

Consultation Statement



Holloway Prison Site Supplementary
Planning Document
January 2018

Regulation 12(a) Consultation Statement

Holloway Prison Site SPD Regulation 12(a) consultation statement

1. Purpose and background

The statement has been prepared in accordance with regulation 12(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) which sets out the requirements for public participation and for preparing a consultation statement. It accompanies a draft Supplementary Planning Document (SPD) which provides guidance on how the future development of the Holloway Prison site should be approached.

This statement sets out details of the preliminary consultation that has taken place which has informed the development of the draft SPD. It provides details of who was consulted, how and when to inform the preparation of the SPD, what main issues were raised during the public consultation stage and how those issues have been addressed in the draft SPD.

2. Preliminary consultation

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 6,000 properties in the local area, contacting around 1600 individuals and organisations on the Planning Policy database, as well as writing to additional stakeholders who were identified as having a specific interest in the site. 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.

The majority of the responses focused on future uses, in particular housing and affordable housing, open space, community facilities and commercial/employment uses. Appendix 1 summarises the consultation comments received, and the council's responses to these, and is structured according to the following main topics:

- Housing
- Social infrastructure
- Employment, retail and leisure
- Design and Conservation
- Sustainability
- Transport and Public Realm
- General Comments

3. Draft SPD consultation

Consultation on the draft SPD took place from 16 August to 3 October 2017. The council held two drop-in sessions at the temporary John Barnes Library, where residents and other interested parties could come and ask questions about the draft SPD and the site in general. In order to promote the consultation and drop-in sessions, the council organised extensive leafleting in the local area (several thousand leaflets in total), with the aim of publicising the proposals and maximising feedback.

The consultation was also promoted extensively on social media, with a reach of 456,000 people (the number of people who could have seen a social media post relating to the consultation). Social media activity generated almost 400 'clicks' through to the consultation website, with 120 retweets and 42 likes.

There were two ways in which to engage with the draft SPD consultation: written responses and an online survey.

Written responses

There were around 100 written responses to the draft SPD consultation. The majority of these responses were template letters of support for a swimming pool to be provided at the site, linked to representations from Anaconda swimming club (see below). Generally, responses were largely positive of the draft SPD's key objectives for the development of the site, in particular housing and social infrastructure.

The responses to the draft SPD consultation are summarised in Appendix 2, alongside the council's response to issues raised. The responses are grouped under the following main topics:

- Housing
- Social infrastructure
- Employment, retail and leisure
- Design and Conservation
- Sustainability
- Transport and Public Realm

The key issues raised during the consultation were as follows:

Housing: Affordable housing was one of the most commented on themes with large support for delivery of at least 50% affordable housing. Several respondents want to see more ambitious affordable housing targets, including increased percentages of social housing and the inclusion of alternative housing and assisted living accommodation for vulnerable women. The Ministry of Justice (MoJ) expressed concern with the viability work which underpinned the SPD objective to deliver 50% affordable housing.

Regarding the type and density of the dwellings, several respondents were strongly opposed to any high rise development. However, the MoJ expressed their disagreement with capping the sites capacity at 900 dwellings and prescribing an objective to maximise three-bedroom family units.

Social Infrastructure: The number of comments relating to social infrastructure were substantial and varied. The provision of a Women's Centre was widely supported in the consultation, with some variance about the exact services which should be provided. Several organisations expressed their desire to see a holistic women's centre acting as a focal point for these support services and becoming a beacon of best practice. The MoJ does not support

specific provision of a women's centre, stating that any centre should be provided as part of general community provision.

Alternatively, Anaconda Swimming Club provided a representation stating the case for the development of a competition standard swimming pool to allow the swimming club to expand. The representation was supported by further letters of support based on a standard template and a petition. Another individual respondent commented that providing a swimming pool would not be the most efficient use of space when housing and a women's centre are high priority.

Employment: There was support for some small scale commercial uses on site. The MoJ noted that demand for such space should be determined to ensure it is viable. There was support for the affordable workspace objective, but the MoJ feel this should be aspirational rather than a requirement.

Conservation and Design: Natural England and other respondents are in favour of requiring open space. The MoJ welcomes an appropriate level of open space but finds the requirement to locate such space in the centre of the development overly prescriptive.

Several respondents commented on the unsuitability of tall buildings on the site.

The MoJ argue that there is clearly scope to maximize the opportunity for high density development at a high scale.

Sustainability: Most written responses commenting on sustainability were in agreement with the draft SPD's sustainability objectives and standards. Several comments were made regarding the poor air quality around the site. Natural England and the Islington Green Party stated the importance of providing green infrastructure and ecological networks, which benefit people and local ecology, as well as mitigating against flooding and heatwave effects.

Transport and Public Realm: There was strong support for a car free development. The importance of good connectivity through and around the site for pedestrians and cyclists was expressed by several respondents.

Online survey

An online survey was created using the Survs online survey tool. The survey asked questions about whether people agreed with the land use priorities identified in the draft SPD, namely housing, non-residential uses (particularly a women's centre/building) and open space.

There were just over 400 responses to the online survey, with summary statistics as follows:

- 76% of respondents were residents
- 15% of respondents were community/voluntary groups.
- 85% agreed with the draft SPD housing objectives; 69% strongly agreed and 16% agreed.
- 84% agreed with the draft SPD non-residential uses objectives including the inclusion of a women's centre; 40% strongly agreed and 43% agreed.

- 86% agreed with the draft SPD open and play space objectives; 56% strongly agreed and 30% agreed.

The council were also given a small number of printed survey responses at one of the community consultation events. These responses all supported provision of affordable housing.

The survey had room for respondents to leave further comments/views on the consultation. The council has analysed these comments. Largely, the comments reflect the issues identified in Appendix 2, in particular support for affordable housing (with a particular emphasis on this being genuinely affordable), a women’s centre and open space. There were several ‘unique’ responses which were not raised elsewhere. These are noted below, alongside the council’s response:

Summary of comments	LBI response
Site should not be planned for any development as this would cause loss of peace and quiet for nearby residents.	This site offers a unique opportunity to meet need for new homes, social infrastructure and other uses. Amenity of nearby residents will be a key consideration of any planning application.
Site should be turned into a park, maybe with a pond. Alternatively a social forest with orchard should be provided.	As above, the site is an opportunity to meet key development needs, so turning the entire site into a park would not be the best use of the site.
Provision of transgender centre, community forest garden project, refugee community kitchen, people's supermarket, permaculture gardens, hydroponics food production. English cultural centre.	These suggested uses are very broad ranging and too specific to specify in the SPD. However, several of these uses could be considered suitable in principle, with regard to general retail/commercial/social infrastructure space.
Provision of facility for universal youth provision.	A specific youth facility is unlikely to be a priority but the SPD does note requirement for formal play space and playable space.
Include a cultural space like the Turner Gallery in Margate.	Cultural uses would not be a priority for the site, compared to other objectives of the SPD.
No taxpayer subsidised housing; maximise the sale price plus S106 payments from the developer.	This betrays a misunderstanding of development economics. Higher land prices could mean less S106 contributions and may increase the amount of grant funding necessary to deliver affordable housing.
Two respondents question the need for a women’s centre. Why not a men’s centre or a people’s centre.	There is a defined need for specific provision for female offender service provision. Such a facility is a fitting legacy for the site and reflects the existence of a significant number of women’s organisation in the borough.
Sport England commented that the borough is short of sports provision, and that provision of a MUGA should be considered, potentially alongside a sports wall.	Noted. The council has commissioned evidence to assess requirements for sports facilities. If this research shows specific needs for provision, the council will consider how these needs can be met as part of the Local Plan.

Appendix 1

Topic/section of document	Respondent	Summary of comments	LBI response
Affordable Housing (general)	Individuals/residents Community groups Councillors 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>	<p>Support for affordable housing noted. The draft SPD sets out the importance of affordable housing being provided consistent with planning policy which requires the majority (70%) of affordable housing to be social rented. The SPD also reflects the policy requirement that the remaining 30% of affordable housing provided should be intermediate (such as shared ownership or potentially London Living Rent)</p> <p>The draft SPD emphasises the importance of affordable housing as a key objective and has a section on housing which focuses on the context and need for affordable housing in the borough and how the site can help to address this need.</p> <p>Islington’s planning policy seeks to maximise the provision of affordable housing with a view to achieving a borough wide target of 50%. This final proportion of affordable housing will be determined through the viability process as part of a future planning application. However, the SPD sets out clear expectations around the level of affordable housing that can be provided on the site, based on the initial viability testing commissioned by the council.</p> <p>The council’s understanding, based on the ongoing engagement with the Ministry of Justice, is that the site will be sold to a private housing developers. It is common practice that the developer would then work with a Housing Association (Registered Social Landlord) to deliver the affordable housing element of a scheme. The council will work with any future developer and a housing association to deliver affordable housing and will explore the different ways that this could be delivered that meet identified housing needs consistent with planning policies.</p> <p>In light of the stated intention by the Ministry of Justice to sell the site on the open market, community-led housing initiatives/projects such as a Community Land Trust is unlikely to happen on this site.</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. • 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 stating support for community led housing projects, as well as interest in the model from the former Housing Minister 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>Although a key priority is to maximise affordable housing and within that social housing, Islington’s planning policies also seek to promote mixed and balanced communities and this applies to having different tenures. Future development on the site will provide a mix of tenures – including private and affordable housing.</p> <p>Islington Council have taken a strong stance against new build properties being left empty. The SPD highlights that as part of the planning application process the developer will be required to sign a legal agreement to ensure that future residential units will not be left unoccupied consistent with the council’s Prevented Wasted Housing Supply SPD.</p> <p>Islington’s planning policies seek to limit student accommodation to just a couple of locations in the borough and</p>

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.

			the Holloway Prison site is not one of them. New student accommodation would therefore not be supported.
Housing for women	<p>Individuals/residents</p> <p>Women In Prison (Charity)</p> <p>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> <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.</p>	<p>Noted. The council will work with any future developer and housing association to deliver affordable housing and explore the different ways that this could be delivered that meet identified housing needs and is consistent with planning policies.</p> <p>Future housing allocations will be allocated to those on the housing waiting list with the highest priority which may help to provide housing in relation to some of the points raised.</p> <p>The scope and need for supported housing, will also be assessed.</p>

	<p>Ministry of Justice</p>	<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. Welcome further discussions in this regard. 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>	<p>The aspiration to use proceeds from the sale of the site to fund the delivery of and improvements to prisons elsewhere is understood. However, as set out in the draft SPD it is essential that planning policies, including policies on affordable housing, are fully taken account of at an early stage and in the price that is paid for the land. 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 - including those for affordable housing - sufficiently into account.</p>
	<p>Greater London Authority (GLA)</p>	<p>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.</p>	<p>Noted. The approach to affordable housing and viability reflects Islington’s policies and guidance and is considered to be in conformity with the approach of the Mayor.</p>
<p>Accessible housing</p>	<p>Centre 404 (charity) Individuals/residents</p>	<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 respondents 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>	<p>The importance of accessible and inclusive housing and the wider environment is clearly set out in the draft SPD, in particular there is a whole section dedicated to inclusiveness in the design chapter.</p>
<p>Housing amenity space</p>	<p>Individuals/residents</p>	<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. 	<p>Future housing development on the site will be required to provide housing amenity space for future residents, including the provision of private amenity space (balconies/gardens). Links to this planning policy are referenced in paragraph 4.14, further guidance is also set out in the green infrastructure section.</p>

Housing Design	Individuals/residents	<p>A number <u>of</u> 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. 	<p>Comments and concerns around housing design are noted. There are a number of planning policies around design, which deal with issues raised in this section, that would be applicable to any future planning application, including the need for high quality design and that minimum space standards are met. These are complemented by a section on design within the draft SPD.</p>
	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>	<p>Noted. The council will work with any future developer and housing association to deliver affordable housing to meet identified housing needs consistent with planning policies. Future housing allocations will be allocated to those on the housing waiting list in line with the council’s allocations policy which has specific criteria in relation to homeless applicants.</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>	<p>Noted. Islington's planning policies prioritise large family units as part of the affordable housing of new developments, particularly within social rented accommodation. The draft SPD further emphasises that the site would lend itself well to providing a genuine mix of unit sizes, including a significant proportion of family accommodation.</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>	<p>See comments above in relation to supported housing. The scope and need for supported housing, will also be assessed, in consultation with NHS and other stakeholders.</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>	<p>The council will work with any future developer and housing association to deliver housing to meet identified housing needs. The planning department will work closely with colleagues in housing and adult social care to assess the extent to which specialist housing may be required on the site as part of the overall mix of units.</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>	<p>There is a significant and growing need for affordable housing in the borough. The provision of a significant proportion of affordable housing on the site will help to address this need. There is no evidence to suggest that there is or will be an oversupply in cheap housing. As with other policy areas housing trends, needs and evidence is kept under review.</p>

Topic/section of document	Respondent (s)	Summary of comments	LBI response
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. • A centre for culture • 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 funds) 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>	<p>Noted. The need for and provision of social infrastructure (which can include community space) is set out in chapter 4 of the draft SPD and its importance is recognised. In response the additional pressures associated with population growth the draft SPD highlights that 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 facilities and that developers should liaise with the council at an early stage around the requirements on the site.</p>

<p>Education/school provision</p>	<p>Residents/individuals A landowner (unspecified)</p>	<p>Around a dozen respondents mentioned education provision and in particular school 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>The council have looked at the school place projections and future population/housing growth and have concluded there is no requirement for a new school on the site. There is a programme of expansions to existing schools (primary and secondary) to cater for future population growth. The requirements for school places in the borough are kept under review and reported on annually.</p> <p>The draft SPD clearly sets out the need for open space to be provided on the site. There may be potential for education opportunities associated with this.</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>See above. There is not deemed to be a requirement/need for a new school on the site.</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</p>	<p>The draft SPD clearly sets out the need for additional social infrastructure on the site. The scope and detail of this will be determined as part of the planning process and could include the provision of facilities which provide an offer for young people. In addition, the SPD clearly sets out the requirement for open space and play space and for future proposals to be inclusive in order to attract</p>

		(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.	diverse users including young people and children with disabilities.
Sports facilities	Residents/individuals	<p>There were around a dozen comments on sports facilities. These included:</p> <ul style="list-style-type: none"> • Having a gym for older people. • Nearest gyms aren’t convenient (e.g. Kentish Town and Tufnell Park). • Having a basketball court. • Having a tennis court. • Having arts and sports facilities. • 5 comments were made about having a swimming pool – some of these comments highlighted the existing pool within the prison building, the lack of other options (Archway as a leisure pool and Closure of Hornsey Road), the lack of public access to bridge school pool. The health benefits of swimming were also highlighted. <p>One respondent suggested that part of the site, to the rear, could be used for a crazy golf course and shrubland with a water feature, with development of housing facing Camden Road.</p>	<p>The design of future open space/play space on the site can consider how physical activity can best be promoted and encouraged.</p> <p>There are several gyms in the local area. With regards to public gyms the Sobell Leisure Centre is easily accessible by bus and alongside the Islington Tennis Centre (which also has a gym) is around a 15 minute walk away.</p> <p>With regards to swimming pool provision Holloway School provides after school and evening activities for local residents through swimming clubs. Highbury Pool and Cally Pool are both relatively close to the site and easily accessible.</p> <p>The provision of a crazy golf course would not be considered to make the most efficient use of the site given the substantial and identified need for other land uses in the borough.</p>
Health	Residents/individuals	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.	The draft SPD highlights the additional demand for health facilities that will be generated as a result of population growth and that following an assessment of the likely impacts of new development, there is unlikely to be the need for a new GP practice on the site provided that neighbouring facilities can expand. It is stated that future developers of the site should engage with Islington Council and the Clinical Commissioning Group at an early stage in the development of proposals to confirm an updated local picture of health care needs associated with proposals and agree how these can be met.
	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 Goodinge 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.	Noted. There are several aspects of the draft SPD that are relevant to the wider determinants of health and seek to promote positive health and wellbeing outcomes as part of any future development of the site.
Open space	<p>Residents/individuals</p> <p>Centre for Crime and Justice Studies</p>	<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. 	Strong support for open space is noted. The draft SPD highlights the need for open space to be provided on site given the lack of open space in the area. The need for open space to be provided is set out in the objectives

	<p>Islington Green Party Greater London Authority (GLA).</p>	<ul style="list-style-type: none"> • 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>	<p>and uses chapters, whilst the design chapter contains a section on green infrastructure which provides further guidance around the delivery of open space, this includes recognition of the benefits of open/green space.</p>
<p>Biodiversity/trees</p>	<p>Residents/individuals Islington Green Party</p>	<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 draft SPD recognises the value of the existing biodiversity (including trees) on the site. This is referred to in both the Context and Constraints chapter and the green infrastructure section of the Design chapter. The</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 • 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>	<p>draft SPD highlights the need to retain and protect existing trees and the need for tree planting throughout the development including along Camden Road/Parkhurst Road. As part of a landscaping strategy future proposal will be expected to set out the approach to landscaping and biodiversity, including having regard to the Biodiversity Action Plan and Arboricultural Implications Assessment would also be required. The draft SPD is also clear that for any trees that the council agrees can be removed there should be replacement canopy cover on site.</p>
Women's Centre/Building	GLA	<p>The discussion paper mentions the possibility of support services for women in the justice system, this may be appropriate but should be evidenced.</p>	<p>The draft SPD address the need for support services for women in the criminal justice system as evidenced in the response from the Mayor's Officer for Policing and Crime below.</p>
	Mayor's Office for Policing and Crime (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>	<p>Noted. The draft SPD highlights the importance of providing a women's centre/building on the site that could provide space for the Female Offender Service.</p>
	Individual/Respect Party representative	<p>Support their organisation to highlight the needs of women, importance of education and avoiding financial problems which damage families.</p>	<p>Noted.</p>
	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. 	<p>Strong support noted. Comments related to this topic have helped inform the drafting of the SPD.</p> <p>The draft SPD highlights the importance of providing a women's centre/building on the site. This includes a paragraph which highlights that the need for a women's centre/building is something that has been identified by a</p>

		<ul style="list-style-type: none"> • 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. • 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 from BAME communities) 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. 	<p>number of stakeholders. The draft SPD states that in developing future proposals for the site, it will be important to engage with the planning department, the Council’s Voluntary and Community Sector (VCS) team, MOPAC and other key stakeholders to help assess the extent of what is required. The draft SPDs states that this should include a safe women only space, with separate and secure access and outdoor amenity space, 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.</p>
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<p>Women’s centre/building</p>	<p>A Landowner</p>	<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 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>	<p>See response above. Comments related to provision of a women’s centre/building, received during the preliminary consultation, have informed the drafting of the SPD. For details please see Chapters 3 and 4 of the draft SPD</p>
	<p>Maya Centre Islington</p>	<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>	
	<p>Women United in Action</p>	<p>A women’s building is important on the site.</p>	
	<p>Open university</p>	<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>	
<p>Women’s centre/building</p>	<p>Rooms of our own</p>	<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 organisations 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. 	

		<ul style="list-style-type: none"> • 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 (IMECE Women’s Centre)</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 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</p>	

		<p>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 	
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		<p>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.</p> <ul style="list-style-type: none"> • 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 (NIA)	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 it's 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>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>	<p>We have engaged with a range of statutory and voluntary organisations. Through this process the need for services for women, including those within the criminal justice system, has been identified. The drafting of the SPD reflects these findings.</p>

	<p>Independent Advisory Panel on Deaths in Custody (IAP)</p>	<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>	<p>Noted. This will be something that will need to be considered as part of a wider review of the criminal justice system. With regard the remit of the SPD and what can be achieved as part of the planning process, through the provision of a women’s centre/building on the site there can be a range of services provided including supporting women in the criminal justice system.</p>
	<p>Rights of Women</p>	<p>Leading women’s legal charity, Rights of Women (based in Islington) support the proposal made to create a Women’s Building on the site of the former Holloway Women’s Prison. Aside from the fact it would be a fitting legacy considering the history of the site, the proposal has been rooted with a series of robust financial arguments that would allow it to become self-sustaining through income generation. A women’s building with the resources proposed would be unique and valued by a wide cohort of local communities whilst also attracting building and service users from elsewhere. There is a great deal of support for this venture within the women’s sector and a desire to see Islington Council continue its longstanding supportive partnership working with the sector through this project.</p>	<p>Support noted. See responses above.</p>
<p>Legacy use (general)</p>	<p>Individuals/residents Community/voluntary group</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. 	<p>Suggestions noted. Through the provision of a women’s centre/building on the site there can be a range of services provided. The draft SPD highlights that 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.</p> <p>The draft SPD highlights the historic significance of the site and sets out the requirement for a legacy use in the form of a women’s/centre building. The scope for other memorials such as plaques and statues can be explored when proposals for the site have been worked up in more detail as part of the planning process.</p>

		<ul style="list-style-type: none">• 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.	
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Topic/section of document	Respondent	Summary of comments	LBI response
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 lively daytime and evening space with diverse architecture." 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.	The draft SPD highlights how a mix of uses can be supported on the site, including the potential for affordable workspace and a small amount of retail use.
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 or 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>	Noted. The draft SPD highlights the potential for affordable workspace/some business use on the site to provide employment opportunities as well as a small amount of retail provision.
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 	The draft SPD highlights the scope for a small amount of retail provision, this could include cafes. It is not possible to specify the types of business that could be secured as part of a future planning application, only the use class(es) can be specified (e.g. A1 shops, or A3 cafes and restaurants). The size of the retail units can be specified and small units

		<p>retailers such as an organic grocery store, butchers, fishmongers or bakery.</p> <ul style="list-style-type: none"> • 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 increase employment opportunities for local people. • 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 they 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>	<p>are more likely to be used by independent/local businesses.</p> <p>Given the site’s proximity to the Nag’s Head Town Centre and Local Shopping Areas the site is considered to be well served by local shops. The draft SPD therefore highlights that a small amount of retail provision may be acceptable subject to an assessment of impacts on nearby retail locations.</p>
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<p>Education/training</p>	<p>Residents/individuals</p>	<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>	<p>The draft SPD highlights the scope for affordable workspace, this could include provision for social enterprises, as well as space for charities and local organisations. Potential links with local educational institutions can be explored once there are more detailed proposals.</p> <p>Communal amenity space and open space will be required as part of future development on the site as set out in the draft SPD. The Draft SPD also highlights that opportunities for food growing should be explored and integrated into the design of a future scheme.</p> <p>The draft SPD highlights the potential for the women’s building/centre to provide services to the wider community, this could include flexible spaces for hire.</p>
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Topic/section of document	Respondent	Summary of comments	LBI response
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.	Consistent with Islington's Planning Policies the draft SPD highlights the need for high quality contextual design. Further guidance on this is provided in the design section, which also highlights the importance of connecting the site to the surrounding area. This will help with integrating new development within the existing built environment. The constraints and context sections of the draft SPD highlight the need for future development to conserve and enhance the setting of nearby heritage assets.
	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.	The scope for uses other than residential are set out in section 4 of the SPD. This includes community uses as well as the scope for commercial uses. Combined with a new public space the intention is to create a new neighbourhood which integrates into its surroundings and encourages people into the site.
	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.	The draft SPD encourages high quality contextual design consistent with existing planning policies, however it does not specify the exact architectural style, this level of detail will be something that will be discussed and consulted on as part of the planning application process.
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</p>	<p>As set out in the draft SPD the building heights in the surround area are generally 3-5 storeys. The Bakersfield Estate varies in height from between 4-10 storeys. This is anomalous to the immediate site surroundings and should not be used to inform the context of the site.</p> <p>Islington planning policies clearly set out the approach to tall buildings (over 30m, generally 10 storeys). They are only considered appropriate in a limited number of locations and this is not one of them.</p> <p>The extent to which heritage assets will be affected by development will depend on the nature of the proposals and will need to be assessed.</p>

		comprehensive redevelopment of the site should be the primary objective.	
	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>	See response above with regard to building heights.
	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 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>	The density will be informed by a design solution which is consistent with planning policies and the guidance set out in the draft SPD. As noted above, consistent with planning policies the SPD seeks to promote a high quality and contextual design approach. Tall buildings are not considered appropriate in this location as set out in Islington's Local Plan.
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>	<p>Future development proposals will be required to provide a good level of amenity (including consideration of privacy, daylight and sunlight) consistent with relevant planning policies and text within section 5 of the draft SPD.</p> <p>The draft SPD highlights the importance of minimising the impacts of construction with construction practice standards put in place to address the effects of construction and the approach to construction practice will be secured as part of the legal agreement.</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. 	The constraints and context sections of the draft SPD highlight the need for future development to conserve and enhance the setting of nearby heritage assets, consistent with relevant planning policies.

		<ul style="list-style-type: none"> 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>	<p>Support noted.</p> <p>The constraints and context sections of the draft SPD highlight the need for future development to conserve and enhance the setting of nearby heritage assets. The importance of reconnecting the site to the surrounding area is also highlighted. The draft SPD also highlights the historic and cultural significance of 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>	<p>The draft SPD highlights the historic significance of the site and sets out the requirement for a legacy use in the form of a women's/centre building. The scope for other memorials such as plaques and statues can be explored when proposals for the site as being worked up in more detail as part of the planning process.</p>

Topic/section of document	Respondent	Summary of comments	LBI response
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>	<p>The draft SPD highlights the importance of sustainability in the objectives and contains a section on sustainability as part of the design chapter. This sets out to encourage high sustainability standards consistent with relevant planning policies which includes Islington’s zero carbon development policy. Sustainable design standards also include waste minimisation.</p>
Re-use of existing buildings and embodied carbon	Residents/individuals Islington Green Party.	<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> <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>	<p>The sustainability section of the draft SPD sets out the importance of minimising the environmental impacts of materials, including through the use of sustainably sourced, low impacts and recycled materials. It also sets out that 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</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>	<p>Noted. The sustainability standards referred to in the draft SPD include energy standards. The draft SPD sets out the requirement for an energy centre on-site to meet energy needs as well as the requirement to maximise energy efficiency, energy saving measures and renewable energy.</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 draft SPD highlights the importance of minimising the impacts of construction with construction practice standards put in place to address the effects of construction and the approach to construction practice will be secured as part of the legal agreement.</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>	<p>Noted.</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>	<p>Sustainability policies referred to in the draft SPD include water consumption/efficiency, rainwater harvesting, and sustainable drainage to minimise the impacts on/of water.</p>
	Islington Green Party	<p>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.</p>	<p>See above, sustainability policies require water sensitive design, with an approach that should achieve greenfield run-off rates.</p>

Topic/section of document	Respondent(s)	Summary of comments	LBI response
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. Another respondent commented on the safety of the space whilst a prison is closed. 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. 	<p>Noted. There is a section on the importance of connectivity in the design chapter of the draft, this includes encouraging walking and cycling.</p> <p>The draft SPD highlights that there are several connections that should be explored and facilitated and this includes links to the Bakersfield Estate, Crayford Road, Penderyn Way and Dalmeny Avenue. Some of these routes are likely to be easier to achieve and deliver than others. Concerns about safety of some existing routes noted.</p> <p>Having more than one entrance for cars/vehicles is likely to be difficult given the existing junction arrangements. As stated in the draft SPD it will be important for a developer to work with the council and TfL in developing plans for access to the site and exploring any changes to existing junctions. Any new access from Camden Road which forms part of the Transport for London Road Network would require consultation and agreement with TfL.</p> <p>Given the above the access from Camden Road and any adjustments to it will be carefully managed and require close cooperation with TfL.</p> <p>Any improvements or alterations to the gyratory on Parkhurst Road/Camden Road would be something that would need to be taken forward by Transport for London.</p> <p>Text has been added about the need for consultation and agreement with TfL for any changes to the TLRN.</p>

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>	<p>Noted. As stated above the draft SPD encourages walking and cycling consistent with relevant planning policies, this includes reference to cycle parking, linking back to the standards set out in the Development Management Policies document. Islington's policies are considered to be in general conformity with the London Plan. Any changes to existing policies with regard to cycling will need to be considered as part of the Local Plan review.</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 Caledonian) are already at capacity, especially at rush hour and that buses on Camden Road are full in the morning. <p>Within this context the additional burdens that new development would have on public transport infrastructure was as a concern with provision to mitigate this and increase capacity emphasised.</p>	<p>Improvements to public transport infrastructure are highlighted in the objectives for the site. The connectivity section also highlights the importance of working with the council and TfL in exploring improvements in access to the public transport network (including bus, tube and overground). There will still be a requirement for bus stops along Camden Road.</p>
Parking	Residents/individuals Islington Green Party	<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 stated 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>	<p>The draft SPD emphasises Islington's approach to car free development. All development is required to be car free. This means that no parking will be allowed on site (other than wheelchair accessible parking) and that occupiers will have no ability to obtain a parking permit. There is therefore likely to be limited need for electric charging points. The impacts of the development on neighbouring roads and in relation to parking is therefore minimised.</p> <p>The draft SPD highlights the importance of minimising the impacts of construction, including traffic, with construction practice standards put in place to address the effects of construction and the approach to construction practice will be secured as part of the legal agreement.</p>

Topic/section of document	Respondent	Summary of comments	LBI response
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.	The draft SPD sets out the requirement for social infrastructure uses to meet local needs as well as the requirement for open space and a women's centre/building. A future developer of the site, be they private or public, would be expected to comply with relevant planning policies and guidance for the site, including the draft SPD.
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>	<p>There have been discussions with various stakeholders as part of the development of the draft SPD. The draft SPD (sections 5 and 6) set out the requirement for developers to engage with the local community at an early stage in the scheme design process as well as the importance of maintaining an ongoing dialogue to clearly communicate key construction timescales and events as well as take into account feedback from any issues identified. It is also highlighted that a list of key organisations can be provided.</p> <p>This consultation statement will be updated following consultation on the draft SPD. It will set out the main issues raised and how they were taken into account.</p> <p>If individuals or organisations would like to discuss future proposals for the site with the council then officers are happy to arrange meetings, particularly during the consultation period on the draft SPD.</p>
New community	Individuals/residents	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	Noted. The objectives for the draft SPD highlight how the site provides an opportunity to make a valuable contribution to the local community and that future development facilities

		<p>community in this large and historically important site. Another comment highlighted that the site is an opportunity to put real 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 Bakersfield estate (former prison officers accommodation) is included in the development proposal?</p>	<p>community cohesion. It is hoped that through creating a high quality inclusive and sustainable new neighbourhood the site will create a place where people desire to live.</p> <p>A key part of good design (as specified in the draft SPD and Islington's planning policies) is that it is adaptable. This is also emphasised within the context of housing so that it can accommodate changing needs.</p> <p>The Bakersfield Estate is not included within proposals for the site, however the proposals will need to demonstrate how they integrate with and connect to the surrounding environment, including the Bakersfield Estate.</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.	The Ministry of Justice are reviewing the whole of the prison estate as part of their prison estate transformation programme. It is not clear at this stage which other prisons will close and where alternative provision will be made available.
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.	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 – including those for affordable housing - sufficiently into account.
No comment	<p>LEAP (London Economic Action Partnership)</p> <p>Natural England</p> <p>Environment Agency</p> <p>Highways England</p> <p>Health and Safety Executive</p>	No comments.	Noted.
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.	The draft SPD encourages a mix of uses, including housing, a women's building/services, employment opportunities and green open space. The design section highlights the sustainability policies are applicable as part of a sustainable future development proposal.

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	Supported noted.
	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.	Support noted.
	Ministry of Justice	<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> <p>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.</p>	The draft SPD provides further guidance on existing policies in order to promote the best development possible on the site. The draft SPD positively promotes residential development.
	EFA	<p>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.</p> <p>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.</p>	Support noted. The EFA will be notified/consulted on future updates to the boroughs CIL.

Appendix 2

Topic/section of document	Respondent	Summary of comments	LBI response
Affordable Housing	Individuals/resident	Reference to the need for social housing with a presumption against luxury homes.	Noted. Providing genuinely affordable housing is a key objective of the SPD. The council's viability work which underpins the SPD suggests at least 50% affordable housing is deliverable.
	Reclaim Holloway	<p>The current target of 50% affordable housing is felt to be too unambitious given the huge need for housing in the borough. Community-led housing provides the potential for 100% affordable housing with greater long-term financial value.</p> <p>Reference was made to 30% of the AH being intermediate in the form of shared ownership or LLR. These two models are financially out of reach for the majority in housing need.</p> <p>More genuinely affordable housing would enable higher levels of public saving through reduced housing benefit payments and higher contributions to public funds.</p> <p>Given the legacy of the site, we also want to see an investment in appropriate housing for women affected by incarceration or disadvantaged in social circumstances which often lead to incarceration. This should include supported housing (which also enables women to address complex needs through support services embedded in the housing scheme). Supported housing 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>	<p>Comments noted. While the council agrees that 100% affordable housing would be preferable, it would not be realistic given that the site is being sold by the landowner to a private developer and there is a requirement set in national planning policy to consider the financial viability of development. However, as stated above, maximising provision of affordable housing is council's key objective and the council's viability work which underpins the SPD suggests at least 50% affordable housing is deliverable.</p> <p>With regard to intermediate housing, the council's policy seeks a 70:30 split between social rented and intermediate. Preference would be for rented housing at rent levels which are genuinely affordable rather than shared ownership which is increasingly unfordable. It is noted that provision of LLR has a greater viability impact than shared ownership, albeit 50% affordable housing is still considered viable with provision of LLR.</p> <p>Whilst a laudable aim, reduction of the housing benefit bill is not a planning matter.</p> <p>At the time of writing the SPD, needs for supported housing for any specific group in the borough, has not been quantified, hence the SPD has no specific acknowledgment. This issue will be explored in due course and it might be that some supported housing will be sought during the preparation of detailed plans for the site. It is anticipated that any supported housing would be part of the overall affordable housing provision on the site.</p> <p>In any case, on the issue of which specific groups any future housing on the site will be allocated to, this is determined in</p>

			<p>line with the relevant housing legislation and the council’s housing allocations policies which are separate from planning. There are over 18,000 households on the council’s housing waiting list at the moment. Once the affordable homes are completed on the site, which will take several years, they will need to be allocated in line with the relevant housing legislation and the council’s allocations policies at the time.</p>
	<p>Centre for Crime and Justice Studies</p>	<p>The Centre for Crime and Justice Studies (CCJS) are preparing a Community Plan for Holloway, working with local people and community groups. The CCJS have conducted a survey of almost 1,000 respondents to inform this community plan, including a number of women currently or formerly within the criminal justice system. The survey asked questions on the most important issues for the site and asked what people would like and not like to see on the site. Housing and particularly affordable housing was a key priority for the respondents engaged through the consultation. The survey found that people are most opposed to 'unaffordable luxury flats, followed by private housing, high rise, gated or privatised space and private development.</p>	<p>Support for affordable housing noted. The council’s viability work which underpins the SPD suggests at least 50% affordable housing is deliverable.</p> <p>Islington's planning policies also aim to create mixed and balanced communities and this involves providing different tenures. Private dwellings will form part of the development as well as affordable housing.</p> <p>Gated development and privatised space is not consistent with Local Plan policy and would be resisted. The SPD is clear about the requirement for publicly accessible space throughout the development and linking through to the wider community.</p> <p>In terms of building heights, the SPD highlights why the site is not suitable for high-rise buildings.</p>
	<p>Ministry of Justice</p>	<p>The MoJ support the SPD's affordable housing of appropriate levels in para 3.1. However, in regard to para 4.6-4.11 they take the view that seeking 50% affordable housing should be subject to full viability testing. It is commented that this target is inappropriate to conclude that 50% affordable housing can be delivered on the basis of 'high level' analysis, nor should there be a requirement to deliver above 50% AH.</p>	<p>Comments noted.</p> <p>The MoJ will be fully aware of the council’s planning policies on affordable housing. Policy CS 12 of the Islington Core Strategy requires that 50% of additional housing to be built in the borough over the plan period should be affordable. The policy also states that the maximum reasonable amount of affordable housing, especially social rented housing, will be sought from private residential and mixed-use schemes, taking account of the overall borough wide strategic target. Further it states that many sites will deliver at least 50% of units as affordable, subject to a financial viability assessment, the availability of public subsidy and individual circumstances on the site.</p> <p>The council's viability assessment has been undertaken to test what is the maximum reasonable amount of affordable housing that can be provided on this site, as required by the above policy.</p>

			<p>The council considers that the viability work undertaken is sufficiently robust to demonstrate that 50% affordable housing is achievable on site, and it is important to set this benchmark to indicate expectations to potential purchasers of the site.</p> <p>Further, the viability assessment was undertaken in line with the council's adopted Development Viability SPD .</p> <p>The MoJ will also be aware of the relevant affordable housing policies in the current London Plan as well as the provision of the Mayor's SPG which sets out what levels of affordable housing should be achieved on public sector disposal sites.</p>
Islington Green Party	<p>Islington Green Party considers a 50% affordable homes target, of which 70% is social housing an absolute minimum requirement. Therefore, they would like to see a significantly higher social housing component for the development.</p> <p>In strong agreement with 'maximising affordable housing to meet identified housing needs in the borough'.</p>		<p>Noted. At least 50% affordable housing (without grant) with 70% social housing and 30% intermediate housing, is considered viable based on the council's assessment.</p>
Individual/resident	<p>Development of the site should include housing but as much as possible being low rent/affordable housing. This respondent believes scenario B in the draft SPD of 600 dwellings is most appropriate and that ex-prisoners should be prioritised for the social housing.</p>		<p>Noted. The council's viability work which underpins the SPD suggests at least 50% affordable housing is deliverable. The SPD sets out capacity scenarios which are likely to be acceptable in planning terms. .</p> <p>The SPD has no role in the prioritisation of ex-prisoners. Allocations will be determined in line with the housing legislation and council's allocations policies which are separate from planning.</p>
Women In Prison	<p>From their own consultation, privately rented/sold housing barely featured as a priority for women in the justice system. Respondent asks whether there is scope to be more ambitious than the 50% affordable housing targets with 70% social rented?</p>		<p>Noted. At least 50% affordable housing (without grant) with 70% social housing and 30% intermediate housing, is considered viable based on the council's assessment. The site will be sold by the MoJ to a private developer, and the marketing process is currently underway (Deadline for bids is 15 Nov 2017).</p> <p>Dwellings for private sale are essential as they will cross-subsidise other uses such as affordable housing and a women's centre.</p>
Rooms of our Own	<p>Most important issue is to ensure that the MOJ does not just sell the land off to a developer of luxury properties.</p>		<p>While the aim of the SPD is to set out the council's expectations for the site, the council does not exercise any direct control over the sale of the site. Any developer looking to purchase the site will be aware of the council's policy requirements in relation to the provision of affordable housing.</p>

	Individual/resident	<p>It was commented by one resident that the affordable housing should be pepper-potted around the site to ensure inclusiveness.</p> <p>It was commented that the SPD should cross refer to guidance on the approach to housing priorities in an Annex.</p> <p>This respondent also commented the affordable housing percentage should be addressed through an early pre application viability study, with the SPD pointing out this procedure.</p>	<p>The council agrees a pepper-potted approach to affordable, social and intermediate housing is beneficial for inclusiveness. All residential development should also be 'tenure blind' as required by the Local Plan.</p> <p>With regard to reference to housing priorities, the respondent presumably means the council's approach to allocating affordable housing. In which case, we do not consider it appropriate to enshrine this within the SPD, as it is dealt with via a separate housing allocations regime.</p> <p>The SPD encourages early engagement on future development proposals. The Development Viability SPD (Jan 2016) sets out the council's approach to viability in the planning process and it is not necessary to repeat this in detail in the Holloway Prison SPD.</p>
Dwelling Type	Individual/resident	<p>A respondent commented in relation also to the need for 'supported housing' on the site for vulnerable people. Early engagement would be needed between developers and specialist agencies.</p>	<p>At the time of writing the SPD, needs for supported housing for any specific group in the borough, has not been quantified, hence the SPD has no specific acknowledgment. This issue will be explored in due course and it might be that some supported housing will be sought during the preparation of detailed plans for the site. It is anticipated that any supported housing would be part of the overall affordable housing provision on the site.</p> <p>As regards which specific groups the future housing on the site will be allocated to, this is determined in line with the relevant housing legislation and the council's housing allocations policies which are separate from planning.</p>
	Reclaim Holloway	<p>The site should include housing for women affected by incarceration and disadvantaged circumstances, with some supported housing options for these people. This would have a positive impact on re-offending levels creating a net saving compared to the cost of prison places.</p>	<p>At the time of writing the SPD, needs for supported housing for any specific group in the borough, has not been quantified, hence the SPD has no specific acknowledgment. This issue will be explored in due course and it might be that some supported housing will be sought during the preparation of detailed plans for the site. It is anticipated that any supported housing would be part of the overall affordable housing provision on the site.</p> <p>As regards which specific groups the future housing on the site will be allocated to, this is determined in line with the relevant</p>

			housing legislation and the council's housing allocations policies which are separate from planning.
	Centre for Crime and Justice Studies	CCJS survey responses raised concern over the density of proposed development. The site is being advertised as a site that can accommodate over 1000 apartments.	<p>The SPD has been informed by the findings of the development capacity study for the site. The SPD sets out capacity scenarios which are likely to be acceptable in planning terms.</p> <p>Any prospective purchasers should have regard to the SPD..</p>
	Ministry of Justice	In reference to paragraph 4.12 the MoJ feel the objective to maximise family accommodation of 3 bedrooms or more should be removed in preference of a simple objective for a balance of unit types.	The SPD clearly explains how the exact mix of units will be discussed with the council at planning stage. The reference to 3+ bedroom units refers to the identified need for this size of dwelling.
	Islington Green Party	<p>Islington Green Party do not object to dense development, provided it is not in the form of high rise flats. They raise concerns over the often poor quality of these dwellings, their unsuitability for larger families and barriers associated with community creation. The Islington Green Party would like clear language in the SPD highlighting these reservations. Additionally, however comment is made opposing placing a cap on the number of possible dwellings. Instead a clear target percentage for 4,3,2,1 bedroom dwellings should be provided.</p> <p>There is an expressed need for alternative housing, including communal housing, sheltered housing, key worker housing, temporary accommodation for homeless persons.</p>	<p>The SPD does not promote high-rise buildings, and sets out the capacity scenarios based on an urban design assessment. On a broader point, it would not be appropriate to add reference to high-rise being generally poor quality or unsuitable for families, as this is not evidenced.</p> <p>The SPD does not place a cap on the amount of housing but it does set out scenarios which are likely to be acceptable in planning terms based on an urban design assessment. The Local Plan sets out the council's dwelling size mix requirements.</p> <p>It is worth noting that the dwelling size mix needs in the affordable sector does change over time (and sometimes relatively rapidly, for instance as a consequence of the government's welfare benefit changes). Precise requirements will be set out by the council at the time of drawing up details plans for the development and will be informed by close engagement with colleagues in Housing Needs.</p> <p>There is no evidence of specific identified need for some of these "alternative" types of housing at this site, such as communal housing. The council supports provision of self-contained housing.</p> <p>Please note that key worker housing is considered to be part of the overall need for affordable housing. Key worker is not a separate tenure, it is simply about which groups might be given priority when it comes to allocating affordable homes in a particular development.</p> <p>Scope for providing temporary accommodation for homeless people will be explored at the stage of preparing detailed plans for the site.</p>

	Women in Prison	<p>From Women in Prison’s own consultation, housing was a key desire for the site. Supported housing with short term tenancies and domestic violence refuges were top among preferred preferences. Examples of particular models were given, including a women’s centre with residential facilities.</p>	<p>Discussions on the women’s centre should involve a number of different stakeholders and take place at an early stage of any future proposal. It is not anticipated that women’s centre itself would include residential accommodation.</p> <p>On a broader point in relation to supported housing, the need for supported housing, and for which specific groups, will be explored in due course, and any specific requirements will inform negotiations at the detailed design stage.</p> <p>As regards which specific groups the future housing on the site will be allocated to, this is determined in line with the relevant housing legislation and the council’s housing allocations policies which are separate from planning.</p>
Housing targets, allocation and windfall	Ministry of Justice	<p>With reference to paragraph 4.2 of the draft SPD, the MoJ understand the site will form part of the next Local Plan review. Although Islington’s housing targets have been exceeded in the past five years, the period up to 2025/26 has a greater reliance on windfall sites (53%) of total future delivery. The local plan Scope of the Review states most allocated sites have permission, or are at application or pre-application stage. Therefore, the MoJ see it as critical that the site is maximised in terms of scale and residential development to address the housing shortage locally and city wide.</p> <p>In reference to paragraph 4.6 - 4.11 the MoJ are in disagreement with the housing capacity scenarios, stating 900 dwellings could be exceeded with high quality design solutions.</p>	<p>Islington’s latest housing trajectory shows that the council has a five year supply in excess of the current housing target. The latest trajectory also includes Holloway Prison as a specific site</p> <p>The SPD sets out scenarios which are likely to be acceptable in planning terms, based on an urban design assessment. Due to the limited supply of land in the borough, we do seek to maximise development potential of a given site as a matter of course, as can be seen from many high density developments in the borough over the recent years. However, it would not be appropriate for the SPD to assume unrealistically high number of homes on the site. In addition to provision of housing and affordable housing, the other objectives of the SPD in terms of providing open space, a women’s centre, etc also need to be met.</p> <p>Please note that the Islington’s housing target, to be formally published in the new Draft London Plan, is 775 units per annum, which is a significant reduction on the existing target. Such a reduction further lessens the reliance on additional numbers from windfall sites,</p> <p>In terms of the contribution to meeting the overall London housing need, we note that the new London Plan will come very close to meeting the full housing need for London. London is considered to be a single housing market, and each borough’s ability to contribute towards meeting London’s overall housing need is determined by the capacity/land supply in a given borough. Islington’s has had very high housing targets for many years, and has consistently exceeded those targets, making a disproportionately high contribution towards meeting London’s overall housing need.</p>

Housing Design	Islington Green Party	Reference to para 4.13 has been made, urging the Council to state it will encourage any development where the minimum size requirements are exceeded.	Noted. The Local Plan sets out minimum standards. Setting out higher requirements could amount to new policy which is beyond the scope of an SPD.
	Various groups/individuals/residents	A number of individuals/residents agreed with the requirement for high quality housing. Comments were made as follows: <ul style="list-style-type: none"> • Design should create a sense of all the buildings coming together – similar to the development of Granary Square in Kings Cross. • Commitment to 10% wheelchair accessible housing welcomed. • One respondent stated there should be no tower blocks on the site. Additionally, referring to not copy the City North development at Finsbury Park and the high-rise developments, existing and planned at Archway. 	Noted. The SPD highlights the importance of design, and the Local Plan has various policies to ensure high quality design outcomes. The SPD sets out capacity scenarios which are likely to be acceptable in planning terms, based on an urban design assessment, and does not encourage tower block development.
Sale and ownership	Reclaim Holloway	This coalition of groups believe this asset should remain in public hands and other models of funding and ownership should be considered. Reclaim Holloway oppose any use of the receipts from the land to fund more prison places. Other financing models are felt to be more in line with the aims of the SPD regarding affordable housing, public space and women's building's. It is expressed that by keeping this asset in public hands it will save taxpayer money in the long term.	As the Ministry of Justice are the owners of the site and associated buildings, the council has no control over how the MoJ will dispose of the site and how they use the receipts. However, the council as a planning authority is acting well within its remit, in terms of setting out its planning objectives for the site through this SPD.
	Ministry of Justice	Referring to paragraph 6.4 the MoJ state a full marketing campaign is needed to gather appropriate evidence to achieve 'best value'. Without this they feel it is inappropriate for a party who is not a site stakeholder to indicate what constitutes as an appropriate financial return for a landowner. Thus making Islington Council's viability assessment premature, inadequate and flawed. The MoJ commented in regard to paragraph 6.6 that viability testing by LBI is not of sufficient substance or detail to suggest the price and expectations of the development. It is up to the potential applicant to define their own expectations of the opportunity in accordance with core policies. They also note planning policy does not determine land value but is merely a consideration in deriving it.	As noted above, the council considers that the viability work undertaken is sufficiently robust. It has been undertaken in line with the council's adopted Development Viability SPD. The British planning system is Development Plan led. The starting point and a key consideration for any viability assessment is the relevant planning policy for the site in question, including the policy on affordable housing. Any potential values to be realised from this site outside of its current planning use may only be arrived at through the grant of new planning permission. To gain planning permission would require planning policy requirements to be taken into account. Using a range of capacity scenarios, we have tested what the maximum reasonable amount of affordable housing might be, in line with the policy. Arriving at a benchmark land value is a critical component of any viability assessment, and is necessary to be able to make a judgment as to whether a proposal is likely to be viable or not. This assessment is also fully in line with the national guidance on viability and the Mayor's policy and guidance. The SPD and the viability assessment do not fix the land value. What they do is demonstrate, using robust and reasonable

			<p>assumptions, that 50% affordable housing is viable on this site without grant, and this is what a developer will be expected to deliver in order for a development proposal to be policy compliant and secure planning permission.</p> <p>The SPD gives certainty to the potential purchasers of the site at this early but critical stage, and as such it will help reduce potential for protracted disagreements at the planning application stage and help to ensure speedy delivery of much needed housing and affordable housing.</p>
	Individual/resident	It should be made clear the council welcomes expressions of interest from a consortium of developers to reflect a range of community interests.	Who bids for the land and how such bids are structured is not a matter for the council. Our role is to set out planning objectives for the site at an early stage with a view to influencing future proposals at the earliest possible stage.
Collaboration	Ministry of Justice	<p>Referencing paragraph 6.1 the MoJ feel the objectives of the MoJ have been clearly publicised and that this redevelopment and management should not provide a benchmark for other schemes developing public land.</p> <p>Referring to paragraph 6.2 the MoJ does not agree with the viability evidence commissioned by LBI. This is due to the assessment being very 'high level' and fails to appreciate other relevant factors. The MoJ also comment that it is inappropriate to comment with regards to what may represent a 'reasonable incentive' to sell the site.</p> <p>With reference to paragraph 6.5 the MoJ state the disposal process will be conducted in a confidential manner with the MoJ. Any shared information with the preferred bidder will have to be done so ensuring confidentiality is not breached.</p>	<p>This site is one of the first instances of disposal of a large public sector site since publication of the Mayor's SPG. The site is also unique in Islington in terms of being a large windfall site. The reference to the site being a benchmark relates to the potential for achieving a significant number of policy objectives while still providing competitive returns for a landowner and developer.</p> <p>The viability work which underpins the SPD is fit for purpose in terms of indicating that policy expectations are realistic.</p> <p>The expectation for future developers to disclose the assumptions made in relation to land values is considered reasonable and appropriate. Information that is relied on in support of a planning viability assessment should be treated transparently and be available for wider scrutiny.</p> <p>It is important to note that the council is not requiring confidential information submitted as part of the bidding process to be revealed. Rather, the assumptions that a bidder made when deciding what to pay for land will be important in considering any future viability assessment of a scheme. Should this information be relied as part of a planning application process, it will need to be shared with the council.</p> <p>The MoJ and any potential developer will be aware that Islington, and many other planning authorities, are seeking to increase transparency in the planning process. As part of this</p>

			drive Islington's Development Viability SPD requires that viability assessments accompanying planning applications are made public in their entirety. Islington now publishes un-redacted viability assessments as a matter of course. The reference in paragraph 6.5 has been included in the spirit of ensuring transparency in the planning process.
Construction/phasing	Individual/resident	The SPD should go into specifics about demolition, remediation and construction phases/process.	Noted. It is not necessary to go into such specifics in the SPD. The role of the SPD is not to spell out the exact requirements of a future planning application. The council has strong policies to protect amenity of local residents during demolition and construction, and this will be a key consideration during assessment of any future planning application. Paragraph 6.10 of the SPD refers to such requirements and this is considered sufficient.
	Individual/resident	A respondent wants a strategy to be put in place to mitigate the impact of increased HGV's and other motor vehicles during the construction phase.	The mitigation of impacts caused by HGV's and other construction related vehicles will be a key part of any planning permission. The SPD cannot provide specific guidance given that the details of a scheme are not yet known.
	Ministry of justice	Referring to para 6.7 the MoJ believe there is an absence of detailed assessment for the SPD to comment on possible phasing strategies. A phasing strategy will be a consequence of a specific application.	The SPD does not prescribe requirement for a phasing strategy, it sets guiding principles for any phasing strategy that may come forward to minimise disruption to existing and future residents. It is not unreasonable to assume that a site of this size may come forward in a phased manner.

Topic/section of document	Respondent (s)	Summary of comments	LBI response
Sports facilities	Anaconda Swimming Club	<p>Anaconda provided a written response, with a further 64 letters of support received based on a standard template. A link to a petition has been provided, which, at the point when the application closed, had several hundred signatures.</p> <p>Anaconda Swimming Club are Islington’s only competitive swimming club and provide swimming lessons for over 500 children. The club state a need to expand and provide adequate facilities, mainly relating to a sufficiently deep 8 lane pool required for competitions as well as a viewing gallery.</p> <p>The above responses detail a number of benefits of swimming including:</p> <ul style="list-style-type: none"> • Swimming supports health and fitness • Sporting success should be supported, with some national swimming champions coming through Anaconda Swimming Club. • Swimming provides the ability to engage more young people and improve social cohesiveness. • Swimming can support youth crime reduction <p>The responses note the potential opportunity for provision of a swimming pool at the Holloway Prison site. The main response from Anaconda sets out the case for why a pool should be provided, as follows:</p> <ul style="list-style-type: none"> • Local Plan policy requires provision of new sports and recreation facilities on sites in excess of certain threshold. • Islington’s swimming pools are already at capacity and that provision has not kept pace with Islington’s population growth. The Core Strategy identifies a likely shortfall in provision which Anaconda believe has now come to pass. • There is an existing large pool in the prison and provision of a new pool as part of the redevelopment would create positive legacy. • Increased provision would help improve sports participation rates, promote health and wellbeing, reduce childhood obesity and strengthen ties with local community, including women and disadvantaged young people. • Anaconda can offer a significant income stream for pool operator. • The location is well connected and a pool could be sited on the Camden Road frontage to act as a buffer for housing to the rear and to ensure it is highly visible. 	<p>Responses are noted.</p> <p>The council has carefully considered the issues raised by the respondents, taking into account whether there is need for a swimming pool against the need for other types of development to meet the objectives set out in the Core Strategy as well as overarching council vision and priorities.</p> <p>Islington is the second smallest Borough in London and is well provided for in terms of indoor sport and recreation facilities, having eight public leisure centres, four of which are public pool sites (three of these have two pools per site). There are also two secondary school sites that have publicly accessible swimming pools. We do not believe that additional provision at the Holloway Prison site is necessary.</p> <p>In addition, we do not consider that provision of a swimming pool at the Holloway Prison site makes best use of the site, and given the good provision of existing pool facilities, the importance of a new pool in no way compares with the need for affordable housing, social infrastructure, open space and decentralised energy, in terms of the wide range of tangible benefits that would be achieved.</p> <p>The council has estimated that the construction costs for a swimming pool and associated facilities of the size suggested by Anaconda would be in the range of £9-£12 million.</p> <p>More significantly, such facility would take up the amount of floorspace equivalent to around 30- 40 residential units. Reducing the overall amount of housing by up to 40 homes would have significant bearing on the overall value of the development, impact the development viability and in turn reduce the provision of affordable housing and other key priorities on the site.</p> <p>Islington Council, in partnership with its leisure operator GLL, will work in partnership with Anaconda swimming club to explore further swimming development opportunities to continue to expand and develop the club as has been the case to date whereby increased access</p>

			<p>to Holloway School Pool has delivered significant expansion to the programme.</p> <p>As part of the current Local Plan review, the council will assess needs for sports and recreation facilities. If this research shows specific needs for certain facilities, the council will consider how these needs can be met through the Local Plan, in conjunction with stakeholders both within and outside the council.</p> <p>The existing Local Plan policy DM6.4 does not set an explicit requirement for sports and recreation facilities. In this case the council considers that the balance of priority land uses would be an exceptional circumstance for not providing such facilities. Any future development will be required to pay the Community Infrastructure Levy (CIL), which can then be used to fund infrastructure in the borough, potentially new sports and recreation facilities.</p> <p>A pool is not considered to be the most suitable legacy use for the site. As noted in the SPD, a women's building/centre is considered much more appropriate and in-keeping with the historic use of the site.</p> <p>The potential income from Anaconda cannot be taken into account when considering the merits of a pool on the Holloway Prison site, as there is no way this can be guaranteed.</p>
Individual/resident	A respondent expressed their concern regarding their name and email address being added to the Anaconda Swimming Club-led petition without their consent.		Noted. The council understands the concern raised and considers that this does undermine the validity of the petition to some degree (although we note that the letters of support are considered more robust as they are accompanied by a signature).
Individual/resident	An individual commented that the final development should include a competition sized swimming pool.		Noted. See response to Anaconda above.
Individual/resident	A respondent commented that the idea for a swimming pool on the site is not a good use of the space because there are other swimming pools nearby and low cost housing and a women's centre is more of a priority.		Noted, The council agrees that housing and social infrastructure, as well as other uses, are a priority for this site.
Individual/resident	Respondent wants to see the site accommodate some leisure/exercise functions that could benefit the rest of the community.		Noted. The draft SPD stipulates that 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 space. This space could potentially accommodate specific exercise functions such as outdoor gym facilities, although any such additional function should not compromise the functionality of the open space. Any development will also be liable for CIL,

			which may be used to fund leisure/exercise improvements in the area and elsewhere.
Women's provision/centre/building	Individual/resident	Several respondents expressed strong support for the inclusion of a women's centre that provides a holistic service.	The support for the inclusion of a women's centre is noted and is a key objective of the SPD.
	Reclaim Holloway	<p>A Women's Building should be provided, independent of the criminal justice system. Such a building should mark the legacy of the prison and provide a space where women can come together, to grow, develop, learn, create and celebrate, in the mode of the Women's Building in New York. The building should have a long term and secure tenancy to guard against rising rents and uncertain funding cycles. Space for small enterprises could make the building self-sustaining and provide opportunities for women.</p> <p>Additionally, the prison's visitor centre is empty and unused and the Reclaim Holloway coalition want the MoJ and the Council to work out a joint policy on temporary uses.=</p> <p>Reclaim Holloway are disappointed at the limited number of stakeholders consulted on the Women's Building and feel this should be widened.</p>	<p>Support for women's building is noted. In terms of the potential additional services, while these may be suitable in principle, there is no guarantee any additional services would be able to be funded, therefore it is not considered appropriate to add further reference to the SPD.</p> <p>The SPD states as a key objective that there is scope to include affordable workspace to support local organisations and local employment. The SPD acknowledges the potential for this affordable workspace to be complimentary to the community uses that are proposed.</p> <p>The SPD is supportive, in principle, of temporary uses on the site prior to implementation of any future development, and would be open to discussions with the MoJ to facilitate this. However, the council cannot force the MoJ to allow such uses.</p> <p>The council has engaged with a number of organisations on the potential for a women's building. The aim to secure this facility as part of a future development came about as part of these discussions.</p>
	Centre for Crime and Justice Studies	<p>The Centre for Crime and Justice Studies (CCJS) are preparing a Community Plan for Holloway, working with local people and community groups. The CCJS have conducted a survey of almost 1,000 respondents to inform this community plan, including a number of women currently or formerly within the criminal justice system. The survey asked questions on the most important issues for the site and asked what people would like and not like to see on the site. Women's provision was the second biggest priority after housing of the respondents engaged through the Centre for Crime and Justice Studies own consultation. The charity's own consultation engaged different cohorts of people on what they would like to see and what they would not like to see on the Holloway Prison site.</p> <ul style="list-style-type: none"> • 	The Council notes the CCJS survey work which is comprehensive. The priority for a women's centre aligns with the SPD.
	Ministry of Justice	The MoJ in reference to paragraph 3.1 of the draft SPD, does not support a specific requirement for the provision of a women's centre, commenting that this use could be provided as part of general community provision.	Noted. As acknowledged by the MoJ, there is a need for specific services related to women's centre service provision. While this need is wider than local, the services do need to be provided somewhere, and the

		<p>The MoJ feel the fact that the prison was a national provision not a local one should be acknowledged as a significant factor. The majority of prisoners have not been local; therefore, the brief should not overly prescribe re-provision of community uses.</p> <p>Referring to paragraph 4.20 of the draft SPD, MOPAC indicated the need for female offender provision in North East London, not Islington. Operational data showed Holloway was not the best location for a new women's centre based on demand. The MoJ feel prescribing a specific use for a women's community provision is inappropriate and is subject to external factors such as funding and demand. Therefore, this use should be more flexible as requiring general community use which may incorporate women's provision.</p>	<p>Holloway Prison site is considered to be the ideal site, especially given the site legacy.</p> <p>It would not be enough to merely specify general community provision, as this lessens the opportunity for securing a women's centre.</p>
	<p>Islington Green Party</p>	<p>There is strong support for re-provision of social infrastructure a building that specifically dedicates services to those parts of society served and wronged by the former Holloway Prison, including dedicated women's services.. The Green Party talk of the rising costs of rent in Islington for organisations supporting women, therefore highlighting the need for a women's support service. The visitor centre in the prison was only recently completed and was funded by charitable money, not government funds. It is a high-quality facility and should be retained and repurposed.</p> <p>Islington Green Party would urge the planning department to remove this sentence from the SPD: "it should be noted that it is highly unlikely that the council will be able to fund any additional services within these buildings."</p> <p>Suggest a stronger requirement for affordable workspace alongside wider community service offer.</p>	<p>The SPD acknowledges the historical national, regional and local importance of the site. The Council are aware of the rising cost of rent affecting social and community based services. The SPD identifies potential provision for affordable workspace which could compliment services at any women's centre.</p> <p>The council disagree with the proposed removal of the sentence from paragraph 4.24, as we cannot give any certainty about whether such funding would be available in future.</p>
	<p>Individual/resident</p>	<p>A respondent would like to see a women's centre on the site supporting victims of violence and former female prisoners. They feel any other location for this would be unacceptable because of the history of the site.</p> <p>The respondent suggests that any centre is located in or near the site of the visitor's centre, which is a place where charities supported women prisoners to meet with their children.</p> <p>The current visitors centre could be used as a women's centre immediately. 'Pop-up' events are not enough, however, they would be something, as long as they were focused on the local community and/or on women.</p> <p>The respondent suggests that any women's centre is named after Sara Reed.</p>	<p>Support for women's centre and temporary uses noted.</p> <p>Siting of any women's centre is a matter for a future planning application, but the SPD does set out some key design criteria in paragraph 4.24.</p> <p>Likewise, it would be premature to suggest potential names for a future visitors centre, and at any rate, the SPD would hold no weight when it comes to naming the space.</p>
	<p>Prison Reform Trust</p>	<p>The Prison Reform Trust strongly support the objective relating to providing a women's centre, commenting that some provision should be made for women at risk of entering the criminal justice system, as well as provision that supports women with their caring responsibilities, particularly for dependent children, and addresses unmet needs for mental and physical health care is badly needed in this part of London. The site could act as focal point for Islington Borough Council, MOPAC, NHS London, the Metropolitan Police, London</p>	<p>The support for the provision of a women's centre, and the temporary use of existing buildings, is noted.</p> <p>Discussions about the exact make-up of services provided should be discussed with key stakeholders when developing future proposals.</p>

		<p>Community Rehabilitation Company and National Probation Service to work with women's organisations.</p> <p>Some supported accommodation for women with and without children should be incorporated.</p> <p>Strongly support a legal agreement attached to any planning application to include a women's building/centre.</p> <p>Support temporary use of existing buildings to deliver much needed services for women.</p>	<p>In relation to supported accommodation, please see comments above.</p>
	Women In Prison	<p>Women In Prison raise concerns about the receipt from the site being used to fund new prisons and propose an alternative approach adopting the Corston recommendations.</p> <p>Through their own consultation, Women in Prison have identified a strong need for mental health and domestic violence support.</p> <p>Additionally, the women's building could demonstrate the best ways of developing mixed use space incorporating offices, day and residential services and become an example of best practice.</p> <p>Any women's building should have a social rather than criminal justice focus. The building should be a safe and empowering space offering holistic support for women, either as a Women's Centre/Building or a hub for a range of services and facilities for women., and should be run by independent organisations in partnership with the local authority, MoJ and police,</p>	<p>Support for women's centre/building is noted. The sale of the site by the MoJ and what is done with the receipts is outside the remit of the SPD.</p> <p>Regarding the operation of any building, the SPD encourages engagement with a wide range of stakeholders to help assess the extent of what is required in terms of women's centre/building provision.</p> <p>The SPD acknowledges the potential for affordable workspace to be complimentary to the community uses that are proposed.</p>
	Rooms of our Own	<p>Support provision of a women's building alongside housing and open space.</p> <p>Rooms of our Own has developed a social enterprise model for providing a permanent, accessible, safe building for Women. The model has been fully checked by developers and investors and was awarded a GLA grant. Parts of the model, such as the internal layout, could be adapted to meet the needs of Islington residents. Rooms of our Own are involved with Reclaim Holloway and Centre for Justice Studies and are keen on further engagement.</p>	<p>Support noted.</p> <p>The SPD encourages engagement with a wide range of stakeholders to help assess the extent of what is required in terms of women's centre/building provision.</p>
	Prison Reform Trust	<p>Propose a percentage of the proceeds from the sale of the site must be reinvested in community services, ideally a women's centre, providing a mix of universal and targeted services.</p>	<p>The SPD proposes provision of a women's centre on-site as part of future development. In terms of other services for the local community, any development would pay CIL which can be used to fund social infrastructure, depending on defined need and spending priorities for the local area.</p>
Children's play facilities	Individual/resident	<p>One respondent strongly agrees with the council's approach regarding the need for a children's play area.</p>	<p>Support noted.</p>
	Individual/resident	<p>A respondent commented that the skateboard park at Canteloves on Camden Road is successful and suggests that similar activity for teenagers may be suitable on the site.</p>	<p>Comment is noted. The SPD identifies a requirement for play space for children of all ages The type of play space will be discussed as part of the site proposals.</p>

Health	Islington Green Party	Development of local social infrastructure such as health facilities must support the new additional population the development brings as well as support the existing Tufnell Park and Holloway residents.	Noted. A key objective of the SPD is to provide improvements to local infrastructure to support population growth, for example health facilities and public transport. Local healthcare needs will be assessed at an early stage of future development proposals..
	Individual/resident	A respondent's experience is that the NHS GP facilities are restricted and under performing in meeting local demand. A more detailed analysis should be carried out to see if the local GP practice can expand sufficiently to accommodate up to 2,000 more people. Mental health facilities are poor in the area in terms of under provision; such services could be offered on site.	As noted above, local healthcare needs will be assessed at an early stage of future development proposals. Need for mental health facilities could also be established as part of this process.
Education	Individual/resident	With an increased population in the area, comment was made that child yield and impact on schools will need testing. The developer should have to contribute to local school upgrading.	The council has investigated the need for a school at this site as part of the SPD preparation, in liaison with colleagues in the council education team. This work suggests that there will be no requirement for additional school provision, over and above additional provision already planned, as a result of a housing-led development.
Other infrastructure	HSE	No representations to make but referred to further web-based information.	Noted.
	Zayo Group	Confirmed no assets in this area.	Noted.

Topic/section of document	Respondent	Summary of comments	LBI response
Retail	Individuals/residents	<p>One respondent expressed the need for more bars and restaurants in the area.</p> <p>Another resident thought new shop premises should support independent retailers. Large supermarkets should be avoided, instead providing specialist amenities e.g. butchers, bakers, green grocers, post office, doctors surgery, hairdressers, pharmacy. Essex Road is given as suitable example.</p> <p>One respondent commented with internet shopping being very prevalent now, there is a need to incorporate facilities for van drop offs.</p>	<p>The SPD cannot specify what specific types of businesses can occupy the premises on site. The SPD does however consider that some A3 use may be desirable to serve the local community and bring activity into the site.</p> <p>The site is considered to be well served by shops with Nag's Head town centre and two local shopping areas nearby. Providing a full set of convenience based shops on site could be detrimental to the existing surrounding retail provision.</p> <p>The SPD notes that proposals should adequately address delivery, servicing and drop-off requirements.</p>
	Ministry of Justice	The MoJ supports the aspiration for small scale commercial uses subject to an assessment of demand.	Noted.
Non-residential uses	Ministry of Justice	<p>Support the provision of limited non-residential uses along Parkhurst Road and Camden Road. However, they are concerned such commercial provision will be unviable.</p> <p>With reference to affordable workspace (paragraph 4.25) the MoJ feel this objective should be aspirational rather than a requirement as long as there is an absence of detailed market assessment or demonstrable need.</p>	<p>Concern about viability of commercial space noted. The SPD notes that retail space would need to be justified sequentially and in terms of impacts, hence there is some flexibility about future provision.</p> <p>Employment studies have identified significant gaps in the supply of workspace especially affordable workspace. Policy DM5.4 in the Local Plan sets out clear requirements for the need and provision of affordable workspace.</p>
	Islington Green Party	<p>The Islington Green Party commented that the loss of employment provided by the prison should be compensated for by offering local employment opportunities.</p> <p>In strong agreement with paragraph 4.29 providing some business use, especially space for small businesses and affordable workspace is supported.</p>	Noted. The SPD does aim to secure some commercial space but this could not be guaranteed to provide local employment opportunities.

Entertainment	Individual/resident	One respondent expressed the desire for a cinema showing international films and a new community centre providing social infrastructure fostering community cohesion.	The provision of a cinema on site would not be regarded as the most efficient use of space, given the greater demand for housing, women's/community centre and green space.
Jobs	Individual/resident	The development of the site should include a construction/training facility on site, targeted at women in manual trades.	<p>Noted. There is not enough evidence to require such a specific facility although we note that the proposed women's centre could provide a multitude of services including skills training with a view to helping women back into employment.</p> <p>Please note that council's existing planning policies already include a requirement for developments to provide employment and training opportunities, including construction placements during the construction phase of development. Given the scale of the development to be built on the Holloway Prison site, there will be significant employment and training opportunities for local people.</p>

Topic/section of document	Respondent	Summary of comments	LBI response
Heritage/ legacy	Resident/individual	<p>Although not specific, reference was made about the need for high quality design, and respecting the legacy for women through this.</p> <p>Several respondents' commented that there should be careful consideration for the historical aspect of the prison site dating back to the suffragettes.</p>	<p>The SPD acknowledges the historical significance of the site and through one of its objectives, requires high quality design that responds to the site's context and constraints.</p>
	Ministry of Justice (MoJ)	<p>With regard to paragraph 1.5 of the draft SPD, the MoJ commented that the number of influential organisations working with women do not necessarily have to have a presence on the site as there are a number of factors that will influence locational requirements.</p>	<p>The Ministry of Justice's comment is in direct contradiction to other women's support organisations. Several organisations have commented there has been a clustering of services around the prison site and the dispersal of these make it more challenging to engage with hard to reach individuals. Islington's planning policies strongly protect existing social infrastructure uses and the analysis of MOPAC clearly shows a gap in female offender provision in North East London now. With an estimated 40 organisations operating in the borough supporting women, the SPD endeavours to continue fostering this local support.</p>
	Centre for Crime and Justice Studies	<p>The female prisoners consulted by the Centre for Crime and Justice Studies, responded that the historical legacy of the site should be recognised through locating women's services there, rather than a plaque or museum.</p>	<p>The SPD has as a key objective to incorporate a women's centre to support women in the criminal justice system as well as provide other women's services, as part of a wider building.</p>
	Prison Reform Trust	<p>The Prison Reform Trust's central concern is that the planning process will lose sight of the history of the site as the first women only prison in the country and biggest women's jail in western Europe. Its legacy should include modern, humane facilities that will contribute to eliminating the disadvantage, abuse and discrimination that can lead women into crime and ultimately to prison.</p>	<p>In addition to a mixed use development, the SPD aims to see the implementation of women's services on site, through a women's centre.</p>
Design/quality	Resident/individual	<p>One respondent commented that the design of development must promote safety.</p>	<p>Noted. Islington's planning policy requires that all development is designed to be safe and inclusive.</p>
	Resident/individual	<p>Development should be safe and well maintained.</p> <p>Respondent also suggested incorporating two 'village squares' into the development that can support some cafes and restaurants. Outdoor space should be versatile.</p>	<p>Noted. Safety is a key part of design requirements set out in Islington planning policy.</p> <p>The SPD identifies provision of open space as a key objective. Such open space could function as a focal point but café and restaurant space on the open space itself would be resisted as this could affect the functionality of such space.</p>
	Ministry of Justice (MoJ)	<p>In reference to para. 2.9 the MoJ disagree that the Bakersfield Estate is anomalous and feel it is part of the immediate context of the prison site and should thus be acknowledged in description of the surrounding context.</p>	<p>The Council feel the Bakersfield Estate is anomalous to the immediate site surroundings and should not form a basis in local building height context because it is not prominent from the surrounding streets and is set back.</p>

		<p>In reference to para. 3.1 the MoJ are in support of high quality design and provision for open space. With reference to paragraph 4.30, the MoJ welcome the aspiration to provide open space within the development. The MoJ in reference to paragraph 2.2 of the draft SPD feel the focus on preserving the open green space already within the site is too restrictive, as it is of no ecological quality. The SPD should therefore be more flexible to incorporate perhaps new green space within a masterplan. Referring to para. 5.54 the MoJ support the objective of green infrastructure although requiring this to be in the centre of the development is overly prescriptive.</p> <p>Similarly, in response to para. 2.13. it is felt the retention of trees identified as being worthy of protection should be considered flexibly</p> <p>The MoJ comment the SPD should reasonably acknowledge scope for development above 6 storeys subject to a detailed design process. Given the relatively large size of the site at 4.05 hectares, the MoJ want to maximise the opportunity for high density at a high scale.</p>	<p>Figure 2 in the SPD illustrates how the surrounding area is dominated with 1-6 storey buildings. The addition of a massing of 10+ storey buildings would not be appropriate for this area of Islington and is generally only considered appropriate in parts of the Central Activities Zone as set out in the Finsbury Local Plan.</p> <p>Support for high quality open space is noted. The existence of open space on the site is not the main factor determining a requirement for open space as part of future development. As noted in the SPD, Islington has a low amount of open space and this site offers a significant opportunity for new provision.</p> <p>Islington’s Local Plan policy DM6.2 requires that developments in excess of 200 residential units are required to provide on-site public open space. This is in addition to any private amenity space landscaping.</p> <p>The existing site has open space at the centre, and retaining this layout means that the open space can act as a focal point and will be equally accessible for all future residents.</p> <p>Islington Council Tree Officers assessment of the site has identified trees worthy of protection.</p>
Islington Green Party		<p>Referring to para 5.18 comment was made urging the council to make clear in the SPD that any gated development, private road or limited access will not be permitted.</p> <p>The Islington Green Party are in strong agreement with providing open green space, play space, enhancing biodiversity and retaining existing trees. Also in strong agreement with high quality design respecting the surrounding area.</p> <p>With reference to para 5.3 there is a request to change the sentence relating to community engagement to ‘Consult with the local community as early as possible, preferably in the pre-design stage in order to achieve a design that the local community welcomes</p>	<p>Noted. Through reference to the Islington Urban Design Guide, the SPD notes the benefits of good connectivity and conversely the effects of segregated communities and isolated residents in poorly connected development. Additionally, Policy CS9 in the Core Strategy stipulates housing development should not isolate their residents from the surrounding area in gated communities.</p> <p>The SPD advocates early engagement with the local community</p>
Women In Prison		<p>The design of a women’s building could become iconic and act as a monument too. They comment it is a struggle to find appropriate space in London for dedicated services to women.</p>	<p>Any future assessment of design will consider the development’s aesthetic aims but fundamentally its functionality to operate as a flexible use space for women’s services.</p>
Individual/resident		<p>There should be sufficient detail to set out the design considerations and possibilities. The respondent also suggests the site analysis should include a section about relationship to the surrounding estates and streets, cumulative residential impacts and how the proposal will impact on infrastructure.</p>	<p>The draft SPD has set out the general design principles that should be adhered to in terms of design, with the Islington Urban Design Guide SPD providing further detail of how this can be achieved in practice. Impact on infrastructure will be assessed as part of an application.</p>
Individual/resident		<p>Accessible London standards and Part M of the Building Regulations should be incorporated into the design with planning for fire prevention and escape as key.</p>	<p>The Local Plan and London Plan policies on accessibility will apply to future proposals.</p> <p>The council does not consider a site-specific design code is necessary on this site. The work undertaken to inform the SPD</p>

		There should be a requirement for design codes to be applied across the site. The SPD should remind developer of the development process and the Council's and Mayor's Design Review Panels.	provides a strong basis for assessing the design merits of a future scheme, alongside development plan policy. The SPD does refer to the council's Design Review Panel in paragraph 5.3. As far as the council is aware, the Mayor does not have a specific design review panel.
Conservation	Resident/individual	A respondent felt any signage of shops should be discreet, adhering to the same or similar rules as a conservation area.	The site is not within a conservation area, although it is adjacent to one. The council has detailed design and shopfront policies that would apply to new signage.
	Historic England	Historic England confirmed there are no designated heritage assets or identified archaeological deposits on the site. They agree the draft SPD provides a positive and sustainable framework for the development of the site. The only heritage impacts are on the wider setting of designated heritage assets and the opportunities to reflect the cultural significance of the suffragette movement and the prison's wider social history.	Noted.

Topic/section of document	Respondent	Summary of comments	LBI response
General	Individual/resident	One respondent simply stated 'sustainability is a must'	Noted. A key planning and development objective of the draft SPD is to achieve best practice sustainability standards.
	Environment Agency	The Environment Agency responded and have no comment.	Noted.
	Islington Green Party	In strong agreement with adhering to best practice sustainability standards, including the provision of an energy centre. The Islington Green Party are also in strong agreement with paragraph 5.31 of the draft SPD that all development should be encouraged to follow BREEAM standards.	Strong agreement with adhering to best practice sustainability standards is noted.
	Rooms of our Own	We welcome the commitment to the best energy practice	Noted.
	Individual/resident	There has been no EIA to assess the impact of significant new housing on the site. The new EIA 2017 regulations require a greater focus on health assessment. The respondent would expect air quality impacts to be a feature of the health report. Respondent commented that air quality tests should be conducted and published. The environment around the site is unsatisfactory and the respondent believes the character of the area needs to be redefined as a home zone.	The SPD does not require an EIA, although a future planning application would be screened for an EIA. The SPD has been screened for an Strategic Environmental Assessment (SEA) but the results of this exercise showed that an SEA was unnecessary. With regard to health, the SPD notes that a Health Impact Assessment should 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. The draft SPD requires any future development to demonstrate how the highest possible sustainable design standards have been achieved, which includes measures to mitigate impact on air quality. The SPD notes that any future development should be car-free and that site access roads should be designed to maintain low vehicle speeds at junctions to indicate pedestrian priority. The SPD cannot however stipulate changes to the wider area such as potential re-designation as a home zone.
Green infrastructure	Natural England	Natural England note that the proposed development outlined in the SPD is unlikely to have major effects on the natural environment, but may nonetheless have some effects. General advice provided on several issues. The benefits of integrating green infrastructure into the site are noted.	The SPD clearly stipulates that given the dense urban form of the borough, the provision of high quality green infrastructure must be a fundamental part of any future development proposals.
	Islington Green Party	In reference to paragraph 4.30 of the draft SPD, the Islington Green Party are in general strong agreement. However they urge that any open space should be ecologically relevant using the Council's own ecology standards, benefiting both people and local wildlife.	The support for ensuring open and play space is provided is noted. Islington's Streetbook SPD advises site analysis comprises of landscape appraisal including tree survey and local ecology assessments.

	Canal and River Trust	No comments to make.	Noted.
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Topic/section of document	Respondent(s)	Summary of comments	LBI response
Public realm functions	Individual/ resident	One respondent stated the public space should be flexible and versatile, being able to accommodate different functions.	Open space provision could be multifunctional, but other uses should not diminish the primary green infrastructure role of the space.
	Islington Green Party	It is felt that upon entering the site it should be made clear through a visual clue that any vehicle accessing the site that it is a car free development and priority is given to pedestrians and cyclists. In strong agreement with the creation of playable spaces on minor roads.	The SPD is clear about the requirement for car-free development. Paragraph 5.22 states that the site entrance should be welcoming and signal a change in the environment, for example the prioritisation of pedestrians. .
	Individual/resident	Residents' in the immediate locality need to be considered in terms of open and play space, privacy, and accessibility	Any future development on the site will be publicly permeable and open and play space will be for public use, not just for residents of the site.
	Individual/resident	Open space should be addressed in the surrounding community too. This respondent also would like to see the installation of public art to be considered on the site. This should honour the women of Holloway Prison.	The SPD supports connecting the site to the surrounding area making it a permeable environment. While public art could be suitable in principle where it does not detract from other key objectives, it is not a priority which warrants specific mention in the SPD.
Connectivity and access	Natural England	Natural England stated green neighbourhoods with engaging accessibility can improve public health and quality of life, which should be strongly considered in the future development of the site.	Noted. The draft SPD clearly supports both these principles.

Transport for London (TfL)	<ul style="list-style-type: none"> TfL provided a number of comments on the SPD, as follows: The implementation of 'home zones' should be considered for internal streets, especially along the green space. TfL support SPD's proposal for a new access from Camden Road (part of the TfL road network – TLRN). This would require consultation with TfL and highlight need for early engagement with TfL prior to development of detailed access proposals. Pedestrian and cycling routes should follow desire lines and be direct as possible. Clarity is needed on whether the road network will be a private or adopted highway, with any future planning application providing a Parking and Development Management Plan. The SPD should make clear all pedestrian and cycle routes through the site are publicly accessible 24/7. The assessment of need for further off-site improvements linking facilities and services in Nag's Head, Tufnell Park and local schools through Pers audits and CLoS assessments is encouraged. Any future planning applications should be supported by a Transport Assessment; Travel Plan; and Construction and Logistics Plan. The SPD proposals should take into account proposals from adjacent development sites. For example, the development site at the corner of Camden Road (east bound), Camden Road (west bound) and Hillmarton Road. 	<p>Points noted. On a general point, TfL will be engaged throughout any future development process, and the council will require submission of various documentation which provides detail on the different aspects of transport.</p> <p>Reference to potential for home zones had been added to the SPD, although this is caveated to ensure that home zones are not counted as open space for the purposes of meeting one of the SPDs key objectives.</p> <p>The draft SPD states pedestrian routes should be direct and follow desire lines. The SPD has been amended to add reference to cycle routes also.</p> <p>The SPD has been amended to add reference to 24/7 access to pedestrian and cycle routes.</p> <p>Any application which comes forward will need to demonstrate how the proposed development fits within the local context, including impacts on the local road network and local services, and therefore what on-site and off-site measures may be necessary.</p>	
Highways England	Highways England have responded and have no comment	Noted.	
Ministry of Justice	With reference to paragraph 5.20, the MoJ believe the provision of pedestrian routes set out in Figure 4, are unlikely to be deliverable given third party land ownership. They argue that given the site has always acted as a barrier to surrounding communities any requirement for pedestrian routes without a detailed investigation could create a ransom situation which could threaten delivery and delay.	Figure 4 is a concept plan which by its very nature is aspirational. It visualises the objective for the site to be permeable. It may be that access issues preclude certain suggested routes but it should be possible to create some new routes and this needs to be explored as part of future negotiations.	

	Cycle Islington	<p>Comment is made, requiring motor vehicles to both enter and exit the development from Parkhurst Road to ensure no through traffic on the residential streets.</p> <p>In particular walking and cycle access should be made possible from Hamilton Road through to Carleton Road, Crayford Road and Dalmeny Avenue.</p> <p>It was commented that access to quiet streets should be over continuous footways with clear No Through Road signs.</p>	<p>The SPD highlights that Parkhurst Road should be the principal vehicular access and egress point and encourages priority for pedestrian and cycle routes within the development, which would include measures such as signage.</p> <p>The SPD aims to maximise permeability of the site in terms of links to surrounding streets.</p>
	Islington Green Party	<p>Concern over the current road layout on Parkhurst Road and Camden Road in terms of road safety and pollution especially for cyclists is expressed by the Islington Green Party. They propose that ideas should be considered including a small roundabout where Camden Road and Parkhurst Road converge and redevelopment of the one way gyratory around Nag's Head town centre.</p> <p>Comment was made for any future development to change the current lay out of Camden Road and Parkhurst Road in favour of two-way traffic and segregated cycle lanes.</p> <p>In strong agreement with increasing the site's permeability, promoting walking and cycling.</p> <p>In strong agreement with making pedestrian routes continuous, follow desire lines and of sufficient width. Additionally, there is strong agreement that there should be pedestrian priority measures such as raised tables at access roads from Parkhurst Road.</p>	<p>Comments noted.</p> <p>The redevelopment of local roads such as Camden Road and Parkhurst Road will be the outcome of liaison between Islington Council, TfL and the developers.</p>
	Resident/Individual	<p>A respondent would like to see dialogue between TfL, Islington Council planners and highway officers and cycling groups to discuss road safety and cycling.</p>	<p>The council is open to ongoing discussions regarding the transport impacts of the site.</p>
Cycling	TfL	<p>Potential new pedestrian connections should also be accessible for cyclists, and Figure 4 should be updated so the label states 'Potential new pedestrian and cycle connections',</p> <p>It is recommended that the SPD proposal considers providing cycle parking above minimum London Plan requirements. All cycle parking proposed should be in accordance with London Cycle Design Standards.</p>	<p>Noted. The text of the SPD is clear about dual pedestrian/cyclist connections, pending clear delineation.</p> <p>Cycle parking will be secured in line with Local Plan policy, which, in terms of C3 standards, has greater requirements than the London Plan (1 space per bedroom rather than 1/2 space(s) per unit.</p>

	Cycle Islington	<p>Cycle Islington state that it should remain possible to install cycle tracks for 160 metres along Parkhurst Road/Camden Road. At the very least, the footway must be wide enough to install a 2.4m cycle track later (including a buffer from traffic). This should be free of trees, utilities and street furniture.</p> <p>Concerning the Nag's Head gyratory, the obligation to build Healthy Streets compliant cycle infrastructure should be accounted for with regard to the site's street frontage. Additionally, the group advocate for the extension of cycle tracks along Seven Sisters Road in Hackney to be extended through Islington all the way to Camden to facilitate cycling for ages 8 – 80.</p> <p>If the site contains one way streets, they should be two-way for cyclists.</p> <p>Any gates leading in and out of the site should not hinder cyclists of all abilities. For each entrance the ability for an adult tricycle or bakfiets to use it with ease should be considered.</p> <p>The form of raised tables is important and should be easy for cyclists to negotiate.</p> <p>Cycle Islington do not favour shared space, believing those on foot and cycling should have their own access points ideally grade separated.</p>	<p>The impact of the development on delivery/practicality of future cycle tracks can be considered as part of any future application, in liaison with TfL.</p> <p>Links with the wider Hackney plans and the Nag's Head Gyratory may be beyond the scope of this development. However, given the scale of the prison site development, transport improvements to the wider area may be explored as part of the negotiations on a future planning application.</p> <p>Fine-grain details of the sites cycling infrastructure will be a key part of planning application discussions. The SPD gives clear priority to cycling, emphasising its importance in the planning process, although cycling infrastructure and arrangements must co-exist with pedestrian routes and ensure the safety of both.</p>
	Islington green Party	<p>There should be a protected route through the junction from Hillmarton road for those approaching from the south east.</p> <p>In strong agreement with creating clear routes linking the site to the surrounding area and providing adequate cycle parking.</p>	<p>Noted. Paragraph 5.22 of the SPD supports direct access to the site from Hillmarton Road</p>
	Individual/resident	<p>Holloway Road, Parkhurst Road and Camden Road are felt not to be safe for cyclists. The respondent would like to see safe cycling routes created in and around the site.</p>	<p>Noted. The SPD promotes cycling routes within the development. Measures to improve local roads – in particular cycle routes – will be assessed as part of any future application</p>
Public Transport	TfL	<p>It was stated by TfL that any changes to access or junctions should require the bus lane operation on Camden Road to be maintained and enhanced. This includes also protecting bus stop K on Camden Road.</p> <p>Further study should conduct a Transport Assessment to include a detailed multi-modal trip generation analysis. This analysis should show proposed bus trip generation per bus route, and by direction, for both AM and PM peak periods.</p>	<p>TfL will be engaged throughout any future development process, and the council will require submission of various documentation which provides detail on the different aspects of transport.</p>

	Individual/resident	The bus network from Camden heading north in the direction of Seven Sisters is operating with an inadequate service due to high demand at peak hours. The respondent fears the current network will not be able to accommodate the extra demand from the new residents on the site. Therefore, a movement strategy should assess in relation to local needs e.g. access to local schools, tube stations, employment.	Impact on local transport networks will be a key consideration as part of any application, including liaison with TfL and other stakeholders.
Parking and car-free	TfL	TfL welcome the objective of car free developments, although want clarification and detail regarding how disabled parking in a car free development will work and note that it should not dominate any streets, should not be continuous or should not present barriers to walking and cycling.). There is a requirement for electric vehicle charging provision to be provided in accordance with London Plan standards.	Noted. The SPD (in paragraph 5.27) refers to Local Plan policy re: car-free development and highlights that wheelchair accessible parking should be provided. Details of any such parking will be discussed as part of a planning application, mindful of the SPD guidance regarding the clear priority of pedestrian and cycling routes. The SPD has been amended to note that any parking provided – wheelchair accessible and/or essential drop-off – should have electric charging points.
	Cycle Islington	Cycle Parking should be able to accommodate more than just typical 2 wheel road bikes. Consideration for tricycles, bakfiets, disabled and pregnant cyclists should be a feature of the cycle parking	The Local Plan sets out detailed cycle parking requirements in Appendix 6, and these would apply to any future application.
	Islington Green Party	In strong agreement that the development should be car free, except for those requiring disabled access parking.	Support noted.
	Individual/resident	A respondent commented there should be 2 – 4 bike stands for each dwelling unit. Due to the amount of cycle theft in London, covered and secured cycle parking will also be needed. This has been done well nearby Crayford Road and should be replicated on the site and the surrounding streets. In terms of car parking the respondent agrees the development should generally be car free. However, providing car club support with a few parking bays is a more realistic option as residents will likely need some sort of car use.	Minimum cycle parking standards are set out in the Local Plan. Paragraph 5.22 of the SPD notes that any parking should be secure, sheltered, well located and accessible. The Local Plan requires contributions from major residential development toward provision of car-club spaces.

	Rooms of our Own	We would query the car-free requirement. Many people who are not registered disabled do need cars, especially women who find that their evening activities are restricted due to safety concerns by having to walk / use public transport. we would urge you to modify this requirement	Car-free development is a policy requirement. Leaving aside the issue of the safety concerns, it does not follow that such safety concerns would be solved merely by owning a car, and therefore relaxing car-free would not solve these perceived safety concerns.
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