

Holloway Prison Site

Supplementary Planning Document (SPD)



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Foreword

London is facing an unprecedented housing crisis. Islington Council and the Mayor of London share the objectives of increasing housing delivery and, in particular, maximising the delivery of genuinely affordable housing. The Holloway Prison site represents an important opportunity to achieve these objectives and others.

The future development of the site can set a benchmark for the potential of public sector land in the capital, delivering much needed affordable housing as part of a high quality sustainable new neighbourhood. In addition to a large amount of housing, the development will also deliver public open space and important community facilities, including a prison legacy project, which could provide a range of services for women. An ambitious development can deliver all these objectives alongside a capital receipt for the site's current owner, the Ministry of Justice.

The Supplementary Planning Document sets out a clear vision for the development of the site, and Islington and the Mayor of London will work together to deliver this.



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Executive Member for Housing and Development, London Borough of Islington

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James Murray

Deputy Mayor for Housing and Residential Development, Office of the Mayor of London

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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. Following this consultation, the council developed a draft Supplementary Planning Document (SPD) and consulted on this between August and October 2017. In total, around 800 responses were received during these consultation exercises and these responses have played a valuable role in informing the Supplementary Planning Document (SPD).

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 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 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. The SPD is considered against existing planning policies at the time it was written. However, where appropriate, equivalent replacement local plan policies should also be taken into account. Future revisions of this document will take into account emerging planning policies where appropriate.

This SPD should be read in conjunction with the Holloway Prison Site Capacity Study and the Viability Assessment of Development Scenarios, published alongside the SPD.

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

- 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 which still have a strong local connections². As the profile of the institution rose there was an increase in the public's



Holloway Prison in 2017

- 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 did 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 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.

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 is approximately 4.05 hectares in size and 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.



Figure 1: surrounding context land use map.

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 three Local Shopping Areas in close proximity to the site Cardwell Terrace, Brecknock Road and Hillmarton Terrace.
- **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 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.
 - 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 borough's historic environment is an irreplaceable resource and that heritage assets, such as those identified above, must be conserved and enhanced⁷.

Building Heights

⁶ Development Management Policy DM2.4.

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

- **2.8** Despite its very dense nature, Islington is generally a low rise borough. 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 storeys in height. There are some height increases, however, further towards the Nag's Head Town Centre.
- 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 the estate is not prominent from the surroundings streets and it is set back.

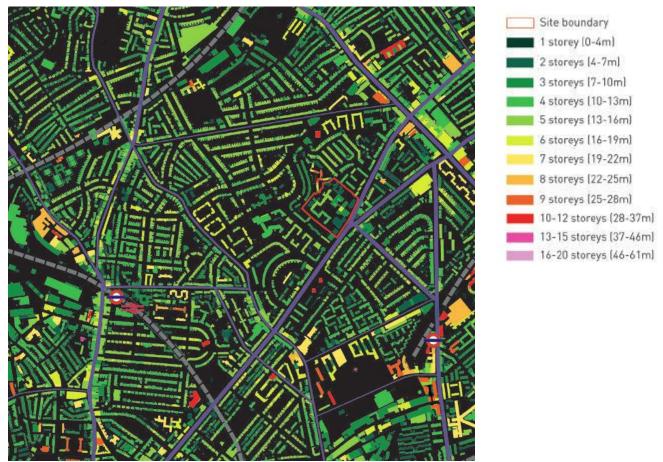


Figure 2: Building heights context map

- **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), and

- restoration of the church tower. (planning application approved subject to legal agreement).
- The former Territorial Army Centre on Parkhurst Road is allocated for residential-led development but does not currently 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 site's whilst maximising 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 individual 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 Aboricultural 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

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

- 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) local distributor roads (Dalmeny Avenue, Charlton Road and Tufnell Park Roads) and 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 minute walk away.
- 2.16 The existing prison buildings were purposefully laid out to discourage 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.

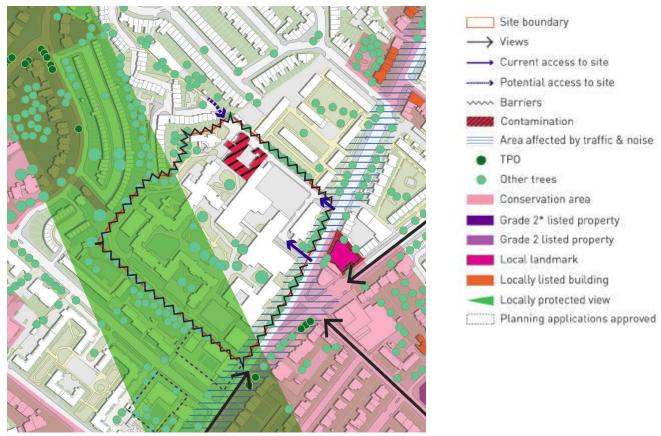


Figure 3: constraints map

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.

3. Key planning and development objectives

- 3.1 The site represents a real opportunity to provide a high quality, inclusive and sustainable new neighbourhood that can make a valuable contribution to the local community and built environment. A summary of the key objectives for the site can be found below, with further detail provided in the sections four and five of the SPD:
 - 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, which 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.
 - High quality design that responds to the site's 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.

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 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.
- 4.5 Islington has a borough wide affordable housing target of 50%, with developments required to maximise affordable housing delivery in order to achieve this 14. 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 Affordable Housing and Viability Supplementary Planning Guidance (SPG)15 emphasises that land in public ownership should make a significant contribution towards the supply of new affordable housing, and should deliver at least 50 per cent affordable housing to benefit from the SPG's 'Fast Track Route'. 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 site's constraints, policy requirements and key urban design considerations¹⁶. 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.

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.

¹⁴ Core Strategy Policy CS12.

¹⁵ Available at: https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/supplementary-planning-quidance/affordable-housing-and

¹⁶ Available at https://www.islington.gov.uk/spds

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
В	600
С	700
D	900

^{*}Figures are rounded and may be subject to minor amendments.

- 4.8 The council undertook viability analysis of scenario B (approximately 600 units) to assess if such as scheme would be deliverable and how planning policy requirements, such as affordable housing, can be achieved¹⁷. The viability analysis demonstrates a minimum of 50% affordable housing is achievable without grant. Taking into account the existing use value of the site this scenario is considered to provide a reasonable incentive for the landowner 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.
- 4.9 In addition to the above, the council has undertaken viability testing on scenario C, approximately 700 units, and scenario D with a capacity of 900 units¹⁸. 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 scenario D is acceptable in planning terms. Viability evidence shows that delivering 50% of units as affordable housing (including where shared ownership is replaced by London Living Rent) would be viable. Generally, it should be taken that schemes with a greater quantum of development can support this percentage of affordable housing whilst generating higher values. The scenarios are based on urban design work that is illustrative of one way in which the site could be developed according to the key principles identified. The final design of any scheme and quantum of development are likely to be different. Any future scheme will be subject to detailed design and appraisal and will need to demonstrate that it provides an appropriate response to the site's constraints and the context and character of the area.
- **4.10** 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

¹⁷ Available at: https://www.islington.gov.uk/spds

¹⁸ 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.

London Living Rent units, the impacts on the overall viability are not significant and at least 50% affordable housing is still viable.

- 4.11 As stated above, the scenarios tested did not include provision of grant but this should be accessed from the Greater London Authority to increase levels of affordable housing beyond what is viable without grant. Grant funding can be accessed by a Registered Provider (RP), either acting as the main developer or in partnership with the main developer. Where the main developer is not an RP, they would be required to engage a partner RP at an early stage, to optimise design, mix of homes and maximise provision of affordable housing. Any developer needs to be mindful of this principle of additionality associated with grant, and we would seek to embed this in any future legal agreement.
- **4.12** Developments are required to provide a mix of units across different tenures¹⁹. 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.
- **4.13** 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 standards²⁰. 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 required to sign a legal agreement to ensure that future residential units will not be left unoccupied²¹.

Non-residential uses

- **4.14** 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.
- **4.15** Islington's planning policies strongly protect existing social infrastructure uses and emphasise the importance of providing new social infrastructure to support large new developments²².
- **4.16** The prison is an unusual 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

¹⁹ As set out in Development Management Policy DM3.1.

²⁰ Including Core Strategy Policy CS9, Development Management Policies 3.4-3.7.

²¹ Further detail on this is set out in the Prevented Wasted Housing Supply SPD.

²² In particular Development Management Policy DM4.12.

that relevant social infrastructure is still adequately provided for. The historical use of the site as a women's prison is of national, regional and local importance.

- 4.17 The council places great emphasis on the retention of existing social infrastructure, particularly where it provides an important, accessible service. The loss of social infrastructure is proposed by the closure of the prison. No replacement prison will be provided on the site. As set out in Development Management Policy DM4.12, the full or partial loss of the social infrastructure use must be justified by demonstrating that 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 (noting that the demand for prison places is being met elsewhere within the prison estate)
 - 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.
- 4.18 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.
- **4.19** 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.
- **4.20** 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 provided as part of any future development proposals for the site in order to ensure equivalent levels of provision and access.
- 4.21 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 supported.

- **4.22** 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.
- **4.23** 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. together with a simpler more accessible range of services in one place, can help to avoid women remaining in high risk situations.
- 4.24 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 Service, 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. Whilst the council is keen to see a suitably sized building that can accommodate these facilities provided on site, it should be noted that it is highly unlikely that the council will be able to fund any additional services within these buildings.
- 4.25 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.
- 4.26 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 existing provision or providing new facilities²³. There was strong support for the provision of social infrastructure as part of the consultation process. Developers should liaise with the council

²³ As required by Development Management Policies - policy DM4.12.

at an early stage around the requirements for the provision of social infrastructure on the site.

- 4.27 The uplift in population associated with any development will generate additional demand for health facilities in the area. Islington Council has 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 picture of local health care needs associated with proposals and agree how these can be met.
- **4.28** A small amount of retail may be acceptable to serve the 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 an assessment of the impacts on nearby retail locations and consideration of amenity impacts²⁴.
- **4.29** 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 proposed²⁵.

Open space and play space

4.30 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 space²⁶. This should form a focal point of any new development, easy to navigate 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 policy²⁷ requires that all development is designed to (*inter alia*):

²⁴ Consistent with Development Management Policies DM4.4 and DM2.1.

²⁵ Consistent with policies CS13, DM5.1 and DM5.4.

²⁶ As required by policies DM6.2, CS16 and DM3.6.

²⁷ DM2.1A

- 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.
 - 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 online²⁸.
- 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.
- **5.6** An indicative site concept plan is shown below. This sets out some of the key design principles which are discussed further below.

²⁸ https://www.islington.gov.uk/planning/applications/permission-check/need-planning-advice/formal-pre-app-advice.

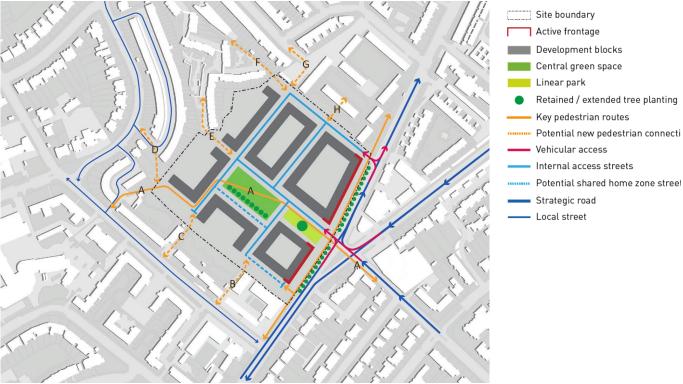


Figure 4: Concept Plan:

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 begins. 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 prevailing heights of buildings surrounding the site are generally 3-6 storeys. Buildings should respond to this local 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 impact of development and that this does not adversely impact on the view.

- **5.9** 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 area²⁹.
- **5.10** 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 this³⁰.
- **5.11** A perimeter block pattern would be in keeping with the character of the surrounding townscape³¹, 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.
- 5.12 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.
- 5.13 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 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.
- **5.14** 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, overdominance, 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.³²
 - Due to its redevelopment in the late twentieth century very few remnants of the Victorian Prison remain in place. The exception to this are two stone griffins which once marked the gateway to the prison. These artefacts were taken to the Museum of London when the prison was closed. The feasibility of returning these artefacts to any

²⁹ Development Management Policy DM2.3.

³⁰ Development Management Policy DM2.5.

³¹ Consistent with policies CS9, DM2.1 and the Urban Design Guide.

³² As required by policy DM2.3.

new development should be explored. Ways of commemorating the rich social history of the prison should also be explored, including its pivotal role within the history of the suffragette movement.

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).

- **5.15** 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 above³³.
- 5.16 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.
- 5.17 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.
- 5.18 New publicly accessible pedestrian connections across the site will be important in connecting the site the wider area, 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

³³ Development Management Policies DM2.1 and DM8.2.

- consistent edge treatment, clearly delineating between the footway and the private space outside dwellings.
- 5.19 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.
- 5.20 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). 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.
- **5.21** Cycle and pedestrian routes across the site should follow the street layout, and should allow for 24/7 public access. 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. The use of 'home zones' may be suitable for internal streets, although any identified 'home zones' will not be considered to count toward open space provision.
- 5.22 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.
- 5.23 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.
- 5.24 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.
- **5.25** As part of the approach to encouraging cycling, routes through the site should follow desire lines, be as direct as possible and should link in to the surrounding area. Adequate

- cycle parking must also be provided³⁴, and should be secure, sheltered, well located and accessible.
- **5.26** 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 application³⁵.
- **5.27** Islington's planning policies require that all new development is car free³⁶ (i.e. no parking will be allowed on site and occupiers will have no ability to obtain a parking permit, unless they are Islington's residents who are permit holders and have had a permit for at least a year). Wheelchair accessible parking should be provided, while some essential drop-off may also be permitted. Any such parking provision should have electric charging points.
- 5.28 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.
- **5.29** Proposals should adequately address delivery, servicing and drop-off requirements, with full details submitted alongside information about refuse and recycling collection.
- **5.30** 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

5.31 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 policies³⁷. All developments need to clearly demonstrate how the highest possible sustainable design standards have been achieved³⁸. 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

³⁴ As set out in Development Management Policy DM8.4 and Appendix 6 of Development Management Policies.

³⁵ Development Management Policy DM8.2 and appendix 5 of Development Management Policies.

³⁶ Core Strategy policy CS10 and Development Management Policy DM8.5.

³⁷ 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.

³⁸ 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).

carbon dioxide emissions to be offset through financial contribution to local carbon offset fund³⁹.

- 5.32 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.
- 5.33 Consistent with the London Plan and Islington's Local Plan there is a requirement for major developments to contribute towards decentralised heating and cooling networks⁴⁰. 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 buildings 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 networks⁴¹.
- **5.34** 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:
 - A single energy centre that serves the 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
- **5.35** The space required for an energy centre is likely to be between 500-1000sqm. 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.

³⁹ Core Strategy policy CS10.

⁴⁰ London Plan policy 5.5, Core Strategy Policy CS10 and Development Management Policy DM 7.3.

^{41 &}lt;a href="https://www.islington.gov.uk//~/media/sharepoint-lists/public-records/energyservices/information/guidance/20152016/20160310connectionsguidepart1">https://www.islington.gov.uk//~/media/sharepoint-lists/public-records/energyservices/information/guidance/20152016/20160310connectionsguidepart1.

- **5.36** Development needs to be to high standards with efficient buildings that have low energy costs to the end users. This is particularly important for future residents on lower incomes in order to avoid fuel poverty. There is a requirement to maximise energy efficiency⁴². In addition, the use of energy efficiency standards is highly recommended to ensure that key design principles have been fully integrated into proposals.
- **5.37** 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 area⁴³.
- **5.38** 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 hierarchy⁴⁴) without resorting to energy intensive cooling methods such as air conditioning.
- 5.39 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)⁴⁵. The approach to SUDs should achieve greenfield run-off rates and maximise amenity and biodiversity benefits with scheme design taking a holistic approach to landscape, water management and green infrastructure⁴⁶. Greenfield run-off rates should be achieved.
- 5.40 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 waste⁴⁷. 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.

⁴² Core Strategy policy CS10.

⁴³ Core Strategy Policy CS10, Environmental Design SPD and Islington Urban Design Guide.

⁴⁴ Identified in development management policy DM7.5.

⁴⁵ Core Strategy Policy CS10

⁴⁶ Development Management Policy DM6.6.

⁴⁷ Core Strategy Policy CS10

Inclusiveness

"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)

- **5.41** 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.
- **5.42** Inclusive design is a fundamental part of Islington's approach to development⁴⁸, it forms part of a holistic and interdisciplinary approach to development 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 form⁴⁹.
- **5.43** 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.
- **5.44** 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 tenure⁵⁰.
- **5.45** Detailed guidance about the approach that should be taken to designing inclusive buildings of different uses can be found in Islington's Inclusive Design SPD. This should be taken into account at the beginning of the design process.
- **5.46** 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

⁴⁸ As set out in Development Management Policy DM2.2.

⁴⁹ As set out in the Development Management Policies document and further elaborated in the Inclusive Design SPD.

⁵⁰ Islington Urban Design Guide and Core Strategy Policy CS12.

housing across all tenures, based on habitable rooms⁵¹. Wheelchair units should be pepper potted throughout the development offering a range of unit sizes. Where wheelchair accessible dwellings are above ground floor, a minimum of two lift cores will be required. All wheelchair accessible housing should be single storey⁵².

- **5.47** Whilst the development must be car free⁵³, there is a requirement for wheelchair accessible parking. The council will require accessible parking bays to be located onstreet. 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.
- 5.48 In addition to creating inclusive buildings, it is also essential that 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 to facilitate play for children of all ages. Islington's Streetbook and Inclusive Landscape SPDs provide further useful guidance on the design of inclusive spaces.
- **5.49** 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

- **5.50** 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 presence of green spaces and trees on the site, the provision of high quality green infrastructure, including open space, must be a fundamental part of any future development proposals.
- 5.51 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.
- **5.52** 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

⁵¹ Category 2 and Category 3 as set out in the Approved document to Part M of the Building Regulations

⁵² Inclusive Design SPD

⁵³ i.e. no parking will be allowed on site and occupiers will have no ability to obtain a parking permit, unless they are Islington's residents who are permit holders and have had a permit for at least a year)

⁵⁴ Core Strategy Policies CS15 and CS16.

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

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

something which inhibits the development potential of the site, but rather something that maximises the site's potential. Green infrastructure has social, environmental and economic value and should be a fundamental part of the design process, planned for in an integrated way from beginning⁵⁷.

- **5.53** 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.
- **5.54** 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.
- 5.55 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.
- 5.56 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 the focal feature of this green strip. Lighting should further strengthen this link into the site.
- 5.57 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.
- 5.58 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 footways and buildings should be landscaped, and managed and maintained to a high standard in perpetuity.

⁵⁷ Islington Urban Design Guide.

⁵⁸ Development Management Policy DM6.1.

⁵⁹ Development Management Policy DM6.1.

⁶⁰ Islington Urban Design Guide.

- **5.59** The provision of private amenity space should also be considered holistically as part of the site's 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.
- **5.60** 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.
- **5.61** 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.
- 5.62 Finally the approach to green infrastructure 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 to the northern end of the site on Parkhurst Road and could be extended further 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 publicly owned sites 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 has made it clear that, working with planning authorities and within the planning system, their primary objectives for the disposal of the site are a) the maximisation of capital receipt to help fund improvements to the prison estate elsewhere and b) the maximisation of housing potential for the site to support the Government's Public Land for Housing Programme. It is however important to note that the MoJ's desire to maximise its capital receipt does not override planning considerations or objectives for the site. Development of the site must take into account all relevant planning requirements

⁶¹ Core Strategy policy CS15.

⁶² Development Management Policy DM6.2.

⁶³ Development Management Policy DM6.1.

- including the requirement for affordable housing⁶⁴. Islington's viability evidence for the site demonstrates that the landowner can achieve a reasonable 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 will only materialise 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 fails to take planning policy requirements sufficiently into account, as evidenced by the recent Parkhurst Road appeal on land sold by the Ministry of Defence⁶⁵. The duty to achieve best value for the site does not therefore 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 Affordable Housing and Viability SPG sets out that land that is surplus to public sector requirements typically has low value in its current use, allowing higher levels of affordable housing to be delivered.
- 6.5 The onus is on bidders for the site to ensure all their assumptions are realistic and deliverable and fully take account of planning policy considerations. Any future buyers of the site who enter into negotiations with the council will be asked to make available the terms on which they bid for the land (quantum of development, level and type of affordable housing etc).
- 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 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 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

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.

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 determining land value. Viability testing should therefore always include and start with the policy target of 50% affordable housing. Testing carried out by the council indicates that this target is achievable on this site.

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 an 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 effects 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

⁶⁷ Consistent with Development Management Polices DM6.2.

will be subject to Community Infrastructure Levy charges in line with Islington's and the Mayor's requirements⁶⁸.

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