

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>
<p>Mix</p>	<p>Individuals/residents</p>	<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>
<p>Housing for women</p>	<p>Individuals/residents</p> <p>Women In Prison (Charity) A landowner (unnamed)</p>	<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	<p>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.</p>
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	<p>The site should be used to provide housing for the rehabilitation of young drink users and mental health housing.</p>
Housing for Older people	Individual/resident	<p>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.</p>
Over supply of cheap housing	Individual/resident	<p>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.</p>

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>

	<p>Education Funding Agency (EFA)</p>	<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>
<p>Youth facilities</p>	<p>Residents/individuals Charity (Centre 404)</p>	<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>
<p>Sports facilities</p>	<p>Residents/individuals</p>	<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>
<p>Health</p>	<p>Residents/individuals</p>	<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	<p>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.</p>
	Open university	<p>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.</p>
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>

	<p>Islington Green Party.</p>	<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
	<p>Two Community/Voluntary Groups/Resident</p>	<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.
	<p>Community/voluntary group</p>	<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.
	<p>Centre for Crime and Justice Studies</p>	<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

		<p>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.</p>
<p>Legacy use (general)</p>	<p>Individuals/residents</p>	<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 “<i>developers will seek to add high-rises to maximise returns, but this must be resisted</i>” 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	<p>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.</p>
	Residents/individuals	<p>A couple of questions were raised about what the effects of the development will have on the local water table and surface runoff.</p>

	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. 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>
<p>Parking</p>	<p>Residents/individuals 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.