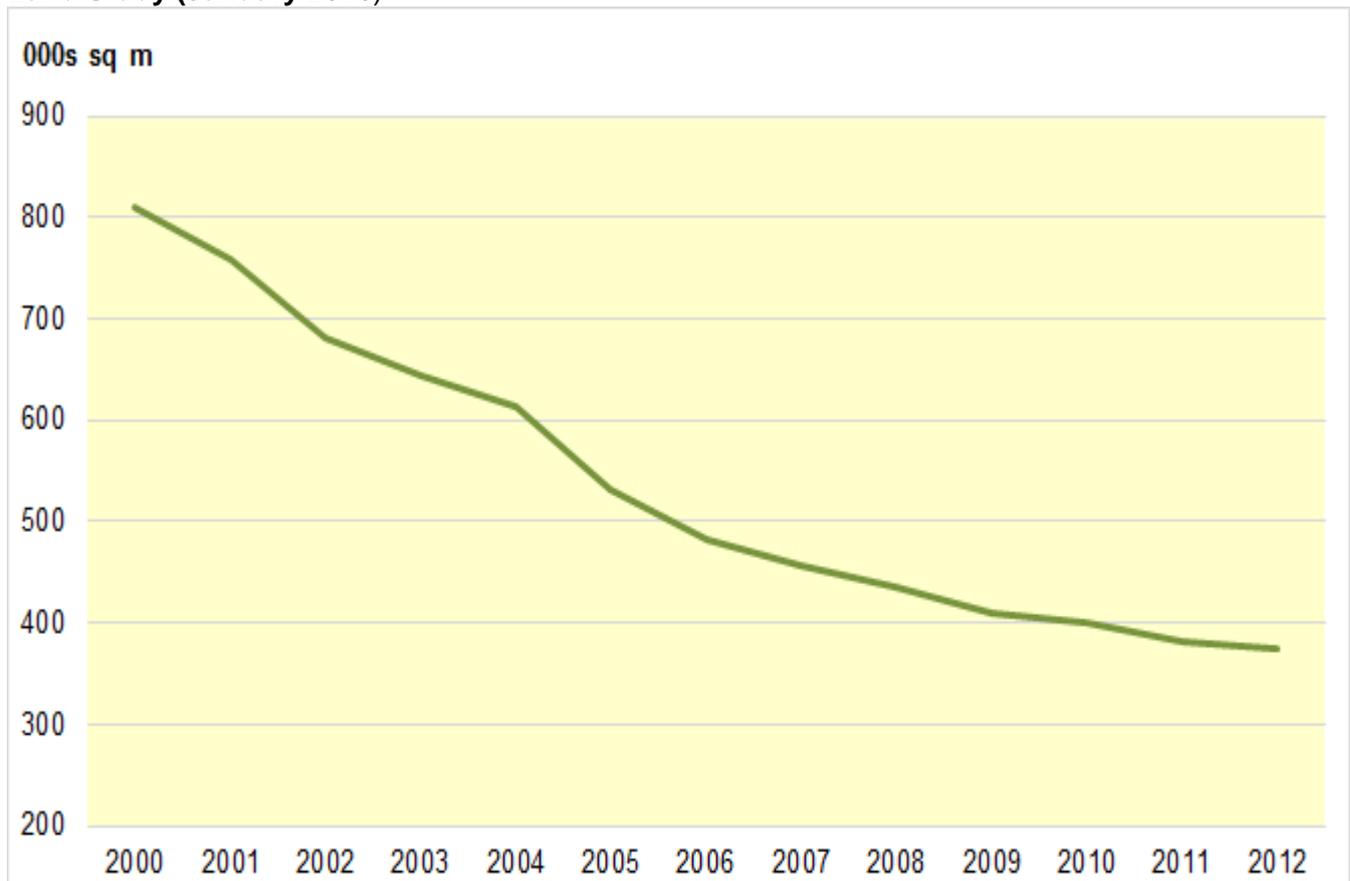
Policy and material considerations

- 3.11 In deciding whether an Article 4 Direction is expedient, regard has been had to various national, London-wide and local planning policies and considerations.
- 3.12 The B1(c) to residential PD right was first proposed in the Technical Consultation on Planning published by the Department for Communities and Local Government in July 2014. The aim of this proposal was to make the best use of existing underused light industrial, storage and distribution buildings to create much needed new homes; any Article 4 Direction should therefore not protect light industrial uses which have no reasonable chance of occupation by light industrial uses (demonstrated by high vacancy and/or low demand). The ability of a borough to meet its housing target should also be taken into account when considering the expediency of an Article 4 Direction. The Directions proposed to be confirmed in this report cover areas with relatively low vacancy and high demand for light industrial property, as shown in Islington's Employment Study 2016 (hereafter 'the 2016 study') and other documents. Through the formulation of the areas, the Council have verified that vacancy levels are low.
- 3.13 With regard to whether the Directions would constrain housing delivery, Islington has a strong track record of high housing delivery. In the six year period from 2009/10 to 2014/15, 9,538 residential units were completed, which exceeded the borough's housing target by over 2,500 units (or 36%). In terms of future supply, Islington's five year supply (covering the period up to 2020/21) projects delivery of over 8,200 units, which would exceed the borough's housing target by nearly 2,000 units (or 30%). Therefore, although the Directions may affect the delivery of residential units that may have otherwise

come forward if the Directions were not in place, Islington will still be able to deliver and exceed its current target without relying on delivery through this PD right. In any case, housing should not be delivered at the expense of workspace that is highly sought after, particularly given the shortage of supply of such workspace in the borough.

- 3.14 Islington is the most densely populated local authority area in the UK, with further significant increases in population projected in future years. Islington is also an important centre for employment; the 2016 study projects an increase of approximately 50,000 jobs in the borough between 2016 and 2036.
- 3.15 As stated above, premises in B1(c) are important in and of themselves – i.e. being an industrial use – but they are also important in providing opportunities to deliver ‘hybrid space’ which will continue to be in high demand as noted in the 2016 study.
- 3.16 The 2016 study shows that there has been strong growth in firms seeking ‘hybrid space’ – normally older, industrial-style stock that has been refurbished not as Grade A office stock, but as studio/light production space within the B1(c) use class. Around 60% of projected jobs growth is expected to be office based, and given the strong growth in ‘hybrid space’ as a form of office accommodation, this type of space will, in practice, be integral to meeting employment projections. ‘Hybrid space’ also accommodates different types of employment, more so than standard B1a office floorspace. This means that a wider range of employment opportunities can be accommodated via ‘hybrid space’.
- 3.17 The 2016 study identifies numerous areas across the borough where this ‘hybrid space’ is prevalent, notably the Vale Royal/Brewery Road Locally Significant Industrial Site, but also in other areas roughly correlating with designated Employment Growth Areas.
- 3.18 The 2016 study also found that the central London office market and its fringe areas (which includes Islington’s section of the CAZ) has seen a rise in the flexible space market including ‘hybrid space’ which appeals to both micro and small companies, and to larger corporate organisations looking for temporary space to house, for example, project teams. Demand for such space is being driven by a growth in SMEs and the impact of digital economy which is transforming business structures.
- 3.19 Almost all ‘hybrid space’ is within older industrial buildings that have been converted. This is an important point in terms of decisions on releasing employment land, because it should not be assumed that space that appears "old" or "tired" has lost economic value.
- 3.20 In order to facilitate sustainable population and employment growth, to maintain and improve the amenity and wellbeing of the boroughs residents and businesses, the Council needs to ensure that sufficient land is available for different land uses, including office and industrial floorspace. This is currently done through the planning system, and the implementation of Local Plan policies. For industrial uses in particular, loss of floorspace in recent years has been excessive compared to benchmarks. The 2016 study highlights the large losses of industrial land in recent years - 436,000sqm (43.6 hectares) between 2000 and 2012, amounting to a 54% loss. The recent GLA Industrial Land baseline data also demonstrates the fall in the boroughs’ stock of industrial land, from around 60ha in 2010 to just 35ha in 2015.

Industrial property stock (sq m), Islington, 2000-2012, chart taken from LB Islington Employment Land Study (January 2016)



- 3.21 Islington's Local Plan is made up of several documents which provide the basis for assessing planning applications in the borough; this includes the Core Strategy (adopted February 2011), Development Management Policies, Finsbury Local Plan and Site Allocations (all adopted June 2013). The Local Plan is up-to-date and is fully consistent with the NPPF.
- 3.22 Islington's Local Plan policies positively promote sustainable development to ensure that social, environmental and economic goals are achieved across the lifetime of the plan. One of the fundamental Core Strategy objectives, which underpins Islington's entire Local Plan, is to maintain the growth in employment by ensuring a broad range of opportunities exist for all types and sizes of businesses across all parts of the borough. Policy CS13 of Islington's Core Strategy encourages a diverse and vibrant economic base in the borough, supporting sectors and businesses that can adapt to changing circumstances in order to ensure long term economic sustainability in Islington. This has implications for residents, employers, employees and visitors alike.
- 3.23 Ad-hoc loss of B1(c) business floorspace, coupled with the introduction of residential uses into designated employment areas, could undermine the sustainable development of the borough, particularly in terms of economic and social sustainability, and impact negatively on local amenity and wellbeing of businesses. There is also potential impact on the amenity and wellbeing of future residents.
- 3.24 The Local Plan has detailed policies which resist the loss of B-use business floorspace across the borough. The Local Plan also has heightened protection for business floorspace in designated Employment Growth Areas, the Vale Royal/Brewery Road Locally Significant Industrial Area (designated in the Development Management Policies) and within the CAZ. These designated areas link to the justification for each proposed Article 4 Direction are discussed in relevant sections below.
- 3.25 The B1(c) to C3 PD right would undermine the Council's policy to protect existing, and maximise provision of future, business floorspace. This is an explicit Local Plan policy requirement across various employment designations in the borough. If the Council is unable to ensure protection and maximisation, this means that we would be unable to ensure a good supply of business floorspace to

meet projected employment needs, including the needs of existing local businesses to expand.

- 3.26 The Council are currently reviewing the Local Plan, with a view to adopting updated policies by early 2019. Early consultation on the scope of the Local Plan review took place between November 2016 and February 2017. This consultation sought views on a range of policy issues, including options for greater protections for business floorspace across the borough and promotion of 'hybrid' space amongst other types of business space.
- 3.27 Business floorspace also plays an important anchor role in terms of supporting other uses, such as local retail and visitor accommodation. This is particularly the case in clusters of business floorspace. The PD right could undermine the function of these clusters if they lead to the 'pepper-potting' of residential uses within business clusters, including within individual buildings, which could in turn undermine the amenity, vitality and viability of supporting uses which depend on a continued critical mass of business uses.
- 3.28 At the national level, paragraph 20 of the NPPF directs Local Planning Authorities (LPAs) to plan proactively to meet the development needs of business and support an economy for the 21st Century. Industrial sectors are changing and restructuring; existing industrial buildings are adapting to provide workspace for 21st Century industries, such as film production spaces, music production facilities and artisan food and drink producers (e.g. microbreweries).
- 3.29 The NPPF paragraph 22 states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of continued employment use. Islington's Local Plan employment policies were adopted post-NPPF and are sufficiently flexible to allow release of employment land where criteria are met to justify any loss. The borough-wide protection of employment uses set out in Local Plan employment policies is necessary given the significant losses experienced in the last decade and in order to meet the borough's high employment projections.
- 3.30 The PPG requires local planning authorities to assess economic development needs within their areas to ascertain the levels of quantitative and qualitative predicted employment need. Islington have done this for existing adopted Local Plan policies and (as noted above) have prepared a new Employment Study (January 2016) to identify current employment need to inform the Local Plan review.
- 3.31 At the London level, the London Plan (consolidated with alterations since 2011) policy 4.1 promotes the continued development of a strong, sustainable and increasingly diverse economy across all parts of London, ensuring the availability of sufficient and suitable workspaces in terms of type, size and cost, supporting infrastructure and suitable environments for larger employers and small and medium sized enterprises, including the voluntary and community sectors.
- 3.32 Islington is identified as a borough of 'restricted transfer' of industrial land in the London Plan (2015) – the strongest protection for industrial land. Policy 4.4 of the London Plan encourages boroughs to adopt a rigorous approach to industrial land management to ensure a sufficient stock of land and premises to meet the future needs of different types of industrial and related uses in different parts of London, including for good quality and affordable space. The Mayor's Land for Industry and Transport Supplementary Planning Guidance (SPG) (2012) highlights growing demand for industrial land (including B1(c)) from a range of other important industrial type functions. These include an efficient and sustainable land supply for logistics and some creative industries. Paragraph 2.42 of the London Plan states that loss of industrial capacity must be weighed very carefully against the scope it can provide for relatively affordable workspace, not least in terms of the locational advantages it has in providing services for CAZ. Islington's proximity and accessibility to the CAZ and the value of the remaining industrial space in the borough after significant losses means that the loss of industrial land needs to be carefully considered against relevant local and regional policies.
- 3.33 Policy 4.10 supports new and emerging economic sectors, with a particular aim of ensuring availability of a range of workspaces including start-up space, co-working space and 'grow-on' space. Paragraph 4.53 notes that the London Plan's strategic approach of seeking space for offices and industrial activities will help underpin innovative firms seeking more flexible hybrid, incubator and accelerator premises (which are often within B1(c) use). The 2016 study identified significant clusters of such space

which will be critical to meeting the demand from these new and emerging sectors.

- 3.34 With regard to the CAZ, policy 2.10 of the London Plan sets out that a key strategic priority for the Mayor is to enhance and promote the role of the CAZ as one of the world's most attractive and competitive business locations. Paragraph 2.46 expands on this, noting that the CAZ is expected to grow substantially over the London Plan period (to 2036); and therefore it will be important to ensure an adequate supply of office accommodation and other workspaces suitable to meet the needs of a growing and changing economy. This includes a need to ensure continued availability of workspaces appropriate for the technology, media and telecommunications and other emerging sectors.
- 3.35 The Mayor's CAZ SPG gives further guidance on the London Plan CAZ policies. The SPG identifies a list of strategic functions, and identifies where these have priority over residential development, which in Islington is any area which is not predominantly residential. The SPG notes that a range of property types and requirements will need to be met to support the diversity and dynamism of the CAZ, including provision for flexible and 'hybrid' workspace, and small offices.
- 3.36 The City Fringe Opportunity Area Planning Framework (OAPF) aims to create a positive environment for employment growth in the City Fringe Opportunity Area which falls partly within Islington and includes the Tech City cluster around Old Street Roundabout. Employment floorspace, for the purposes of the OAPF, generally means Class B uses and would also include activity of an industrial nature not falling with Class B1, B2 and B8 use.
- 3.37 The London Industrial Land Supply & Economy Study 2015, prepared by AECOM for the Greater London Authority, is a comprehensive review of the supply of industrial land in London and an assessment of the implications of future restricted supply of industrial land for the London economy. The study identifies B1(c) light industrial space as a core industrial use. Past trends in industrial land release show an accelerated rate of release around three times greater than the GLA's existing benchmark rates of release. Case studies suggest that at a local level, significant shifts to non-industrial uses can undermine the integrity of industrial areas.
- 3.38 The GLA study notes that this accelerated release is approaching the level where it will cause difficulty with the operation of the industrial land market, i.e. it results in less supply in a market with very low rates of vacancy, thereby resulting in less churn and stifling development of new businesses and the ability of existing businesses to expand. The GLA study shows that Islington has extremely low levels of vacancy, well below the frictional target rate of 5% which allows for effective market operation. The vacancy rate for core industrial uses in the borough (which includes B1(c) uses) is 0.7%, while vacancy rates in the LSIS (Locally Significant Industrial Site) is 0.9%. In addition, the GLA study shows that, between 2001 and 2015, industrial rents have increased by 61%, which is another indicator of constrained supply; while the overall amount of vacant industrial land has fallen by 91% over the same period, indicating significant demand for industrial space.

Proposed Article 4 Directions – general justification

- 3.39 Islington has a significant and diverse employment function, with concentrations of business floorspace in the south of the borough (corresponding with the CAZ) and in various locations across the rest of the borough. B1(a) office uses are the predominant business use but other subsets of B1, particularly B1(c), make up a significant part of the employment offer across these locations. Identification of B1(c) uses is complicated by the fact that any lawful B1 floorspace is generally able to operate freely within any subset of B1, i.e. B1(a), B1(b) or B1(c), as such interchange does not constitute development in planning terms. This makes it very difficult to map B1(c) uses exactly.
- 3.40 However, an exercise to identify B1(c) locations has been completed utilising information from the Valuation Office Agency (VOA), the Council's business rates data, the 2016 study and the Council's planning permission database. VOA data includes relatively fine-grain categorisation of business premises, which provided a reasonable proxy for identifying the likely use class of these premises. This exercise has informed the proposed Article 4 Direction areas shown in Appendix 1 and is discussed further below.

The adopted Local Plan has several policies which aim to maintain and promote business floorspace to meet employment projections, encourage new businesses and support the wider sustainable development of the borough. B1(c) floorspace will be a key part of this, as part of provision of a range of business floorspace including 'hybrid space' which evidence suggests will be the main driver of economic growth over the next two decades. The 2016 Study highlights the importance of maintaining and enhancing these policies, which the council intends to reflect in the Local Plan Review.

- 3.41 The new PD right allows B1(c) use to change to residential use without the need for planning permission. This could lead to a reduction in B1(c) space, which will affect economic growth in terms of lessening supply of floorspace and the range of job opportunities within the borough, and therefore could have a direct impact on the future wellbeing of Islington's businesses and residents. It could also introduce sensitive residential uses into employment areas which could affect the amenity of business occupiers nearby. These potential impacts provide significant justification for implementing Article 4 Directions to remove the B1(c) to C3 PD right in the areas shown in Appendix 1.
- 3.42 As noted above, the intent behind the Government's recent relaxations of the GPDO to allow various commercial uses to convert to residential use is to assist in meeting the vast demand for new housing. However, in Islington we have been delivering significant numbers of new residential units in recent years; Islington's 2015 housing trajectory¹ shows that, in the six financial years between April 2009 and March 2015, 9,538 residential units were delivered in the borough. This exceeded Islington's housing target for this period by over 2,500 units, or 36%.
- 3.43 Further, we have strong five year supply of housing and can therefore expect past strong delivery to continue. Islington's 2015 housing trajectory² projects that, between 2016/17 and 2020/21, over 8,200 residential units will be delivered, which would exceed Islington's housing target by nearly 2,000 units, or 30%.
- 3.44 The Council's policies on design and housing standards require that new residential units provide a good level of amenity. The GPDO offers no opportunity to assess the design of prior approval schemes and the impact that the design will have on amenity. Light industrial property is also unlikely to be well insulated and conversion into dwellinghouses may result in those dwellinghouses having a poor level of energy efficiency, which could adversely affect the amenity of future occupiers of any converted units. The Directions proposed in this report will ensure that amenity for future occupiers can be properly assessed through an application for planning permission and appropriate design mitigation measures implemented where necessary, e.g. soundproofing and insulation.
- 3.45 In summary, the new PD right is likely to compromise the ability of the Council to plan properly and ensure uses which contribute significantly to economic growth are protected and local wellbeing is maintained. Introduction of residential premises poses a threat to the continued business use of neighbouring business premises due to potential residents' complaints about noise, delivery traffic, etc. Loss of B1(c) uses and the potential 'contagion' effect on clusters of employment uses due to the pepper-potting of residential uses in these areas poses a threat to the achievement of sustainable development in the borough.
- 3.46 The following three Article 4 Directions are proposed as set out below. These are considered necessary because of the likely adverse impacts that the PD right will have on local amenity and wellbeing, as outlined below and in the general justification above.

Article 4 Direction for Vale Royal/Brewery Road Locally Significant Industrial Area – potential harm to local amenity and wellbeing

- 3.47 Core Strategy policy CS13 identifies the Vale Royal/Brewery Road area as a Locally Significant

¹ Islington Annual Monitoring Report 2015, available from: <https://www.islington.gov.uk/~media/sharepoint-lists/public-records/planningandbuildingcontrol/qualityandperformance/reporting/20162017/20161213planningpoliciesannualmonitoringreport2015.pdf>

² Ibid

Industrial Site (LSIS), to be retained for industrial/warehousing/employment use. Development Management Policy DM5.3 seeks to retain and enhance appropriate uses – including B1(c) – in the LSIS and sets out criteria which needs to be met where loss of such uses is proposed. Introduction of any non-business uses (except for supporting/ancillary services and facilities such as small cafes) will be refused. This approach is integral to maintaining amenity and wellbeing of businesses in the LSIS, as well as those businesses in the rest of the borough who rely on services provided within the LSIS.

- 3.48 With regard to the LSIS the 2016 study highlights that severely constrained supply and sustained take-up are combining to maintain rents at a relatively high level. Local agents report that there is a lack of comparable rental evidence on Brewery Road/Vale Royal, due to a lack of transactions.
- 3.49 Despite the wider context regarding loss of industrial land, industrial land within the LSIS has remained relatively stable. The LSIS operates to near full capacity with vacancy rates well below the frictional vacancy target of 5% (which allows for churn of occupiers). The London Industrial Land Supply & Economy Study 2015 identifies a vacancy rate of 0.9% industrial land in the LSIS. There is evidence of significant demand from potential occupiers to locate in the area.
- 3.50 The 2016 study acknowledges that although the appearance of the LSIS is unprepossessing, in terms of function it is an increasingly rare entity in Inner London which provides space that is crucial to accommodate businesses servicing both the wider borough and central London. In addition to the presence of more traditional industrial operators, new ‘industries’ are now also locating in the LSIS. This is particularly evidenced by the cluster of live event and music oriented businesses (such as recording studios), and also by the number of catering operations. Once lost, such clusters tend to take with them a range of supporting jobs, often nearby, ranging from maintenance staff to janitorial services to sandwich vendors.
- 3.51 In considering how to intensify industrial use and encourage re-provision/modernisation of industrial space in the LSIS, this can be achieved through the provision of ‘hybrid space’ of the type noted elsewhere in this report. The provision of B1(c) space is therefore important to both the current operation of the area as well as future intensification of space to help meet employment growth needs. This is essential to maintain the wellbeing of the area.
- 3.52 The 2016 study recommends that, as a minimum position, planning policy continues to restrict the net loss of employment space in the LSIS, and that efforts should be pursued to intensify employment uses in the LSIS.
- 3.53 The LSIS is Islington’s only significant industrial area. Its proximity close to major road networks and to the CAZ offers significant benefits in terms of logistics and close proximity to outlets selling their products, and therefore associated cost savings. The Land for Industry and Transport SPG notes that land used for industrial purposes outside but close to the CAZ can serve businesses and activities within the Zone, and in particular the office, leisure and retail economies of the West End, City and Canary Wharf. Demand is driven by businesses that need to be close to their customers including food and drink preparation, printing, publishing, local distribution activities such as couriers.
- 3.54 The Council is preparing a Supplementary Planning Document (SPD) for the LSIS. The SPD discussion paper, which was consulted on in Spring 2017, proposes guidance on building heights and urban design principles (informed by a specific building heights study) , but also some guidance on how certain recommendations of the 2016 study can be implemented, such as guidance on suitable typologies of business floorspace particularly for SMEs.
- 3.55 The amenity and wellbeing of businesses in the LSIS is dependent on the industrial function of the area being retained. At a more strategic level, the LSIS contributes to the economic success of the borough and central London, and therefore it helps to achieve a sense of wellbeing for businesses elsewhere in the borough, and also residents who benefit from concentrations of industrial uses being located outside residential areas.
- 3.56 The new PD right poses a real risk to the LSIS, as it removes the Council’s ability to properly assess the impacts of changes of use from B1(c) to C3; this could significantly undermine the level of B1(c) in the

LSIS, and lead to significant impacts on the function of the area, due to the lack of available floorspace but also due to the close proximity of residential uses which could affect the future operation of industrial uses, e.g. due to noise associated with industrial methods or transport of goods. Ultimately this could cause significant harm to local amenity and the wellbeing of businesses in the area. Given the significance of this employment cluster and its function in terms of serving the CAZ, the Council is considering extending the CAZ boundary to include the LSIS through the Local Plan review process, in line with the recommendations from the 2016 study.

Article 4 Direction for the CAZ – potential harm to local amenity and wellbeing

- 3.57 As noted above, the CAZ is a unique and important location for business floorspace where strategic functions such as offices and uses connected to creative industries have priority over residential use. Local and London-wide policy and guidance protects B-use floorspace from change of use unless exceptional circumstances are demonstrated. This protection is vital in order to maintain the amenity of local businesses that benefit from the CAZ overarching employment function. The distinct function of the CAZ also maintains local wellbeing in that it enables retention of an employment ‘ecosystem’ which facilitates jobs growth in line with projections and therefore improves opportunities for local employment. It also ensures that the character of the CAZ, which is synonymous with employment uses, can be retained in line with policy aims.
- 3.58 The function of the CAZ is also extremely important for the rest of the borough. As noted in the 2016 study, the CAZ area performs a critical function absorbing growth from the Central London economy. There are also important economic interrelationships between CAZ and other parts of Islington which offer good quality, desirable and well located office buildings which attract a high number of SMEs. These businesses are dependent, in part, on their proximity to the CAZ and central London, particularly those businesses in the creative and manufacturing sector occupying B1(c) space who supply CAZ businesses.
- 3.59 If the Council lose the ability to properly assess the impact of applications to change the use of B1(c) premises to residential use against local and London-wide planning policy which seeks to protect amenity and local wellbeing, then this could have a significant cumulative impact, primarily due to a loss of jobs (existing and potential) both within the CAZ and also within employment clusters outside the CAZ which rely on its continued successful operation; and a diminution of the character and function of the CAZ. The PD right could lead to the eviction of successful businesses given that the GPDO has no requirement for floorspace to be vacant. Even if businesses that were evicted were able to find alternative accommodation, the diminishing of B1(c) supply means that there is likely to be more demand for existing space, which often has a knock-on effect of increased rents; this acts as a further ‘push’ factor for businesses which prevents them locating in the CAZ.
- 3.60 The PD right could also lead to the introduction of sensitive residential uses in areas where noise and disturbance may cause adverse impacts for future occupiers. The PD right requires prior approval of several potential impacts, including the impact of introducing residential uses into areas with a distinct industrial/storage/distribution function. The CAZ does feature some areas which could be classed as a cluster of industrial/storage/distribution but the vast majority of B1(c) uses are not within any defined clusters. However, these dispersed B1(c) uses are in close proximity to other incompatible commercial uses which could also have an adverse impact on future residential occupiers and such impacts would not be able to be considered as part of the prior approval assessment.
- 3.61 B1(c) uses, including ‘hybrid space’, are an important part of the employment offer within the CAZ and are dispersed across the area. The exercise to identify B1(c) units in Islington shows that there are likely to be a number of B1(c) units scattered broadly across the CAZ, with potential for much greater numbers where these have changed from other B1 subsets.
- 3.62 Overall, it is considered that to be in the interests of better planning of the area - in particular in terms of maintaining good levels of amenity and wellbeing - to put in place an Article 4 Direction for the entire CAZ within Islington. This ensures beyond doubt that B1(c) uses are protected. Without an Article 4 Direction, the PD right could compromise the objectives of local and London-wide CAZ policy and mean that adverse cumulative impacts on amenity and wellbeing cannot be properly prevented or mitigated.

Article 4 Direction for other B1(c) locations – potential harm to local amenity and wellbeing

- 3.63 Outside of the LSIS and the CAZ, there are numerous smaller-scale clusters of business floorspace which contribute significantly to the overall employment offer in the borough, particularly through the provision of space which supports the SME economy and lower specification, affordable space. The 2016 study notes the potential for further encouragement of such space in these areas in order to help meet the demand for employment space and the overall jobs projections. This is especially important with regard to grow-on space to allow existing businesses to expand, and with regard to businesses who may struggle to find space within the LSIS and the CAZ (due to cost and/or lack of supply). The close proximity of these smaller-scale clusters to the CAZ/LSIS means that they are realistic, viable alternative locations for businesses who cannot locate in the CAZ/LSIS itself.
- 3.64 There is an indisputable interdependence between the CAZ and many of Islington's economic clusters, particularly for B1 SME businesses that either trade with other nearby businesses or hold a competitive advantage due to their proximity to the CAZ. Many SME businesses depend on their Inner London 'fringe' location in order to thrive.
- 3.65 Islington has a burgeoning micro and small business economy and it is clear that many of these businesses are clustered in business centres across the Borough. The locations where these centres are situated should be prioritised for growth and intensification of business uses. Identifying (and protecting) other suitable premises for conversion to this use should also be a priority.
- 3.66 A focused Article 4 Direction is proposed to cover those areas with identified or likely clusters of B1(c). The Council have arrived at the boundaries for this Direction by using VOA data and site surveys. These locations covered by the Direction are distributed throughout the borough including around Archway, Holloway, Finsbury Park and Angel/Essex Road. The map in Appendix 1 shows the exact locations.
- 3.67 The Development Management Policies designates Employment Growth Areas and Town Centres as locations which have local or strategic economic potential or value. These locations accommodate a diverse range of businesses and enterprises, including a significant element of B1 (all subsets). The exercise to identify B1(c) units in Islington shows that there are likely to be a number of B1(c) units correlating with these designated areas, with potential for much greater numbers were these have changed from other B1 subsets.
- 3.68 The Direction will ensure that dispersed B1(c) uses are protected. Without an Article 4 Direction, the PD right could compromise the objectives of local and London-wide policy and mean that adverse cumulative impacts on amenity and wellbeing cannot be properly prevented or mitigated. The Direction will protect space which is generally more affordable, hence protecting this space will maintain a supply of affordable business space for businesses in the borough; this type of space is particularly important for start-up companies and to allow expansion of existing companies.

Consultation on Article 4 Directions

- 3.69 In line with planning regulations, the Council consulted on the three Article 4 Directions from 3 November 2016 (the day the Directions were made) to 16 December 2016, a period of six weeks. This is double the minimum period specified in the regulations. In deciding whether to confirm the Directions, the local planning authority must take into account any representations received during the period.
- 3.70 Ten responses were received (see Appendix 2). Five responses (Greater London Authority, Transport for London, Historic England and two local residents) expressed support for the Directions, primarily in order to protect important business space and potentially help sustain and enhance local character and heritage assets. One local resident responded based on a site notice and presumed that it related to a planning application. The points raised were not directly relevant to the Directions themselves but they do highlight the importance of ensuring that potential amenity impacts can be properly considered through the planning permission process.

- 3.71 Four objections were received from developers/site owners, relating to three specific sites included within the 'Other B1(c) Locations' Direction, and the Vale Royal/Brewery Road LSIS Direction. These objections largely expressed concern with lack of flexibility as a result of the Direction and potential impacts on redevelopment of respective sites/areas.
- 3.72 One response was copied to the Secretary of State for the Department for Communities and Local Government and requested that he intervene to modify or cancel the Direction. The National Planning Casework Unit responded on behalf of the Department/Secretary of State, stating that clear reasons for intervention at Government level are not presented by this case; and that it is for the London Borough of Islington to proceed with the matter as it sees fit, taking into consideration the representations made in the representation and any other comments it has received on this matter.
- 3.73 The responses received reinforce the justification for the Directions set out in section 3 of this report.

4. Implications

Financial implications:

- 4.1 Any applicants submitting applications for planning permission which would have been unnecessary, prior to an Article 4 Direction removing PD rights are entitled to apply for planning permission without paying standard application fees. The Article 4 Directions are therefore likely to lead to an increase in the number of planning applications for which planning application fees will not be applicable.
- 4.2 If a local planning authority makes an Article 4 Direction, it may be liable to pay compensation to those whose PD rights have been withdrawn in the event that planning permission is refused for such development. However, no compensation is payable if the following procedure is followed, as set out in section 108 of the Town and Country Planning Act:
- The planning permission withdrawn is of a prescribed description as set out in the Town and Country Planning (Compensation) (England) Regulations 2015 (as amended). Part 3, Class D Permitted Development rights are included in this list.
 - The permitted development right is withdrawn in the prescribed manner.
 - Notice of withdrawal is given in the prescribed manner:
 - not less than 12 months before it takes effect.
 - not more than the prescribed period (two years)
- 4.3 The process followed by the council with regard to these Directions means that no compensation will be payable if the Direction is confirmed to come into force on 3 November 2017.
- 4.4 Costs associated with publishing the confirmation of the Article 4 Directions will be met from the Spatial Planning and Transport Team budget.

Legal Implications:

- 4.5 Legal implications are contained within the body of this report. An Article 4 Direction removes the specified PD right and means that an express grant of planning permission will be required for the change of use. If the Directions are confirmed, the council would not be liable to pay compensation should planning permission which would otherwise have been permitted development be refused or granted subject to conditions, as the non-immediate procedure has been followed and one year's notice of the introduction of the Directions has been given.
- 4.6 Legal Services will advise on the form of the notice and linked procedures which are specified in the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). The Secretary of State has power to withdraw or modify the Direction at any time. The council has power to cancel the Direction by subsequent Direction.
- 4.7 If confirmed by Executive, the Article 4 Directions will be publicised via the press (local advertisement) and site notices. The GPDO requires the local planning authority to serve notice on the owner and

occupier of every part of the land within the area or site to which the Directions relate, unless they consider that individual service on that owner or occupier is impracticable because it is difficult to identify or locate that person; or the number of owners or occupiers within the area to which the Direction relates makes individual service impracticable.

4.8 In this case, the Council has used data from the Valuation Office Agency (VOA) to identify potential B1(c) occupiers. This data breaks commercial premises down into different types of use, and the council has used the following categories as a proxy for B1(c) uses:

- Workshop & Premises
- Industrial (unclassified)
- Factory & Premises
- Business Unit & Premises

4.9 This is considered to be a reasonable method of identifying properties likely to be in B1(c) use. As noted in the body of this report, there may be some other general B1 premises which could actually be B1(c) and the council have determined the boundaries of the Direction for the CAZ based on this potential. However, it is considered impracticable to identify and write to every office occupier within these areas as this would likely total several thousand premises. In addition to writing to specific premises likely to be in B1(c) use, the council will ensure that a large number of site notices are placed throughout the borough, including in the CAZ, in addition to press notices.

Environmental Implications:

4.10 The Article 4 Directions are likely to have a positive environmental impact as, by re-introducing the need for planning permission for certain proposals, they will allow relevant planning policies to be applied – in particular the Core Strategy, Development Management Policies and Finsbury Local Plan. Light industrial property is unlikely to be well insulated and conversion into dwellinghouses may result in those dwellinghouses having a poor level of energy efficiency. Islington's planning policies look to achieve a high level of environmental standards, and their application may be able to mitigate this. In addition, the retention of local employment sites mitigates against the potential impact of longer commuting distance, with the associated issues of vehicular emissions and congestion.

Resident Impact Assessment:

4.11 The Council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The Council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The Council must have due regard to the need to tackle prejudice and promote understanding.

4.12 A Resident Impact Assessment (RIA) has been completed and has shown that there are no specific equalities implications relating to the Article 4 Directions.

4.13 The assessment of equality impacts is an iterative process and has been considered throughout the development of the Directions. The initial screening for a Resident Impact Assessment (RIA) was completed on 14 September 2016, in respect of the Article 4 Directions which were then consulted on. This screening did not identify any specific equalities implications.

4.14 The RIA was been revisited in May 2017 following the consultation on the Directions. The representations received raised no negative equality impacts and the conclusions of the September 2016 RIA remain relevant.

5. Reasons for the recommendations

- 5.1 The Government has introduced a new Permitted Development right which allows light industrial uses (B1(c) use class) to change to residential use (C3 use class) without planning permission. Light industrial uses are an important part of the borough's diverse economy. They also provide opportunities for conversion into modern day industrial spaces occupied by creative sector firms. We propose that three Article 4 Directions are confirmed to remove the new PD right in different areas of the borough, in order to protect the amenity and wellbeing of the borough's businesses and residents. These Directions are justified taking into account adopted planning policy and other material considerations and address the criteria for Article 4 Directions set out in the NPPF and PPG, as follows:
- 5.2 **Vale Royal / Brewery Road Locally Significant Industrial Site (LSIS)** – the LSIS is a significant employment cluster and provides an important servicing function for businesses in the CAZ. The new PD right poses a real risk to the LSIS, as it removes the Council's ability to properly assess the impacts of changes of use from B1(c) to C3; this could significantly undermine the level of B1(c) in the LSIS, and lead to significant impacts on the function of the area, due to the lack of available floorspace but also due to the close proximity of residential uses which could affect the future operation of industrial uses, e.g. due to noise associated with industrial methods or transport of goods. Ultimately this could cause significant harm to local amenity and the wellbeing of businesses in the area.
- 5.3 **Central Activities Zone (CAZ) within Islington** - the CAZ is a unique and important location for business floorspace where strategic functions such as offices and uses connected to creative industries have priority over residential use. If the Council lose the ability to properly assess the impact of applications to change the use of B1(c) premises to residential use in the CAZ, then this could have a significant cumulative impact, primarily due to a loss of jobs (existing and potential) both within the CAZ and also within employment clusters outside the CAZ which rely on its continued successful operation; and a diminution of the character and function of the CAZ. The PD right could lead to the eviction of successful businesses given that the GPDO has no requirement for floorspace to be vacant. Overall, it is considered that to be in the interests of better planning of the area - in particular in terms of maintaining good levels of amenity and wellbeing - to put in place an Article 4 Direction for the entire CAZ within Islington. This ensures beyond doubt that B1(c) uses are protected. Without an Article 4 Direction, the PD right could compromise the objectives of local and London-wide CAZ policy and mean that adverse cumulative impacts on amenity and wellbeing cannot be properly prevented or mitigated.
- 5.4 **Other B1(c) locations across the borough** - outside of the LSIS and the CAZ, there are numerous smaller-scale clusters of business floorspace which contribute significantly to the overall employment offer in the borough, particularly through the provision of space which supports the SME economy and lower specification, affordable space. The close proximity of these smaller-scale clusters to the CAZ/LSIS means that they are realistic, viable alternative locations for businesses who cannot locate in the CAZ/LSIS itself. The Direction will ensure that dispersed B1(c) uses are protected. Without an Article 4 Direction, the PD right could compromise the objectives of local and London-wide policy and mean that adverse cumulative impacts on amenity and wellbeing cannot be properly prevented or mitigated. The Direction will protect space which is generally more affordable, hence protecting this space will maintain a supply of affordable business space for businesses in the borough; this type of space is particularly important for start-up companies and to allow expansion of existing companies.

Signed by:



3 July 2017

Executive Member for Housing and Development Date

Appendices

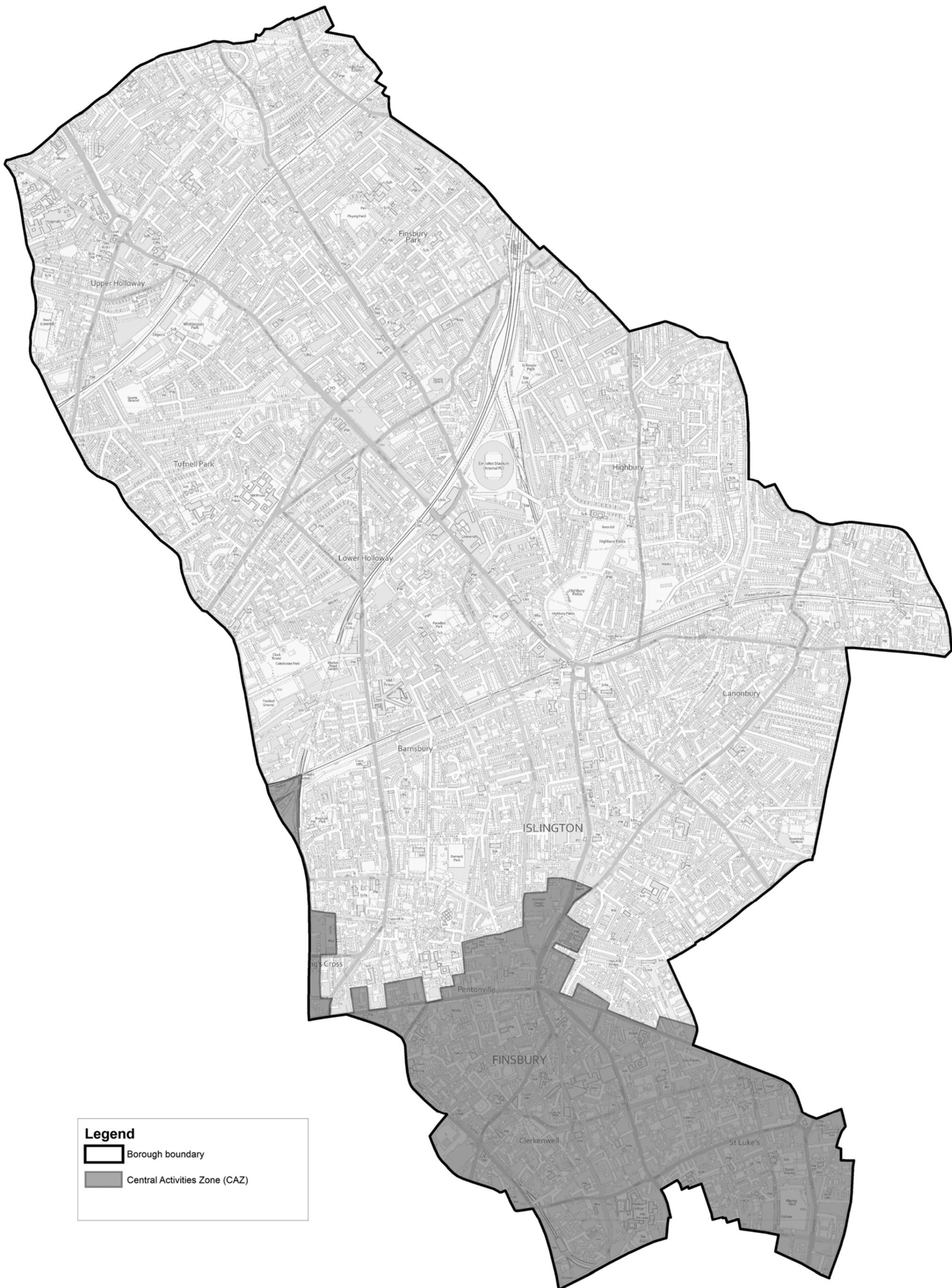
1. Maps of areas to be covered by each Article 4 Direction
2. Summary of representations received during consultation (3 November 2016 to 16 December 2016)

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Ben.johnson2@islington.gov.uk



Legend

-  Borough boundary
-  Vale Royal/Brewery Road Locally Significant Industrial Site



Legend

-  Borough boundary
-  Central Activities Zone (CAZ)

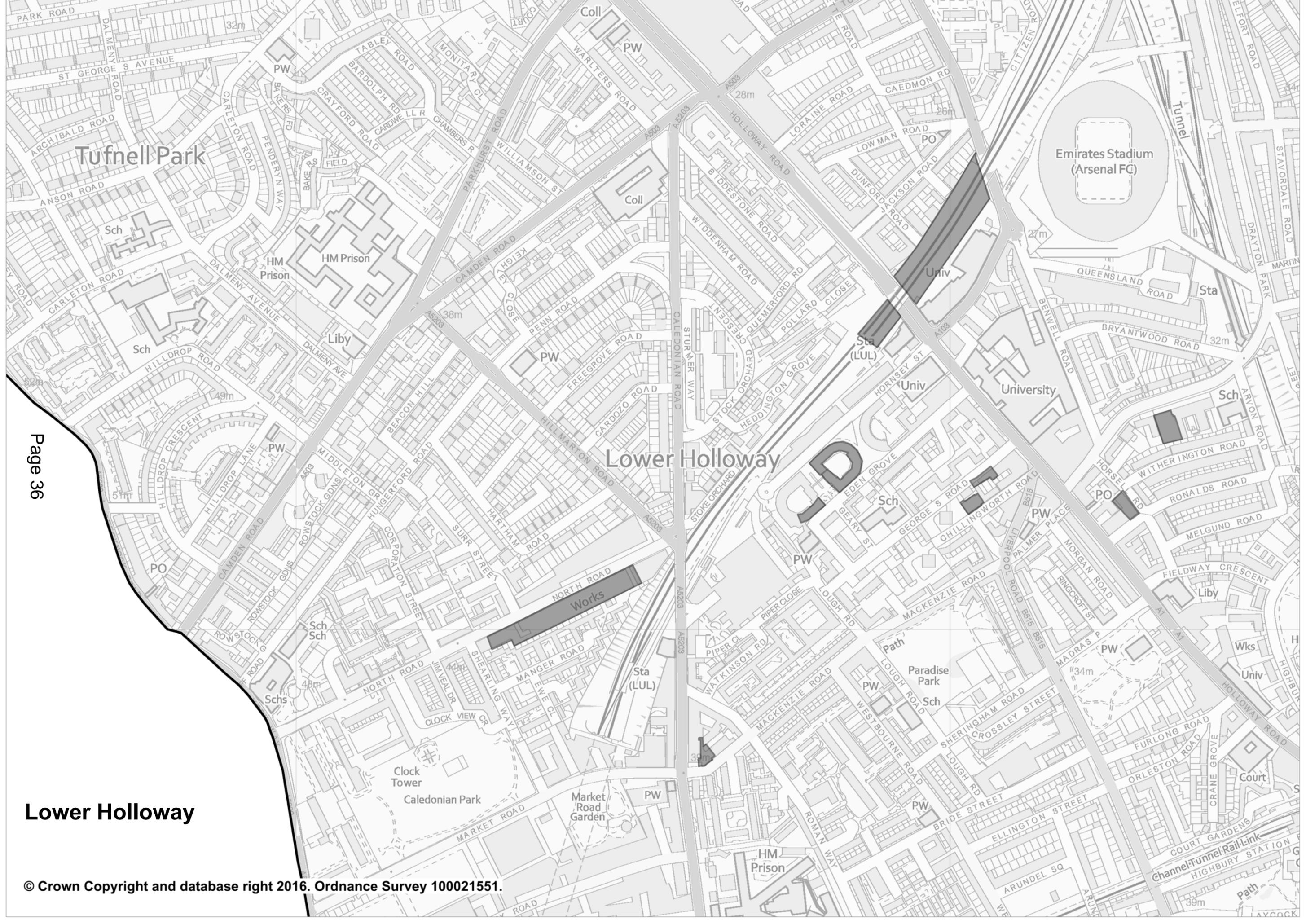


Finsbury Park



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Finsbury Park



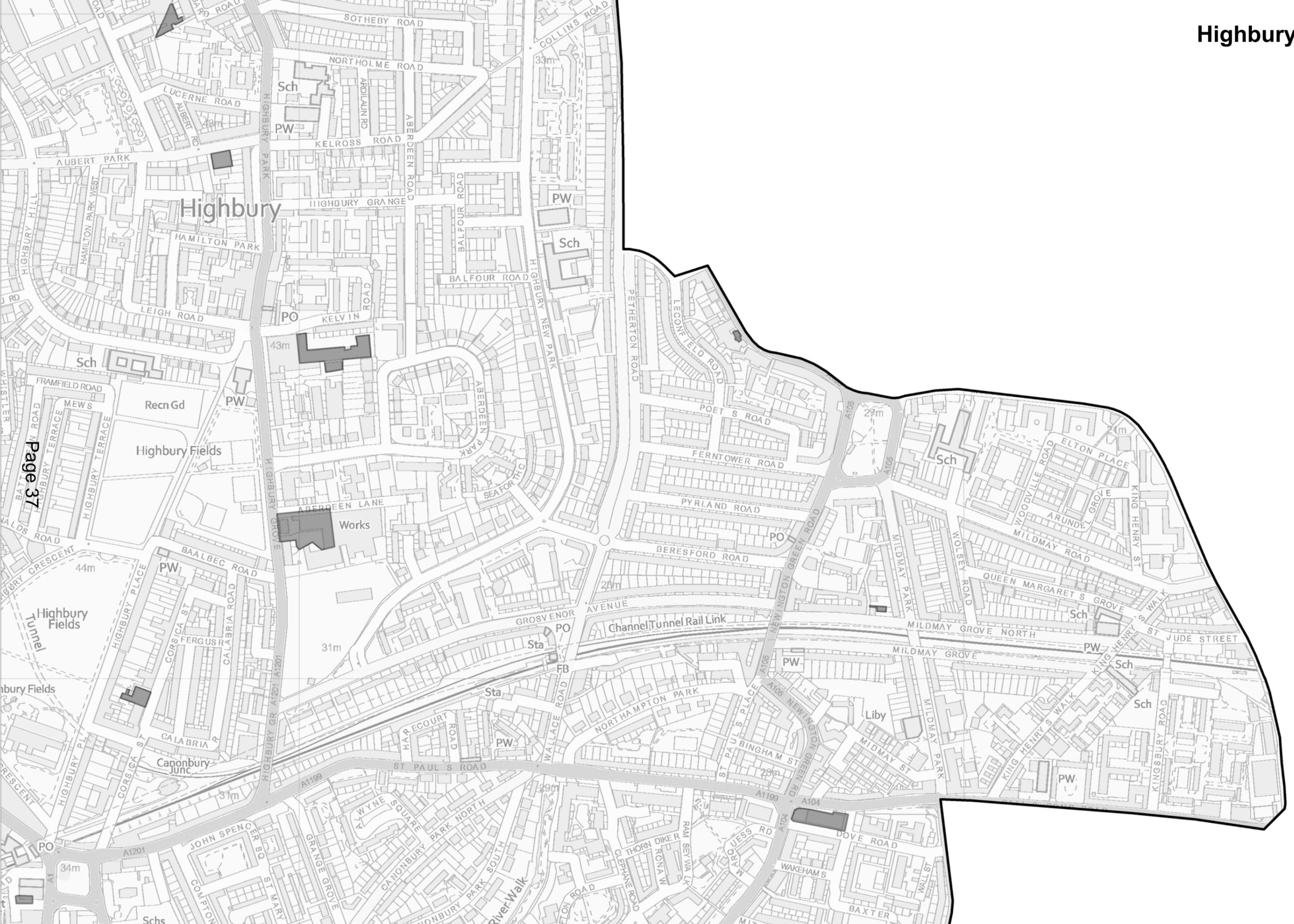
Tufnell Park

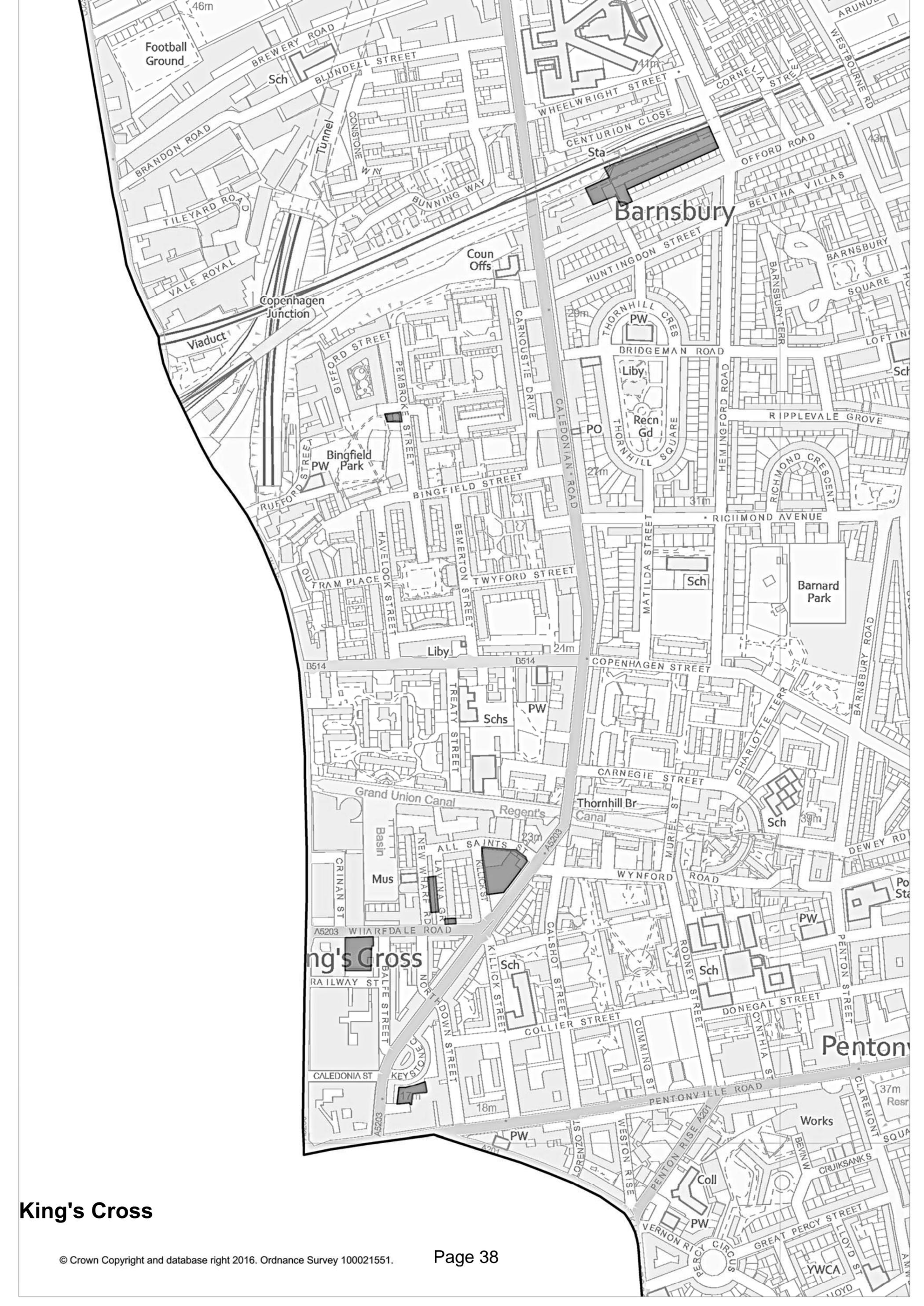
Emirates Stadium
(Arsenal FC)

Lower Holloway

Page 36

Lower Holloway





King's Cross



Canonbury

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Page 39

Angel and Canonbury

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Article 4 Direction to remove Part 3, Class PA Permitted Development Rights – representations received during consultation (3 November 2016 to 16 December 2016)

Consultee ID	Name of organisation (if applicable)	Summary of comments	Islington Council response
A4D1	Transport for London	Support the proposed Article 4 Directions	Support noted
A4D2	Individual	Supports the withdrawal of permitted development rights as light industry uses have been eroded in recent years. Light industry space is important for learning skills and also to ensure that useful services such as antique restoration (which can have agglomeration benefits) are within an accessible distance and don't necessitate vehicular journeys to access. PD right would also lead to increased intensity of housing uses without corresponding increase in local infrastructure such as schools and transport. Housing should be focused on outside cities on sites like airfields.	Support noted. The issues raised in this representation are important considerations in the council's decision to make the Article 4 Directions. While housing at high density is suitable in principle, the council agrees that new housing should be permitted through planning application in order to secure appropriate obligations for local infrastructure and other priorities, to mitigate impacts of new development. The council are already significantly exceeding our housing targets and as such the removal of PD rights will not affect this.
A4D3	Individual	Representation misunderstood site notice and assumed that it related to planning application. Concerned about how it would impact on existing residents lives: an erosion of privacy due to gardens being overlooked; reduction of light due to being overshadowed by a higher build; increased traffic to the site (current users of the site generally walk to work) and extra competition for parking.	While not a comment on the proposed Directions themselves, the representation highlights important planning considerations that cannot be taken into account (at least to the same degree) in the assessment of prior approval applications. This could lead to significant local amenity issues.
A4D4	Individual	Agrees with proposed Directions. Asks for it to be extended.	Support noted. Area for proposed extension includes no discernible B1c premises, therefore expanded Direction is not necessary.
A4D5	Ashburton Trading Ltd	Objects to designation of Railway Arches at Hornsey Road within the 'Other B1(c) Locations' Article 4 Direction. Consider that conversion to residential is unlikely and that Direction is excessive; and that the Direction will in practice give the area a protected status which will inhibit wider redevelopment proposals.	Comments noted. The council considers that the area is justified for inclusion given the importance of B1(c) provision across the borough, especially in secondary and potentially more affordable locations. The respondent notes that residential use is unlikely, therefore removal of rights is not inhibiting potential development on the site. We also note that the representation does not dispute existing B1(c) use. With regard to the Direction giving a protected status, this is not correct. An Article 4 Direction only removes specific permitted development rights; it does not preclude development coming forward via a planning application. Such development is considered against Development Plan policies and any relevant material considerations.
A4D6	Re-creo	Representation on inclusion of Legard Works, N5 within the 'Other B1(c) locations' Article 4 Direction, which the respondent considers manifestly unreasonable. Site is not part of recognised employment location of either local or more strategic significance and sits within a residential area. It does not form part of any important economic centre. The majority of the floorspace was historically used as offices, falling within Use Class B1(a). The council considers that the ground floor floorspace within one building was used for light industrial purposes falling with Use Class B1(c), notwithstanding the fact that it was occupied only as part of the offices which it served. The quality of the buildings is poor and access to the site is via a single narrow, access road wide enough to accommodate one vehicle. The previous commercial usage of the site ceased in early 2015, and since that time the site has remained vacant in spite of continued marketing. The building has been marketed since September 2013 onwards and has failed to attract firm interest in either letting or sale for commercial purposes. Part of the site has been prior approval permission to convert to residential through office to residential permitted development rights. Having regard to both the locational context of the site and its recent planning history, including both extant and partially implemented permissions for the majority of the floorspace to be converted into residential use, no basis exists to justify the inclusion of this site within this Article 4 Direction. It is a small, residual element in a site that is no longer fit for employment use. Whilst the Council might argue that there is a shortage of employment land, and a need to protect and intensify remaining suitable land for business use, in light of both the location of	Comments noted. While the site is not within a specific employment designation, this does not preclude inclusion within an Article 4 Direction area. The council's justification for the 'Other B1(c) Locations' Direction is set out in the accompanying committee report. In summary, the Directions are considered necessary as the PD right could compromise the objectives of local and London-wide policy and mean that adverse cumulative impacts (through the loss of numerous individual sites) on amenity and wellbeing cannot be properly prevented or mitigated. The Direction will protect secondary space which is generally more affordable, hence protecting this space will maintain a supply of affordable business space for businesses in the borough; this type of space is particularly important for start-up companies and to allow expansion of existing companies. The site specific context set out in the representation does not raise any issues which warrant withdrawal or modification of the Direction. We note that the Direction does not preclude development of the site; rather, it ensures that any proposals must seek planning permission and be assessed against development plan policies. The representation notes that the site is not part of a recognised employment location but Islington's Local Plan has policies in place to protect all existing business floorspace. Article 4 Directions will naturally be at odds with the principles of a permitted development right, as they remove such rights. The question therefore is whether the removal is justified taking into account other factors. The fact that the process or removing Directions exists demonstrates that removal is appropriate were local circumstances suggest that the PD right will have/had had adverse impacts, which we consider is the case here.

Article 4 Direction to remove Part 3, Class D Permitted Development Rights – consultation statement

Consultee ID	Name of organisation (if applicable)	Summary of comments	Islington Council response	
Page 42		<p>the site and the fact that the majority of the existing floorspace benefits from prior approval for residential use, the remaining floorspace is no longer suitable or appropriate for continued commercial usage.</p> <p>Respondent considers that the Article 4 Direction is at odds with the principles of the introduction of this Part of the GPDO, the aim of which was to increase the delivery of new homes by removing unnecessary planning obstacles. It is clear that there is no strong justification, exceptional or sound reason for the withdrawal of such rights in this case and the Article 4 Direction should, therefore, not be confirmed and should be withdrawn.</p> <p>The areas proposed to be covered by the Direction are not unique, exceptional or designated in any way and no harm to the amenity or environment of the area would arise in the absence of the Direction. Its purpose is simply to frustrate the use of permitted development rights on the affected sites to change to residential use.</p> <p>There are clear reasons at a local and site specific level why the Direction is not appropriate or soundly justified in this specific case. There is no rationale to this other than to exclude large parts of the Borough from the changes permitted by this part of the GPDO. Many of these sites such as our client's land are in residential areas and not within a recognised CAZ or strategic employment site. In light of both the emphasis placed within relevant national guidance upon the need to clearly identify the potential harm that the direction is intended to address, and the fact that this direction would override prior approval permitted development rights, the lack of any such explanation is both surprising and alarming.</p> <p>Respondent considers that the council has only included this particular site within the Article 4 Direction to hinder our client's aspirations to secure a comprehensive residential redevelopment of the site, despite it being within an entirely residential area.</p> <p>Respondent requests that the Secretary of State intervenes to modify the Direction if it is not withdrawn by the council.</p>	<p>It should be noted that the National Planning Casework Unit has responded to the representation, on behalf of the Secretary of State/Department for Communities and Local Government. The response notes that the Department does not consider that the clear reasons for intervention at Government level are presented by this case; and that it is now for the London Borough of Islington to proceed with the matter as it sees fit, taking into consideration the representations made in your letter and any other comments it has received on this matter.</p> <p>The council has considered all representations and does not consider that they highlight any issues which necessitate cancelling any of the Directions, nor is there any justification for the Secretary of State to modify Directions.</p>	
	A4D7	Stadium Blenheim Court Limited	Objects to the 'Vale Royal/Brewery Road' Article 4 Direction, as this area is in need of regeneration and this is more likely to occur if there is flexibility in the way in which buildings are used.	Comments noted. The area is designated as a Locally Significant Industrial Site in the Local Plan; residential use in this area is restricted. The council's up-to-date employment evidence suggests the area is functioning well with very low vacancy rates, therefore we dispute the assertion that the area is in need of regeneration.
	A4D8	Stadium Capital Investments	Objects to designation of commercial space on Hornsey Street within the 'Other B1(c) Locations' Article 4 Direction. The Direction will tend to inhibit flexibility to secure good mix of uses and tenants, and so is inherently undesirable. The commercial space is currently used for various purposes, not necessarily B1(c), therefore it is perverse to treat it as B1(c).	Comments noted. The council considers that the area is justified for inclusion given the importance of B1(c) provision across the borough, especially in secondary and potentially more affordable locations. The Direction does not preclude any use as applications can still come forward via planning application. We also note that the representation does not dispute potential B1(c) use at the site.
	A4D9	Greater London Authority	Notes the Mayor's commitment to preventing business space through excessive conversion of commercial space under PD rights, and supports the three Directions.	Support noted.
	A4D10	Historic England	<p>Notes no specific concerns regarding the removal of PD rights. Recognises the contribution made by many historic industrial buildings and areas to Islington's rich historic character; and notes that the retention of such buildings can rely on recognition that they provide and support important city fringe and central activity zone employment functions.</p> <p>Consider that the Directions will be potentially beneficial to sustain and enhance local character and heritage assets, as it will enable proper assessment of proposed changes and any likely harm, not only to local economic activity but also to the character of the historic environment.</p>	Comments and support noted. The Directions will enable the council to assess all applications against Local Plan, in terms of their potential impact on character and heritage.



Report of: Executive Member for Housing and Development

Executive	Date: 13 July 2017	Ward(s): St George's and Holloway
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SUBJECT: Holloway Prison Site – Approval of draft Supplementary Planning Document for consultation

1. Synopsis

- 1.1 The Ministry of Justice has stated its intention to dispose of the Holloway Prison site. The last prisoners left the site in the summer of 2016 and the prison has been decommissioned.
- 1.2 The Council is preparing planning guidance - in the form of a Supplementary Planning Document - to provide further detail and clarity about how the future development of the site should be approached.
- 1.3 The Council consulted local residents and key stakeholders on a discussion paper in spring 2017 asking for feedback about the content of future planning guidance. Over 300 responses were received. This feedback is being used to inform a draft Supplementary Planning Document (SPD) for the site which is intended to be consulted on during the summer of 2017.
- 1.4 The purpose of this report is to provide an outline of the draft SPD to be approved for consultation and provide a summary of some of the headline responses to the discussion paper for the site which was consulted on in spring 2017.

2. Recommendations

- 2.1 To note the results of the public consultation on the discussion paper for the Holloway Prison Site (attached at Appendix 2)
- 2.2 To approve the draft SPD for the Holloway Prison site for public consultation (attached at appendix 1).

- 2.3 To delegate authority to the Corporate Director of Environment and Regeneration in consultation with the Executive Member for Housing and Development, to make any further changes to the SPD and supporting documents that are considered necessary prior to public consultation.
- 2.4 To note that the consultation timetable will also be jointly agreed between Corporate Director of Environment and Regeneration and the Executive Member for Housing and Development.

3. Background

Update on the site

- 3.1 The site is now empty. The last prisoners left the site in the summer of 2016 and were relocated to facilities at HMP Bronzefield (in Ashford) and HMP Downview (in Surrey) ¹. The Government concluded that the design and physical state of the prison do not provide the best environment for the rehabilitation of offenders. The last inspection of the prison concluded the “the size and poor design make it a very difficult establishment to run”²
- 3.2 The Ministry of Justice have announced their intention to sell the site in order to fund improvements to the prison estate elsewhere as part of the £1.3billion Prison Estate Transformation Programme to modernise the prison estate and support rehabilitation. No timescales have so far been announced for the sites sale.

The need for planning guidance

- 3.3 The Council has committed to producing planning guidance to provide clarity about what would be expected from the site’s future development. It is important that draft guidance is published as soon as possible in order to inform the decisions of prospective buyers of the site
- 3.4 It is proposed that the planning guidance will be a Supplementary Planning Document (SPD). This follows a set statutory process and, once adopted, will be a material consideration in the determination of a future planning application.
- 3.5 An SPD does not introduce new planning policies; rather it provides guidance around existing policies in relation to the site. As the council has also started the review of its statutory [Local Plan](#), the site will be included within this as a site allocation and will therefore have a site specific policy. The SPD is considered against existing planning policies; however it will also need to take account of emerging policies as relevant.

Discussion Paper Consultation

- 3.6 The first stage in the preparation of the SPD was an early consultation on a Discussion Paper which asked for feedback on the content of future planning guidance. Consultation took place for over 5 weeks from 3 March to 10 April 2017. This included writing to over 6000 properties in the local area, contacting around 1600 individuals and organisations on the Planning Policy database, as well as writing to additional stakeholders who were identified as having a specific interest in the site.
- 3.7 Over 300 responses were received. The majority of responses were from local residents. However, there were also responses from other key stakeholders that have an interest in the site, including voluntary and community groups as well as government agencies and bodies. Given the high number and depth of responses a full summary of the consultation responses is set out in appendix 2. Some headline consultation findings include:
- Housing: this was the single biggest issue raised in responses – around two thirds of respondents. There was strong support for affordable housing on the site, in particular social/council housing.
 - Community facilities: there were a number of responses about the need for community facilities, including open space, a women’s centre and other uses associated with the historical legacy of

¹ Ibid.

² Witten Ministerial Statement: <https://www.gov.uk/government/speeches/prisons-announcement>

the site, including space to support women in the criminal justice system.

- The Mayor's Office for Policy and Crime (MOPAC) highlighted that the Mayor supports proposals for retaining space for female offender services on the site given the gap in provision that resulted from the sites closure.
- The Greater London Authority (GLA) and Transport for London (TfL) provided a joint response which highlighted their support for a significant number of new homes on the site, including affordable housing. The GLA suggest that the site should be relatively high density given the sites transport accessibility and proximity to Nag's Head Town Centre, with parts of the site likely to be suitable for taller building elements.
- The Ministry of Justice (MoJ) reiterated that the sale of the site will help to fund the prison reform programme and the importance of maximising capital receipts for this purpose. "The impact of the level of affordable housing and housing mix could be significant to the value of the site and this could have wider implications for the affordability of the delivery of new prisons and improvements elsewhere." The MoJ consider there is potential to increase building heights above 10 storeys. It was highlighted that community infrastructure provision on the site should also be considered in the context of the need to improve prison facilities elsewhere.

3.8 Content of SPD

The SPD was drafted taking into account the feedback received from consultation on the discussion paper as well as utilising additional technical evidence around urban design and viability work which will be published during the public consultation on the draft SPD. The structure of the SPD follows that of the discussion paper and is summarised below:

- **Site history and prison reform** – this section sets out a brief background about the historical evolution of the prison as well as the more recent context of prison reform.
- **Site context and planning constraints** – this section provides a summary of the context and constraints to be taken into account by future development proposals, including: the built environment; topography; heritage considerations; building heights; biodiversity, transport and access,
- **Future uses:**
 - **Housing:** The document sets out the potential of the site to accommodate housing to meet the boroughs housing needs, emphasising the importance of genuinely affordable housing. The draft SPD includes some indicative numbers about the quantum of housing that might be achievable and desirable and also includes information about the levels of affordable housing that are likely to be achievable.
 - **Community uses:** this section sets out the extent to which social and community infrastructure uses will be needed on site including on-site open space/play space and community facilities including a women's centre/building.
 - **Other uses:** how the other uses, such as the provision of a small amount of retail and/or employment space should be approached.
- **Design:** this section sets out key design principles for the future development of the site, including: how development should take into account the context of building heights and heritage assets; how the site is connected to its surroundings and encourages sustainable transport choices; how development should encourage inclusive design features as well as provide green infrastructure; and finally how future development should take account of sustainability policies including those around decentralised energy.
- **Delivery:** this section sets out expectations in relation to viability, community involvement in developing plans and expectations around phasing of the development.
- **Key objectives:** this section provides a summary of the main objectives for the site.

3.9 Next Steps

Following consultation on a draft SPD, responses will be analysed and amendments made as appropriate. There may be a requirement for additional consultation depending on the extent of the changes. The final version of the SPD will then be taken to the Council's Executive for adoption.

4. Implications

Financial implications:

- 4.1 The cost of producing the SPD and consultation costs will be met through existing budgets within the Planning and Development division.

Legal Implications:

- 4.2 The draft SPD has been prepared in line with relevant planning regulations – including the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). Once the draft SPD has been adopted it will be a material consideration in the determination of relevant planning applications. An SEA screening statement has been prepared which confirms that no environmental assessment is required in accordance with the requirements of European Directive 2001/42/EC (The Strategic Environmental Assessment Directive).

Environmental Implications

- 4.3 The SPD provides guidance on existing policies to mitigate against negative environmental impacts in line with existing planning policy. There are a number of measures identified as required by existing planning policies that have the potential to improve the environment – for example an improved streetscene, new open space and sustainability measures including decentralised energy.

Resident Impact Assessment:

- 4.4 The Council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The Council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The Council must have due regard to the need to tackle prejudice and promote understanding.
- 4.5 A Resident Impact Assessment (RIA) has been completed and this did not identify any negative equality impacts for any protected characteristic or any human rights or safeguarding risks. The SPD will encourage benefits from the future development of the site, including the provision of affordable housing.

5. Reasons for the recommendations / decision:

- 5.1 The development of planning guidance for the Holloway Prison site is important in setting out and delivering the Council's objectives for the site. The timing of the guidance will also be important in informing future buyers of the site. For the reasons set out above it is recommended that the Executive note the summary of the consultation responses to the discussion paper (attached at appendix 2) and to approve the draft SPD (attached at appendix 1) for consultation. Executive is also asked to delegate authority to the Corporate Director of Environment and Regeneration in consultation with the Executive Member for Housing and Development to make changes to the draft SPD and (and supporting documents where relevant) if any are needed prior to public consultation.

Signed by:

Diarmid Ward

5 July 2017

Executive Member for Housing and Development Date

Appendices

Appendix 1: Holloway Prison draft Supplementary Planning Document (SPD)

Appendix 2: Summary of Discussion Paper consultation responses

Background Papers - none

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Holloway Prison

Draft Supplementary Planning Document (SPD)

A plan for the future of Holloway Prison site



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Background

The Ministry of Justice has stated its intention to dispose of the Holloway Prison site. The last prisoners left the site in the summer of 2016 and the prison has now been decommissioned.

The council consulted local residents and key stakeholders on a discussion paper in spring 2017, asking for feedback on options about the content of future planning guidance. Over 300 responses were received and have played a valuable role in informing the draft Supplementary Planning Document. Further detail about the consultation, a summary of the responses received and how they have been taken into account can be found in the Consultation Statement accompanying this document.

This draft SPD provides further detail about how the future development of the site should be approached. The site is considered to represent an important opportunity to meet the significant need for affordable homes in the borough – this is a key priority for the draft SPD.

Given the size and complexity of the site, the SPD will set out how existing planning policies relate to the site. An SPD does not introduce new planning policies. The SPD does not go into detail about every policy that is applicable to the site or could be relevant to a future planning application (all relevant planning policies would apply) rather it provides an overview of some of the key issues and the different policies that relate to these. The SPD will be a material consideration in the determination of a future planning application.

As the council has also started the review of its statutory [Local Plan](#), the site will be included within this as a site allocation and will therefore have a site specific policy. This draft of the SPD is considered against existing planning policies, however, where appropriate, equivalent replacement local plan policies should also be taken into account. Future drafts of this document will take into account emerging planning policies where appropriate.

Following consultation on the draft SPD we'll review the responses and make changes to the document where appropriate. The final document will then be taken to the council's Executive for adoption in the Autumn of 2017.

Have your say

We would welcome any comments you have on the draft SPD, whether you agree with the proposed content and if you feel that anything is missing. You can have your say on until **[to be added]**. You can view a copy of the document online at www.islington.gov.uk/consultations.

You can provide comments:

- Online: **[to be added]**
- By email: **[to be added]**
- In writing to: **[to be added]**

1. Site history and prison reform

1.1 Holloway prison was opened in 1852 as a mixed gender facility before increasing demand for space resulted in it becoming the first female-only prison in the country in the early 1900s.

1.2 When the prison was constructed the area surrounding the site was still only partially developed however, with the growth associated with industrialisation by the late 1800s the site was surrounded by new buildings – mainly long terraces of housing. The fabric of the built environment has remained relatively similar since this time with the exception of post war housing estates, although many of these kept the existing street structure.

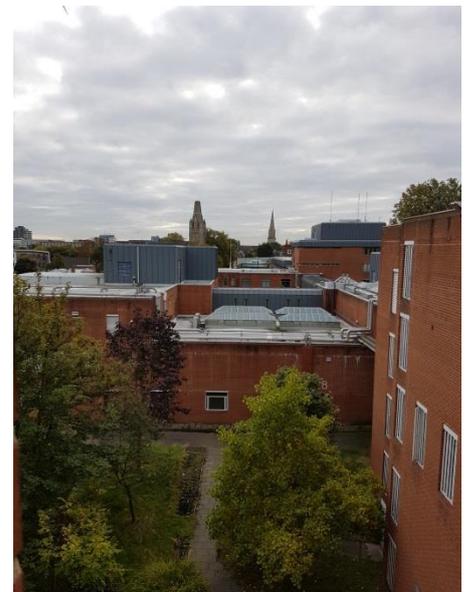


Holloway Prison in 1896. Source: Wikipedia

1.3 Whilst the original prison was an imposing Victorian structure (called the Castle) it was completely rebuilt between 1971 and 1985. The new prison was reflective of a desire to move away from the Victorian justice system; it was designed not to feel like a prison with accommodation grouped around a number of attractive green spaces, with cells along corridors rather than wings to provide greater privacy. The aim was to provide better facilities for the treatment of women in prison. Whilst in operation it was Western Europe's largest women's prison with an operational capacity of around 500 inmates¹.

1.4 In reviewing the history of the site it is important to recognise the significance of the prison. It was the first female prison in the country. The suffragettes were imprisoned on the site and the prison is symbolic in the history of women's rights. It has been a site for political protest and campaigns focusing on legal, social and health rights of women over the last 100 years.

1.5 Historically, being London's only women's prison has impacted on the profile of Holloway both locally and nationally. A number of important and influential organisations were created because of the prison, many of which have developed a wider than local remit but



Holloway Prison in 2017

¹ <http://www.standard.co.uk/news/london/holloway-prison-to-close-and-sold-off-for-housing-a3123396.html>.

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which still have a strong local connections². As the profile of the institution rose there was an increase in the public's awareness for the need to ensure that there is support and assistance to women particularly those within and formerly of the criminal justice system.

- 1.6** Despite the good intentions for the new design the building proved to be difficult to manage. The Government's 2015 Autumn Statement announced that the prison would close deeming that the design and physical state of the prison do not provide the best environment for the rehabilitation of offenders, making it inadequate and antiquated. The last inspection of the prison concluded the "the size and poor design make it a very difficult establishment to run"³.
- 1.7** The site is now empty, with the last prisoners leaving in summer 2016. Offenders in London are to be held in facilities at HMP Bronzefield (in Ashford) and newly refurbished facilities at HMP Downview (in Surrey)⁴.
- 1.8** The disposal of the Holloway Prison site by the Ministry of Justice forms part of a wider programme of prison reform - the Prison Estate Transformation Programme. The prison reform programme involves £1.3billion of investment to modernise the prison estate and support rehabilitation. As well as closing older prisons that are considered to be no longer fit for purpose, the programme involves the creation of 9 new prisons – 5 of these are expected within the current Parliament; it is unclear if recent political events will affect this⁵.

2. Site context and planning constraints

General context

- 2.1** In terms of its built form, Islington is generally a fine grain borough – something determined by its historic character. Most development follows a traditional perimeter block pattern made up of low rise Victorian and Georgian housing interspersed with inter and post war estates. The area around the prison is no different in this respect.
- 2.2** The Holloway Prison site fronts onto the busy arterial route of Parkhurst Road/Camden Road which has a mix of uses, including a library, commercial uses, arts and educational uses, and residential uses. However, on three sides the prison is mostly flanked by residential accommodation situated on quieter streets, as can be seen in figure 1 below.

² For example The Griffins Society, Wish, Birth Companions, Women in Prison, Hibiscus, Wish, Working Chance, Treasures Foundation and Holloway United Therapies.

³ Witten Ministerial Statement: <https://www.gov.uk/government/speeches/prisons-announcement>

⁴ Ibid.

⁵ <https://www.gov.uk/government/news/ministry-of-justices-settlement-at-the-spending-review-2015>.

Figure 1: surrounding context land use map. **To be added prior to public consultation.**

- 2.3** The site is located in relatively close proximity to the Nag's Head Town Centre and its amenities. There is an intensification in the townscape around the Nags Head town centre with more continuous building frontages and large building footprints reflecting the commercial uses found in this area. There are also a couple of Local Shopping Areas in close proximity to the site - Cardwell Terrace and Brecknock Road.
- 2.4** Building frontages in the area generally align with the street. The existing buildings on the Holloway Prison site however present large blank facades resulting in a more hostile environment on this part of the street.

Topography

- 2.5** In considering the design of future proposals on the site it will also be important to take account of the changes in ground level across the site. The land rises up to a a band of higher ground to the south-west of the site. The topography of the site runs from north to south with a level difference of approximately 7 metres, whilst land at Dalmeny Avenue is roughly 4m higher than the southern part of the site. It will be important for future proposals to address level differences across the site and in relation to the surrounding context.

Heritage considerations

- 2.6** The site contains no buildings of historical interest following its redevelopment in the late 20th Century. There are however a number of important heritage considerations:
- To the north-west of the site is the Tufnell Park Conservation Area which is characterised by Edwardian and Victorian three storey housing.

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- Immediately to the south is the Hillmarton Conservation Area which is characterised by two and three storey Victorian semi-detached and terraced houses.
- The local landmark of the Camden Road New Church Tower and Spire is directly opposite the prison site and is an important part of the local townscape. Important views to the spire of the former church are along Camden Road from Holloway Road (north) and from the junction with Dalmeny Avenue (south).
- Another important tall structure in the vicinity is the listed St. Lukes Church on Hillmarton Road, a prominent feature on Hillmarton Road.
- The western portion of the site falls within the protected viewing corridors for Local Views 4 and 5 (from Archway Road / Archway Bridge to St.Paul's Cathedral). This will restrict the height of development on a large part of the site in order to ensure that the viewing corridors are maintained as required by Local Plan Policy⁶.

2.7 Islington's Local Plan is clear that the boroughs historic environment is an irreplaceable resource and that heritage assets, such as those identified above, are conserved and enhanced⁷.

Building Heights

2.8 Islington is generally a low rise borough and most of the buildings around the site are between three and five storeys in height. The existing prison buildings are generally between two and five storey's in height. There are some height increases, however, further towards the Nag's Head Town Centre.

Figure 2: Building heights map. **To be added prior to public consultation.**

⁶ Development Management Policy DM2.4.

⁷ Development Management Policy DM2.3 and Core Strategy Policy CS9.

- 2.9** The former prison officer's accommodation to the north east of the site, now the private Bakersfield Estate, rises from 4 – 10 storeys. This is anomalous to the immediate site surroundings and should not be used to inform the context of the site; the Bakersfield Estate has low floor to ceiling heights, is not prominent from the surroundings streets and it is set back.
- 2.10** There are several development sites around the prison which are at various stages of progress. These sites include:
- The redevelopment of the John Barnes library to provide a new library and 34 residential units (3-6 storeys).
 - A new building with 45 residential units at Ada Lewis House on Dalmany Avenue (5-6 Storeys).
 - The development of the Islington Arts Factory site on Parkhurst to provide a mixed use scheme including residential, community and commercial floorspace (4-5 storeys) (planning application approved subject to legal agreement).
 - The former Territorial Army Centre on Parkhurst Road is allocated for residential-led development but does not have planning permission.

Trees and biodiversity

- 2.11** The site is well served in terms of green infrastructure assets; it has a series of attractive green and landscaped spaces, as well as a number of mature trees within and surrounding the site, examples of which are pictured below.



Examples of the existing green infrastructure on the site – a landscaped courtyard and mature trees.

- 2.12** Islington's planning policies are clear that private open space should be protected and that developments must protect and enhance the biodiversity value of sites whilst maximising

A plan for the future of the Holloway Prison site

their biodiversity benefits⁸. It will be important that the sites natural assets are protected and enhanced with any future proposals considering how they can best be integrated and utilised at an early stage.

2.13 Trees on the site have been identified in figure 3 below. A number of individuals and groups of trees have been identified as worthy of protection through a preliminary assessment by Islington Council Tree Officers. A tree survey (to BS 5837) should be undertaken and should include an Arboricultural Implications Assessment to inform developers of the constraints that the trees pose to future development. The impact on trees and other vegetation is required to be minimised. For any trees that the council agrees can be removed there should be replacement canopy cover on site. The screening provided by the trees on adjacent estates should also be maintained.

Transport and access

2.14 The area around the prison is generally well connected with a legible network of strategic and local roads – including Parkhurst Road and Camden Road (part of the Transport for London Road Network), Hillmarton Road (a borough principal road and part of the Strategic Road Network) and local distributor roads (Dalmeny Ave, Charlton Road and Tufnell Park Roads) other local access roads. Vehicular access to the site is from Parkhurst Road. There are no vehicular connections through the site at present. The only internal road is an access road that runs along the site's north eastern boundary.

2.15 Public transport accessibility is highest along the site's boundary along Camden Road, declining towards the site's western boundary.⁹ A number of bus routes serve the site¹⁰ while the nearest underground station from the site is Caledonian Road Station on the Piccadilly Line, 10 minutes walk away.

2.16 The existing prison buildings were purposefully laid out not to encourage connections to the surrounding streets and movement across the site. In its current form the site does not reflect the generally permeable network of streets and blocks, with large blank frontages contrasting greatly with the surround environment. The redevelopment of the site however represents a real opportunity to resolve this.

⁸ Development Management Policies DM6.3, DM 6.5 and Core Strategy Policy CS15.

⁹ The Public Transport Accessibility Levels (PTALS) range from 5 to 3 – where a score of 6 represents the highest levels of accessibility.

¹⁰ Buses numbers 29, 253 north and south bound; and buses 17, 91, 259, 393 north bound.



Figure 3: constraints map. **To be updated prior to consultation.**

3. Key planning and development objectives

3.1 The site represents a real opportunity to provide a high quality, inclusive and sustainable new neighbourhood.. A summary of the key objectives can be found below:

- The provision of housing and in particular maximising affordable housing to meet identified housing needs in the borough.
- The provision of a women's building/centre that incorporates safe space to support women in the criminal justice system and services for women as part of a wider building that could also include affordable workspace to support local organisations and employment opportunities.
- Active uses along Parkhurst Road and Camden Road, this could include, for example, a small amount of retail provision.
- Improvements to local infrastructure to support population growth, for example, health facilities and public transport.
- The provision of publicly accessible open green space including play space as part of a design that protects and enhances biodiversity, retains existing trees and provides high quality landscaping.

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- High quality design that responds to the sites context and constraints and makes a positive contribution to the local character of the area.
- The connection of the site to the surrounding neighbourhood, increasing the site's permeability, promoting walking and cycling.
- The provision of an inclusive environment which is accessible, invites people into the site, and facilitates community cohesion.
- The achievement of best practice sustainability standards, including the provision of an energy centre.

3.2 Further detail on these objectives is provided below.

4. Future uses

Housing

- 4.1** Islington has a high housing target (currently 1264 units per year) and has been very successful in meeting and exceeding the target over a long period of time. Delivery of new housing, and within this maximising delivery of affordable housing, is a key objective of the London Plan and Islington's Local Plan. Given this, and the context of the site, its size and layout, housing is considered to be an appropriate use on the site.
- 4.2** As the site was not previously identified as a housing site it is therefore a 'windfall site'¹¹. Islington has a very healthy supply of housing land, particularly over the next five years or so¹². The site will contribute towards housing delivery over the longer term.
- 4.3** The Government has stated its intention that the release of public sector land, including prisons, should contribute to the delivery of new homes. However, it will be important that new homes help to meet identified local housing needs, in particular affordable housing.
- 4.4** Despite consistently high rates of housing delivery over the past ten years, indicators demonstrate that affordability has not improved, rather it has worsened. The average price of a property in Islington increased by 63% between October 2007 (the peak in the market preceding the financial crisis of 2008) and July 2016. Prices now exceed pre-recession levels by a significant margin. Private rents in the borough have also increased significantly compared to earnings and are much greater than the London Average¹³. Maximising the provision of genuinely affordable housing, in line with local policies, is therefore a key council priority.

¹¹ A site that was not previously identified or allocated for housing development but which unexpectedly becomes available for development during the lifetime of the Local Plan.

¹² As identified in Islington's Annual Monitoring Report (2015).

¹³ Islington Local Plan, Scope of the Review, November 2016.

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- 4.5** Islington has a borough wide affordable housing target of 50%, with developments required to maximise affordable housing delivery in order to achieve this¹⁴. Many sites are expected to deliver in excess of 50% of homes as affordable. This is consistent with the Mayor of London’s approach in the London Plan which seeks to achieve the maximum reasonable amount of affordable housing. The Mayor’s emerging Affordable Housing and Viability SPG emphasises that schemes coming forward on public sector land should deliver as much affordable housing as possible. The maximisation of affordable housing is considered through the viability process – further information on the approach to this is outlined in section 5. Islington’s policy prioritises social rented housing (the tenure split for affordable housing is 70% social and 30% intermediate).
- 4.6** The council commissioned an urban design and site capacity study to assess indicative numbers of housing on the site taking into account the sites constraints, policy requirements and key urban design considerations¹⁵. It is important to note that this is not a detailed design scheme and does not reflect what a final development on the site will look like, rather it provides an illustration of the scale, and height and massing of a development based on key design principles.
- 4.7** In considering development options for the site it is important to take into account the need to make the most efficient use of the site and assume appropriate densities, whilst providing high quality design that responds to the sites context. The urban design study looked at the following scenarios :

Scenario	Number of dwellings*
A	400
B	600
C	700
D	900

*Figures rounded and may be subject to minor amendments.

- 4.8** Scenario B has the potential to provide around 600 units and is considered to strike a balance between optimising development density whilst providing a considered response to the surrounding context that is in keeping with the character of the area and respects the townscape, including views of local landmarks.
- 4.9** The council undertook viability analysis of the medium scenario B (approximately 600 units) to assess if the site is deliverable and how planning policy requirements, such as affordable housing, can be achieved¹⁶. The viability analysis demonstrates a minimum of 50% affordable housing is achievable without grant and taking into account the existing use value of the site this is considered to provide a reasonable incentive for the landowner

¹⁴ Core Strategy Policy CS12.

¹⁵ [Link to be added.](#)

¹⁶ [Link to viability analysis to be added.](#)

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to release the site. Proposals may vary, however the evidence is clear that a policy compliant scheme can be delivered that includes a minimum of 50% affordable housing based on a currently applied tenure split of 70% social rented and 30% intermediate, consisting of shared ownership housing.

- 4.10** In addition to the above, the council has undertaken viability testing on scenario C, approximately 700 units, and scenario D with a total capacity of 900 units¹⁷. The purpose of these exercises is to explore how the viability of the site is affected with an increased number of units whilst not necessarily suggesting that the higher scenarios are acceptable in planning terms. In both of these higher scenarios, viability evidence shows that delivering 50% of units as affordable housing (including where shared ownership is replaced by London Living Rent) would be viable whilst generating greater values. It is important to stress that any proposal will need to demonstrate that it provides an appropriate response to the site's constraints and the context and character of the area.
- 4.11** A different tenure split for all three capacity scenarios outlined above has been modelled, under which London Living Rent would be delivered in place of the shared ownership accommodation. Whilst there is a difference in value between shared ownership and London Living Rent units, the impacts on the overall viability are not significant and at least 50% affordable housing is still viable.
- 4.12** As stated above, the scenarios tested did not include provision of grant. However the council would expect any potential developer to identify a Register Provider (RP) as a partner at an early stage and the RP would be expected to bring a relevant level of grant to the scheme. The grant would be required to deliver additional affordable housing units beyond the minimum of 50% which is viable without grant. Any developer needs to be mindful of this principle of additionality, and we would seek to embed this in any future legal agreement.
- 4.13** Developments are required to provide a mix of units across different tenures¹⁸. The exact mix of units should be confirmed in discussions with the council at planning stage however the size of the site would lend itself well to the provision of a genuine mix of unit sizes, including a significant proportion of family accommodation of 3 bedrooms or more.
- 4.14** There are a number of policies that are applicable to new residential development on the site in order to provide good amenity to future occupiers including dual aspect, minimum floor to ceiling heights, outdoor amenity and play space requirements, as well as minimum space standards¹⁹. It will be important that these standards are factored in at the start of the design process. As part of the planning application process the developer will also be

¹⁷ Scenario A (400 units) was not tested for viability as delivering such a quantum of housing is not considered to make the most efficient use of the site as required by policy.

¹⁸ As set out in Development Management Policy DM3.1.

¹⁹ Including Core Strategy Policy CS9, Development Management Policies 3.4-3.7.

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required to sign a legal agreement to ensure that future residential units will not be left unoccupied²⁰.

Non-residential uses

- 4.15** The existing land-use of the site, as a prison, can be considered to be a community use - part of the social infrastructure of the borough and London. Indeed the prison played a valuable social role both within the borough and beyond in supporting women within the criminal justice system.
- 4.16** Islington's planning policies strongly protect existing social infrastructure uses and emphasise the importance of providing new social infrastructure to support large new developments²¹.
- 4.17** The prison is a unique form of social infrastructure within the context of the borough. Whilst the prison reform programme looks at the provision of prisons at the national level, it is also important to look at the more localised impact of the prison relocation and ensure that relevant social infrastructure is still adequately provided for. The historical use of the site as a prison is of national, regional and local importance.
- 4.18** The council places great emphasis on the retention of existing social infrastructure, particularly where it provides an important, accessible service. As the loss of social infrastructure is proposed by the closure of the prison, and as no replacement prison will be provided on the site, in order to justify the full or partial loss of the social infrastructure use it is necessary to demonstrate the following criteria have been satisfactorily met:
- a) That the proposal would not lead to a shortfall in provision for the specific use within the local catchment;
 - b) That there is either no demand for another suitable social infrastructure use on the site, or that the site/premises is no longer appropriate for social infrastructure uses; and
 - c) Any replacement/relocated facilities for the specific use provide a level of accessibility and standard of provision at least equal to that of the existing facility.
- (Development Management Policy DM4.12, part A, ii)
- 4.19** In considering the different elements of the policy it is important to distinguish between pure built facilities and the activities and services that took place on the site. The prison performed important rehabilitation and support functions to vulnerable women. As prison spaces are now located outside of London this does not address the immediate local needs for services that have been provided on the site; particular regard needs to be given to what support services are still required in the borough and London.

²⁰ Further detail on this is set out in the Prevented Wasted Housing Supply SPD.

²¹ In particular Development Management Policy DM4.12.

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- 4.20** Analysis by the Mayor's Office for Policing and Crime (MOPAC), for example, clearly shows a gap in female offender service provision in North East London following the closure of the prison. MOPAC highlight the need to build up women's centre service provision in the capital to support the transition from custody and providing alternatives to custody in the first place.
- 4.21** Given the services and support networks that operated from the site, there would be a shortfall in Islington/north-east London if this is not re-provided. The continued presence of a base for women's services, including female offender services, should therefore be re-provided as part of any future development proposals for the site in order to ensure equivalent levels of provision and access.
- 4.22** In addition to space to provide support for women in the criminal justice system, it will also be important to provide space for support and services for women more generally. Estimates suggest there are around 40 organisations in operation in the borough providing support and activity specifically for women. There are also other organisations who now operate outside the borough but that still have strong local connections. The long standing connection between the presence of a women's prison and the growth of locally based specialist women's voluntary and community groups should continue to be acknowledged.
- 4.23** The purposeful location of a number of women's services into one building would be beneficial in assisting and enabling the rehabilitation and integration of hard to reach groups of women beyond those in the criminal justice system; including those that are vulnerable, homeless, and those that fall between services and agencies.
- 4.24** There is currently work taking place around violence against women and girls, supported by Islington's Violence against Women and Girls (VAWG) strategy (2017-2020). Whilst some services are provided, there is no comprehensive service provision in place to address all of the issues around VAWG. This can be addressed through the provision of a safe space in which multiple services can be accessed. Safe spaces have been evidenced to foster an environment which makes it easier to come forward and report issues and, alongside a simpler more accessible range of services in one place, can help to avoid women remaining in high risk situations.
- 4.25** The need for a women's centre/building is something that has been identified by a number of stakeholders as part of the consultation process, including the voluntary and community sector, local residents, and public sector bodies. In developing future proposals for the site, it will be important to engage with the planning department, the Council's Voluntary and Community Sector (VCS) team, MOPAC and other key stakeholders to help assess the extent of what is required. This will be secured through a legal agreement attached to a future planning application. It will be important that a safe women only space, with separate and secure access and outdoor amenity space, is provided as part of a high quality flexible facility that can allow multiple services to operate from the building and provide a safe and pleasant place for clients accessing the services.

- 4.26** The wider building could include affordable workspace to support local enterprises and employment opportunities, particularly for young people. There is also the potential to provide a service offer to the wider community with the provision of a range of well-being, therapeutic and family support services.
- 4.27** In addition to the retention of some social infrastructure use associated with the sites historical use as a prison, it is also important to consider what social infrastructure uses will be required on the site in the future as part of its redevelopment. Islington is the most densely populated local authority in the country and has been subject to significant population growth in recent years. As this growth continues, so does the need for essential social infrastructure to support this. Large new developments that result in additional need for social infrastructure on the site are required to contribute towards enhancing new provision or providing new facilities²². There was strong support for the provision of social infrastructure as part of the consultation process. Developers should liaise with the council at an early stage around the requirements for the provision of social infrastructure on the site.
- 4.28** The uplift in population associated with any development will generate additional demand for health facilities in the area. Islington Council have worked with the Clinical Commissioning Group to assess the likely impacts of new development on GP provision in the area. There is unlikely to be the need for a new GP practice on the site provided the nearby facilities (the Partnership Practice and Goodinge Health Centre) can expand to support population growth. Future developers of the site should engage with Islington Council and the Clinical Commissioning Group at an early stage in the development of proposals to confirm an updated local picture of health care needs associated with proposals and agree how these can be met.
- 4.29** A small amount of retail may be acceptable to serve local population (existing and new) however the site is considered to be well served by local shops with the Nag's Head town centre in close proximity and two local shopping areas nearby. Café/restaurant use may be desirable and assist with serving the local community and bringing activity to the street in the right locations (e.g. near open space and along Parkhurst Road), however the provision of A1/A3 uses will be subject to assessment of impacts on nearby retail locations and consideration of amenity impacts²³.
- 4.30** The provision of some business use on the site is likely to be acceptable given the need for this type of accommodation, in particular office/workshop space which provides for small businesses. There is also the potential to provide affordable workspace on the site which could be complementary to the community uses that are proposed²⁴.

²² As required by Development Management Policies - policy DM4.12.

²³ Consistent with Development Management Policies DM4.4 and DM2.1.

²⁴ Consistent with policies CS13, DM5.1 and DM5.4.

Open space and play space

4.31 Islington has one of the lowest proportions of green space in the country and the site falls within a part of Islington that is particularly deficient in open space. There are no major open spaces in close vicinity to the site with provision limited to smaller urban squares and pocket spaces. The site represents a unique opportunity to address this deficiency by providing a space that can serve the local area. A site of this size is required to provide high quality, publicly accessible open space on site, which also includes formal play space and playable space²⁵. This should form a focal point of any new development, be legible and be connected by permeable routes. The provision of open and green space should be an integral part of the design of any scheme.

5. Design

- 5.1** Islington's planning policy²⁶ requires that all development is designed to (*inter alia*):
- Reinforce and complement local distinctiveness and create a positive sense of place;
 - Be sustainable, durable and adaptable;
 - Be safe and inclusive;
 - Improve the quality, clarity and space around buildings;
 - Improves movement through areas and repair fragmented urban form.
- 5.2** Islington's Urban Design Guide SPD provides further detail about how this can be achieved in practice. High quality design is defined as an integrated and iterative process, bringing together contextual, connected, sustainable, and inclusive design. The SPD sets out clear objectives that should be met and design considerations that should be taken into account.
- 5.3** As part of the design process, when beginning to develop proposals for the site, developers should:
- Engage with the local community and key stakeholders.
 - Participate in the council's Design Review Panel.
 - Consult with the councillors' pre-application forum.
 - Make use of the multidisciplinary expertise provided at a Streetbook Surgery (a design workshop) to get specific feedback on the site appraisal and strategic design.
- 5.4** Further information about the pre-application process can be found online²⁷.
- 5.5** A Health Impact Assessment should also be completed at an early stage to identify how the benefits in relation to the wider determinants of health can be maximised and potential negative impacts minimised. This can in turn inform the evolution of the proposals, including design, in order to maximise positive health outcomes.

²⁵ As required by policies DM6.2, CS16 and DM3.6.

²⁶ DM2.1A

²⁷ <https://www.islington.gov.uk/planning/applications/permission-check/need-planning-advice/formal-pre-app-advice>.

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5.6 An indicative site concept plan is shown below. This sets out some of the key design principles which are discussed further below.

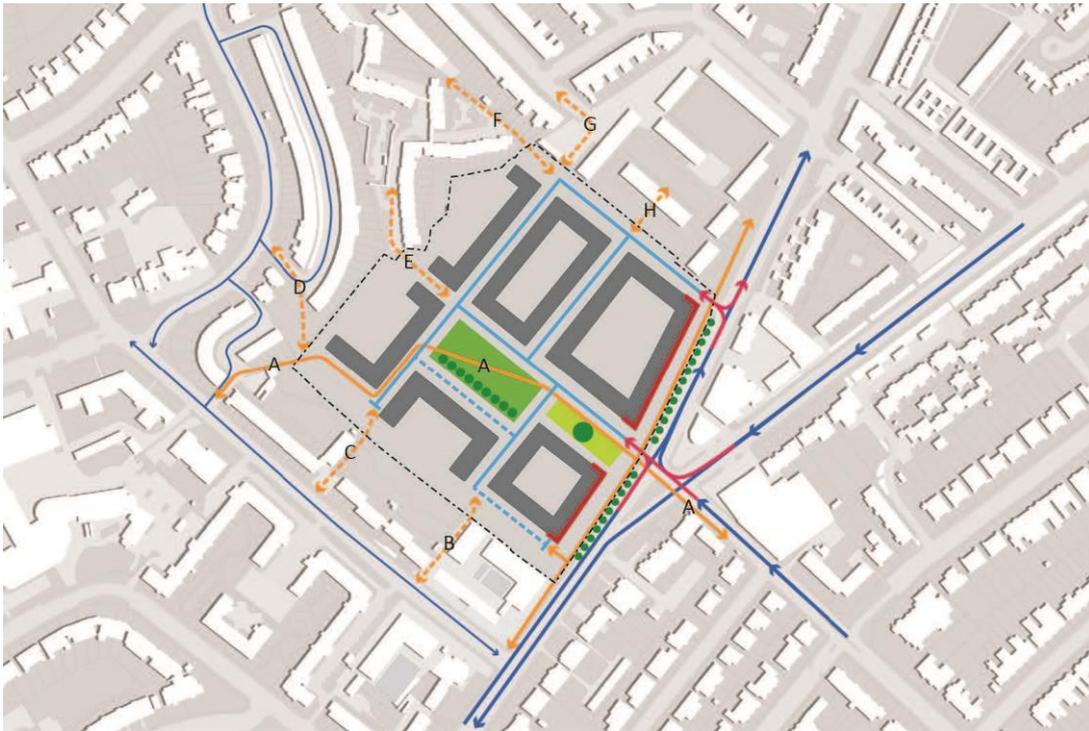


Figure 4: Concept Plan: Updated image and key to be added prior to consultation.

Context

5.7 The size of the site, its context in relation to neighbouring land uses and its prominent location mean that high quality contextual design for future proposals on the site is particularly important. The context of the site is set out in section 2. It will be essential that development on the site clearly relates to and respond to its setting. Proposals should be informed by contextual analysis evidence that is undertaken before any design work begins²⁸. Islington's Streetbook SPD advises that site analysis comprises:

- Analysis of scale, use and context including route:place analysis.
- Landscape appraisal including tree survey and local ecology
- A survey of utilities above and below ground
- An analysis of surface water flows
- An access and inclusion audit
- Traffic survey (vehicles, cyclists, pedestrians)

5.8 The site's context in terms of build heights is clearly established by the prevailing heights of buildings surrounding the site (generally 3-6 storeys). Tall buildings on the site are not considered appropriate, rather new buildings should be at a human scale which respects the site's context whilst also making efficient use of the site²⁹.

²⁸ Consistent with the Urban Design Guide 2017.

²⁹ Consistent with policies CS9 and DM2.3.

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- 5.9** Buildings should respond to this context, including the constraint posed by the local viewing corridor. Any development over 6 storeys within the viewing corridor is likely to require supporting evidence to verify the visual impact of development and that this does not adversely impact on the view.
- 5.10** With regard to nearby heritage assets, including conservation areas and listed buildings, it is essential that new development is sensitive to this context, conserves and enhances their setting and provides a positive contribution to the local character of the area³⁰.
- 5.11** In addition new development will need to respond sensitively to the Camden Road New Church Tower and Spire and the St. Luke's Church given the important role they play in the local townscape. Local Plan policies strongly protect views of local landmarks. Particular regard will need to be had to the proposed height, location and design of buildings which could impact on this³¹.
- 5.12** A perimeter block pattern would be in keeping with the character of the surrounding townscape³², with blocks arranged to frame routes through the site and any open spaces and enhance the local microclimate. Consideration of topography and water movement through the site should also inform the spatial layout of the development as part of site wide integrated water design.
- 5.13** On Camden Road and Parkhurst Road the development should establish a strong street frontage with wide footways and ample space to retain existing trees and tree cover along the road. Active ground floor frontages (for examples, retail, commercial and appropriate community uses) should be provided on this part of the site.
- 5.14** The provision of community facilities should generally be located on this prominent part of the site and in close proximity to the John Barnes library in order to form a community focal point. The provision of any more sensitive community uses (such as a nursery for example) should be accommodated in a quieter location where air and noise pollution will be minimised.
- 5.15** Given the site is bounded on three sides by residential accommodation it will be important that proposals for new development respect this context and provide a good level of amenity. Local Plan policy is clear that development is required to, amongst other things,:
- provide a good level of amenity including consideration of noise and the impact of disturbance, hours of operation, vibration, pollution, fumes between and within developments, overshadowing, overlooking, privacy, direct sunlight and daylight, over-dominance, sense of enclosure and outlook; and
 - not unduly prejudice the satisfactory development or operation of adjoining land and/or the development of the surrounding area as a whole.³³

³⁰ Development Management Policy DM2.3.

³¹ Development Management Policy DM2.5.

³² Consistent with policies CS9, DM2.1 and the Urban Design Guide.

³³ As required by policy DM2.3.

Connectivity

“Improved neighbourhood permeability is a core planning objective. Connectivity promotes active lifestyles and social cohesion. Increasing the number and diversity of pedestrians in an area will also provide greater natural surveillance and improve public safety. Conversely, where access is restricted the effect is to segregate communities, to isolate residents, and/or to provide an opportunity for anti-social behaviour. Development proposals should therefore provide open connections for pedestrians and cyclists, and good permeability through the site/area, to improve movement patterns in the wider area”.

(Islington Urban Design Guide).

- 5.16** Given the historical nature of the land use and its lack of connection to the surrounding environment, connectivity of the site to the surrounding context, and permeability through the site will be essential in promoting movement, repairing the urban fabric and promoting other benefits as identified above³⁴.
- 5.17** The quality of the public realm, including the streets and spaces between buildings, plays a crucial role in creating successful places. Islington’s Streetbook SPD sets out core values for the design, construction and maintenance of the borough’s public realm. Streetbook Surgery (a design workshop) as part of the pre-application process is strongly encouraged.
- 5.18** Islington has planning policies which promote sustainable transport choices prioritising walking, public transport use and cycling over other road users. The site is well served by public transport and increasing the connectivity of the site with the surrounding area will help to encourage walking and cycling.
- 5.19** New publicly accessible pedestrian connections across the site will be important in connecting the site, particularly routes from the northwest to the southeast. The public realm should be designed to provide clear, high quality routes with sufficient width to accommodate all users. The development should provide a coherent and consistent edge treatment, clearly delineating between the footway and the private space outside dwellings.
- 5.20** Pedestrian routes should be continuous, follow desire lines, and be of sufficient width to reflect the anticipated pedestrian traffic. Pedestrian priority measures should be implemented at junctions and raised tables should be considered at access roads from Parkhurst Road.
- 5.21** To support the greater integration of the site with the surrounding environment and permeability across the site there are several pedestrian connections with surrounding streets that should be explored and facilitated as indicated in the Concept Plan (figure 4).

³⁴ Development Management Policies DM2.1 and DM8.2.

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This includes the provision of route A which could provide a safe walking route across the site connecting to existing schools on Carlton Road and Dalmeny Road.

- 5.22** Cycle and pedestrian routes across the site should follow the street layout. In order to keep all users safe (including young children and families and those with sensory and or cognitive impairments), there should be clear delineation and contrasting tone between any surfaces that are shared between cyclists and pedestrians.
- 5.23** A new strong and legible principal site entrance should be created at the centre of the frontage on Camden Road / Parkhurst Road, addressing the relationship with the junction opposite and allowing direct pedestrian and vehicular access into the site from the junction with Hillmarton Road. The site entrance should be welcoming and signal a change in the environment, for example the prioritisation of pedestrians.
- 5.24** A key opportunity involves improving pedestrian access to the site from Hillmarton Road which currently requires following an indirect route rather than the desire line directly across to the site. This would be part of a new route to Caledonian Road Underground Station. Links to The main entrance to the site should afford views of public open space(s) from along Hillmarton Road, inviting people into the site.
- 5.25** It will be important for the developer of the site to work with the Council and TfL in developing plans for the site's access and links, including exploring any changes to existing crossings or alterations to existing junctions and improvements in access to the public transport network (including bus, tube and overground). Any new access from Camden Road which forms part of the Transport for London Road Network would require consultation and agreement with TfL.
- 5.26** As part of the approach to encouraging cycling, in addition to clear routes through the site which link in to the surrounding area, adequate cycle parking must be provided³⁵. This should be secure, sheltered, well located and accessible.
- 5.27** Proposals for the site should assess and address the transport impacts of future development, including mitigating adverse impacts on the capacity of local transport infrastructure. A Transport Assessment and Full Travel Plan should be submitted as part of any application³⁶.
- 5.28** Islington's planning policies require that all new development is car free³⁷ (i.e. no parking will be allowed on site and occupiers will have no ability to obtain a parking permit). Wheelchair accessible parking should be provided.
- 5.29** The existing access point at Parkhurst Road should be retained for access and egress. Internally routes should connect back to key access points and form a legible grid of streets. Site access roads should be designed to maintain low vehicle speeds at junctions to indicate pedestrian priority.

³⁵ As set out in Development Management Policy DM8.4 and Appendix 6 of Development Management Policies.

³⁶ Development Management Policy DM8.2 and appendix 5 of Development Management Policies.

³⁷ Core Strategy policy CS10 and Development Management Policy DM8.5.

5.30 Proposals should adequately address delivery, servicing and drop-off requirements, with full details submitted alongside information about refuse and recycling collection.

5.31 On minor access streets the creation of playable spaces should be explored, creating opportunities for children to “play on the way” in addition to play opportunities in designated play areas.

Sustainability

5.32 The future development of the site represents a real opportunity to contribute to the creation of a sustainable new neighbourhood through the achievement of best practice sustainability standards during design, construction and operation of the development, as required by Islington’s planning policies³⁸. All developments need to clearly demonstrate how the highest possible sustainable design standards have been achieved³⁹. The use of BREEAM Communities is strongly encouraged to demonstrate how this has been achieved. Islington operates a zero carbon development policy, requiring any residual carbon dioxide emissions to be offset through financial contribution to local carbon offset fund⁴⁰.

5.33 In developing proposals, alongside relevant Development Plan policies, further guidance on key topics, including energy, buildings standards, water consumption, biodiversity, climate change adaptations, sustainable materials and operational sustainability is set out in the Environmental Design SPD. This should be reviewed at an early stage in the development of proposals.

5.34 Consistent with the London Plan and Islington’s Local Plan there is a requirement for major developments to contribute towards decentralised heating and cooling networks⁴¹. Given the size of the site and the nature of development, proposals should include an energy centre on-site to meet the energy needs of the site, as required by policy DM7.3. The heating network should explore opportunities to share heat with neighbouring developments through providing additional capacity as well as potential connection to DE networks in the wider area (including the Holloway Road and Highbury West clusters). Developers should refer to Islington’s Guidelines for connecting to heat networks⁴².

³⁸ A Sustainable Design and Construction Statement, incorporating an Energy Statement, should accompany any planning application setting out clearly how the application complies with relevant sustainable design and construction policies. A Green Performance Plan should also be provided as required by Development Management Policy DM7.1.

³⁹ with regard to passive design and energy efficiency; material use, low impact sourcing and whole lifecycle costing; waste minimisation, renewable and low carbon technology; flexibility/adaptability and adaptation to climate change; sustainable drainage, rainwater harvesting and urban greening, biodiversity, air quality, and operational sustainability (in accordance with the specific requirements of Core Strategy Policy CS10, Development Management Policies DM6.5 - DM7.5 and Environmental Design SPD).

⁴⁰ Core Strategy policy CS10.

⁴¹ London Plan policy 5.5, Core Strategy Policy CS10 and Development Management Policy DM 7.3.

⁴² https://www.islington.gov.uk/~/_/media/sharepoint-lists/public-records/energyservices/information/guidance/20152016/20160310connectionsguidepart1.

5.35 Islington Council's planning and energy departments should be engaged at an early stage to provide input into the design requirements of an energy centre, however as a minimum it would include the following:

- Singular energy centre that serves entire site (plus ability to act as an energy centre of a wider network)
- Distribution pipework
- Low or zero carbon heat generation plant
- Back-up and top-up gas boilers
- Network distribution pumps and valves etc.
- Water treatment plant
- Water expansion tank
- Pressurisation unit
- Heat exchangers
- Dry air cooler/heat dump
- Electrical switchgear and transformers
- Control systems
- Incoming utility connections

5.36 The space required for an energy centre is likely to be between 500-1000m². The provision of well-designed on-site communal heating will result in significant space savings within buildings, helping to make the most efficient use of the site.

5.37 Given affordable housing provision, development needs to be to high standards with efficient buildings and that have low energy costs to the end users. There is a requirement to maximise energy efficiency⁴³. In addition, the use of energy efficiency standards is highly recommended to ensure that key design principles have been fully integrated into proposals.

5.38 Use of renewable energy, such as solar panels, should be maximised to achieve carbon reduction targets. Energy saving measures should be considered at the earliest design stages with their effectiveness in relation to the site considered as well as impacts on the character of the area⁴⁴.

5.39 As part of designing high quality building fabric it should be demonstrated how the development maximises incorporation of passive design features to control heat gain and deliver passive cooling (in line with the sequential cooling hierarchy⁴⁵) without resorting to energy intensive cooling methods such as air conditioning.

5.40 The layout and design of the scheme should take into account an integrated approach to water management. Proposals should meet best practice water efficiency targets and incorporate rain/grey water recycling linked to Sustainable Urban Drainage Systems (SUDs)⁴⁶. The approach to SUDs should achieve greenfield run-off rates and maximise

⁴³ Core Strategy policy CS10.

⁴⁴ Core Strategy Policy CS10, Environmental Design SPD and Islington Urban Design Guide.

⁴⁵ Identified in development management policy DM7.5.

⁴⁶ Core Strategy Policy CS10

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and amenity and biodiversity benefits with scheme design taking a holistic approach to landscape, water management and green infrastructure⁴⁷. Greenfield run-off rates should be achieved.

5.41 In approaching scheme design, careful consideration needs to be given to material selection, sourcing and fabric efficiency. Development is required to minimise the environmental impact of materials, for example through the use of sustainably-sourced, low impact and recycled materials, as well as minimising the impact of construction on the environment, including construction waste⁴⁸. The Environment Design SPD sets out key principles in relation to material use and recycling. As part of material selection and sourcing consideration should be given to embodied carbon as well as circular economy principles, so that buildings can be flexible, adaptable and deconstructed and made from components that can be reused and recycled.

Inclusiveness

5.42 All development in the borough is required to be inclusive. Proposals on the Holloway Prison site will be expected to deliver a high quality inclusive new environment.

“Inclusive Design is ultimately achieved by bringing together the full range of interests and expertise that will produce environments that work for everyone; that are functional, flexible, aesthetically pleasing, sustainable, and that deliver value for money over the lifetime of the development.”

(Islington Urban Design Guide, 2017)

5.43 Inclusive design is a fundamental part of Islington’s approach to development⁴⁹, it forms part of a holistic and interdisciplinary approach to working and crucially takes into account the different ways that people use and experience space and their perceptions of it. The principles of inclusive design include:

- ease of use/versatility
- safety, logic and legibility
- places that are convenient and enjoyable for all to use, and
- taking into account the management of places as well as the physical form⁵⁰.

5.44 There are a number of ways in which the site can deliver inclusive design in the buildings and spaces that will be created as well as how they are used and managed.

⁴⁷ Development Management Policy DM6.6.

⁴⁸ Core Strategy Policy CS10

⁴⁹ As set out in Development Management Policy DM2.2.

⁵⁰ As set out in the Development Management Policies document and further elaborated in the Inclusive Design SPD.

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- 5.45** In reflection of the council's commitment to community cohesion and the value and vitality associated with diverse communities, the residential elements of a future scheme should be based on a layout which maximises tenure integration, with affordable and private housing built to the same standards and indistinguishable from one another in terms of design quality, appearance and location on site. There should be no separation of amenity or facilities according to tenure⁵¹.
- 5.46** Detailed guidance about the approach that should be taken to designing inclusive buildings of different uses and the approaches to them can be found in Islington's Inclusive Design SPD. This should be taken into account at the beginning of the design process.
- 5.47** Future housing should be flexible and adaptable to changing needs. All homes should be built to be accessible and adaptable with a minimum of 10% wheelchair accessible housing across all tenures, based on habitable rooms⁵². Wheelchair units should be pepper potted throughout the development offering a range of unit sizes. Where wheelchair accessible dwellings are above ground floor, they should be served by a minimum of two lift cores will be required. All wheelchair accessible housing should be single storey⁵³.
- 5.48** Whilst the development must be car free, there is a requirement for wheelchair accessible parking. The council will require accessible parking bays to be located on-street. As identified in the Islington Planning Obligations SPD one accessible parking bay is required for every wheelchair accessible home (10% of total units) with appropriate provision made for community and other uses. Provision should also be made for storage and charging for mobility scooters, accessible cycle parking and safe drop off points.
- 5.49** In addition to creating inclusive buildings, it is also essential the future development creates an inclusive public realm and public spaces so that diverse users can dwell in, visit and move through the site. Given the topography of the site, a key challenge will be addressing level changes. It will also be essential that new public open space and play spaces are designed in an inclusive way⁵⁴. Islington's Streetbook and Inclusive Landscape SPDs provide further useful guidance on the design of inclusive spaces.
- 5.50** Part of creating inclusive spaces is ensuring they are also safe. Proposals should be designed to follow Secure by Design standards to address potential crime and anti-social behaviour issues, whilst using solutions that are also inclusive and incorporate other benefits (for example biodiversity)⁵⁵.

Green infrastructure

- 5.51** Islington is a densely built borough with high levels of development pressure and low levels of open and green space. Given the site is situated within an area which is particularly deficient in open space and the existing green spaces and trees on the site,

⁵¹ Islington Urban Design Guide and Core Strategy Policy CS12.

⁵² Category 2 and Category 3 as set out in the Approved document to Part M of the Building Regulations

⁵³ Inclusive Design SPD

⁵⁴ Core Strategy Policies CS15 and CS16.

⁵⁵ Development Management Policy DM2.1 and Islington Urban Design Guide.

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the provision of high quality green infrastructure, including open space, must be a fundamental part of any future development proposals.

- 5.52** Islington's planning policies are clear that existing open and green spaces and biodiversity should be protected and enhanced, with opportunities to green the borough maximised⁵⁶.
- 5.53** Green infrastructure is a key part of the place making of this new neighbourhood and is particularly important given the size and context of the site. It should not be viewed as something which inhibits the development potential of the site, but rather something that maximises the sites potential. Green infrastructure has social, environment and economic value and should be a fundamental part of the design process, planned for in an integrated way from beginning⁵⁷.
- 5.54** The provision of publicly accessible open space as part of a future development on this site is a policy requirement⁵⁸. This should be provided in addition to private amenity space, have no restrictions and be maintained in perpetuity⁵⁹.
- 5.55** A new public open space should be provided in the centre of the development. This should retain existing trees, and complement them with high quality landscaping and new tree planting of an appropriate scale and with adequate rooting volumes. New open and green spaces on the site must maximise biodiversity benefits.
- 5.56** Future development should be focused around a central public green space that provides a strong sense of place and identity to the new neighbourhood, being a destination to attract diverse users and promote positive activity. The space needs to be well defined, and well overlooked by the surrounding development. A publicly accessible children's play area with a diverse range of quality facilities, including natural play, should be provided. The landscape design of the space should provide accessible routes across that align with desire lines and pedestrian routes leading to and from the site. Accessible entrances, carefully designed planting, seating in sunny locations and clear sightlines will contribute to creating an inclusive environment⁶⁰.
- 5.57** The entrance into the site from Hillmarton Road should provide greenspace with landscaping that invites people into the site, gives visibility of and announces the internal green space. The existing mature plane tree should be retained and be focal feature of this green strip. Lighting should further strengthen this link into the site.
- 5.58** A high quality public realm should be provided throughout the site, with opportunities for greening, landscaping and biodiversity maximised. Street trees should be planted throughout the development. Where possible the mature trees identified on site should be retained.

⁵⁶ Core Strategy Policy CS15 and Development Management Policies DM6.3.

⁵⁷ Islington Urban Design Guide.

⁵⁸ Development Management Policy DM6.1.

⁵⁹ Development Management Policy DM6.1.

⁶⁰ Islington Urban Design Guide.

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- 5.59** Public realm areas should be designed with a function in mind and left over pieces of land should be avoided. Unadopted common spaces including areas between the back of footway and buildings should be landscaped, and managed and maintained to a high standard in perpetuity by the development's management company.
- 5.60** The provision of private amenity spaces should also be considered holistically as part of the sites green infrastructure – helping to maximise biodiversity and ecological connectivity and opportunities. There should be clear separation of private and communal spaces that also include playable space. Opportunities for food growing should also be explored and integrated into the design⁶¹. Rear private gardens abutting open spaces should be avoided.
- 5.61** In addition to public and private green and open spaces on-site, future proposals should maximise the provision of green roofs and vertical greening for biodiversity, sustainable drainage and cooling⁶².
- 5.62** The approach to green infrastructure should be considered as part of an integrated approach to water management, including SUDs, to help maximise the biodiversity and amenity benefits for the site.
- 5.63** Finally the approach to green infrastructure design should address how air and noise pollution can be most effectively mitigated⁶³. On Camden Road and Parkhurst Road, for example, a boulevard treatment should be considered with wide footways and a public realm that integrates and retains existing mature trees. The boulevard treatment and tree planting should be extended until the northern end of the site on Parkhurst Road and could be extended towards Holloway Road.

6. Delivery

- 6.1** It is considered that this site represents an opportunity to demonstrate best practice and set a benchmark for the disposal of other public sector land in the capital. In order to meet Islington's key priorities as well as the intended aspirations of the Ministry of Justice for the disposal of the site and those of the Mayor of London in developing surplus public sector land for housing it will be important for all stakeholders to work together.

Viability

- 6.2** The Ministry of Justice have made it clear that their primary objective for the disposal of the site is the maximisation of capital receipt to, in part, fund improvements to the prison estate elsewhere. It is however important to note that this does not override planning considerations or objectives for the site. The land or site must take into account planning

⁶¹ Core Strategy policy CS15.

⁶² Development Management Policy DM6.2.

⁶³ Development Management Policy DM6.1.

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requirements – including the requirement for affordable housing⁶⁴. Islington's viability evidence for the site demonstrates that the landowner can achieve a good incentive to sell the site to meet their objectives whilst still meeting planning requirements.

- 6.3** Whilst public sector bodies are bound by the principles of best consideration, and are seeking to achieve maximum value, it is important to note that any uplift in the site's value can only be crystallised through the granting of planning permission and in order to secure planning permission applicants are required to meet planning policy requirements, including affordable housing. The need for the Ministry of Justice to maximise return on the site does not justify a purchase price which does not take this into account, as evidenced by the recent Parkurst Road appeal on land sold by the Ministry of Defence⁶⁵. The duty to achieve best value for the site does not outweigh the need to meet planning requirements as part of the plan-led planning system.
- 6.4** Indeed, there is scope to take into account issues other than solely achieving the maximum value for the site. Government guidance for the disposal of public sector land suggests that "Where there are wider public benefits, consistent with the principles of Best Value, disposing bodies may consider disposal of assets at less than Market Value taking into account wider value considerations such as economic, environmental and social value factors⁶⁶". In addition, the Mayor's Draft Affordable Housing and Viability SPG sets out that in order to maximise affordable housing delivery on public sector land this will include forgoing land value to increase the number of affordable units.
- 6.5** The onus is on bidders for the site to ensure all their assumptions are realistic and deliverable and take into account planning policy considerations. Any future buyers of the site who enter into negotiations with the council will be asked to make available the terms of which they bid for the land (quantum of development, level and type of affordable housing etc). Overpaying against the value of the land will not be taken into account in planning negotiations and will not be taken into account as part of the viability process.
- 6.6** Islington's approach to development viability, including the requirements for information is set out in the Councils Development Viability SPD. This is consistent with the Mayor's emerging guidance on viability and, amongst other things, makes the following points clear with regard to the approach to viability and land values:
- Based on the imperative of delivering sustainable development, the fact that Development Plan policies are the starting point for determining applications and that an uplift in land value is dependent on the grant of planning consent, the premium, landowner's expectations and associated developer bids, should therefore be directly influenced by the extent of planning policies that apply.
 - A key requirement that must be taken into account in determining the land value is the council's affordable housing target that 50% of residential units should be delivered as affordable housing, with individual schemes providing the maximum reasonable amount. The policy sets out that many sites will achieve this 50% and some will provide more than this. In all cases significant weight should be given to this requirement when

⁶⁴ Consistent with Planning Practice Guidance and Islington's Viability SPD.

⁶⁵ Reference APP/V5570/W/16/3151698.

⁶⁶ Guide for the disposal of surplus land, Cabinet Office, March 2017.

A plan for the future of the Holloway Prison site

determining land value. Viability testing should therefore always include and start with the policy target of 50% affordable housing.

Phasing

- 6.7** The implementation of future development should be phased in a way that minimises disruption to existing and future residents with essential infrastructure such as open spaces and community facilities completed prior to residential occupation.

Temporary (meanwhile) uses

- 6.8** Given the length of time that the planning and development process may take meanwhile (temporary) uses on the site prior to and, where appropriate, during implementation are strongly encouraged. This could include the temporary use of the buildings such as the visitors centre for community use and/or events and temporary use of spaces for public amenity⁶⁷ (e.g. open spaces, pop-up events), in particular activating the large blank frontage on Parkhurst Road, bringing vitality into such a large blank space and bringing the local community together. Any proposals for temporary uses will be assessed for their amenity impact and their planning benefits.

Consultation

- 6.9** In addition to early engagement with local residents and key stakeholders identified in section 4, it will be important that future developers of the site maintain and ongoing dialogue with the local community to clearly communicate key construction timescales and events as well as take into account feedback from any issues identified by stakeholders throughout the development process. A list of key organisations can be provided.

Construction

- 6.10** It will be important that development minimises the negative impacts of construction on the environment, with construction practice standards put in place to address the effective of construction, including air pollution, noise and vibration, dust, traffic congestion and waste disposal. The approach to construction practice will be secured as part of the legal agreement.

Other information requirements and obligations

- 6.11** A full list of information requirements that will be needed as part of a future planning application will be provided at pre-application stage. Applicants should also consult the local validation requirements and the planning obligations (S106) SPD. Future proposals will be subject to Community Infrastructure Levy charges in line with Islington's and the Mayor's requirements⁶⁸.

⁶⁷ Consistent with Development Management Policies DM6.2.

⁶⁸ Further information about Community Infrastructure Levy can be found at www.islington.gov.uk/CIL.

Summary of consultation responses



Holloway Prison Discussion Paper
July 2017

In order to inform the draft SPD, consultation on a Discussion Paper took place for over 5 weeks from 3 March to 10 April 2017. This included writing to over 6000 properties in the local area, contacting around 1600 individuals and organisations on the Planning Policy databased, as well as writing to additional stakeholders who were identified as having a specific interest in the site. The Discussion Paper set out in broad terms what the content of a future SPD might contain and asked for feedback on this.

Over 300 responses were received. The majority of responses were from local residents. However, there were also responses from other key stakeholders that have an interest in the site, including voluntary and community groups as well as government agencies and bodies.

This document summarises the consultation responses received.

A full Consultation Statement will be published when the draft SPD is consulted on.

Topic/section of document	Respondent	Summary of comments
Affordable Housing (general)	Individuals/residents/ Councillor Centre for Crime and Justice Studies. Islington Green Party Keep homes	<p>The overwhelming majority of respondents commented on the need for housing on the site (around two thirds of a total of over 300 responses).</p> <p>Within this there was a particular emphasis on affordability of new housing:</p> <ul style="list-style-type: none"> • The desire for affordable housing (also referred to by some as ‘low cost housing’) was stated by 71 respondents. • A further 71 respondents made specific reference of the desire for social housing. • A further 63 respondents stated that they wished specifically for Council Housing to feature on the site. <p>The Centre for Crime and Justice studies highlighted that affordable housing was also raised as an important issue in public consultation they have undertaken about the site¹.</p> <p>A number of other comments were also made about affordable housing, including:</p> <ul style="list-style-type: none"> • The wider context of the housing crisis, the need for affordable homes to be genuinely affordable (i.e. not 80% of market rate) and linked to peoples wages rather than the market was emphasised by a number of respondents. It was suggested that “genuinely affordable” should be defined along with the percentage of new homes. • The need for a large proportion of social housing. Some respondents suggested 90-100% of housing should be social housing due to affordability problems. • Shared ownership housing should be provided on the site. • The need for key worker housing for essential workers such as police, nurses and teachers; one respondent suggested this should be 10% of new housing. • The specific need for affordable housing in the borough was identified, including highlighting that Islington has a large number of homeless/overcrowded households and a large housing waiting list which affordable housing provision on the site could help to address. • Additional affordable homes to make up for those being bought on the government's right to buy scheme. • The situation should be avoided in which a private developer purchases the site, obtains planning consent for mixed use, then subsequently changes the percentage of affordable to open market housing. • Some of the problems with the affordability of shared ownership and that this does not work for the vast majority of people due to income restrictions and saving for a substantial deposit. • There should be housing for first time buyers. • The importance of affordable housing in maintaining a mixed population. • That people are leaving the area due to the high housing costs. • Consideration should be given to housing cooperatives and community land trusts. <p>The Islington Green Party made a number of points around affordable housing, including:</p> <ul style="list-style-type: none"> • that the land should stay in public ownership to provide community-led housing, with benefits of reduced housing benefit payments, with long-term revenues allowing the site to become a net contributor to the public purse. It was highlighted that there would also be a saving in allowing people to move out of other private rented homes. Leasing land to achieve long-term ground rent from leaseholders can make affordable housing viable and also provide the land-owner with better financial value than a one-off upfront capital payment from selling the land. • Whilst the commitment to Islington’s policy of seeking 50% affordable housing is welcomed there should be more ambitious goal for affordable housing on the site, highlighting that over 19,000 people remain on the housing waiting list. • The provision of key working housing.

¹ The Centre for Crime and Justice Studies have received funding for a project on the site which includes undertaking community consultation about the site’s future.

		<ul style="list-style-type: none"> Considering different models of affordable housing, such as cooperative housing. It is suggested that such models can engender increased satisfaction, pride in the community, enhanced training and employment opportunities, and a greater degree of enfranchisement for tenants. The response included quotes from the GLA (James Murray) stating support for community led housing projects, as well as interest in the model from the former Housing Minister Gavin Barwell who also identified potential government funding. It was highlighted that smaller scale community-led developments can better ensure new housing meets local needs than large scale private developers. <p>Keep Homes suggested that the company offers new approach to development that provides quality homes with sustainable affordability. Site is too large and important to allow large developer(s) to price local people out of home ownership. Islington has areas where properties sell for £1000+psf – company offers homes at maximum level of £400psf.</p>
Mix	Individuals/residents	<p>A number of comments were made emphasising the importance of a mixed tenure development on the site. That market/private housing should be mixed with affordable housing so that communities are integrated and not segregated.</p> <p>Linked to this there were a number of comments raising concerns about private housing. Some suggested that this should be kept to a minimum, whilst others highlighted that more luxury flats in gated communities that are left empty are not needed. It was suggested that private development does not always provide affordable housing pro rata.</p> <p>Several respondents suggested that more student housing is not needed.</p>
Housing for women	Individuals/residents Women In Prison (Charity) A landowner (unnamed)	<p>A number of individuals suggested that housing should specifically be provided for women, including:</p> <ul style="list-style-type: none"> That the prison site should be turned into a social housing project for single mothers and vulnerable women, offering subsidised accommodation affordable for those close to and in poverty. That social housing should be suitable for families and also be able to accommodate the needs of women who have been imprisoned as well as women and children who have been the victims of domestic violence. Purpose built affordable accommodation for students who are single mothers with appropriate community areas and crèche facilities. Affordable housing for homeless women, older women and disabled women. It should be imaginative, creative housing such as cohousing or custom build. The SPD should ensure an area of the site is offered to a cohousing group to develop. Above all there should be safe space for women that have been the victims of domestic violence. This should be a multi-cultural, multi-generational place. There should be new forms of housing including live/work because many women entrepreneurs will set up business from home. The site should be project designed for women and/or council housing for either women on probation or for families of offenders. The site should be used to house female victims of domestic violence and their children through a refuge or individual homes with priority for placing these families. Keeping in mind the history of the women imprisoned on this site - 46% of women in UK prisons are survivors of domestic violence. Housing female ex-offenders on the site. A significant amount of housing to vulnerable women. The site should be used to provide genuinely low cost accommodation particularly for women and vulnerable people in the area. <p>Women in Prison stated that the current housing crisis means a lack of housing for women in the criminal justice system. Homelessness and inappropriate housing play a fundamental role in women’s (re)offending, with prison sometimes being the only “housing option” available to a woman. Sadly, HMP Holloway housed many disadvantaged women and it would therefore be fitting to use the site to provide community housing for this group. An investment in appropriate housing, including supported housing (which also enables women to address complex needs through support services embedded in the housing scheme) and genuinely affordable housing, would have a significant impact on (re)offending levels among women and would have a clear net saving compared to the cost of prison places and other costs managed by local authorities, including children and adult social services.</p>

		A landowner suggested there is the possibility here for housing allocation for women likely to be target by the criminal justice system as well as women leaving prison.
	Ministry of Justice	<p>Support a strong focus on the provision of housing as part of the Government’s wider commitment to housing growth in the UK. The impact of the level of affordable housing and housing mix could be significant to the value of the site and this could have wider implications for the affordability of the delivery of new prisons and improvements elsewhere.</p> <p>The respondent stated that the receipts from the sale of the Holloway Prison site will partially fund the MOJ’s Prison Estate Transformation Programme which is aimed at ensuring prisons are places of reform and safety, and ensure benefits for local communities across the UK. The MOJ consider that the overriding provision of housing as a whole and the benefits this will bring should be given greater weight than, for example, affordable housing delivery on this site.</p> <p>Agree that setting a range of housing units provides a useful starting point, provided that this does not limit the potential to maximise development opportunity that this site offers to increase the housing supply and development viability. We welcome further discussions in this regard. We consider that given the scale of development possible, flexibility should also be provided for in potential housing mix to ensure future developers may meet market demand.</p> <p>The MOJ welcome further engagement with LBI and the GLA and in particular, acknowledgement that it will need to meet its aspirations for the disposal of the site to meet the objectives of the Prison Estate Transformation Programme.</p>
	Greater London Authority (GLA)	The disposal of the Holloway Prison site represents a good opportunity to deliver new development within Islington that can positively contribute to the quality of life in London and importantly can provide capacity for a significant number of new homes. A high priority will be the provision of new housing, including affordable housing. The SPD could set out a minimum number of new homes that the Council will look to achieve. GLA will seek to ensure that the SPD conforms with the policies contained in Chapter 3 of the London Plan and the Council should reflect the Mayor’s Affordable housing and Viability SPG.
Accessible housing	Centre 404 (charity) Individuals/residents	<p>Centre 404: support use for social housing suitable for people with multiple disabilities including wheelchair users and those with a familiar member who is on the autistic spectrum. Majority of members live in social housing and there is a shortage of suitable properties.</p> <p>Several respondent stated that housing on the site (including council housing) should be suitable for disabled residents. Two respondents considered that the site should provide social housing suitable for people with multiple disabilities as well those on the autistic spectrum, suggesting that there is a huge shortage of these properties for these families in the borough.</p>
Housing amenity space	Individuals/residents	<p>A couple of comments were made about the importance of housing amenity space:</p> <ul style="list-style-type: none"> • Provision of both backyards and balconies is important as this additional space can be used in a multitude of fashions providing important social benefits such as child play space and social and recreational activities. • That private amenity space is important for how people use their homes and access the outdoors, communal green space can be unused whereas small private areas can be used for a range of activities.

Housing Design	Individuals/residents	<p>A number comments were made about housing design, including:</p> <ul style="list-style-type: none"> Concerns that housing design will be low budget and small, with new developments looking like old estates that are now being demolished. That new buildings should be aesthetically pleasing. Having decent size dwellings not little boxes. That the amount of new housing needed should not sacrifice quality, with the site should be planned to give a high standard, good quality of life. A need for sustainable and well-built housing - much of modern housing is badly thrown together, which is bad for occupants and bad for the environment. Giving non-standard housing types, such as communal housing, a chance. Demand as high as possible standards for any new build, and go well above the minimum requirements, having ample size in each room, allowing for maximum self-expression and privacy for all residents. Design that can be modified with ease by any resident to accommodate changing circumstances, due to change in health, age, growing families and families that become smaller.
	Islington green party	<p>Too much new housing is of a poor quality, for example with inadequate space and light, or poor energy performance. Islington Green Party would therefore like the To Be Published SPD to require:</p> <ul style="list-style-type: none"> Minimum space standards based on for example the 'Parker Morris' standards, 10% above the Mayor's London Housing Design Guide recommended areas to improve residents' quality of life, ensure that homes are accessible, and are built to the Lifetime Homes standard so that they are able to accommodate changing personal circumstances and growing families. These standards should enable anyone with a disability to live in any home. The 'Parker Morris' standards can be found in the publication 'Homes for today and tomorrow' published by the (then) Ministry for Housing and Local Government https://archive.org/details/op1266209-1001 Comfort standards addressing ergonomics, sound, privacy and light, so that homes are places of retreat.
Housing for single homeless people	Individual/resident	The building should be made available for single homeless people and funding from the sale of the site could be used to make adaptations to make the site 'community friendly'. Rents must be in accordance with the people's circumstances when accommodation is offered to them and a residential caretaker should be part of the set up.
Housing for young people and families	Individuals/residents	<p>A number of comments were made about the need for housing for young people and families, in particular affordable housing. This was seen as important in encouraging multigenerational living and not forcing families out of the borough/London.</p> <p>With specific reference to family housing providing larger units (2-3 or more bedrooms) was mentioned as being of great importance, particularly for families currently trapped in one bedroom flats.</p>
Housing for rehabilitation and mental health	Individual/resident	The site should be used to provide housing for the rehabilitation of young drink users and mental health housing.
Housing for Older people	Individual/resident	Several respondents stated that future housing on the site should provide homes for older people. One respondent suggested that this should include an element of social sheltered housing so older people can vacate large flats and move into accommodation where they will be well looked after.
Over supply of cheap housing	Individual/resident	One respondent stated the oversupply of cheap housing will not help the city facing the Brexit challenge. With raising interest rates and an exodus of jobs and international talents house prices will come down.

Topic/section of document	Respondent (s)	Summary of comments
Community facilities (general)	Residents/Individuals Islington Green Party Centre for Crime and Justice Studies A land owner Greater London Authority (GLA)	<p>There was support for the provision of community space on the site. With around 80 responses, predominantly from individuals/residents, suggesting the site should include community space/facilities. Within this there were some more specific suggestions, including:</p> <ul style="list-style-type: none"> • A community centre, with venue hire and space for activities • Space for charity services, including those supporting refugees, • Space for local people, older people and young people • A Somali community centre • Café/cinema/theatre/creative space • Meeting/event/activity space • Childcare facilities/nursery • Health uses and social care • Women’s support centre/spaces for women/ facilities to support female victims of domestic violence • Education facilities • Taking into account the impact on places of worship, including ensuring they are consulted. • Advice centre • Support for low income residents. <p>The Centre for Crime and Justice Studies highlighted that community spaces and buildings were highlighted as important in the public consultation they have undertaken on the future of the site.</p> <p>There were a number of comments which emphasised the importance of providing sufficient services to take account of population growth and the impact this would have on local services and taking into account evidence of future needs.</p> <p>A few respondents highlighted the importance of community spaces as places of interaction and to bring people together, including the health benefits of this.</p> <p>Several respondents including individuals, the Islington Green Party and an unspecified landowner suggested that the visitors centre (built with charitable fund) should be made available for community use/activities, particularly until the redevelopment occurs.</p> <p>Several respondents suggested a nursery/preschool should be provided, including outside space.</p> <p>The GLA responded stating that the aim of providing relevant social infrastructure is generally welcomed, in line with London Plan policy 3.16. Whilst it is not immediately clear as to the nature and type of infrastructure that is required in this area, the discussion paper stated that the Council is undertaking research into this.</p>
Education/school provision	Residents/individuals A landowner (unspecified)	<p>Around a dozen respondents mentioned education provision and in particular school is on the site.</p> <p>Some respondents mentioned the expansion of existing facilities, whilst others suggested a new school should be provided, subject to need. One respondent suggested the expansion of Tufnell Park Primary School may be problematic and cited demand for additional school places/forecasts.</p> <p>A couple of respondents suggested an outdoor classroom could be provided to support local pupils as part of plans for a green space on the site, consulting with the organisation Garden Classroom and working with local schools.</p>

	Education Funding Agency (EFA)	<p>Welcomed the support in the discussion paper for social and community infrastructure and reference made to protecting existing social infrastructure uses.</p> <p>Provision of new school places should be explicitly referenced within the SPD.</p> <p>In addition to NPPF requirement for providing school places LB Islington should have regard to the joint policy statement from the Secretary of State for Communities and Local Government and Secretary of State for Education on ‘Planning for Schools Development’ (2011) which outlines the Government’s commitment to supporting the development of state-funded schools and their delivery through the Planning System.</p> <p>Although number of homes and potential for mixed use development on the Holloway Prison site is still to be confirmed, ensuring that there is an adequate supply of sites for schools arising from growth is essential. The EFA would therefore welcome specific reference within the SPD to safeguarding land for D1 education use on the site as part of the social/community infrastructure requirements. This will help to ensure that LB Islington can swiftly and flexibly respond to the existing and future need for school places to meet the needs of the borough over the plan period.</p> <p>Note that the Holloway Prison site will have a site allocation within the emerging Local Plan and as a result the preferred uses should also reflect retention and provision of new social infrastructure, with specific reference to safeguarding land for D1 education use, to reflect the SPD.</p>
Youth facilities	Residents/individuals Charity (Centre 404)	<p>Over 20 respondents mentioned the facilities for young people. Around a dozen of these suggested that there should be youth facilities/activities, with examples such as leisure, art, music, sport mentioned. A centre for the rehabilitation of young offenders was also suggested.</p> <p>Play space was also mentioned by number of respondents, with suggestions including water play, facilities for children with disabilities and accessible play for local schools and charities (Bridge School, Centre 404 and users of Lough Road centre for disabled children). It was also highlighted that St George’s ward has minimal play spaces, with parks/playspaces a long distance away, particularly for wheelchair users.</p>
Sports facilities	Residents/individuals	<p>There were around a dozen comments on sports facilities. These included:</p> <ul style="list-style-type: none"> • Having a gym for older people. • Nearest gyms aren’t convenient (e.g. Kentish Town and Tufnell Park). • Having a basketball court • Having a tennis court • Having arts and sports facilities • 5 comments were made about having a swimming pool – some of these comments highlighted the existing pool within the prison building, the lack of other options (Archway as a leisure pool and Closure of Hornsey Road), the lack of public access to bridge school pool. The health benefits of swimming were also highlighted. <p>One respondent suggested that part of the site, to the rear, could be used for a crazy golf course and shrubland with a water feature, with development of housing facing Camden Road.</p>
Health	Residents/individuals	<p>Around 15 respondents suggested the need to consider health facilities, the majority of which specified GPs, with other suggestions made around space being made available for mental health services, counselling and women’s health.</p>

	Camden and Islington Public Health	Camden and Islington Public Health stated that they have assessed the need for health facilities in the area, and recommends that NHS Islington CCG consults with the Partnership Primary Care Centre and the Gooding Practice to assess capacity at those practices. If this satisfies healthcare demand, they encourage the developer to focus on the wider determinants of health, specifically considering how housing is not only good quality and affordable, but also how residents are able to interact with the wider environment seamlessly in a way that promotes good health and wellbeing.
Open space	Residents/individuals Centre for Crime and Justice Studies Islington Green Party Greater London Authority (GLA).	<p>There were over 40 comments in support of the provision of greenspace/park/open space on the site. More specific points included:</p> <ul style="list-style-type: none"> • The space should be genuinely publicly accessible. • The mental and physical health benefits of green space (including for children/residents who don't have their own space). • The benefits of green space with regard to cleaner air/pollution. • The benefits of green/open space for social interaction and community cohesion. • The benefits of green space for exercise. • The benefits of green space for local wildlife and increasing biodiversity in the area. • The lack of open/green space in the area (and borough) and the need for some, including for any new residents on the site. • If there was scope for allotments/food growing/community garden. • Respecting and preserving the existing gardens and the work that went into them. • Extending the central garden area that is currently there to include the big tree. • There should be a good sized park. • The majority of space used for green space. • The need for high quality space that has a maintenance plan with participation of residents. • The requirements of planning policy for open space, including space that is accessible and biodiverse. • Public space-garden space that is run by women but for use by local people. • "Friends of the Park" schemes are successful in many areas of London already, and alongside perhaps a cafe and other amenities, would help to support and fund the park and its care, as well as providing an opportunity for further social cohesion amongst volunteers and park users. • Recognition of the history of the site and having some connection with the past e.g. a plaque/memorial or the name of the public space. e.g. "Pankhurst Park". • The space should not be in the middle of the site as this would make it feel like an estate not open to the public, it should be adjacent to Camden Road to enable housing to be set back from the busy Camden Road, give a pleasing aesthetic, and making the space clearly accessible to the public. • It was suggested that it might be worth investing benefits from site development into a fund to maintain the space in perpetuity. • Islington Green Party expects the council to insist that any development meets policy DM6.2 with regard to new public open spaces, the accessibility of these and the biodiversity benefits thereof. <p>Finally, the Centre for Crime and Justice Studies highlighted that green space was highlighted as important in public consultation undertaken as part of their research on the site.</p> <p>The GLA stated that the ambition to provide new open space and green infrastructure is welcomed in line with London Plan policy 5.0-5.11 as there is an identified shortage of such provision in Islington. It was also stated that it may be good to clarify that play space is included in open space provision.</p>
Biodiversity/trees	Residents/individuals Islington Green Party	<p>There were around a dozen comments on the importance of nature/biodiversity on the site.</p> <p>The majority of comments highlighted trees – the need to protect the trees that are there, planting more trees and having lots of trees on the site, and the advantages of trees in terms of air pollution/air quality, drainage and water run off, visual impact and wellbeing,</p> <p>The importance of planting/trees along Camden Road/Parkhurst Road as a boundary to the site was also mentioned, for visual amenity and to create a barrier from the busy road.</p> <p>Other comments highlighted:</p> <ul style="list-style-type: none"> • The need for vegetation and gardens to be included

		<ul style="list-style-type: none"> • Considering nature corridors, including taking into account the habitat and biodiversity currently on/surrounding the site and the impact on animals/plants. • Questioning if a biodiversity impact assessment will be carried out before deciding what to plant, with flora chosen according to the boroughs Biodiversity Action Plan. <p>The Islington Green Party highlighted consideration of the importance of the built environment for other species such as lichens, birds, bats and insects, avoiding impacts where possible, and enhancing the local ecology. There are a number of large and mature trees on the site; these are invaluable to the local environment and Islington Green Party would like to see these protected.</p>
Women's Centre/Building	GLA	The discussion paper mentions the possibility of support services for women in the justice system, this may be appropriate but should be evidenced.
	MOPAC	<p>Highlight that the Mayor had previously expressed disappointment that HMP Holloway closed without proper provision being made for women prisoners in London. The Mayor supports proposals for retaining a footprint of female offender services at the Holloway site.</p> <p>Research and analysis completed by the MOPAC clearly showed a gap in female offender service provision in north east London following the closure of HMP Holloway. The respondent stated that work is underway to address the gap through the London Female Offender Strategy Programme which is seeking to secure investment to build up women centre service provision across London.</p> <p>Savings arising from the closure of HMP Holloway should be reinvested by Central Government in community provision in London to support the transition from custody and provide greater alternatives in the first place for vulnerable women in society.</p> <p>Maintaining a base for services to women in Holloway would protect the social infrastructure of Islington and supports London's wider ambitions of ensuring there are adequate provisions for our most vulnerable members of society.</p>
	Individual/Respect Party representative	Support their organisation to highlight the needs of women, importance of education and avoiding financial problems which damage families.
	Residents/individuals	<p>Over 30 residents/individuals commented in support of the provision of a legacy use on the site in the form of a women's centre/building providing services to women. Comments about this include:</p> <ul style="list-style-type: none"> • A women's building which would support the delivery of vital services, including supporting former prisoners, providing social services, justice related services, support for victims of domestic violence. • The importance of the site's historical connection with women's rights, including the suffragettes, with a women's building honouring this legacy. this is especially fitting given the site's historic connection with women's rights. • Facilities for both women and children. • Opportunities for education to empower women. • Provide resources/space for organisations/charities to support women. • Providing women's services for the local area/residents. • Women's social centre within the same complex and women's gardens so that this would become a site supporting women living in poverty of all racial and cultural backgrounds in Islington and London more widely. • Facilities for women fleeing violence, recovering from alcohol/substance abuse and needing mental health support. • Facilities that could also be available to wider comment including café, cinema, theatre, creative and meeting spaces, as well as space for counselling and health services. • The current provision of specialist women's services is difficult to access and such services can greatly improve welfare. • The centre should provide key women-only rental premises for women's sector organisations and local grassroots women's organisations, and serve as a women-only multi-functional buildings featuring venue space and event space. The centre should be financially and environmentally sustainable and also provide support for children and young people affected by the criminal justice system.

		<ul style="list-style-type: none"> • It should include offices and spaces specifically for women's services and organisations, with appropriate rents. • It would be great if there were also public spaces like a cafe, library/archive on women's issues, and even a theatre or lecture hall. • An opportunity to lower re offending, which women's centres have proved to do. • a women's centre as an asset: in community ownership, not rented. • This might include provision for single mothers, perhaps those who at risk of imprisonment or just after leaving prison. This would be a place from where they can be supported to reintegrate into society together. • creation of a women's centre could generate income and support the sustainability of local small to medium sized women's organisations, and groups that support women and children and ensure that marginalized groups and those disproportionately affected by the criminal justice system (especially people of colour) have a place for their needs to be met. The public-facing, income-generating elements would also be a place to engage the public while contributing to the sustainability of the work within the women's building. • Spaces for women where their quality of life, health and happiness can thrive privileging spaces for women, in terms of work, living arrangements and social life. • Many organisations supporting women describe difficulties they are facing keeping their services open in Islington. The rising costs of rent, the challenges in finding suitable places for women's only services that offer appropriate space for their trauma informed approach. Some women's sector organisation that have delivered services in Islington for over 30 years are being forced to move out of the borough due to rising costs. Full support for the following initiative "A women's building for Holloway" https://www.crimeandjustice.org.uk/resources/womens-building-holloway.
Women's centre/building	A Landowner	<p>No memorialization of Holloway as only a historical site but attributed to a future space that aims to help and address the needs of women from all social, cultural and economic backgrounds. A site that is embedded in a politics that understands that crime is a symptom of a society and the structures that are in place. That the site be used as a legacy to not only the suffragettes that were imprisoned but includes the thousands of women who have passed through the gates of Holloway, many to return again and again (many intergenerational) and many who died there. Most women are imprisoned as a result of poverty and mental health.</p> <p>A women's centre that provides assistance to women who are at risk of entering the the criminal justice system or have been party to it would be an appropriate and beneficial use of the site, as well as green public space-garden space that is run by women.</p>
	Maya Centre Islington	As a women's organisation that has worked with ex-prisoners we would like to see a women's building dedicated for use by women with a range of providers within this setting.
	Open university	The Supplementary Planning Document should include plans for a Women's Centre. Given the site's previous use, it is fitting that the plans should include some provision for vulnerable women in London. The development of the Holloway site offers the opportunity to design a financially sustainable women's centre, with facilities capable of generating an income to help fund vital services. The future of women-centred services in the criminal justice system has been threatened by the imperatives of the government's Transforming Rehabilitation agenda, so it is crucial that alternative ways of sustaining services be identified. A financially sustainable women's centre like this on the Holloway site could become a blueprint for women-centred services elsewhere. As such, this project is of national importance.
Women's centre/building	Rooms of our own	<p>There is a strong demand from local residents and community groups that there should be recognition in any future plans for the Holloway Prison site of the particular experiences and needs of women.</p> <p>The Suffragettes were imprisoned in Holloway – their contribution and legacy should be recognised on the site. Other interventions can be more successful in prevention, rehabilitation and avoiding re-offending than prison.</p> <p>Highlight that the organisation was established to address the problem of the loss of women's organisation and spaces, often as a result of organisations being unable to afford them. Have an interest in space for the women's' sector, citing a scheme planned in Walthamstow and this should be considered as a project as part of plans for the Holloway Prison site and anticipate the need for premises for organisations addressing the needs of women in situations of poverty, violence, substance abuse or other potential precursors to criminality. We would also anticipate the need to provide space for rehabilitation services.</p>

	Islington Green Party.	<ul style="list-style-type: none"> • For 164 years this site has housed a prison; for the last 113 years it was a dedicated female-only prison. Any future development must include dedicated women’s services. • Women, and especially women in and leaving prison, especially Black Asian and Minority Ethnic women are among the most disadvantaged social groups in Britain; the closure of Holloway Prison must be compensated by a substantial investment in women’s services such as those for domestic violence, mental health, substance abuse, general health and well-being and social reintegration. • Many organisations supporting women describe difficulties they are facing keeping their services open in Islington. The rising costs of rent, the challenges in finding suitable places for women’s only services that offer appropriate space for their trauma informed approach. • Some women’s sector organisation that have delivered services in Islington for over 30 years are being forced to move out of the borough due to rising costs. • With regard to this Islington Green Party would like to ask the council’s attention and full support for the following initiative “A women’s building for Holloway” https://www.crimeandjustice.org.uk/resources/womens-building-holloway
	Two Community/Voluntary Groups/Resident	<ul style="list-style-type: none"> • Provide key women-only rental premises for women’s sector organisations allowing it to be a venue, event space, multi-functional women’s only building. • Would reduce costs to local authorities and other grant making bodies currently spent on renting spaces for organisations and groups • Promote the value and leadership of women and women-only spaces • Be income generating: through renting offices and event spaces; running public events; offering other facilities, such as a café or crèche • Be financially and environmentally sustainable • Reduce women’s organisations reliance on local authority funding • Support longevity and survival in a difficult funding environment • Be a living legacy for the prison’s historic connection with suffragettes and the women’s movement • Become a ‘lighthouse’ for those connected to the prison to return to and reclaim their history and support other women in similar situations • Support the delivery of vital services for women and children in the area – which could incorporate a Women’s Centre within the Women’s Building • Potentially a safe space for domestic violence victims- needed in a government where funds for those abused has been drastically cut.
	Community/voluntary group	<ul style="list-style-type: none"> • A service hub for women from diverse background. • A meeting space for meetings and multi-functional events. • Women drop in services including welfare advice, housing, VAW&G, divorce custody, education, employment. • ESOL classes, training courses, leadership programmes for women. • Home for set and test innovative projects, a women’s catering cooperative for canteen and event catering. • Art and music activities, courses for women. • Access for local women’s organisations. • Women only trustee board.
	Centre for Crime and Justice Studies	<p>‘A community Plan for Holloway’ is managed by the Centre for Crime and Justice Studies and is a coalition of active local community groups, faith groups, trade unions, political parties and others with the aim of ensuring wide ranging social inclusion in decision-making. The aim is to work with local partners to spread the word, host local consultation meetings and gather ideas and support for an alternative vision for the Holloway site.</p> <p>Undertaken data analysis, community meetings and surveys to develop a community plan for the Holloway Prison site and worked hard to engage with marginalised and excluded groups in the Borough as well as people caught up in the criminal justice system and women who have been imprisoned.</p> <p>Concept of women’s centre for women in criminal justice system well received and strong support for a women’s building on the site to offer space and services to the many women’s organisation in Islington.</p>

	<p>Women in prison</p>	<p>Women in Prison is a national women’s organisation that provides holistic gender-specialist support to women affected by the criminal justice system.</p> <p>HMP Holloway provided a strong hub for services and its closure resulted in the removal of support and housing in London for some of the most vulnerable women in the community.</p> <p>For a genuine, living legacy from the prison’s closure it should be a space for women’s empowerment, space for debate and a space to celebrate women. We want a multi-functional space for support services, the arts, social enterprise etc. A hub for many different women’s organisations to work together and to benefit and evolve, not just one organisation running one particular service. It can provide desperately needed rental premises for the broader women’s sector and also meeting spaces for grassroots organisations. It could be income generating through its offering of rental space and by hosting social enterprises such as a café, art studios or crèche for example.</p> <p>Whilst it should be considered that the Women’s Building incorporates a Women’s Centre (or house organisations) that can provide the specialist support for women affected by the criminal justice system (and provide a custody diversion programme) Women in Prison fully supports the idea of a Women’s Building as opposed to just a Women’s Centre. This is because firstly the two ideas are not mutually exclusive.</p> <p>Our successful model of support for women affected by the criminal justice system works because we focus on the needs of women not on the needs of the criminal justice system. If you provided support and a space for the above ideas you will find that it enables the women we support to turn their lives around and will ultimately impact and reduce the number of women coming into contact with the criminal justice system in the first place. Secondly we support this idea because of the model’s greater potential for capital sustainability for the women’s sector, which we know first-hand does not currently exist in London and the current climate is very costly for charities and the women we support.</p>
	<p>Women’s Resource Centre</p>	<p>Women’s sector should be considered as stakeholders in the site as played a significant part in the history of the site and impacted by its closure.</p> <p>Consideration should be given to ‘women’s building’ rather than a ‘centre’. Have established that there is a need and that this site provides a once in a generation opportunity.</p> <p>This could be a resource for the women’s sector to provide services for women in Islington and London in challenging time. Women’s services have experience difficulties in maintaining their services due to increased costs and difficulties in attaining appropriate spaces.</p> <p>Women’s sector organisations that have been delivering services in Islington for over thirty years have been forced to move out of the borough due to rising costs, and their tenancies ending. Public money is being used on private rental income, and a Women’s Building could be a move towards a more sustainable model.</p> <p>Holloway Prison is important in the legacy of the women’s movement in London where a number of women’s sector organisations in Islington started in the prison all of which have been affected by the closure, and where women have been moved further out, increasing women’s organisations travel costs and staff time.</p> <p>Women’s Building proposal is for a whole multi purpose, multi floored building with that is owned by the women’s sector, so the risks of being moved on or having the building sold on are minimised.</p> <p>Previous evidence gathered and three feasibility studies done over the last 8 years estimate a building footprint size of 1.500 sqm space, to accommodate a range of facilities to support the building being self-sustaining and income generating. WRC has a fundraising strategy in place to work toward securing the considerable resources to bring this project to fruition.</p> <p>A number of points were made about the building, including that it would provide for women’s sector organisations in one place with the advantages that would bring, that it would be income generating through rental offices and event spaces and that it would support the delivery of vital services for</p>

		<p>women and children in the area – which could incorporate a Women’s Centre within the Women’s Building.</p> <p>Additional information was provided about the importance of the history of the site and the organisations/campaigns that emerged.</p>
	<p>Prison Reform Trust</p>	<p>Recognise that the sale and development of the HMP Holloway site will require a careful balance between the legitimate need to recoup maximum value for the tax payer, ensure adequate provision of social housing and satisfy the planning objectives set out in the Local Plan for the London Borough of Islington.</p> <p>Central argument is that during the planning process we must not lose sight of the history of HMP Holloway as both the first female-only prison in the country and the biggest women’s jail in Western Europe. It has housed many thousands of vulnerable and disadvantaged women in the course of its history, and although rebuilt since then it is well-known as the prison where suffragettes were incarcerated and force fed. Its role and reputation in the long struggle for women’s equality warrant more than a plaque. Its closure is a matter for celebration, but only if its legacy includes a modern and humane contribution to the continuing struggle to eliminate the disadvantage and discrimination that leads so many into crime and ultimately to prison.</p> <p>The respondent stated that the redevelopment of the Holloway Prison site should deliver effective, alternative community provision for vulnerable women including those in contact with the criminal justice system.</p> <p>The respondent stated that the opportunity to redevelop the site constitutes an opportunity to address under-investment and support access to effective gender informed services that get to the root cause of offending.</p> <p>With the closure of HMP Holloway there is a pressing need for alternative community use in Islington. Proposed a percentage of the proceeds from the sale of the Holloway site must be reinvested in community services, ideally a women’s centre providing a mix of universal and targeted services to vulnerable women, including those at risk of entering the criminal justice system. Believe the women’s centre model, ideally with provision of secure accommodation, represents the most effective, and financially sustainable alternative community use.</p> <p>Assessment of the site suggests that the footprint of the HMP Holloway Visitors Centre is approximately 150 – 160m2. This is comparable in size to the Anawim Centre in Birmingham that delivers a range of services to approximately 400 women per year and has recently opened a new sheltered accommodation facility on the site of the existing women’s centre. Given a site of this size we believe it would be possible to deliver a significant community hub providing a range of women’s services alongside social housing for the wider benefit of the community. A detailed design specification for a women’s centre is set out at Annex A. This is based upon data from comparably sized women’s centres elsewhere in the United Kingdom and best practice evidence for delivering gender-informed services to women.</p> <p>To ensure continuity of service to women in Islington during the development of the Holloway site believe there are advantages to staggering the development of the HMP Holloway site as follows:</p> <ul style="list-style-type: none"> • Short-term: It is likely that the sale of HMP Holloway and subsequent clearing of the site will take a considerable period of time. While this is undertaken PRT proposes that the visitors’ centre is retained in the short term and converted into a women’s centre to provide much needed gender-specific services for women in North East London as services transition to the women’s cohort model established following the introduction of Transforming Rehabilitation. Reflecting wider learning from the Manchester ‘whole systems approach’, the IOM Cymru Women’s Pathfinder, and recent MOJ ‘whole systems’ grant funding, this Centre could receive voluntary admissions, police referrals at the point of arrest, community orders and those on licence following their release from prison. • Medium-term: Propose that the visitors’ centre, which is already physically split off from the main prison estate by an entry road through the site, is hived off and re-developed with a requirement that it includes adequate community use for women. We understand that housing in this part of the London Borough of Islington is dense and new developments tend to be 8-10 floors in height. Separating off the visitors’ centre site would allow for the site to be sold and developed as a distinct mixed use development incorporating a women’s centre, sheltered accommodation and social housing for women on the upper floors. • Long-term: While the sale and development of the site is undertaken, it would be necessary to find an interim site for the 2-3 years that the site is being developed. On completion of the property a range of public sector and voluntary sector organisations would migrate into the new purpose-built building providing a range of gender-informed criminal justice, health and social care interventions.

	Community/voluntary group	Given the government cuts to services to vulnerable women and the victims of domestic abuse (and the disproportionate amount of women who had been abused that end up in prison, at least in part due to poor access to these kinds of resources) the decommissioned space of the prison should be used for services like that.
	Community Group	We feel strongly that the Holloway site is of vital historic significance to London, the poor and disenfranchised and to women in particular in view of its status as women's prison and where suffragettes were held. The lack of, and increasingly loss of, women-only space especially in accessible central locations is very marked. We feel that this space needs to be affordable, accessible and very women centred. We would like it to be a space that women feel is theirs, is safe and comfortable where they can relax and where they can access specialist women only services.
	Ministry of Justice	<p>The closure of the prison is to facilitate a national strategy for prison service transformation and forms a significant part of the objective to ensure development maximises any capital receipt through maximising residential development which will in turn fund vital improvements to national prison infrastructure.</p> <p>Whilst we welcome views as to the scope of community provision on the site, we believe that these should be limited to reflect the nature of the former use and the objective to maximise residential development to increase housing supply and support the funding of the national Prison Estate Transformation Programme.</p> <p>The extent of community infrastructure provision should be considered in the context of the need to the viability of the provision of improved prison facilities elsewhere. In this regard, the need to maximise residential accommodation on the site will not only deliver the best opportunity for funding the Prison Estate Transformation Programme, but also to provide replacement Prison facilities elsewhere and a boost to housing supply in the local area.</p> <p>The women's prison places formerly provided by HMP Holloway have been re-provided elsewhere by MoJ and thus MoJ do not consider that there is a requirement to maintain a prison legacy on this site. As a key stakeholder MoJ would be happy to be involved in any discussion on the question of whether there is a need for a centre for women.</p>
	Independent Advisory Panel on Deaths in Custody (IAP)	<p>The respondent provided a 'Preventing the Deaths of Women in Prison' working paper dated March 2017. The report highlighted that in 2016 there were 12 self-inflicted deaths in women's prisons in England, the highest number recorded since 2004. This is attributed to 5 main reasons:</p> <ul style="list-style-type: none"> • A reduction in staffing levels combined with the loss of experienced, trusted staff, plus vacancies in mental health teams, and the accompanying reduction inactivity, time out of cell and time to listen and talk. • Unmet mental health, drug and alcohol treatment needs and the discernible increase in the vulnerability and complex needs of women received into prison. • An increase in illicit drug use, intimidation, bullying and debt in custody. • A marked decrease in use of release on temporary licence (ROTL), an increased likelihood of homelessness on release and high numbers of recalls. • The knock on effect of the hasty closure of Holloway prison including increased distance from home and pressure on other establishments combined with the widespread closure of women-only support services in the community. <p>There was a clear consensus that a sustained effort must be made to imprison fewer women by investing in preventative work, mental health treatment, social care, treatment for addictions, and developing a range of community sentences in which courts could remain confident.</p>
	Rights of Women	Leading women's legal charity, Rights of Women (based in Islington) support the proposal made to create a Women's Building on the site of the former Holloway Women's Prison. Aside from the fact it would be a fitting legacy considering the history of the site, the proposal has been rooted with a series of robust financial arguments that would allow it to become self-sustaining through income generation. A women's building with the resources proposed would be unique and valued by a wide cohort of local communities whilst also attracting building and service users from elsewhere. There is

		a great deal of support for this venture within the women's sector and a desire to see Islington Council continue it's longstanding supportive partnership working with the sector through this project.
Legacy use (general)	Individuals/residents	<p>A number of respondents raised the general principle of a legacy use on the site. Suggestions for legacy uses other than a women's centre/building included:</p> <ul style="list-style-type: none"> • Using the site as a rehabilitation centre, training centre or as a support hub for those that need to address some of the root causes of the problems the criminal justice system is facing. • A centre for the rehabilitation of young offenders should be included, providing social and creative facilities, space for drama and art. • An offenders "school". • A museum for women in London/women's history museum/library. • A wall with an engraved timeline or archive photographs etc. • An outdoor memorial area appropriate for those who wish to return to the prison site. • An acknowledgement that the site once housed women imprisoned due to poverty, or mental health issues, or those who challenged the prevailing status quo: suffragettes. • Given the history of the site, it would be great if the site could somehow also still be used to provide advice or support to prisoners/ the families of prisoners, and I think there should be some plaque or something to give the history. • Recognition of the history of the site, and in particular women's issues and e.g. the imprisonment of the suffragettes. • The new space and the area around also needs a name - how about "Holloway Castle", in memory of the great gatehouse which once looked straight down Hillmarton Road - and the pub called after it.

Topic/section of document	Respondent	Summary of comments
Mixed-use	Resident/individual	References for the desire to establish a mixed-use development were expressed by a number of respondents; one respondent referred to the recent Kings Cross development where education, business and leisure facilities feature alongside housing creating "... a <i>lively daytime and evening space with diverse architecture.</i> " Whilst a second respondent also suggested that the Kings Cross development provided a standard that a new development on the Holloway Prison site should aspire to.
Business use/Employment opportunities	Residents/individuals Islington Green Party	<p>A number of responses highlighted the importance of opportunities for business use and employment opportunities on the site.</p> <p>One respondent stated that there are minimal modern workspaces in the area for business start-ups and suggested that London Metropolitan University could explore the possibilities of setting up workspaces for emerging university start-ups or creating business laboratories for both graduates and post-graduates.</p> <p>One respondent suggested that a future development on the Holloway Prison site could feature workshops for activities such as craft, wood work, metalwork, jewellery, textiles, printing, art, pottery, paint, photography, design, architecture, furniture, lighting and computing thus producing a similar dynamic to that of the Bauhaus in Germany. The respondent stated that this would: "<i>Create a powerhouse of art, culture, design and inspiration to a better life.</i>"</p> <p>References were made for the need to provide employment opportunities as well as housing on the site. One respondent specifically suggested that some land should be sold to the private sector to build offices/retail developments to increase employment opportunities in the local area. A further respondent commented that commercial property in the neighbourhood, railway arches, workshop space and garage areas are being redeveloped, pushing out small businesses. It would make sense to design in small office / workshop spaces to support new and small businesses.</p> <p>Islington Green Party stated that they would wish to see facilities within the site enabling small-scale economic activity. Islington Green Party stated that they would wish to see small spaces for local grocers, retailers and workshops as well as small rentable spaces for start-ups and non-location bound activities.</p>
Retail/leisure	Residents/individuals Centre 404 (Charity)	<p>References to the provision of retail provision, cafes and local amenities were made by a number of respondents with a number of respondents specifically stating that they wished independent local business would be sited within a new development on the site rather than multinational stores and cafes.</p> <p>Comments in support of retail/leisure opportunities included:</p> <ul style="list-style-type: none"> • One respondent specifically suggested that the development could feature specialist retailers such as an organic grocery store, butchers, fishmongers or bakery. • Another respondent stated that they would wish for cafes, bakeries, locally owned shops and businesses, chemist and grocery store to be included within the development. Reference to the provision of a supermarket on the site was also made by a number of respondents. • One respondent specifically suggested that an affordable supermarket and eateries should be included in a new development. • One respondent suggested that a new development on the Holloway Prison site should feature shops, restaurants and an Everyman cinema, referring to the Brunswick Centre near Russell Square. The respondent suggested that this would provide an alternative to Holloway Road's commercial amenities. The respondent also suggested that a farmer's market could be included within a new development to offer an alternative to supermarkets. • One respondent commented that the frontage of the site adjacent to the library could be suitable for the provision of a coffee shop. • One respondent specifically stated that the site should include a shopping centre in order to increase the range of retail provision in the local area without to need to travel further afield to Westfield or Wood Green. The respondent also suggested that the provision of a shopping centre would

		<p>increase employment opportunities for local people.</p> <ul style="list-style-type: none"> • Centre 404 requested that the new development include local shops, chemists and doctors for immediate use by the residents of the development. <p>However there were a number of comments that were not supportive of new retail/leisure on the site. A number of respondents stated that the provision of retail premises in a new development should be kept to a minimum. One respondent stated that the site should not include commercial provision; whilst a further respondent in particular commented that betting shops should not be included within a new development. Another felt that there may be a need for one small unit but multiple unwanted shops at ground floor should be avoided.</p> <p>One respondent stated that as a result of the site's proximity to Nags Head shopping area and Brecknock Road shops, extensive retail space would not be appropriate for the new development. A further respondent stated that they consider there to be an oversupply of retail provision in the area and therefore new provision of retail premises is not required.</p>
Education/training	Residents/individuals	<p>One respondent suggested that as a result of the history of the site and its former use as a prison, there should be a policy outlining a preference for the inclusion of social enterprises, and especially organisation/companies that employ ex-prisoners or support families affected by the criminal justice system. The respondent further commented that there should be spaces that allow for organisations and charities to especially focus on supporting both women and children.</p> <p>One respondent asked whether the site could feature amenities such as a hairdresser, exercise space, joiner/electrician and whether the provision of these amenities could be done in conjunction with local colleges in order for students to attain work experiences but also engage in social interaction with the residents. The respondent further enquired whether communal gardens, allotments or beehives could be included within a new development on the site, commenting that schemes in the Netherlands exist where students receive subsidised accommodation in return for undertaking community service.</p> <p>One respondent suggested that a new development could include workshops to be used by students, apprentices and small local business as well as gallery space, dance hall, flexible use rooms that can be hired at low rates by artists and community groups.</p>

Topic/section of document	Respondent	Summary of comments
Design/Quality	Resident/individual	References were made for the need for successful integration of a new development on the Holloway Prison site with the existing built environment, as well as the need to improve the quality of the section of Camden Road where future development is to be sited and also improve the environment of Parkhurst Road. One respondent stated that no integration into the street, low quality convenience stores and no greenery should be avoided. Two respondents suggested collaboration with 'Create Streets' to meet housing density requirements and ensure a high quality environment.
	Resident/individual	References were made to the need to ensure that the new development would feature attractive and appropriately designed housing, and that the height of the new development respected the existing built environment and conformed to policy requirements particularly in light of the site being located close to a Conservation Area. Reference was made for any new development on the Holloway Prison site to respect and have regard to the Hillmarton Conservation Area and the Tufnell Park Conservation Area in terms of design.
	Resident/individual	Reference was made to the idea that a new development on the Holloway Prison site featuring dense housing mix, business, education, retail and leisure facilities could form a new focal point for the Holloway Road/Tufnell Park area and allow for the new community to blend into the area. One respondent specifically stated that in their view, the site offered an opportunity for 'equitable placemaking' and the creation of an inclusive place and environment.
	Resident/individual	References to the architectural design of the new development on the Holloway Prison site were made by two respondents. One respondent stated that the architectural style of the new development should reflect the existing vernacular whilst also consisting of a mix of modern and traditional (pastiche) architectural styles to make an interesting scheme that also highlight the past use of the site as a prison. Another respondent stated that an architectural legacy which local people would be appreciate and feel included in should be realised.
Density	Ministry of Justice	<p>The Ministry of Justice (MoJ) stated that there are several development sites around the prison which are at various stages of progress that should be taken into account; further stating that whilst they agree that there is a mix of building heights, Bakers Field located to the north of the Holloway Prison site rises to 10 storeys at its highest point which provides a broader context of scale and should be reflected in any guidance regarding potential scale.</p> <p>MoJ stated they believe that there is potential to increase heights above 10 storeys and would welcome further discussions on this point. MoJ also stated that due to the proximity of the site to the Nags Head Town Centre, the site's PTAL, significant site frontage, size and scale potential of the site; they consider that there is a strong case to deliver very high density development on the site.</p> <p>MoJ further stated that they do not consider the surrounding conservation areas to represent a significant constraint and further stated that there are no heritage assets that would be adversely affected by the development. MoJ stated that the site offers an exciting new opportunity to create a new high quality landscape as part of a comprehensive redevelopment of the site. Whilst this could include retention of landscape features including trees, we believe that delivering a high quality comprehensive redevelopment of the site should be the primary objective.</p>
	GLA	<p>GLA officers noted that some of the former wardens flats buildings on the site are 10 storeys rather than the range of 3-8 storeys stated in paragraph 2.2 of the consultation paper and that parts of the site are likely to be suitable for taller building elements.</p> <p>Due to the site's good transport accessibility and location close to Nags Head Town Centre the housing density should be relatively high, accepting that there are other calls on land allocation for the site.</p>
	Residents/individuals Urbanis Ltd	<p>References were made for the need for the development not to be overly dense and sympathetic to the local area's townscape in terms of massing and materials. Further reference was made to avoiding high rise tower blocks and a desire for a low rise scheme. Two respondents specifically stated that the development should not feature buildings exceeding 8 storeys in height.</p> <p>One respondent stated that they believed that the number of high-rise properties built on the site of 8-storeys or higher should be restricted to a single building in order to prevent the loss of the areas special character created by the existing 4-storey Victorian properties.</p> <p>The respondent further stated that "developers will seek to add high-rises to maximise returns, but this must be resisted" and that 3-storey and 4-storey properties would be more appropriate for the area and lead to sense of community.</p> <p>One respondent stated that as the site is around 10 acres / 4 hectares large and any housing development should try to reach a density of 150 dwellings per</p>

		<p>hectare. This implies a maximum 600 dwelling can be built on this site.</p> <p>Urbanis Ltd stated that the site should deliver high density development.</p>
Amenity impacts	Resident/individual	<p>One respondent questioned if plans were available which detailed the proposed height of a future development and possible impact upon private/communal space on Dalmeny Avenue. In addition, three respondents stated they worried that high rise buildings would block sunlight and reduce their privacy if overlooked, thus negatively impacting upon their homes and use of communal gardens. One respondent also expressed concern that the new development should not be located in close proximity to existing residential premises to avoid noise from people moving into the new development. Respondents also raised concerns that the construction of the development may also lead to increased noise and traffic and asked for building works to be done in a safe and considerate fashion.</p>
Conservation	Residents/individuals	<p>Several respondents mentioned the need to take into account the heritage constraints surrounding the site, including:</p> <ul style="list-style-type: none"> • That planning provisions should be fully respected as they consider that the views of St Paul's have already been negatively impacted by the development of the Shard and it would be problematic for them to be further damaged. • That the view from Hillmarton Road that shows the hills behind (Waterlow Park etc) should be preserved. • That the site is in between the Hillmarton and Tufnell Park Conservation Areas and that design considerations must note that both should be respected, with appropriate design to fit in within this context.
	Historic England	<p>Generally support the intention to deliver a site which sets a benchmark for best practice for a high quality sustainable neighbourhood, and to produce clear guidance to guide delivery.</p> <p>Principle issues of interest include potential wider impacts in respect to the setting of heritage assets outside of the proposed site boundary which will be dependent on the scale and design across the site. The respondent stated that they would encourage the Council to consider opportunities to reflect local character and to enhance the significance and setting of heritage assets, and also stated that understanding how the built environment has developed and changed can highlight opportunities to reconnect and connect streets severed by large scale in-ward looking development.</p> <p>Historic England stated that whilst the prison site is of little architectural interest, it must be recognised as having cultural significance which the Council may wish to consider reflecting in any proposals for the site.</p>
Heritage legacy	Resident/individual	<p>References were made regarding the desire to ensure that the site's former use as a women's prison is recognised and a legacy maintained. References were made for the inclusion of memorials, statue, plaques and museum to highlight the site's history including the imprisonment of members of the suffragette movement at the prison.</p> <p>One respondent suggested that historical features of the prison should be preserved such as the gryphons and other historical artefacts.</p>

Topic/section of document	Respondent	Summary of comments
Sustainability Standards	Residents/individuals Islington Green Party	<p>Several general comments were made about the need for development on the site to meet the highest environmental standards, to try and showcase what is possible, including the highest possible environmentally friendly methods and materials.</p> <p>One comment was made about the need for convenient and accessible waste recycling.</p> <p>Islington Green Party emphasize the need for zero carbon and the highest possible environmentally-friendly construction and provide modern facilities for convenient and accessible waste recycling.</p>
Re-use of existing buildings and embodied carbon	Residents/individuals	<p>One respondent suggested an investigation into retaining and converting the existing structures should be carried out bearing in mind the overheating risks of new build developments as highlighted by the Zero Carbon Hub's report in 2016. The existing building's thermal mass, floor to ceiling heights and spatial proportions would not be possible to replicate with new construction. Including the assessment of overheating potential of the development is essential as is to apply whole life carbon calculations that include embodied carbon assessments as well as a full projection of life-cycle costs.</p> <p>Three responses suggested that the materials resulting from demolition are reused on the site, with concerns raised about the amount of waste that would otherwise be generated.</p>
Energy	Residents/individuals Islington Green Party	<p>6 comments were made about energy on the site, including:</p> <ul style="list-style-type: none"> • The use of green energy. • Having the highest energy efficiency standards • Having off-grid energy production. • Preferably achieving Passivhaus standards which requires almost no heating. • Generating renewable energy like solar panels, ground source heating, and generating heating from waste. • Having low energy housing for low income families is essential, constructed by direct labour with part of the scheme providing training for local youth in collaboration with colleges. <p>Islington Green Party suggested the SPD should require energy efficiency to exceed Building Regulations requirements and minimise the need for non-renewable energy for space heating and hot-water, designed to avoid overheating during summer months without reliance on energy intensive cooling systems, taking account of projections for our changing climate.</p>
Construction	Residents/individuals	<p>A couple of respondents made comments about construction, including:</p> <ul style="list-style-type: none"> • That air and noise pollution during the demolition, remediation and construction phases be carefully controlled/kept to zero • On-site working hours carefully considered/ strictly maintained as Monday to Friday 9-5. • That the use of Camden Road during the construction of the development must be managed • Thorough testing of the ground for pollutants should be undertaken prior to development to avoid the risk of airborne pollutants being spread. • Question about impacts of construction and future safety/security measures would have on the local community. <p>The Islington Green Party stated that the SPD should require the use of low-impact materials, especially reused and recycled materials, to minimise the lifecycle embodied greenhouse gases, energy, water and other resources used in the construction of buildings and over the lifecycle of the materials.</p>
Sustainable drainage/water	GLA	The respondent stated the recognition of the need for sustainable drainage is welcomed in line with London Plan policy 5.13. Even though the site itself is at low risk of surface water flooding, drainage from this site is likely to exacerbate flood risk in other parts of the borough. Furthermore, given that there may well be an increase in foul water discharges, removing surface water flows from the combined sewer network will counterbalance any such increases.
	Residents/individuals	A couple of questions were raised about what the effects of the development will have on the local water table and surface runoff.

	Islington Green Party	Islington Green Party stated that the SPD should require: Water sensitive design, with a per person consumption target of 100 litres per person per day, the use of rainwater and grey water recycling where appropriate. As a minimum, developments must achieve a neutral impact on surface water runoff, or where conditions don't allow this discharge from the site must be limited, to reduce flooding. Drainage design must take account of climate change, for example in preparing for a 1 in 100 year storm event. Care must be given to ensure that plants such as trees are given adequately sized pits to increase their resilience to climate change.
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Topic/section of document	Respondent(s)	Summary of comments
Connectivity/access	Residents/individuals Greater London Authority (GLA) and Transport for London (TfL).	<p>References regarding the desire for permeability and connectivity of the site for both pedestrians and cyclists were expressed by respondents. Two respondents commented that connectivity across the east, west, north and south of the site was needed.</p> <p>One respondent specifically commented that the right of way to the Bakersfield estate should be maintained. A further respondent specifically commented that access to both Crayford Road and Trecastle Way is vital and queried whether Bakersfield could cease to be gated and isolated. New links between Carleton Road and Parkhurst Road were also advocated by a respondent.</p> <p>One respondent commented that they consider there to be a danger that the site could be disconnected from the rest of the area if there is only one entrance from the Camden Road side. The respondent suggested that as a result there should be entrances for cars and pedestrians on more than one side of the site, and also the ability for local residents to walk through the site in order for the development to become part of the neighbourhood and not a disconnected enclave. The respondent further enquired whether Bakersfield could become an entrance into the site and whether there is a possibility for connections into the site from Penderyn Way/ Trecastle Way, and Dalmeny Avenue.</p> <p>Several respondents commented on access from Camden Road, that it needs to be carefully managed with pavement access maintained.</p> <p>One respondent suggested that there needs to be a return to two way traffic for Parkhurst and Camden Roads, it was suggested two way traffic will encourage integration into the local fabric not only of this site but generally for the triangle at present segregated opposite between the two one-way roads</p> <p>The GLA/TfL made a number of points with regard to connectivity and access:</p> <ul style="list-style-type: none"> • Welcome the ambition to improve the connectivity to the local area including local Underground and Overground stations and crossing points over main roads. • The SPD should be clear that the improvement and integration of cycle and walking routes are a key requirement of future development. • The SPD should make clear that improving permeability through the site from Camden Road to Carleton road and potentially from Dalmeny Avenue to Parkhurst Road/Crayford Road is an important aim of the redevelopment. • Any new access on the adjacent Camden road, which forms part of the Transport for London Road Network (TLRN) would require both consultation and agreement with TfL.
Cycling	Islington Green Party Residents/individuals	<p>Islington Green Party stated that the development should be supportive of both walking and cycling, and meet the cycle parking requirements set out by the Council in Appendix 6 of the Development Management Policies, suggesting at least 1 cycle parking space per bedroom and with such parking provision to be convenient, accessible and secure.</p> <p>Another respondent stated that better cycling provision should be built into the plans - covered cycle spaces for every flat and safe cycling tracks around the development.</p> <p>One respondent questioned if development would be in conformity with London Plan policy 6.9 and minimum cycle parking standards. Questioned whether the London Cycle Design Standards 2014 and CLOCS (Construction Logistics and Community Safety) would be made a requirement for planning applications. It would be welcome if Islington adopted CLOCS working practice across all major developments.</p> <p>Comments were also made about creating cycling/walking routes through the site.</p>
Public transport	Residents/individuals	<p>A number of comments were made about public transport provision:</p> <ul style="list-style-type: none"> • Several people suggested that the bus stops on Camden Road should be preserved for public access. • Several comments were also made about the potential impact on the public transport in the area. It was stated that nearby tubes (Holloway and

		<p>Caledonian) are already at capacity, especially at rush hour and that buses on Camden Road are full in the morning.</p> <p>Within this context the additional burdens that new development would have on public transport infrastructure was as a concern with provision to mitigate this and increase capacity emphasised.</p>
Parking	<p>Residents/individuals</p> <p>Islington Green Party</p>	<p>A number of respondents raised the issue of parking, questioning if new parking will be available and measures to mitigate impacts on existing residents with the point made that some roads cannot accommodate any more cars and the difficulties of parking currently, including on Arsenal match days.</p> <p>The need to take into account adequate parking of residents was mentioned, with several respondents including the Islington Green Party highlighting support for car free development. One respondent questioned if the car free policy means existing car parking spaces can be kept and if it includes underground garages.</p> <p>Another respondent stated that the site has good public transport provision, with Holloway and Camden Roads not needing any further traffic. Concerns were also raised about car traffic increasing on Carleton Road to access the area from Trecastle Way/ Crayford Road and the negative impact this would have on Tufnell Park Conservation area.</p> <p>Linked to parking, one respondent states that electric charging points would be good.</p> <p>Finally, concerns were raised by one respondent about the impact of building traffic during construction.</p>

Topic/section of document	Respondent	Summary of comments
Public land giving back to the local community	Residents/individuals	Several points were made about the fact that as the land is public land, it should be used to benefit the local community, meet local needs and give something back. One respondent raised concerns about the loss of control over the future use of the land once it is sold private developer.
Consultation	IHOOPS (Islington Hands Off Our Public Services) Islington Green Party Individuals/residents	<p>IHOOPS suggested there should be a more detailed consultation process involving discussions with local and Islington-wide organisations and individuals, with local people kept informed of developments, including government actions and developers intentions.</p> <p>One respondent suggested that there should be regular open meetings between the parties involved in the development, including local residents, organisations and businesses should be undertaken and an agreed system of mediation/complaint/troubleshooting should be implemented.</p> <p>Two respondents concluded that the following stakeholder groups should be consulted: Local residents of St George's Ward, Holloway Ward, Women's Resource Centre, Women who were incarcerated in Holloway Prison, Organisation's supporting people in prison including Women In Prison, Prison Reform Trust, Clinks and its many voluntary organisations working with offenders and families, Bridge Secondary School, Bridge Primary School, Other local schools including Tufnell Park Primary and Hungerford Primary, Centre 404, Lough Road Centre for Disabled Children, Create Streets, The Garden Classroom, Islington Ecology Centre, The Garden Classroom, St Mungo's Broadway and 2 Hilldrop Road Care Home.</p> <p>Another respondent stated that they hope it will be shown how the comments from the numerous submission calling for a lasting and meaningful legacy will be taken into account.</p> <p>One respondent felt that the council should have a more detailed consultation process than this, involving discussions with local and Islington-wide organisations and individuals and that the council should keep local people well informed of developments at the site, including Government actions and the intentions of developers.</p> <p>Islington Green Party hopes that the SPD that will follow this consultation addresses in the first place the concerns and desires as voiced by the respondents to this consultation. Hope that the SPD will contain an overview of the submissions to this consultation that were received. The principal planning considerations should be the needs of the local community as expressed by the local community.</p>
New community	Individuals/residents	<p>Several comments were made about the building of community on the site, including that it would be wonderful to create a new community which connects people (e.g. young and old) and the need to make sure that the development serves to build a diverse and sustainable community in this large and historically important site. Another comment highlighted that the site is a an opportunity to put realm community back in the city.</p> <p>One respondent stated the importance of making the site somewhere people desire to live, not just exist.</p> <p>Another respondent highlighted that future development needs to be adaptable to meet changing social needs over time.</p> <p>Another respondent stated their concern about the redevelopment of the site and what this will mean for the community. This is an opportunity to either create positive change or continue the relentless process of driving out working class families and young people further and further out of the city. Believe that the council will make a right choice and enrich the lives of the neighbourhood.</p> <p>One respondent questioned if the Bakersdiel estate (former prison officers accommodation) is included in the development proposal?</p>

Closure of the prison	Individual/resident	One respondent questioned the need to demolish the prison stating that men's prisons are overcrowded and prisons should be located in towns in order for friends and relatives to visit.
Sale of the site	Individual/resident	A respondent stated that the Ministry of Justice should be selling the old Holloway Prison for the maximum price they can achieve on the open market. Tax payers ultimately fund the Ministry of Justice expect any sale of their assets to be at the best possible price.
No comment	LEAP (London Economic Action Partnership) Natural England Environment Agency Highways England Health and Safety Executive	No comments.
General	Islington green party	In respect to this Islington Green Party would like to highlight the general comments made by various members of the public, mostly local residents, who call for a mixed development of not only housing, but also one that offers permanent employment opportunities and green open space. Islington is a stressed borough; this development should be the realization of a once in a lifetime opportunity to lead by example in delivering in an environmentally friendly way much needed high quality social housing, women's services, green open space and the permanent employment opportunities that Islington needs.
Delivery	GLA/TfL	Strongly support the aspirations set out in paragraph 5.1 that this sets a benchmark for disposal of public land in London
	Women in Prison	We agree that this site represents an opportunity to demonstrate best practice and set a benchmark and appreciate the commitment to work together with stakeholders. We strongly support the future involvement of the local community in the development of site specific proposals as well as those connected to the prison in other ways such as through delivering services and formerly in prison.
	Ministry of Justice	The MOJ welcome further engagement with LBI and the GLA and in particular, acknowledgement that it will need to meet its aspirations for the disposal of the site to meet the objectives of the Prison Estate Transformation Programme. The MOJ welcomes appropriate levels of guidance that will encourage, not restrict, the best possible redevelopment 'outcome and financial return'. With this in mind, the MOJ would encourage the Council to positively promote residential led development that gives the MOJ the ability to maximise the receipt and ensure best value for the tax payer.
	EFA	Support the Council's collaborative approach to delivery, referenced at section 5.1 of the discussion paper and request that in-line with Duty to Cooperate, the EFA be included on the Council's list of relevant organisations to consult during the formulation of the Local Plan and SPD. In regards to Developer contributions, the respondent stated that they would be interested in responding to any update regarding the Infrastructure Delivery Plan or review of infrastructure requirements which will inform any CIL review and/or amendments to the Regulation 123 list and would therefore wish that the EFA is included on the database for future CIL consultations.



Report of the Executive Member for Children, Young People and Families

Meeting: Executive	Date: 13 July 2017	Ward(s): All
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Delete as appropriate	Exempt	Non-exempt
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SUBJECT: Procurement Strategy for early education and childcare provision in childrens centres.

1. Synopsis

- 1.1 This report seeks pre-tender approval for the procurement strategy in respect of the provision of early education and childcare provision in four childrens centres in accordance with Rule 2.5 of the Council's Procurement Rules.
- 1.2 This report sets out the procurement strategy to procure up to four providers to deliver and manage the early education and childcare provision from the following children's centres:
 - Conewood Children's Centre: 14 Conewood St, London N5 1DJ
 - Hornsey Road Children's Centre: 8 Tiltman Pl, Hornsey Rd, London N7 7EN
 - Paradise Park Children's Centre: 164 MacKenzie Rd, London N7 8SE
 - The Factory Children's Centre: Mayville Estate, London N16 8NP

The successful provider(s) will manage the early education and childcare provision and will be responsible for the management of the building to allow for a range of early childhood services (Bright Start Islington) to be delivered on site.

2. Recommendations

- 2.1 To approve the procurement strategy for the delivery of early education and childcare provision in the Hornsey Road, Conewood, Paradise Park and The Factory Children's Centres as outlined in this report.
- 2.2 To delegate authority to award the contracts for the delivery of early education and childcare provision in the Hornsey Road, Conewood, Paradise Park and The Factory Children's Centres to the Corporate Director of Children's Services in consultation with the Executive Member for Children Young People and Families.

3. Background

- 3.1 In Islington, we believe that all children should begin their school lives in good health, so they are able to do well at school. For this to happen, all families including pregnant mothers and those with children aged under-five need access to services that work effectively together to provide the right help, at the right time and in the right places.

Islington is proud to be an 'early intervention' borough and we have seen significant improvements in child and family outcomes in the early years, however with 34% of children currently not achieving the 'good level of development' at the end of reception, we know that we have more to do.

To build on the excellent children's centre model already within Islington, the implementation of Bright Start Islington's transformation model will enable the service to be sustained and delivered on reduced investment. A reduced investment will be achieved through reduction of duplication and consolidation of management of children's centres family work, introduction of productive and efficient ways of working and maximising available resources. Full implementation of Bright Start Islington will begin in September 2017.

There are 16 children centres in Islington, of which: five are managed by Islington, seven are managed by a school governing body and four are managed by voluntary sector providers. The new model will separate leadership of the children's centre early childhood services (this will be managed by Islington in locality areas) and the early education and childcare element of Islington's children's centres (this will be managed by the centre directly). This separation of the ways that services are managed will allow for a saving in leadership and management costs for early education and childcare services.

The process of the Bright Start Islington model has been an iterative process which draws on the views, needs and experiences of families, front-line practitioners and managers at all levels and across all sectors of the early childhood workforce. The model has been developed through a consultative and engagement approach, harnessing sector best practice and incorporating evidence based practice; engaging a wide range of key stakeholders in all stages of the project plan and all work activity areas. Task and finish groups and the transformation board have wide representation from providers, professionals, partner organisations, internal officers, schools and council support service areas.

3.2 Estimated Value

The maximum value of the four contracts will be £4,155,545 over a five year period. The Initial contract duration will be for three years from January 2018.

There will be an option to extend for a further two years on two separate occasions of a year. The option of extensions will be subject to availability of funding. The total maximum annual value for all four contracts is £831,109. The value for each contract is set out below:

Name	Childcare subsidy (Maximum)	Management of building (Maximum)	Total per annum
Conewood CC	£174,833	£22,500	£197,333
Hornsey Road CC	£168,739	£22,500	£191,239
Paradise Park CC	£192,440	£22,500	£214,940
The Factory Road CC	£217,097	£10,500	£227,597
TOTAL	£753, 109	£78,000	£831,109

All early education and childcare provisions within children centre buildings receive childcare subsidy funding, this is based on the number of children each centre can occupy. Childcare subsidy will be participation based and will be used in accordance with LBI's Early Years Admissions and Charging Policies.

As part of the wider transformation programme, all aspects of Early Years funding are currently under review. The level of childcare subsidy funding and the income bands (parental fees) associated to this is part of this review. If childcare subsidy is reduced, income generation will still be achieved via higher parental fees.

The contracts are funded through general fund allocation. In addition to the contract value, additional funding passported from the government for the provision of free early years entitlement will be provided to the centre. This is not included as part of the total contract value as this funding is outside the scope of this procurement and prescribed by national government.

The funding provided for the management of the children's centre buildings to host Bright Start services will be proportionate to what is hosted in each building. The £22,500 is therefore a maximum value.

Benchmarking exercises have taken place to ensure that contract values are based on comparable building management costs and childcare subsidy schemes across maintained childrens centres and those managed through schools.

The current childrens centre contracts are funded on a very different basis to the contracts that will be awarded as part of this procurement strategy. The Bright Start Islington model achieves £600,000 savings across all 16 childrens centres. This was achieved through the disaggregation of the management of children's centre services from the management of early education and childcare provision in addition to a reduction in a number of operational and management posts.

The key cost drivers for the early childhood transformation aligns efficiency, savings, reduction of duplication and leaner operating models whilst ensuring services remain high quality and meet the needs of Islington families to ensure significant improvements in child and family outcomes.

3.3 Timetable

The following key dates must be reached:

- Advert in OJEU and tender documents published – anticipated end June 2017
- Evaluation completed – anticipated beginning September 2017
- Contract award – anticipated mid October 2017
- Contract start date January 2018

There is provision to extend the current children centre contracts until 31 December 2017. All current providers have been informed that their contracts will vary from the period of September to December 2017 when Bright Start Islington is fully implemented.

3.4 Options appraisal

The transformation board looked at the following options;

1. Providing the service in-house
2. Offering one contract to all four centres
3. Offering up to four separate contracts (one contract per centre)

Under the Bright Start Islington model, all early childhood services (outreach and family support) that will be delivered across a range of children's centres and community venues will be operated and managed in house. Providing the early education and childcare places in-house was discussed as an option as part of this model. This option was rejected on the basis that the voluntary sector provides a great wealth of knowledge and expertise in delivering early years and childcare provision as well as being part of a good mixed offer in the borough. The voluntary sector is a key partner in Bright Start, they have routes embedded in the local community that greatly support and enhance this offer. In addition to this, there would be very limited capacity to manage these services in-house.

Due to the wealth of skills and knowledge that can be gained from the voluntary sector as well as the

wider community involvement that this sector offers, it was agreed that this expertise may be lost if we were to award only one contract for all four children's centres. In addition there are many successful and highly experienced small sector providers that would be unable to bid for such a large contract.

The preferred procurement route is to use a two-stage restricted procedure and advertise the opportunity as four separate lots. Organisations can apply for any lot, and contracts will be awarded up to four of the highest scoring organisations for each lot based on the Most Economically Advantageous Tender (MEAT) for that lot. The restricted procedure will allow for an opportunity to test the market as it is unclear as to what the market interest will be for the contracts. The drawback is the time taken to undertake a restricted process. Up to four separate contracts will be awarded with a maximum of two contracts per organisation.

3.5 Key Considerations – References to social value and impact on staff

Children's Centres are placed in areas of most need. The provision of early years and childcare on these sites are instrumental in meeting a range of outcomes for children and families. This includes meeting the early years outcomes duty so that children begin their school lives in good health and are able to do well at school and to reduce the inequalities gap between those children who do least well in their Early Years Foundation Stage Profile score in relation to the general population of children living in Islington.

Islington council believes every child should have an equal chance to fulfil their potential and remains committed to ensure that childcare is affordable and that children can receive high quality and support, whatever the family circumstances. We do this by contributing to the cost of childcare for low to middle income families by subsidising places. Good quality childcare is very important to children's development. It also means that parents are able to take up training or go to work. This helps the whole family to be independent and have a better standard of living. In addition to this, 30% of all early education and childcare places are made available to those children who are assessed as being 'in need' according to Islington's child in need priority statement.

London Living Wage (LLW) has been considered and successful bidders will be contractually obliged to pay LLW as a minimum where there is no cross border interest.

Robust monitoring arrangements will be in place. The contract and service specification will be monitored against key performance indicators and outcome measures. A range of monitoring visits and meetings will take place across an annual cycle from a range of officers within Islington. Providers will be expected to conduct self evaluation and develop clear action plans to ensure continuous improvement and service development.

In addition to this monitoring, robust financial probity and monitoring will be embedded throughout the year. This includes:

- Review of submitted Quarterly statement of income and expenditures relevant to the service providers operations, with full financial year (April to March) projections. This should be supported by detail of staffing arrangements (post titles, grades, and contract hours per week).
- Annual statement of income and expenditure relevant to the centre's operations.
- Monthly summary of receipts and banking, including standing order payments, which is used as the basis for monitoring income collection and implementation of the income equalisation scheme.
- A full set of audited accounts that must clearly show income received from council sources and other funding stream sources and expenditure on children's centre activity.

An environmental impact assessment has been carried out which found no negative impact.

As this is an existing service TUPE may apply to this contract.

3.6 Evaluation

This tender will be conducted in two stages, known as the Restricted Procedure as the tender is

'restricted' to a limited number of organisations. The first stage is Selection Criteria through a Selection Questionnaire (SQ) which establishes whether an organisation meets the is competent and capable and has the necessary resources to carry out the contract. The SQ is backwards looking and explores how the organisation has performed to date, its financial standing, history and experience.

A limited or 'restricted' number of these organisations meeting the SQ requirements as specified in the advertisement are then invited to tender (ITT). The second stage is the ITT and is forward looking using the advertised Award Criteria as a basis of award. Tenders are evaluated on the basis of the tenderers' price and quality scores as set out in the evaluation criteria in order to determine the most economically advantageous offer.

Bids will be awarded on a basis of 80% quality and 20% cost

Award criteria	
Cost – made up of	20%
Unit costs	10%
Allocation of costs (direct costs and overheads) including the management of the building	10%
Quality – made up of	80%
Proposed approach to contract implementation, transition and mobilisation	10%
Proposed approach to achieving positive outcomes for children and families	15%
Proposed approach to service outputs as stated in service specification	10%
Proposed approach to safeguarding and early help as stated in service specification	10%
Proposed approach to ensuring continuous improvement and the methods used for this including self evaluation and quality assurance	10%
Partnership working and approach to multi agency working within the scope of Bright Start Islington	15%
Proposed approach to sustainability within the context of Islington's Early Years admissions and charging policies	10%
Total	100%

The successful provider will be expected to deliver:

- a) Early years education and childcare provision;
- b) Manage the children centre building;
- c) Contribute to the Bright Start Islington model through partnership working within the locality.

The intention will be to continue to have a rich mixed economy to offer across the children's centres. In addition, contracts will be awarded for the management of a maximum of two centres per organisation. This is to ensure that we have a broad offer of voluntary sector providers in the borough.

The successful providers will have to demonstrate a strong track record and extensive experience of providing early education and childcare provision including early identification of, and provision for, children with special educational needs and disabilities. They will be expected to demonstrate how they can improve outcomes for children and ensure they can meet the early years outcomes duty.

In addition, the successful provider will manage the children's centre building and be an active partner in the network of early childhood services organised through the Bright Start areas. They will secure arrangements for collaborative working, contributing expertise and ensuring parents using the childcare provision can access the full range of health and family support services and training and employment opportunities and other early childhood services organised through Bright Start Islington.

There will be an additional stipulation for the Conewood Children’s Centre contract to contribute to capital works to enable more childcare places to be provided to meet demand .

3.7 Business Risks

There are four main risks to the procurement for the delivery of early education and childcare services in children centre buildings. These are;

1. Bright Start Islington is still to be implemented in September – if there is slippage on this model, this could impact upon the timeline for this procurement.
2. The procurement process may mean that current, very successful contract suppliers are not shortlisted meaning a disruption to service, particularly if key staff choose not to TUPE across to a new provider.
3. A high risk, low probability impact would be if no provider bid for the service.
4. Potential gaps in service delivery – would result in a high impact to children and families. It is essential that timescales are met to ensure there is no slippage.

3.8 The Employment Relations Act 1999 (Blacklist) Regulations 2010 explicitly prohibit the compilation, use, sale or supply of blacklists containing details of trade union members and their activities. Following a motion to full Council on 26 March 2013, all tenderers will be required to sign the Council’s anti-blacklisting declaration. Where an organisation is unable to declare that they have never blacklisted, they will be required to evidence that they have 'self-cleansed'. The Council will not award a contract to organisations found guilty of blacklisting unless they have demonstrated 'self-cleansing' and taken adequate measures to remedy past actions and prevent re-occurrences. The adequacy of these measures will initially be assessed by officers and the outcome of that assessment will be reviewed by the Council’s Procurement Board

3.9 The following relevant information is required to be specifically approved by the Executive in accordance with rule 2.6 of the Procurement Rules:

Relevant information	Information/section in report
1 Nature of the service	The delivery and management of the early education and childcare provision for four children’s centres and be responsible for the management of the children centre building to allow for a range of early childhood services (Bright Start Islington) to be delivered on site. See paragraph 3.1
2 Estimated value	The estimated maximum value for the four childrens centres per year is £831,109. The agreement is proposed to run for a period of 3 years, with an optional extension of 1 plus 1 year. See paragraph 3.2
3 Timetable	See paragraph 3.3
4 Options appraisal for tender procedure including consideration of collaboration opportunities	Restricted procedure See paragraph 3.4

5 Consideration of: Social benefit clauses; London Living Wage; Best value; TUPE, pensions and other staffing implications	Considerations factored into evaluation criteria and contractual arrangements. Tupe is likely to apply and measures in place to support this transition. See paragraph 3.5
6 Evaluation criteria	Cost 20% - Quality 80%. The award criteria price/quality breakdown is more particularly described within the report. See paragraph 3.6
7 Any business risks associated with entering the contract	All business risks will be managed through strong, open communication, working to timescales and engagement with providers. See paragraph 3.7
8 Any other relevant financial, legal or other considerations.	See paragraph 3.8

4. Implications

4.1 Financial implications:

Funding proposals are within the current revenue budget allocation for Bright Start Islington. Contract extensions of one plus one year are subject to reviewing the financial position at that time.

4.2 Legal Implications:

The Council has duties under sections 6, 7, 7A, 9A, 12 and 13 of the Childcare Act 2006 to provide early education and childcare. The council may enter into contracts for such services under section 1 of the Local Government (Contracts) Act 1997. The Executive may provide Corporate Directors with responsibility to award contracts with a value over £2 million using revenue money and over £5 million using capital money (council's Procurement Rule 16.2).

The services being procured are subject to the light touch regime set out in Regulations 74 to 77 of the Public Contracts Regulations 2015 (the Regulations). The threshold for application of this light touch regime is currently £589,148.00. The value of the proposed contracts is above this threshold. It will therefore need to be advertised in the Official Journal of the European Union (OJEU). There are no prescribed procurement processes under the light touch regime. Therefore the council may use its discretion as to how it conducts the procurement process provided that it: discharges its duty to comply with the Treaty principles of equal treatment, non-discrimination and fair competition; conducts the procurement in conformance with the information that it provides in the OJEU advert; and ensures that the time limits that it imposes on suppliers, such as for responding to adverts is reasonable and proportionate. Following the procurement a contract award notice is required to be published in OJEU. The council's Procurement Rules require light touch contracts over the value of £500,000.00 to be subject to competitive tender.

In compliance with the requirements of the light touch regime in the Regulations and the council's Procurement Rules the proposal outlined in the report is to advertise a call for competition in OJEU and procure the service using a competitive tender process.

4.3 Environmental Implications

An environmental Impact Assessment (EIA) was carried out and is available on request. There were no implications identified.

4.4 Resident Impact Assessment:

The council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The council must have due regard to the need to tackle prejudice and promote understanding.

A Resident Impact Assessment (RIA) was completed in December 2016. It identified that these services will remain to have a very positive impact on the lives of children and families in Islington.

5 Reasons for the decision:

- 5.1 The implementation of Bright Start Islington's transformation model will enable the service to be sustained and delivered on reduced investment. Islington is proud to be an 'early intervention' borough and we have seen significant improvements in child and family outcomes in the early years.

Children's Centres are placed in areas of most need. The provision of early years and childcare on these sites are instrumental in meeting a range of outcomes for children and families. This includes meeting the early years outcomes duty so that children begin their school lives in good health and are able to do well at school and to reduce the inequalities gap between those children who do least well in their Early Years Foundation Stage Profile score in relation to the general population of children living in Islington.

Islington council believes every child should have an equal chance to fulfil their potential and remains committed to ensure that childcare is affordable and that children can receive high quality childcare and support, whatever the family circumstances. We do this by contributing to the cost of childcare for low to middle income families by subsidising places. Good quality childcare is very important to children's development. It also means that parents are able to take up training or go to work. This helps the whole family to be independent and have a better standard of living. In addition to this, 30% of all early education and childcare places are made available to those children who are assessed as being 'in need' according to Islington's child in need priority statement.

Signed by:



7 June 2017

Executive Member for Children, Young People
and Families

Date

Appendices - None

Background papers - None

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Report of: **Executive Member for Finance, Performance and Community Safety**

Meeting of:	Date	Ward(s)
Executive	13 th July 2017	All

Delete as appropriate	Exempt	Non-exempt
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SUBJECT: Procurement Strategy – Apprenticeship Training Provision

1. Synopsis

- 1.1 This report seeks pre-tender approval for the procurement strategy in respect of Apprenticeship Training Provision in accordance with Rule 2.5 of the Council's Procurement Rules.
- 1.2 The contract is for delivery of government approved apprenticeship training for Islington Council employees by Education and Skills Funding Agency (ESFA) approved training providers. Training providers awarded the contract will form a framework of providers to deliver approved apprenticeship training from September 2017. However this contract does not guarantee use of service.

2. Recommendations

- 2.1 To approve the strategy for the procurement of Apprenticeship Training Provision as outlined in this report.
- 2.2 To delegate authority to award the contracts to the Corporate Director of Resources, in consultation with the Executive Member for Finance, Performance & Community Safety.

3. Background

3.1 Nature of the service

- 3.1.1 In June 2015, the Government announced that it would create 3 million additional apprenticeships by 2020 with the aim of boosting the capability of the workforce, raising the nation's productivity and supporting economic development.
- 3.1.2 The apprenticeship levy requires organisations with an annual paybill over £3 million to pay 0.5% of the paybill as an apprenticeship tax. For local authority maintained schools, the local authority is

considered the employer and therefore those schools' paybill will be included in Islington Council levy calculations and subsequent payments. The total levy for the council and schools in scope for 2017-2018 is £1.1 million. The levy paid; alongside a government top-up of 10% of this sum is given back to an organisation in a digital apprenticeship account that will accumulate throughout the year. The money in this account can only be used to pay for government approved apprenticeship training for new and existing employees. Any amount not used after 24 months will be recouped by the government and distributed to other organisations. Previously, training providers drew funding from the ESFA to pay for the apprenticeship training they delivered. Due to this system, Islington Council did not have a formal contract or service level agreement with any of the training providers used. Through the introduction of the apprenticeship levy, the employer will now directly pay training providers for their services. The nature of the payment and value of the training to be delivered requires a formal contract to be put in place.

- 3.1.3 Another key reform has been the Enterprise Act, introducing a statutory target for public sector organisations with 250 or more employees. Such organisations should have the numerical equivalent of 2.3% of their workforce starting an apprenticeship annually. This provides a target of 161 apprenticeships to be started across Islington Council and the relevant schools in scope in 2017/18. This target requires Islington Council to have further consideration of the levy and make every effort to use the funding, compared to private sector organisations that have the option of taking a 'use it or lose it' approach.
- 3.1.4 A further reform has been significant investment in the quality and scope of apprenticeship training through the introduction of apprenticeship standards. Previous apprenticeship frameworks are being replaced by apprenticeship standards, which will be used solely by 2020. The new apprenticeship standards have been developed by employers and are more closely linked to industry skills and needs, with training now ranging from GCSE to Masters level. New apprenticeship standards are being developed each year, and this paper recommends that this contract is awarded on a 1 +1 +1 basis to allow for opportunities to add new lots and new training providers and to be responsive to the developing apprenticeship training landscape.
- 3.1.5 In response to the apprenticeship reforms, Islington Council will be expanding its apprenticeship scheme and will be sourcing a higher volume of apprenticeship training, covering both apprenticeship standards and apprenticeship frameworks. It is intended that the Apprenticeship Training Provision Contract will be awarded to government approved training providers which meet a detailed delivery specification set by the council. Approved training providers may be called upon to deliver training for apprentices employed by Islington Council. To be eligible to deliver apprenticeship training, providers must first be listed on the register of apprenticeship training providers (RoATP). This will be a prerequisite to tender. The framework will ask training providers to select the lots for which they wish to deliver training. Five training providers per lot will be awarded. The 23 lots are as follows:
1. Social Care
 2. Business Administration
 3. Chartered Surveying
 4. Communications
 5. Commercial and Procurement
 6. Customer Service and Operations
 7. Digital, Technology and Data
 8. Early Years Education and Child Care
 9. Environment and Horticulture
 10. Events Management
 11. Facilities Management
 12. Finance and Accounting
 13. Human Resources
 14. Leadership and Management
 15. Law and Legal Services
 16. Project Management
 17. Highways and Electrical and Energy Management
 18. Cleaning and Environmental Support Services
 19. Direct Learning Support Schools

- 20. Housing
- 21. Libraries
- 22. Building, Planning and Construction
- 23. Vehicles Maintenance and Transport

3.1.6 The council must comply with the Public Contracts Regulation 2015 when selecting a training provider and an assessment organisation from the approved government registers. The training must be commissioned to ensure the council provides high quality training, training related support and pastoral care for its apprentices to ensure their success. This contract will set out a quality standard that will be expected from training providers and remedial actions should these not be met.

3.2 **Estimated Value**

3.2.1 Training procured through the Apprenticeship Training Provision contract will be funded by the apprenticeship levy and training providers will be paid directly from the council and schools digital apprenticeship account. The levy paid by the council will come from the council's central budget; the levy paid by schools will come from their individual budgets. It is estimated that the apprenticeship reform will result in levy funding for training of £1.1m per annum for the council as a whole. The £1.1m is made up of £0.8m for the council and £0.3m related to schools. The levy is based on the paybill, which is affected by headcount and salary levels, so the levy amount will fluctuate. The contract will not guarantee a proportion of levy funding or a number of apprenticeships to be delivered by a training provider.

3.2.2 The contract period will be one year, with the opportunity to extend on an annual basis for a maximum period of four years.

3.2.3 Islington Council has used approximately ten different training providers to cover the range of apprenticeship training provided over the past 7 years. Previously training providers drew down funding for apprenticeship training directly from the government and so Islington Council has not directly paid for apprenticeship training before, which means that a record of previous spend has not been maintained.

3.3 **Timetable**

3.3.1 There is no current contract for apprenticeship training. Tendering should begin as soon as possible in order to work towards the government's apprenticeship reforms and spend the levy using high quality training providers. Islington Council will submit a report each September, starting in September 2018, to the Secretary of State stating progress towards the public sector target. Internal reports will also be submitted to CMB covering spend against total levy and progress towards the public sector target.

3.4 **Options appraisal**

3.4.1 Islington Council is interested in working with neighbouring boroughs or being involved in pan London procurement for apprenticeship training provision. Regional discussions have begun with Haringey Council, proposing to set up and manage a dynamic purchasing system (DPS) for all interested parties and it is estimated that this system will be operating in 1 year. When this option becomes available, consideration will be given to adopting it for procuring new contracts. The recommended procurement strategy is to procure a framework (consisting of 23 lots with 5 providers appointed to each lot) advertising in OJEU as required by the Public Contracts Regulations.

3.5 **Key Considerations**

3.5.1 This contract is part of the council's work to support Islington residents to move into employment. Through the national apprenticeship reform, the council will be working towards providing more apprenticeships in the borough. Apprenticeships have the social benefit of providing progression opportunities to those who need them to support economic growth, and are a highly effective way for businesses to build a pipeline of skilled employees, address skills shortages and turnover, increase motivation and continuously develop their employees.

3.5.2 The London Living Wage will apply to all apprenticeship opportunities in the council and the relevant schools in scope. There are a limited number of training providers available on the Register of Approved Apprenticeship Providers. In many cases there is only 1 training provider that can deliver particular training. Requiring all training providers to be London Living Wage employers will potentially

have an impact on the apprenticeships that the council is able to offer. However, where there are no training providers paying the LLW it will be a requirement of the contract that any employees of that provider who work on the training provision for Islington Council apprenticeships will be paid the LLW.

3.5.3 Contracts will be continually monitored by the Apprenticeship Project and Programmes Manager. This is to ensure that the contract is working effectively and adheres to the quality standards set out in the specification. The focus of the service will be quality of training and training-related support. Remedial actions will be built into the contract, setting out steps that will be followed should service provision fall below the agreed standard.

3.6 Evaluation

3.6.1 The tender will be conducted in one stage, known as the Open Procedure as the tender is ‘open’ to all organisations that express their interest in the tender. The Open Procedure includes minimum requirements which the organisation must achieve before their response to the evaluation award criteria is considered.

3.6.2 The Education and Skills Funding Agency (ESFA) requires apprenticeship training paid for from the apprenticeship levy to be paid via the Digital Apprenticeship Account, therefore providers will be required to be registered on the RoATP as one of the minimum requirements before the tender is considered. This is a condition of any contract awarded.

Minimum requirements include:

- A UK Provider Reference Number. This will be used to verify the company is listed on the ESFA register (RoATP). Bidders who are not currently listed on the SFA register are not eligible to bid and the remainder of the bid will not be scored.
- Evidence that the company has achieved an Ofsted rating of a minimum of Level 2 for Provision of Apprenticeships (unless it is a new provider, that has not yet been rated). If the company has not been subject to an Ofsted inspection, it must provide evidence of meeting equivalent quality assurance standards.
- Providers must meet or exceed the national average success rate for the lot/s for which they are applying in order to pass (unless it is a new provider, that has not yet been rated).
- Providers must state if they are a Living Wage Employer or a London Living Wage Employer.

3.6.3 The areas for evaluation will be:

Theme	
Background and Performance History (20%)	<ul style="list-style-type: none"> ● Ofsted inspection report ● Apprenticeship completion rates ● Employer satisfaction rate ● Learner satisfaction rate ● Is the training provider involved in the development of any apprenticeship standards ● Experience of delivering apprenticeships training for local authorities ● Experience and qualifications of trainers and assessors ● Process for assessing the competency of tutors delivering the training
Delivery of Training (40%)	<ul style="list-style-type: none"> ● Detailed and timely feedback and communication methods to ensure the council is informed of training attendance ● Detailed and timely feedback and communication methods to ensure the council is informed of learner progress on their course

	<ul style="list-style-type: none"> • Communication of training dates • Methods of delivery • Facilities and equipment in place to support the training • Frequency of face-to-face learning • Continuity of assessor/tutor • Engagement of learners across the duration of the apprenticeship • Method of recording apprentices 20% off the job learning • Ability to start apprenticeship training within 3 weeks of apprentice starting employment • Ability to complete apprenticeship training and EPA within stated timeframe • Workplace behaviour training
Delivery of Additional Support (10%)	<ul style="list-style-type: none"> • How Initial Assessment information is used to plan appropriate development strategies • Support in place for those who fall behind in training • Support in place for those who have a break from study • Support in place current staff who have been out of education for a long period • Support in place for learners with additional needs • Wider CPD training available to the apprentice and/or their team • Induction support • Training and support to apprentices' line managers
Additional services (5%)	<ul style="list-style-type: none"> • Advertising opportunities • Support with assessment days • Job fairs/recruitment activities • Signposting apprentices to follow on opportunities • Support with CVs/job search
End point assessment (5%)	<ul style="list-style-type: none"> • Role of the training provider in end point assessment
Price (10%)	<ul style="list-style-type: none"> • How the training provider plans to deliver the training and EPA within the maximum pricing structure • Detail any savings that might be made through economy of scale
Customer Care and Contract Management (10%)	<ul style="list-style-type: none"> • Method of collecting feedback from employer • Method of collecting feedback from learners • Method of applying the outcome of evaluation from employer and learner/s • Past experience of achieving contract KPI's • Plan of delivery against KPI's • Plan for remedial action when service falls beneath KPI's

It is recommended that the split for award is 90% quality and 10% cost. This is because there is a national maximum training price set on every apprenticeship training course which sets a feasible delivery price. Negotiating on price at the risk of receiving lower quality or at the risk of the service to Islington Council having a lower value than other contracts would be detrimental.

The biggest risk is of non-completion of apprenticeships resulting from poor training provision. Previously in the delivery of apprenticeships, the council has experienced delays in training due to training provider assessors leaving and no new assessor being assigned. Training providers have then requested extensions to apprentice contracts. There are risks if quality is not set at a high percentage that these same issues might continue.

3.7 Business Risks

3.7.1 The business risks associated with this procurement are the time implications associated with setting up

this framework. The council needs to continue to deliver apprenticeship training in order to have a realistic opportunity to achieve the public sector target and spend the levy and so will need to continue to operate whilst this framework is being set up.

3.7.2 An additional risk is holding a training provider to account for the quality of service. It is proposed that where quality falls short of the agreed standards, the training provider will have a period to remedy this. Following that they will be at risk of payments being stopped until quality is redressed, or being removed from the contract.

3.7.3 Currently the council uses 10 different training providers, none of which are under contract. There could be service user implications if a current training provider is not awarded the contract but is still required to deliver the apprenticeship training for the apprentices they are currently working with.

3.8 The Employment Relations Act 1999 (Blacklist) Regulations 2010

3.8.1 The Employment Relations Act 1999 (Blacklist) Regulations 2010 explicitly prohibit the compilation, use, sale or supply of blacklists containing details of Trades Union members and their activities. Following a motion to full Council on 26 March 2013, all tenderers will be required to sign the council's anti-blacklisting declaration. Where an organisation is unable to declare that they have never blacklisted, they will be required to evidence that they have 'self-cleansed'. The council will not award a contract to organisations found guilty of blacklisting unless they have demonstrated 'self-cleansing' and taken adequate measures to remedy past actions and prevent re-occurrences. The adequacy of these measures will initially be assessed by officers and the outcome of that assessment will be reviewed by the council's Procurement Board

3.8.2 The following relevant information is required to be specifically approved by the Executive in accordance with rule 2.6 of the Procurement Rules:

Relevant information	Information/section in report
1 Nature of the service	The contract is for delivery of approved apprenticeship frameworks and standards eligible for government funding for Islington Council employees by approved training providers. See paragraph 3.1
2 Estimated value	The framework agreement has an estimated value of £1.1 million of Islington Council levy spend. See paragraph 3.2
3 Timetable	The estimated contract start date is 1 September 2017 See paragraph 3.3
4 Options appraisal for tender procedure including consideration of collaboration opportunities	The preferred option is a framework agreement. See paragraph 3.4
5 Consideration of: Social benefit clauses; London Living Wage; Best value; TUPE, pensions and other staffing implications	This contract is part of the council's work to support Islington residents to move into employment. Those completing apprenticeship training are employed on a minimum of the LLW and training providers will need to pay the LLW to all their employees delivering apprenticeships for Islington Council. See paragraph 3.5
6 Evaluation criteria	It is recommended that the split for award is 90% quality and 10% cost The award criteria price/quality breakdown is more particularly described within the report. See paragraph 3.6.3

7 Any business risks associated with entering the contract	The business risks associated with this procurement are the time implications on delivery whilst establishing the framework and holding a training provider to account for quality of service. See paragraph 3.7
8 Any other relevant financial, legal or other considerations.	See paragraph 4

4. Implications

4.1 Financial implications:

4.1.1 It is important that this contract is implemented promptly since the estimated Apprentice Levy for Islington Council is £1.1m and we have a 24-month window to use this for apprenticeship training or the face the prospect of the government recouping the unspent element.

4.2 Legal Implications:

4.2.1 The Apprenticeships, Skills, Children and Learning Act 2009 (new chapter A9 of Part 1) has been amended by the Enterprise Act 2016, Clause 24 in relation to the introduction of public sector apprenticeship targets. The amendment provides for the setting of apprenticeship targets for local authorities by the secretary of state. The government's proposals for the apprenticeship levy are set out in the "proposals for apprenticeship funding in England from May 2017" published on 12 August 2016. The council may enter into contracts with providers of services related to apprenticeship training under section 1 of the Local Government (Contracts) Act 1997.

4.2.2 The services being procured are subject to the light touch regime set out in Regulations 74 to 77 of the Public Contracts Regulations 2015 (the Regulations). The threshold for application of this light touch regime is currently £589,148.00. The value of the proposed contracts is above this threshold. It will therefore need to be advertised in the Official Journal of the European Union (OJEU). There are no prescribed procurement processes under the light touch regime. Therefore the council may use its discretion as to how it conducts the procurement process provided that it: discharges its duty to comply with the Treaty principles of equal treatment, non-discrimination and fair competition; conducts the procurement in conformance with the information that it provides in the OJEU advert; and ensures that the time limits that it imposes on suppliers, such as for responding to adverts is reasonable and proportionate. Following the procurement a contract award notice is required to be published in OJEU. The council's Procurement Rules require light touch contracts over the value of £500,000.00 to be subject to competitive tender.

4.2.3

In compliance with the requirements of the light touch regime in the Regulations and the council's Procurement Rules the proposal outlined in the report is to advertise a call for competition in OJEU and procure the service using a competitive tender process. On completion of the procurement the contract may be awarded as required to tenderers who meet the requirements of the council subject to the tenders providing value for money for the council.

4.3 Environmental Implications

There are no significant environmental implications arising from this proposal. Visits from training providers to apprentices are organised in order to incorporate multiple apprentice assessments within the one visit to encourage efficiency and minimise the carbon footprint.

4.4 Resident Impact Assessment:

4.4.1 The council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The council must have due regard to the need to tackle prejudice and promote understanding. A Resident Impact Assessment was completed on 5th May 2017 and is attached.

5. **Reason for recommendations**

5.1 The approval of this contract framework is recommended in order to work in the developing apprenticeship market. This contract will allow for the council to engage with training providers across clear quality and performance specification to get the best quality training for council employees.

Appendices:

Resident Impact Assessment

Final report clearance:

Signed by:



4 July 2017

Executive Member for Finance, Performance and Community Safety Date

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Resident Impact Assessment

Islington Council Apprenticeship Programme

Service Area: Resources

1. What are the intended outcomes of this function?

As part of its manifesto pledge and in response to the Government's reforms, the Council is revising its approach to apprenticeships for new and existing employees.

The intended outcomes of the new apprenticeship programme are:

- i. Ensure value for money when spending levy funds, including minimising loss through expiry;
- ii. Support Islington residents into employment while also working towards a professional qualification;
- iii. Provide opportunities to address skills shortages and future skills needs and enable existing staff to develop skills and receive a formal qualification relevant to their career.

i. Ensure value for money when spending levy funds, including minimising loss through expiry.

Under the new arrangements, the Council will be implementing a new commercial strategy for the procurement of training providers. The proposed framework will enable the Council to identify a range of training providers with a focus on the quality of training. The new arrangements, which place the contract control firmly with the Council, will allow it to exercise rigorous contract management to ensure a continuous high quality provision.

The Council will need to balance the time pressure of spending the levy funds within 24 months with ensuring that the funds are spent in the most efficient and effective way. The Apprenticeship Team will be working to identify roles appropriate for apprentices and the corresponding apprenticeship training, with the overarching objective of building a talented, professional and skilled workforce across the Council as well as utilising this funding to support Islington residents into careers in a range of industries at a range of levels.

ii. Support Islington residents into employment while also working towards a professional qualification

The apprenticeship programme will contribute significantly to the Council's pledge to help Islington residents find the right job, as identified by the Employment Commission.

In particular, the programme will seek to support the goal of creating change for the next generation. Apprenticeships provide an excellent opportunity for young people to make a start on a promising long-term career. Apprenticeships provide an opportunity to gain valuable work experience with protected time to study for a professional qualification, while earning a London Living Wage. The Council will also be working with local authority maintained schools in the borough to support them to deliver their own apprenticeship programme, as well as providing high quality careers advice around the opportunities apprenticeships provide.

The newly expanded apprenticeship programme will also support the Council's commitment to provide employment support for those who need it the most including those who are long term unemployed. Apprenticeships, by their nature, provide excellent opportunities for those who have been out of work to re-enter the workplace and begin to build a portfolio of skills and experiences backed by a formal qualification. All apprentices will be paid a London Living Wage and training providers will be required to pay the London Living Wage (or Living Wage employers if outside of London) to any of their employees working on the Islington apprenticeship programme as well.

iii. Provide opportunities to address skills shortages and future skills needs and enable existing employees to develop skills and receive a formal qualification relevant to their career.

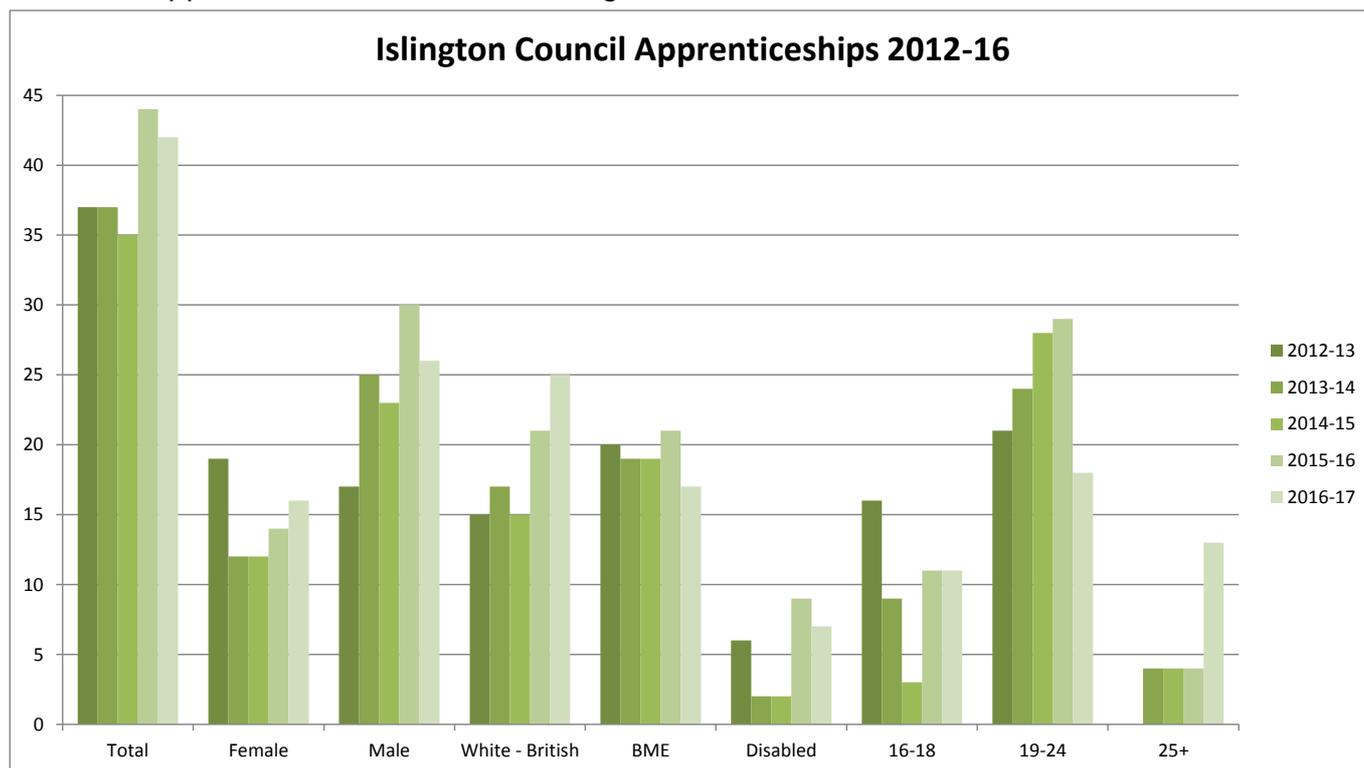
Islington Council will now be able to offer opportunities to existing employees to undertake apprenticeship courses. All training is funded by the levy; the range of courses available is extensive and continually expanding. Existing employees who undertake an apprenticeship course will benefit from learning new skills and gaining a professional qualification. Their teams, and the Council, will benefit from the learning and best practice they will put into practice in their role. Extending apprenticeships to existing employees enables Islington Council to match training to skills needs, taking into account future skills needed.

2. Resident Profile

		Borough profile	Islington Council profile	2016-17 apprenticeship profile
		Total: 206,285	4468	Total: 42
Gender	Female	51%	52%	38%
	Male	49%	48%	62%
Age	16-24	14%	3%	70%
	25+	69%	97%	30%
Disability	Disabled	16%	8%	17%
	Non-disabled	84%	32%	78%
	Not stated		60%	5%
Race	BME	52%	38%	40%
	White	48%	52%	60%
	Unknown		10%	0%

3. Equality impacts

The graph below demonstrates the trends in equality monitoring over the previous four completed intakes of apprentices. The number of BME apprentices has remained steady at around 20 per intake, although there has been a slight decrease to 17 in 2016-17. The 19-24 age range has consistently increased year on year, until 2016-17, when it dropped significantly corresponding with a significant increase in the over-25 age range. The number of 16-18 year olds participating in the apprenticeship programme has fluctuated significantly, with the raising of the school participation age a possible contributing factor. Over the last 5 years, the number of female apprentices has been, on average, 40% of the total in-take.



Nationally across all apprenticeships, women are significantly under-represented in areas such as engineering (25 men for every woman) and plumbing (74 men for every woman).¹ In Islington, women, on average, make up less than 40% of the apprenticeship intake.

In London in 2013, 40% of apprenticeship starts were BME, compared to 57.4% who were white.² While the number of BME apprentices at Islington Council has remained steady at around 20 per year, BME representation as a percentage has decreased from 54% to 40% as the total number of apprentices has increased.

The majority of Islington apprentices are under 25; however, the number of apprentices over 25 increased from a previous average of 4 to 13 in the 2016-17 intake; reflecting the council's commitment to supporting those who are long-term unemployed to gain work.

¹ Young Women's Trust, 'Making Apprenticeships Work for Young Women' (2016)

² BTEG, 'Apprentices and Ethnic Minorities' (2014)

For the first annual cycle of intakes in the new apprenticeship programme, the Council expects to see, as a minimum, a continuation of the trends represented above. However, the focus will be on increasing apprenticeship promotion in the following key areas:

- Female residents
- BME residents
- Residents with a disability
- 16-18 year olds
- Care leavers

For detail on how the Council will address the issues identified above, please see **Section 5**.

4. Safeguarding and Human Rights impacts

Potential safeguarding issues may arise in two areas:

- i. Employment of 16-18 year olds;
- ii. Apprentices working with children or vulnerable adults in their role

i. Employment of 16-18 year olds

All managers of apprentices will undergo specific 'managing an apprentice' training to help prepare them for the additional needs an apprentice may have in their role and to make them aware of training requirements. Safeguarding will be covered in this training. Additional financial support from the Government will be given to those managing apprentices who are 16-18 year olds, 16-24 year olds with an Education, Health and Care Plan from the local authority, and 16-24 year olds who have been in the care of the local authority. This financial support is to be used towards support the apprentices development needs.

ii. Apprentices working with children or vulnerable adults in their role

All apprentices who will be working in roles where there is a safeguarding element required will undergo an enhanced DBS check before they take up their role. Apprentices in these roles will be supported and supervised by both their managers and their training providers. Safeguarding will be included as part of their training courses.

No human rights impacts are expected.

5. Action

The new apprenticeship programme will endeavour to minimise any negative impact on equality of opportunity for people with protected characteristics in Islington. It is the intention of the programme positively to encourage and facilitate residents and Council employees to develop their careers and achieve their potential. As the programme develops, the Council will continue to focus on how to ensure people with protected characteristics are represented, at both the application and selection stage and in sustaining apprenticeships.

Action	Responsible person or team	Deadline
<p>Age</p> <p>Apprenticeships are open to all adults of working age. In promoting both the external recruitment and internal programme, the Council will emphasise that applications are welcome from all people of working age, with the aim of dispelling any misconceptions around apprenticeships, such as age restrictions and promoting parity of esteem with other routes into employment.</p>	Apprenticeship Team	On-going promotion of internal apprenticeship scheme
<p>Recruitment</p> <p>To ensure fair and equal opportunities are afforded to all applicants, the programme will be run in compliance with the Council's existing recruitment and selection policies and best practice.</p> <p>In promoting the apprenticeship programme across the borough, the Council will make use of its existing communication networks, in particular those of the iWork team, to ensure we reach residents facing particular barriers into employment. In order to support applicants, the Council will run application workshops, where residents can attend and receive advice from the recruitment and iWork teams.</p> <p>At the application stage, candidates are assessed on their attitude towards equality and diversity in the workplace. All successful applicants will be expected to adhere to the Council's 'Dignity for All' policy.</p>	Apprenticeship Team, Recruitment Team, iWork Team	Recruitment phase (twice yearly)
<p>Women</p> <p>As a London Living Wage employer, all new recruits across all pathways will be paid the LLW, providing equal pay across career paths. Apprentices will have access to a mentor to support their development and progression. In addition apprentices will have access to attend staff forums to provide support to women in male dominated services.</p> <p>Additional promotional activities will be made to increase the number of applications from women for all apprenticeship roles and activities undertaken to encourage the uptake of female participants in council apprenticeships in trades, engineering, mechanics and surveying.</p>	Apprenticeship Team	On-going throughout apprenticeship programme and life of training contracts

<p>Care Leavers</p> <p>In recognition of the potential additional personal development and learning needs, the ESFA has introduced incentive payments for employing apprentices from the following categories:</p> <ul style="list-style-type: none"> • 16-18 year olds • 16-24 year olds with an Education, Health and Care Plan from the local authority • 16-24 year olds who have been in the care of the local authority <p>The money received through the incentives scheme will be used by the Council to support additional development of apprentices outside of their course specific training. The aim will be to better equip them with the skills necessary to advance their career beyond the apprenticeship.</p> <p>Work with care leavers will be conducted in co-ordination with Independent Futures, the service provided to young people who have been looked after by Islington. Independent Futures provide employability support, as well as information, advice and guidance to care leavers transitioning to living independently. The iWork team provide application support workshops, 1 to 1 support and interview practice.</p> <p>Islington Council will explore introducing a guaranteed interview scheme for Islington Care Leavers who meet the shortlisting criteria for an apprenticeship.</p>	<p>Apprenticeship Team</p>	<p>Recruitment phase (twice yearly) and development programme (annual)</p>
<p>Disability</p> <p>The iWork team have longstanding practices for supporting applicants with disabilities in applying for apprenticeship roles. The apprenticeship team will be working with iWork to support applicants on a client-centred basis according to individual needs. This includes working with partners in the community, such as the Islington Autism Project, Scope and the Community Access Project.</p> <p>The Council's Sign Language Interpreting Service provides BSL interpreters and other support to deaf or hearing impaired residents applying to Council roles. They host a weekly surgery for deaf residents, including job seekers, and have recently established a Facebook page through which they are able to disseminate information to their network. The apprenticeship team will be working with the SLIS to promote the job adverts and support applicants.</p>	<p>Apprenticeship Team, iWork Team</p>	<p>On-going throughout apprenticeship programme and life of training contracts</p>

<p>Apprentices will have access to the disability staff forum. The forum provides a peer support network and a further opportunity for their voice to be heard within the council.</p>		
<p>BME In recognition that the real percentage of BME apprentices has decreased as the programme has expanded, the apprenticeship team will focus on how to ensure continued high levels of BME applicants. In particular, in conjunction with iWork, they will focus on promoting the scheme within schools to BME students and using existing networks to promote the opportunities within the wider community.</p> <p>Apprentices will have access to the BME staff forum. The forum provides a peer support network and a further opportunity for their voice to be heard within the council.</p>	<p>Apprenticeship Team, iWork Team</p>	<p>On-going throughout apprenticeship programme and life of training contracts</p>

Please send the completed RIA to equalites@islington.gov.uk and also make it publicly available online along with the relevant policy or service change.

This Resident Impact Assessment has been completed in accordance with the guidance and using appropriate evidence.

Staff member completing this form:

Signed: Anya Clarkson

Date: 05/05/2017

Head of Service or higher:

Signed: Liz Haynes

Date: 28/06/2017

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Environment and Regeneration, Town Hall,
Upper Street, N1 1YA

Report of: **Executive Member for Environment and Transport**

Meeting of:	Date	Ward(s)
Executive	13 7 17	All

Delete as appropriate		Non-exempt
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SUBJECT: Procurement Strategy – Fleet Replacement Programme

1. Synopsis

- 1.1 This report seeks pre-tender approval for the procurement strategy in respect of Fleet Vehicle Purchases in accordance with Rule 2.5 of the Council's Procurement Rules.
- 1.2 To purchase vehicles for Islington's fleet in order to replace hire and leased vehicles with more fuel efficient, more environmentally sound, reliable vehicles. This will reduce revenue expenditure, fuel and running costs. This strategy covers the two year period up to April 2019.

2. Recommendations

- 2.1 To approve the procurement strategy for the continuation of the fleet replacement programme, as outlined in this report.
- 2.2 To delegate authority to award contracts up to April 2019 to the Corporate Director of Environment and Regeneration in consultation with the Executive Member for Environment and Transport.

3. Background

- 3.1 The Council operates a fleet of approximately 415 vehicles across all Council Departments. Many fleet vehicles have been purchased since 2013, enabling the replacement of vehicles previously owned and operated by Enterprise for waste services, and the purchase of housing repair vans after the contract with Homes for Islington ended. New vehicles for Accessible Community Transport and Parks have also been purchased in the past three years, as well as replacement of long term hire vehicles across all Departments with Council owned fleet.

- There remain approximately 70 vehicles that need to be replaced.

- These 70 vehicles consist of a further 16 refuse vehicles. 11 Accessible Buses for Adult Day Centres and other specialist vehicles.
- Existing Framework agreements in place via The Procurement Partnership Ltd (TPPL) expire as follows: Coaches and Buses in May 2017, Heavy Goods and Specialist Vehicles in October 2017, Cars and Light Commercial Vehicles in 2019 (see below under 3.4).

3.2 Estimated Value

- It is estimated that a minimum of £5.7 million of Capital funding will be required to purchase the remaining vehicles to enable Islington to have a modern and efficient fleet.
- It is also estimated that a further £2 million will be required per annum from 2019 to ensure the fleet is replaced as vehicles reach the end of their expected lifespan.
- In the four years of the fleet replacement programme, a total of £13.4 million has been spent or committed.
- £3 million has been included in the medium term financial strategy (MTFS) for vehicle procurement in the 2017/18 financial year, which will enable around half of the remaining vehicles to be purchased. There is annual capital allocation for fleet built into MTFS assumptions from 2018/19 onwards which will be sufficient to cover a rolling programme of fleet replacement.
- A review is also being undertaken of the entire fleet to verify that the existing number of vehicles is actually required for all of the services the Council runs.
- The cost of hired and leased vehicles was £984,000 in 2015/16 and £1,050,000 in 2016/17. Much of this expenditure will be eradicated in future years through the recent vehicle purchases. The Council's dependence on hired and leased vehicles will end with the procurement of the remaining vehicles required.
- The preferred purchase of electric, hybrid or alternative fuelled vehicles will add a premium to the purchase price of each vehicle. In the case of Refuse Vehicles and Accessible buses this would be in the region of £100,000 per vehicle. The estimated £5.7 million given in this report is based on existing costs for diesel vehicles only.

3.3 Timetable

- The Council Fleet must be compliant with the requirements of the Ultra Low Emission Zone (ULEZ) being introduced by Transport for London at the proposed date of 8th April 2019,
- There are no statutory deadlines relating to this proposal but a modern fleet will assist the Council to meet the requirements of its Operators Licence.

3.4 Options appraisal

- Vehicles are purchased through The Procurement Partnership Ltd (TPPL) Framework Agreement and it is proposed that this continue.
- Preliminary discussions have taken place with Camden Transport Managers about the possibility of utilising Camden's Compressed Natural Gas (CNG) fuelling station, in the event that Islington purchases any CNG powered vehicles.
- Many of the vehicles that could be powered by CNG including Refuse Vehicles and the Accessible Bus fleet are required to operate on a daily basis and it is essential that the supply of fuel and viable alternative providers of fuel could be guaranteed.

Details relating to the TPPL frameworks to be used are as follows:

a) Hertfordshire County Council (HCC) Vehicle Procurement Framework (Covering Cars, LCV's, MCV's, Sweepers, Plant & Grounds Maintenance equipment):

- **Contract Notice** - Contract notice HCC
- **Contract Award Notice** - Contract Award Notice HCC - 2015-OJS099-179555-en

b) Bath and North East Somerset Heavy Goods and Specialist Vehicle Procurement Framework:

- **Contract Notice** - HGV framework contract notice - 2013-OJS146-253373-en
- **Contract Award Notice** - HGV framework contract award notice FINAL

c) Bath and North East Somerset Bus and Coach Procurement Framework (Currently out to tender):

- **Contract Notice - 2017-OJS106-212142-en**

This Framework Agreement for Buses is in the process of being replaced following expiry of the previous Bus Framework in May 2017. The new Framework Agreement is currently out to tender with a closing date of 4th July. The framework is expected to be awarded and available for use from the middle of July 2017.

3.5 Key Considerations

- The purchase of fuel efficient and low emission vehicles will have a positive impact on both the young and elderly in Islington
- A review of the current fleet in terms of the actual number of vehicles and the utilisation of those vehicles is being undertaken. A reduction in the overall size of the fleet would reduce congestion, may enable services to operate more efficiently and reduce revenue costs. The majority of the 70 vehicles required are still necessary however, as they are specialist vehicles and will replace vehicles that have been in the fleet for 10 years.
- The primary considerations with regard to the procurement of vehicles is that they offer the Council the best value and maximum utilisation to deliver efficient services. That will benefit all residents in the borough and will minimise the impact on the environment.
- There are no TUPE, Pensions and Staffing implications.

3.6 Evaluation

All new vehicles will be purchased through the existing TPPL Frameworks and as there are different types of vehicles required, there will be no single tender process to cover all purchase under this procurement strategy. Larger purchase however will be subject to evaluation based on 40% price, 20% specification, 20% delivery and 20% after sales/warranty.

3.7 Business Risks

- There are no particular business risks associated with this procurement.
- The purchase of modern vehicles compliant with the ULEZ will reduce the environmental impact on service users and residents.

3.8 The Employment Relations Act 1999 (Blacklist) Regulations 2010 explicitly prohibit the compilation, use, sale or supply of blacklists containing details of trade union members and their activities. Following a motion to full Council on 26 March 2013, all tenderers will be required to sign the Council's anti-blacklisting declaration. Where an organisation is unable to declare that they have never blacklisted, they will be required to evidence that they have 'self-cleansed'. The Council will not award a contract to organisations found guilty of blacklisting unless they have demonstrated 'self-cleansing' and taken adequate measures to remedy past actions and prevent re-occurrences. The adequacy of these measures will initially be assessed by officers and the outcome of that assessment will be reviewed by the Council's Procurement Board

3.9 The following relevant information is required to be specifically approved by the Executive in accordance with rule 2.6 of the Procurement Rules:

Relevant information	Information/section in report
1 Nature of the service	The purchase of a modern Council vehicle fleet See paragraph [3.1]
2 Estimated value	The estimated financial requirement is £5.7 million across 2017/18 and 2018/19, with a further requirement of up to £2 million per annum to maintain a modern fleet.

3 Timetable	There is £3 million available in the 17/18 financial year to purchase new vehicles. Priority will be given to replace hired and leased vehicles and older diesel vehicles that will not meet the requirements of the ULEZ.
4 Options appraisal for tender procedure including consideration of collaboration opportunities	The procurement process will be dependent on the overall value of the proposed purchase. All vehicle purchases will be made through the TPPL framework and be compliant with Council Standing Orders.
5 Consideration of: Social benefit clauses; London Living Wage; Best value; TUPE, pensions and other staffing implications	N/A
6 Evaluation criteria	Larger purchases are evaluated on 40% price, 20% specification, 20% delivery and 20% after sales/warranty
7 Any business risks associated with entering the contract	There are no particular business risks associated with this procurement and new vehicles should enhance service provision
8 Any other relevant financial, legal or other considerations.	The environmental impact of the Council operating a large fleet of vehicles is a significant consideration.

4. Implications

4.1 Financial implications:

The estimated cost to purchase vehicles will be funded from capital resources earmarked for fleet replacement. Anticipated savings in hire costs will be factored into revenue budgets as part of the medium term financial strategy budget process.

4.2 Legal Implications:

The Council may purchase fleet vehicles as are necessary for the proper discharge of its functions under section 111 of the Local Government Act 1972 which enables the council to carry out any activity that is calculated to facilitate, or is conducive or incidental to, the discharge of any of its functions. The Council has power to purchase fleet vehicles under the General Power of Competence set out in section 1 of the Localism Act 2011. Such purchases are not subject to any other statutory provision. The Council may enter into contracts for such services under section 1 of the Local Government (Contracts) Act 1997. The Executive may provide Corporate Directors with responsibility to award contracts with a value over £2 million using revenue money and over £5 million using capital money (Council's Procurement Rule 16.2).

The proposed contract is a contract for the supply of goods. The threshold for application of the Public Contracts Regulations 2015 (the Regulations) is currently £164,176.00 for goods contracts. Contracts above this threshold must be procured with advertisement in the Official Journal of the European Union and with full compliance of the Regulations. The council's Procurement Rules also require contracts over the value of £164,176.00 to be subject to competitive tender.

The proposed procurement strategy is to use frameworks established by The Procurement Partnership Ltd (TPPL), details of which are set out in paragraph 3.4. These frameworks have been procured (or are in the process of being procured) in compliance with the Public Contracts Regulations 2015 and OJEU advertisement and they are available (or will shortly be available) for use by the council as proposed in the report. Therefore the council may purchase vehicles from suppliers appointed to these frameworks in accordance with the provisions set out in the frameworks and associated call-off conditions.

In deciding whether to award specific contracts the Corporate Director for Environment and

Regeneration should be satisfied as to the competence of the supplier to provide the goods and that the contract prices represent value for money for the Council.

4.3 Environmental Implications

Following a motion to Full Council in November 2009, we are now committed both to reducing borough-wide carbon emissions by 40% by 2020 and to reporting on the energy implications of all Council plans, policies and programmes. The Council is responsible for around 5% of the borough's emissions, and through our services we have a significant impact on the emissions from our partners, businesses and residents. To meet these targets the Council needs to play a leading role, both reducing our energy consumption and enabling our community to make the transition towards a low carbon society.

There is growing evidence of the impact, pollution from CO2 and NOx from vehicles has on health, especially the young and the elderly. The purchase of new vehicles will reduce carbon emissions due to more fuel efficient and cleaner engines. The minimum requirement must be diesel 6 engines which will also meet the requirements of the Transport for London Ultra Low Emission Zone. Wherever possible alternative powered vehicles will be procured, including electric or hybrid vehicles.

4.4 Resident Impact Assessment:

The Council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The Council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The Council must have due regard to the need to tackle prejudice and promote understanding.

No adverse impacts on residents have been identified, with the positive outcomes of more reliable Council services, and reduced vehicle emissions contributing to better air quality.

5. Reason for recommendations

- 5.1 The Council requires a modern fleet of vehicles to carry out its statutory functions and to be compliant with forthcoming legislation (ULEZ). New vehicles will reduce the dependency on hired vehicles and reduce overall vehicle costs for fuel, maintenance, repairs and mileage across the full life of this fleet.

Appendices - none

Final report clearance:

Signed by:



3 July 2017

Executive Member for Environment and Transport Date

Report Author: Ian Spencer
Tel: 5501
Email: Ian.spencer@islington.gov.uk

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Report of: Executive Member for Environment and Transport

Meeting of:	Date	Ward(s)
Executive	13 July 2017	All

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SUBJECT: Procurement Strategy – Automotive Fuels

1. Synopsis

- 1.1 This report seeks pre-tender approval for the procurement strategy in respect of the Supply of Automotive Fuels for the Council's fleet vehicles in accordance with Rule 2.5 of the Council's Procurement Rules.
- 1.2 This Procurement Strategy covers the supply needs for automotive fuels to operate Islington Council's Fleet and plant.

2. Recommendations

- 2.1 To approve the procurement strategy for the Supply of Automotive Fuels for the Council's fleet vehicles as outlined in this report.
- 2.2 To delegate authority over the period 1.10.17 to 30.9.21 to award fuel contracts after call-offs and further competitions to the Corporate Director of Environment and Regeneration in consultation with the Executive Member for Environment and Transport.

3. Background

- 3.1 The current contract was procured via a competition using the Crown Commercial Services (CCS) framework and expires on 30 September 2017. After research, the present arrangements of access to the CCS framework for procuring fuel are considered to remain the most efficient and economical procurement route, and it is intended that this be renewed. This will take advantage of the bulk purchasing discounts via the Government's established framework RM1013 (managed by CCS) and via further mini competitions.

The new further call offs/further competitions will cover the period between 1 October 2017 to 30

September 2019, and prior to that expiry date, CCS will run a bulk further competition on behalf of all customers for another 2 year call-off contract which will expire 30 September 2021

The price paid in pence per litre for delivered fuel is made up of the commodity price of the fuel, duty, supplier margin and the management charge. As the basic commodity price is set by international markets, the tender exercise via the CCS Framework will give the Council an opportunity to market test existing supplier margin and management charge.

Awarding the Contract for the supply of Liquid Fuels for the Islington Fleet will support delivery of services essential to all residents such as waste collection, street cleansing, and highway maintenance, as well as services to our more vulnerable residents through housing repairs and community transport.

To support the drive to maximise savings and efficiencies, strategies are in place to down-size the total number of fleet vehicles in operation and upgrade to more fuel efficient vehicles when replacements are required and available.

Efficient fuel usage will be supported through improved management data that will be provided as a result of procuring via the framework. This will give the Council the means to monitor fuel usage and introduce continuous measures to reduce the amount of fuel we use to deliver greater savings, and reduce carbon and other emissions.

Consideration are always given to the environmental impact and wherever possible, electric, hybrid, petrol vehicles and alternatively powered vehicles are considered prior to purchasing those powered by diesel in line with the Council's support to find alternatives.

3.2 Estimated Value

The arrangement will be funded from existing revenue budgets, with an estimated annual value of £1.2m. The estimated value of the procurement for the initial 24 month contract period starting 1 October 2017 until 30 September 2019 is therefore £2.4m and that total estimated value of the procurement including an additional bulk further competition for 24 months after expiry of the initial 24 months is £4.8m.

The National framework (procured by the Crown Commercial Service on behalf of public authorities) covers an annual spend in the region of £270m and serves over 400 customers with a combined total of over 6,000 sites taking liquid fuel deliveries. The spend on this service for the last two full financial years was £2,210,000.00 though commodity markets are extremely volatile and therefore budgets should be set annually to anticipate future spikes during the duration of the contract.

The Council's fleet in general is going to be subject to resizing which will reduce fuel usage on the whole. The savings strategy is to test the existing supplier margin we are paying against the economies of scale that can be realised through a national framework where the margins have been squeezed due to the huge aggregated volumes. The savings strategy will also explore discounts on the supplier margin as we can pay within a shorter timescale than the standard 30 day payment terms.

3.3 Timetable

Executive are being asked to approve this Procurement Strategy in July 2017 with a view to awarding the contract for a start date of 1 October 2017.

3.4 Options appraisal

Officers have considered undertaking our own Procurement via OJEU, however there are no tangible benefits in doing this and it would add a considerable amount of time to the process minimising the overall savings that can be achieved. The Council would also not benefit from the collaborative buying power and strict terms imposed on the suppliers via an established framework set up by a central purchasing body.

The preferred option is to remain within the framework procured by the Crown Commercial Services (CCS) and carry out a further competition for the following reasons;

- To benefit from a flexible framework that meets our requirements
- To benefit from the collaborative buying power of this framework
- To have a choice of clear and transparent pricing options
- To benefit from early payment options
- To benefit from comprehensive management information including service levels and key performance indicators.

3.5 **Key Considerations**

The London Living Wage will be paid to all delivery and support staff that will be associated to the delivery of liquid fuel for Islington's fleet.

There are no TUPE, Pensions or staff implications associated to this procurement.

3.6 **Evaluation**

Call-off's and further competitions will be carried out in line with the terms of the CCS Liquid Fuels framework agreement. Contracts will be awarded based on 100% cost.

The supply of liquid fuels will be procured by CSS on behalf of the Council against CCS standard terms and conditions of the call-off agreement. The Council will provide details to CCS of our site/supply requirements; this is then sent to all capable suppliers by CCS for pricing. Price evaluation is undertaken by CCS, and verified by the Council. Once pricing is agreed CCS will then seek the Council's agreement to award a call off contract on Islington behalf to the successful supplier.

3.7 **Business Risks**

- Risk of fluctuating costs in excess of market rates/caps will be mitigated through greater price certainty on supplier margin and management charges, and by guaranteed pricing on the framework.
- Using a pre-existing OJEU compliant framework agreement the Council is reducing any risk of challenge in regards to the procurement process undertaken to deliver the supply.

3.8 The Employment Relations Act 1999 (Blacklist) Regulations 2010 explicitly prohibit the compilation, use, sale or supply of blacklists containing details of trade union members and their activities. Following a motion to full Council on 26 March 2013, all tenderers will be required to sign the Council's anti-blacklisting declaration. Where an organisation is unable to declare that they have never blacklisted, they will be required to evidence that they have 'self-cleansed'. The Council will not award a contract to organisations found guilty of blacklisting unless they have demonstrated 'self-cleansing' and taken adequate measures to remedy past actions and prevent re-occurrences. The adequacy of these measures will initially be assessed by officers and the outcome of that assessment will be reviewed by the Council's Procurement Board

3.9 The following relevant information is required to be specifically approved by the Executive in accordance with rule 2.6 of the Procurement Rules:

Relevant information	Information/section in report
<i>1 Nature of the service</i>	To Procure Automotive Fuel for the Council's fleet See paragraph 3.1
<i>2 Estimated value</i>	The estimated annual value is £1.2m The estimated value of the procurement for the initial 24 month contract period starting 1 October 2017 until 30th September 2019 is £2.4m. The estimated total value of the procurement including a further bulk competition for 24 months after expiry of the initial 24 months is £4.8m. See paragraph 3.2
<i>3 Timetable</i>	Contract start date is scheduled for 1 October 2017: See paragraph 3.3
<i>4 Options appraisal for tender procedure including consideration of collaboration opportunities</i>	Outcome of options appraisal are described within this report and it is recommended to remain using the CCS framework. See paragraph 3.4
<i>5 Consideration of: Social benefit clauses; London Living Wage; Best value; TUPE, pensions and other staffing implications</i>	Outcomes are described within this report. LLW will be paid as a minimum to all delivery and support staff, fuel efficiencies sought and emissions minimised wherever possible. See paragraph 3.5
<i>6 Evaluation criteria</i>	The evaluation criterion is 100% on price. See paragraph 3.6
<i>7 Any business risks associated with entering the contract</i>	Business risks are described within this report and minimised by remaining within the pre-existing OJEU compliant CCS framework. See paragraph 3.7
<i>8 Any other relevant financial, legal or other considerations.</i>	None

4. Implications

4.1 Financial implications:

Fuel is recharged to service department budgets based upon cost and usage. Reductions in fuel prices, fleet size and more economical replacement fleet vehicles will see a reduction in charges to service budgets and will help delivery of MTFS savings targets.

4.2 Legal Implications:

The Council has power to procure the supply of liquid fuels under section 111 of the Local Government Act 1972 which enables the council to carry out any activity that is calculated to facilitate, or is conducive or incidental to, the discharge of any of its functions. The Council may enter into contracts for

such services under section 1 of the Local Government (Contracts) Act 1997. The proposed contract is a contract for supply. The threshold for application of the Public Contracts Regulations 2015 (the Regulations) is currently £164,176.00 for supply contracts. Contracts above this threshold must be procured with advertisement in the Official Journal of the European Union and with full compliance of the Regulations. The council's Procurement Rules also require contracts over the value of £164,176.00 to be subject to competitive tender. The proposed procurement strategy is to use the liquid fuels framework agreement that is currently being procured by the Crown Commercial Service on behalf of various organisations, including all local authorities (RM3801). The Crown Commercial Service framework is being procured in compliance with the Public Contracts Regulations 2015 and OJEU advertisement. It is anticipated that the framework will be available for use in July 2017. Once established the framework may be used by the Council as proposed in the report and the council may award a contract to a supplier appointed to the framework in accordance with the provisions set out in the framework and associated call-off conditions.

4.3 Environmental Implications:

Automotive fuels have a significant environmental impact in terms of air quality as their use leads to emissions of several pollutants including CO₂ and particulate matter. Measures to reduce fuel usage, including monitoring, will reduce this impact. The use of biofuels is a secondary option for reducing the wider environmental impact although they would still contribute to local air quality problems.

4.4 Resident Impact Assessment:

The Council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The council must have due regard to the need to tackle prejudice and promote understanding.

An RIA was completed on 5 June 2017, and no adverse equalities, human rights or safeguarding impacts were identified. The positive impact of this procurement on residents will be that it will allow for cost effective automotive fuel purchasing allowing waste collection and other borough services to operate the Council's fleet efficiently.

5. Reasons for recommendations

- 5.1 The proposals in this procurement strategy will support the Councils drive to demonstrate value for money through market testing an area of significant commodity spend within the Council, as well as ensure continuity of service and supply.

It is recommended that authority to award fuel contracts after call-offs and further competitions be given to the Corporate Director of Environment and Regeneration in consultation with the Executive Member for Environment and Transport.

Appendices - none

Background papers – none

Final report clearance:

Signed by:



Executive Member for Environment and Transport

4 July 2017

Date

Report Author: Willem Lewis – Service Lead, Depots and Special Projects

Tel: 020 7527 3539 **Email:** willem.lewis@islington.gov.uk

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Finance and Resources Department
7 Newington Barrow Way, N7 7EP

Report of: **Executive Member for Finance, Performance and Community Safety**

Meeting of:	Date	Ward(s)
Executive	13 July 2017	All

Delete as appropriate	Exempt	Non-exempt

SUBJECT: Procurement Strategy - Insurance London Consortium (ILC) Leaseholder Buildings Insurance Policy for 2018-2023

1. Synopsis

- 1.1 This report seeks pre-tender approval for the procurement strategy in respect of ILC leaseholder building insurance policy, in accordance with Rule 2.5 of the Council's Procurement Rules.
- 1.2 The Council accepts an element of risk with regards to insurance claims, and maintains an insurance fund to cover such eventualities, it also procures 'catastrophe' cover through the insurance market for property and liability covers. The Council is a member of the Insurance London Consortium (ILC). Croydon Council is the Accountable Member of the Consortium and leading on this procurement. The ILC was formed in 2008 and consists of nine London Boroughs. Seven of the nine ILC members are participating in this insurance tender.

2. Recommendations

- 2.1 To approve the procurement strategy for ILC leaseholder buildings insurance policy as outlined in this report.
- 2.2 To delegate authority to award the contract, to the Corporate Director Resources in consultation with the Executive Member for Finance, Performance and Community Safety.

3. Background

- 3.1 Islington is looking to its leaseholder buildings insurance policy via an Insurance London Consortium (ILC) tender. The term of this policy is due to expire on 31st March 2018 and under European Legislation the ILC is obliged to go out to tender for these policies for a further period of time up to 5 years. Discussions are ongoing with the ILC's broker and, similar to the 2016 tender exercise, it is hoped and anticipated that there should be a greater degree of interest in the tender now compared with the previous exercise. A similar permission is being sought by seven of the nine boroughs of the ILC to procure renewal of this insurance policy.
- 3.2 The arrangement will be self-funded, as the Buildings Insurance policy is recharged to all leaseholders via the right to buy annual service charge. The value of the contract for Islington for the potential five year duration of the contracts is estimated to range between £8.5-10m. The expenditure for this year and the previous year is approximately £1.7m. Islington receives insurance claims on an ongoing basis. In order to make savings the Council looks at ways of managing risk in order to reduce the number of insurance claims received. The service is benchmarked across the ILC and costs are lower than the majority of members and claim repudiation rates in line with other members.
- 3.3 The current contract expires on 31st March 2018. The contract notice is due to be published on OJEU on 1st August 2017 which will allow for sufficient time to establish a new contract before the current contract ends. Following the tender process, all boroughs involved will need to observe their internal governance procedures in order to award the contract in time for the start date of 1st April 2018. ILC and senior staff in the Resources Department have been consulted regarding this proposal.
- 3.4 The commissioning team has considered the benefits of carrying out a collaborative procurement with ILC or procuring separately. The ILC is a nine borough collaborative group and a large scale collaborative procurement expects to bring economies of scale. It is anticipated that this will bring savings in respect of insurance premiums compared with individual procurement of insurance policies by Islington Council. The drawback of this is that smaller companies may not have sufficient resources to bid for this work. No suitable framework agreement has been identified, therefore, the preferred route is an OJEU competitive tender. The potential market for large-scale local government procurement is relatively limited, therefore the open procedure has been chosen as the most appropriate route.
- 3.5 The award criteria has been set by the ILC and in order to participate in the collaborate procurement the agreed criteria must be accepted. As part of the award criteria, bidders must provide proposals on how they will bring improvements to the economic and social well-being of the ILC boroughs through the delivery of these services. A requirement for the payment of London Living Wage (LLW) should only be included as a condition of this contract if there is no cross border interest in the contract following OJEU notice. However, market rates are in excess of the LLW levels. The ILC was established to deliver better value on the provision of insurance services for the member boroughs. The successful tenderer will undergo significant financial checks to ensure as far as is reasonably possible their economic sustainability. TUPE will apply to this contract.
- 3.6 The tender will be conducted in one stage, known as the Open Procedure as the tender is 'open' to all organisations who express their interest in the tender. The Open Procedure includes minimum requirements which prospective bidders must achieve before their tender is evaluated against the advertised award criteria. The evaluation award criteria agreed by all

ILC boroughs is for a split of 70% for price and 30% for quality. It is felt that this is a broader market but it is vital to ensure quality within this part of the tender. The award is to be based on the following criteria and will be finalised by the ILC members prior to publication of the contract notice:

- Price 70%
- Quality 30%

- 3.7 If there is no or insufficient insurance cover, the Council and its leaseholders could be placed at considerable financial risk. The new contract will provide an opportunity to implement more robust contract management arrangements to maximise benefits for the ILC. There is an opportunity to test the market for competitive bids from a greater number of organisations than at the previous tender exercise. Insurance Premium Tax also continues to increase and will be at a minimum of 12% for the new insurance year starting 1st April 2018.
- 3.8 The Employment Relations Act 1999 (Blacklist) Regulations 2010 explicitly prohibit the compilation, use, sale or supply of blacklists containing details of trade union members and their activities. Following a motion to full Council on 26th March 2013, all tenderers will be required to sign the Council's anti-blacklisting declaration. Where an organisation is unable to declare that they have never blacklisted, they will be required to evidence that they have 'self-cleansed'. The Council will not award a contract to organisations found guilty of blacklisting unless they have demonstrated 'self-cleansing' and taken adequate measures to remedy past actions and prevent re-occurrences.
- 3.9 The following relevant information is required to be specifically approved by the Executive in accordance with rule 2.6 of the Procurement Rules:

Relevant information	Information/section in report
1 Nature of the service	Islington is looking to leaseholder buildings insurance cover via an Insurance London Consortium tender. See paragraph 3.1
2 Estimated value	The estimated value for the total 60 months is between £8.5 million and £10.0 million. The agreement is proposed to run for a period of 60 months. See paragraph 3.2
3 Timetable	Advert will be placed in August 2017 Contract will commence 1 st April 2018. See paragraph 3.3
4 Options appraisal for tender procedure including consideration of collaboration opportunities	Outcome of options appraisal are described within this report. See paragraph 3.4

5 Consideration of: Social benefit clauses; London Living Wage; Best value; TUPE, pensions and other staffing implications	Outcomes are described within this report. See paragraph 3.5
6 Evaluation criteria	The price/quality breakdown is generally going to be: 70% price 30% quality. The award criteria price/quality breakdown is more particularly described within the report. See paragraph 3.6
7 Any business risks associated with entering the contract	Business risks are described within this report See paragraph 3.7

4.

Implications

4.1 **Financial Implications**

4.1.1 The contract cost will be charged to Islington's leaseholders. The recommended strategy, as agreed by the Insurance London Consortium of which Islington Council is a member, is for the contract to be awarded on the basis of 70% price and 30% quality. This will provide a good basis for achieving adequate value for money alongside an acceptable level of quality.

4.2 **Legal Implications**

4.2.1 The Council has a fiduciary duty to Council tax payers, and must carry out its functions in a business-like manner with reasonable care and skill. Adequate insurance provision is central to good governance, effective business planning and the safeguarding of the Council's assets. Accordingly the Council has power to enter into a contract for the provision of insurance cover to protect its assets, liabilities and risks under section 1 of the Local Government (Contracts) Act 1997 on the basis such subscriptions for insurance are properly required as being incidental to the discharge of its functions.

4.2.2 The estimated value of the procurement for the new insurance contract is above the financial threshold for service contracts for the full application of the Public Contracts Regulations 2015. Accordingly the contract is being advertised in OJEU using the open procedure.

4.2.3 On completion of the procurement process the contract may be awarded to the highest scoring tenderer. In deciding whether to appoint the selected contractor the Executive will need to be satisfied as to the competence of the chosen tenderer and that the tender price represents value for money for the Council.

4.2.4 Under the section 101 agreement, the members of the Insurance London Consortium are responsible for taking procurement decisions albeit that any contract for insurance services and cover will be entered into direct by the relevant Consortium Member(s).

4.3 Environmental Implications

4.3.1 This contract is not expected to have any significant environmental impacts. The contract will work to minimise environmental implications, such as by having electronic, rather than paper, billing only.

4.4 Resident Impact Assessment:

4.4.1 The Council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The Council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The Council must have due regard to the need to tackle prejudice and promote understanding. This contract is not a service that is directly provided to residents, therefore, it is not anticipated that there will be any impact on residents.

5. Reason for Recommendations

5.1 This report seeks approval to continue to enter into collaborative procurement for the Council's insurance policies. This new contract will ensure that there is no break in the provision of this insurance for the Council.

Appendices: None

Background papers: None

Final report clearance

Signed by



4 July 2017

Executive Member for Finance, Performance
and Community Safety

Date

Report Author: Stephen Walsh, Insurance and Operational Risk Manager
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Finance and Resources Department
7 Newington Barrow Way, N7 7EP

Report of: **Executive Member for Finance, Performance and Community Safety**

Meeting of:	Date	Ward(s)
Executive	13 th July 2017	All

Delete as appropriate	Exempt	Non-exempt

SUBJECT: Procurement Strategy - Insurance London Consortium (ILC) 6 Lots of Insurance Policies for 2018-2023

1. Synopsis

- 1.1 This report seeks pre-tender approval for the procurement strategy in respect of ILC motor, commercial property, crime, engineering and inspection, and school travel/personal accident insurance policies, in accordance with Rule 2.5 of the Council's Procurement Rules.
- 1.2 The Council accepts an element of risk with regards to insurance claims, and maintains an insurance fund to cover such eventualities, it also procures 'catastrophe' cover through the insurance market for property and liability covers. The Council is a member of the Insurance London Consortium (ILC). Croydon Council is the Accountable Member of the Consortium and leading on this procurement. The ILC was formed in 2008 and consists of nine London Boroughs. All ILC members are participating in at least some of these insurance tenders.

2. Recommendations

- 2.1 To approve the procurement strategy for ILC insurance policies as outlined in 1.1 above of this report.
- 2.2 To delegate authority to award the contract, to the Corporate Director Resources in consultation with the Executive Member for Finance, Performance and Community Safety.

3. Background

- 3.1 Islington is looking to procure motor, commercial property, crime, engineering and inspection, business travel and school travel/personal accident insurance covers listed above via an Insurance London Consortium (ILC) tender. The term of these policies is due to expire on 31st March 2018 and under European Legislation the ILC is obliged to go out to tender for these policies for a further period of time up to 5 years. Discussions are ongoing with the ILC's broker and, similar to the 2016 tender exercise, it is hoped and anticipated that there should be a greater degree of interest in the tender now compared with the previous exercise. A similar permission is being sought by all eight other boroughs of the ILC to procure renewal of these insurance policies.
- 3.2 The arrangements will be funded from Islington Council's insurance fund, which is supported by contributions from service departments. The value of the contract for Islington for the potential five year duration of the contracts is estimated to range between £2.5-4m. The expenditure for this year and the previous year is approximately £2.5m. Islington receives insurance claims on an ongoing basis. In order to make savings the Council looks at ways of managing risk in order to reduce the number of insurance claims received. The service is benchmarked across the ILC and costs are lower than the majority of members and claim repudiation rates in line with other members.
- 3.3 The current contract expires on 31st March 2018. The contract notice is due to be published on OJEU on 1st August 2017 which will allow for sufficient time to establish a new contract before the current contract ends. Following the tender process, all boroughs will need to observe their internal governance procedures in order to award the contract in time for the start date of 1st April 2018. ILC and senior staff in the Resources Department have been consulted regarding this proposal.
- 3.4 The commissioning team has considered the benefits of carrying out a collaborative procurement with ILC or procuring separately. The ILC is a nine borough collaborative group and a large scale collaborative procurement expects to bring economies of scale. It is anticipated that this will bring savings in respect of insurance premiums compared with individual procurement of insurance policies by Islington Council. The drawback of this is that smaller companies may not have sufficient resources to bid for this work. No suitable framework agreement has been identified, therefore, the preferred route is an OJEU competitive tender. The potential market for large-scale local government procurement is relatively limited, therefore the open procedure has been chosen as the most appropriate route.
- 3.5 The award criteria has been set by the ILC and in order to participate in the collaborate procurement the agreed criteria must be accepted. As part of the award criteria, bidders must provide proposals on how they will bring improvements to the economic and social well-being of the ILC boroughs through the delivery of these services. A requirement for the payment of London Living Wage (LLW) should only be included as a condition of this contract if there is no cross border interest in the contract following OJEU notice. However, market rates are in excess of the LLW levels. The ILC was established to deliver better value on the provision of insurance services for the member boroughs. The successful tenderer will undergo significant financial checks to ensure as far as is reasonably possible their economic sustainability. TUPE will apply to this contract.
- 3.6 The tender will be conducted in one stage, known as the Open Procedure as the tender is 'open' to all organisations who express their interest in the tender. The Open Procedure includes minimum requirements which prospective bidders must achieve before their tender is

evaluated against the advertised award criteria. The evaluation award criteria agreed by all ILC boroughs is 70% price and 30% quality, with the exception of the Engineering contract, which will be based on 60% price and 40% quality. It is felt that this is a broader market but it is vital to ensure quality within this part of the tender. The award, other than for the Engineering contract, is to be based on the following criteria and will be finalised by the ILC members prior to publication of the contract notice:

- Price 70%
- Quality 30%

3.7 If there is no or insufficient insurance cover, the Council could be placed at considerable financial risk. The new contract will provide an opportunity to implement more robust contract management arrangements to maximise benefits for the ILC. There is an opportunity to test the market for competitive bids from a greater number of organisations than at the previous tender exercise. Should insurance premiums increase in future years, recharges to service departments will need to be reviewed and changed in line with the need to maintain a viable insurance fund for the Council. Insurance Premium Tax also continues to increase and will be at a minimum of 12% for the new insurance year starting 1st April 2018.

3.8 The Employment Relations Act 1999 (Blacklist) Regulations 2010 explicitly prohibit the compilation, use, sale or supply of blacklists containing details of trade union members and their activities. Following a motion to full Council on 26th March 2013, all tenderers will be required to sign the Council's anti-blacklisting declaration. Where an organisation is unable to declare that they have never blacklisted, they will be required to evidence that they have 'self-cleansed'. The Council will not award a contract to organisations found guilty of blacklisting unless they have demonstrated 'self-cleansing' and taken adequate measures to remedy past actions and prevent re-occurrences.

3.9 The following relevant information is required to be specifically approved by the Executive in accordance with rule 2.6 of the Procurement Rules:

Relevant information	Information/section in report
1 Nature of the service	<p>Islington is looking to procure motor, commercial property, crime, engineering and inspection, business travel and school travel/personal accident covers via an Insurance London Consortium tender.</p> <p>See paragraph 3.1</p>
2 Estimated value	<p>The estimated value for the total 60 months is between £2.5 million and £4million.</p> <p>The agreement is proposed to run for a period of up to 60 months.</p> <p>See paragraph 3.2</p>

3 Timetable	Advert will be placed in August 2017 Contract will commence 1 st April 2018. See paragraph 3.3
4 Options appraisal for tender procedure including consideration of collaboration opportunities	Outcome of options appraisal are described within this report. See paragraph 3.4
5 Consideration of: Social benefit clauses; London Living Wage; Best value; TUPE, pensions and other staffing implications	Outcomes are described within this report. See paragraph 3.5
6 Evaluation criteria	The price/quality breakdown is generally going to be: 70% price 30% quality. The exception being engineering, which will have a 60%/40% split, as with the existing contract. The award criteria price/quality breakdown is more particularly described within the report. See paragraph 3.6
7 Any business risks associated with entering the contract	Business risks are described within this report See paragraph 3.7

4. Implications

4.1 Financial Implications

4.1.1 The contract cost will be charged to the Insurance Fund annually from 2018-19, for which there is adequate budget provision. The recommended strategy, as agreed by the Insurance London Consortium of which Islington Council is a member, is for the contract to be awarded on the basis of 70% price and 30% quality (60% price and 40% quality for engineering). This will provide a good basis for achieving adequate value for money alongside an acceptable level of quality.

4.2 Legal Implications

4.2.1 The Council has a fiduciary duty to Council tax payers, and must carry out its functions in a business-like manner with reasonable care and skill. Adequate insurance provision is central to good governance, effective business planning and the safeguarding of the Council's assets. Accordingly the Council has power to enter into a contract for the provision of insurance cover to protect its assets, liabilities and risks under section 1 of the Local Government (Contracts) Act 1997 on the basis such subscriptions for insurance are properly required as being incidental to the discharge of its functions.

4.2.2 The estimated value of the procurement for the new insurance contract is above the financial

threshold for service contracts for the full application of the Public Contracts Regulations 2015. Accordingly the contract is being advertised in OJEU using the open procedure.

- 4.2.3 On completion of the procurement process the contract may be awarded to the highest scoring tenderer. In deciding whether to appoint the selected contractor the Executive will need to be satisfied as to the competence of the chosen tenderer and that the tender price represents value for money for the Council.
- 4.2.4 Under the section 101 agreement, the members of the Insurance London Consortium are responsible for taking procurement decisions albeit that any contract for insurance services/cover will be entered into direct by the relevant Consortium Member(s).

4.3 Environmental Implications

- 4.3.1 This contract is not expected to have any significant environmental impacts. The contract will work to minimise environmental implications, such as by having electronic, rather than paper, billing only.

4.4 Resident Impact Assessment:

- 4.4.1 The Council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The Council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The Council must have due regard to the need to tackle prejudice and promote understanding. This contract is not a service that is directly provided to residents, therefore, it is not anticipated that there will be any impact on residents.

5. Reason for Recommendations

- 5.1 This report seeks approval to enter into a collaborative procurement for the Council's insurance policies. This new contract will ensure that there is no break in the provision of these insurances for the Council.

Appendices: None

Background papers: None

Final report clearance

Signed by



4 July 2017

Executive Member for Finance, Performance
and Community Safety

Date

Report Author: Stephen Walsh, Insurance and Operational Risk Manager
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Report of: **Executive Member for Health and Social Care**

Meeting of:	Date	Ward(s)
Executive	13 July 2017	All

Delete as appropriate	Exempt	
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Appendix 1 to this report is exempt and not for publication

SUBJECT: Contract award for block contracts for Domiciliary Care Services

1. Synopsis

- 1.1 This report details the outcome of the procurement process undertaken with respect of Domiciliary Care Services and seeks approval for the award of five contracts to deliver these services to residents with on-going care and support needs in the borough.

2. Recommendations

- 2.1 To approve the award of five (5) block contracts to Allied Healthcare Group Ltd, Castlerock Recruitment Group Ltd, London Care PLC, Mayfair Home Care and Mihomecare for the provision of Domiciliary Care Services commencing 01 April 2018 for a period of four (4) years with a possible extension or a further (4) years (24 months + 24 months) subject to a performance review of each provider.
- 2.2 To award a contract to the value of £78m over a maximum 8 year term based on an annual value of £9.6m.

3. Background

- 3.1 The procurement strategy for the provision of domiciliary care services was agreed by the Executive at its meeting on 29 September 2016.
- 3.2 Islington Housing and Adults Social Services currently commission domiciliary care services

through three cost and volume contracts with external providers. In 2015/16, these services delivered 563,187 actual hours of care, averaging 10,800 actual hours of care weekly to approximately 835 service users. Contracts deliver a broad range of care and support options that include personal and domestic care, respite care, day and night sitting services, waking night services, escorting services and support with accessing activities and the wider community.

Contracts will provide high quality home care services to residents in the borough who are assessed as having a statutory need for community based care. Providers are required to deliver appropriate and varying levels of support to meet the needs of all eligible client groups in the borough. These include individuals with physical, sensory, global learning disability and mental health needs. Additionally, providers are required to demonstrate expertise, knowledge and sensitivity in their response to equality issues, impairment, disability, ethnic, religious, cultural and communication needs.

This procurement has two strategic drivers:

1. To facilitate the Council's commitment to personal social care and the requirements of the Care Act 2014 by continuing to develop a working flexible delivery model in partnership with providers. The delivery model will extend opportunities for choice and control through self – directed support and will provide a mechanism for service users to be directly involved and influential during the care and support planning process with their care providers.
2. To contribute to the Council's corporate priorities in continuing to work towards a fairer Islington by helping people move into employment and earn a living wage. Contracts will stipulate the requirement to pay the London Living Wage (LLW), travel time and will offer guaranteed hour contracts of 16 hours and above. Contracts will also continue to work towards sourcing local recruitment and offering opportunities for care worker career progression.

The arrangement will be funded from existing Adult Social Services resources. The value of the contracts have been estimated to be c.£78 million and the intended contract term is four years with the option to extend for a further two years on two consecutive occasions. This will be an activity based contract, procured on the basis of an hourly rate. The expenditure on this service for the last two years was £15m, £7m in 2014/15 and £8m in 2015/16. The capped rate for the new service has been comprehensively modelled and has been assessed as value for money with respect to the pressures associated with specific requirements such as LLW and travel costs.

- 3.3 The procurement followed a Restricted Procedure which means the process was conducted in two stages: Selection Questionnaire (SQ) stage and Invitation to Tender (ITT) stage. The tender was advertised on the Islington council website, the London Tenders Portal (the council's e-tendering system), Contracts Finder and OJEU (Official Journal of the European Union). Organisations that submitted an Expression of Interest (EOI) via the portal were given access to the tender documents and any relevant additional information. Questions received via the portal were responded to publicly, in order to ensure that all bidders had access to the same information.

At the SQ stage, the twelve highest-scoring organisations were shortlisted through a selection questionnaire. At the ITT stage, the shortlisted twelve organisations were invited to tender, ten of which submitted tender applications.

The tender evaluation panel comprised of three council officers. In addition, to ensure appropriate expertise, LBI's lead for safe guarding of vulnerable adults was asked to evaluate

the ITT question based on safeguarding of vulnerable adults and risk management. To ensure service user involvement, service users were asked to write and evaluate one of the ITT questions concerning customer care.

At SQ stage, a total of 162 organisations expressed interest in the contracts and of these, 51 submitted selection questionnaires. Following the evaluation of the SQ's, the highest scoring twelve organisations were visited for verification of the written submission. Site visits ensured there was a robust process for shortlisting organisations and provided useful market engagement.

Following the completion of the SQ stage, twelve organisations were invited to tender. Bidders were asked to submit a proposal to address the four method statement areas included in the award criteria, and the pricing schedule. The Council received a total of ten compliant bids which were subsequently evaluated.

3.4 The tender submitted was evaluated to determine the Most Economically Advantageous Tender (MEAT) on the basis of 10% Cost and 90% Quality as set out below:

Tender Award Criteria	Total
Cost	10 %
Quality – made up of	90%
Proposed approach to operational delivery	20%
Proposed approach to safeguarding of vulnerable adults and risk management	20%
Proposed approach to customer care	25%
Proposed Approach to quality assurance and continuous improvement	25%
Total	100%

Bidders also had to achieve minimum quality standards to be successful. In order to be awarded a contract, the winning tenderer must score a minimum of 3 points out of 5 in each question.

3.5 The price assessment method was that bidders would complete a pricing schedule. The lowest price submitted would be awarded 10% and all further prices a proportionate score.

3.6 Value for money has been ensured in this re-procurement and the life of the contracts in the following ways:

- Tenderers were asked to bid at or below an agreed ceiling rate, a standard capped rate across all levels of need - low, medium and high thresholds. The rate is inclusive of provision at weekends, bank holidays and unsociable working hours.
- The service is billed by the minute and spend is capped at the hours agreed in the individual service plan.
- Providers are required to make efficiencies through an electronic call monitoring system and efficient operational rostering in delivery.

The service function in terms of providing preventative care and maintaining independence at home supports people to lead fulfilling lives and contributes to social sustainability in the local community. The continued development of a flexible delivery model facilitates more choice in the way services are delivered.

The re-commissioning of this service aims to reduce unemployment in the borough and provide

good quality jobs for residents.

Good quality jobs are created through the contractual requirement to pay London Living Wage (LLW) in an industry that is historically low paid and undervalued. Providers are also required to pay travel time to ensure the benefit of the LLW is fully realised. The provision of good quality jobs is further strengthened by the Council having signed up to the Unison Ethical Charter.

Local employment is supported through an expectation that providers will strive to source their workforce locally. Providers attend local employment fairs, local universities and host local recruitment days. Providers are also supported to network with the Council's Community Partnership Employment. The contract requirements for investment in the workforce and for sourcing local employment will therefore contribute to local economic sustainability.

A breakdown of tenderers scores are given in the Exempt Appendix to this report.

The contract notice stated that the council would appoint up to six (6) different organisations to provide a comprehensive domiciliary care service with a cost and volume contract model that seeks to extend the range of options available for people accessing the service.

Of the ten compliant bids that were received only five (5) met all the minimum standards required by the council. These five tenders were also the five highest scoring tenders.

TUPE will not apply to this contract as all incumbent providers' bids have been successful.

4. Implications

4.1 Financial implications:

The domiciliary contract is funded from the Adult Social Services base budget and the new contract award will not result in a budget pressure. The projected 2018/19 gross budget for the new domiciliary care contracts will be £9.6m. The contracts are cost and volume with a guaranteed minimum delivery of 600 hours per week per provider.

The total estimated value of this contract over the maximum 8 year term is £78m.

It is anticipated that expenditure in the contracts will increase year on year to meet London Living Wage requirements, and additional funding will be sourced from corporate market inflation bids to meet these requirements.

Contract values are inclusive of any TUPE costs, and therefore no additional payments should be made for TUPE above the agreed values.

As these contracts are on a cost and volume basis, it is important that activity is monitored closely so as to identify any future pressures as early as possible and identify potential funding sources.

4.2 Legal Implications:

The Council has power to provide home care services for residents having a statutory need for community based care services under the National Assistance Act 1948, section 29. The council also has a general duty in exercising its functions under part 1 of the Care Act 2014 to promote the 'well-being' of individuals. Well-being includes (a) physical and mental health emotional well-being and personal dignity (b) control by the individual over day to day life (c) participation in work education, training or recreation (section 1). Section 45 of the Health Services and Public Health Act 1968 also places a duty on local authorities to promote the

welfare of older people "in order to prevent or postpone personal or social deterioration or breakdown". Therefore the council may provide domiciliary care services for those who are assessed as having a statutory need for community based care. The council may enter into contracts with providers of such services under section 1 of the Local Government (Contracts) Act 1997.

The proposed contract is a contract for services. The threshold for application of the Public Contracts Regulations 2015 is currently £589,148,000.00 (for light touch services). The value of the contract to be let is above this threshold and will therefore need to be advertised in the Official Journal of the European Journal (OJEU). The council's Procurement Rules require contracts for light touch services over the value of £164,176.00 500,000.00 to be subject to competitive tender. In accordance with the requirements of the Regulations and the Council's Procurement Rules the contract has been procured with advertisement in the Official Journal of the European Union.

Bids were evaluated in accordance with the evaluation model. The contract notice had stated that the council would appoint up to six (6) different organisations. Of the ten compliant bids that were received only five met all the minimum standards required by the council. These five (5) tenders were also the five highest scoring tenders. Therefore, the contract may be awarded to Allied Healthcare Group Ltd, Castlerock Recruitment Group Ltd, London Care PLC, Mayfair Home Care and Mihomecare as recommended in the report. In deciding whether to award the contract as recommended, the Corporate Director for Housing and Adult Social Services should be satisfied as to the competence of the suppliers to provide the services and that the tender prices represent value for money for the Council. Regard must also be had to the information set out in the attached appendix.

4.3 Environmental Implications

No negative environmental impact is expected in from this service. The service involves delivery by a dispersed workforce to residents in their own homes within the community.

4.4 Resident Impact Assessment:

The council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The council must have due regard to the need to tackle prejudice and promote understanding.

A Resident Impact Assessment was completed in July 2016. The service is expected to have a positive impact on older people and people with disabilities. It is also expected to positive impact on economy of the borough as a whole and contributes towards a fairer Islington.

5. Reason for recommendations

- 5.1 This report recommends the approval to award Domiciliary Care Services contracts to Allied Healthcare Group Ltd, Castlerock Recruitment Group Ltd, London Care PLC, Mayfair Home Care and Mihomecare for a period of four (4) years with a possible extension or a further (4) years (24 months + 24 months).

Appendices

- Exempt Appendix 1 - **PROCUREMENT EVALUATION SCORING AND SUCCESSFUL CONTRACTORS**

Background papers: None

Final report clearance:

Signed by:

Janet Burgess

3 July 2017

Executive Member for Health and Social Care

Date

Report

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By virtue of paragraph(s) 3 of Part 1 of Schedule 12A of the Local Government Act 1972.

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