



Holloway Prison draft masterplan – Consultation response

Islington Green Party has considered in full the draft masterplan for the Holloway Prison site as presented by Peabody at hollowayprisonconsultation.co.uk/exhibitionboards/

In the context of:

- Islington Planning policy, especially, but not only, the Supplementary Planning Document as adopted January 04 2018
- Press release from the London Mayor, dated March 09 2019
- Letter from Peabody to Jeremy Corbyn MP, dated March 08 2019
- Environmental Impact Assessment (EIA) Scoping Report, dated May 07 2020
- Holloway prison: Community perspectives, published by Community Plan for Holloway, October 2017

In summary:

The absence of any information regarding the environmental impact of the proposed development and the environmental standards of the proposed housing is concerning.

Islington's Planning policies are clear that private open space should be protected – which the proposal achieves to a reasonable degree with the retention of the existing courtyard and garden (although not all of the 7 existing garden areas are retained) – and that developments must protect and enhance the biodiversity value of the site whilst maximising the biodiversity benefits; aside from the retention of a number of trees, including the London Plane and Weeping Willow, there is no further information in the draft masterplan on how this will be achieved.

It is good that Peabody has committed to delivering 60% of the housing as affordable of which 75% for social rent, however the masterplan provides no detail with regard to the size of these housing units and their distribution throughout the development.

Section 5 of the SPD deals extensively with requirements on 'Design', with subsections on 'Context' such as the requirement for 'Active Ground Floor Frontages' on Camden / Parkhurst Road, 'Connectivity' with for example a requirement on permeability and new pedestrian access routes, and 'Sustainability' which extensively detail the sustainability in design requirements. None of the above, or most other requirements in Section 5 of the SPD are addressed in any way in the draft masterplan.

There is not enough time for people and organisations to gain awareness of the consultation and respond to the proposal. The consultation is scheduled to close shortly on Friday July 3rd.

The draft masterplan lacks enough detail to allow for responses from the public. We strongly request a significant extension in the period for which the consultation is open and the definition of success criteria to establish if the consultation did indeed deliver a response of significance.

The proposals for the Women's Building are not acceptable. The draft Masterplan shows only a poorly defined space allocation in one of the blocks in the corner of the site, but its lack of importance in the development appears to be such that this it is not even communicated.

The developer Peabody states that *"its aim is to create a historical link to the past by retaining landscape elements of the site"*. This shows an inadequate grasp of the historical significance of the site for the penal system, the women's movement in the UK and the many organisations that have grown up locally to support incarcerated women.

Islington Green party supports the call for an iconic and dedicated Women's Building that does justice to the legacy of the site and the needs of women's groups in London for secure space. We ask that the London Mayor, Islington Borough Council, and Peabody seriously consider this need and provide proposals that meet the expectations set with the public.

Consultation response in detail

With regard to the consultation:

- The consultation period is too short to allow people and organisations to gain awareness of the consultation and respond to the proposal.
- The online consultation provides several questions with predefined answers.
 - Not all questions are relevant (for example the preferred landscaping type - formal or informal)
 - Not all questions are clear (for example where building height and percentage of affordable housing are contrasted – in comparison to the clarity of the commitment for affordable housing fixed at 60%)
- Many of the images illustrating the landscaping are misleading.
 - Heights are not accurately depicted in relation to the neighbouring streets and surrounding townscape.
 - Trees are shown with fully mature canopies approximately 5 or even 6 stories high. It is highly unlikely that this size of tree will be planted, and so a misleading impression is given of the amount of greenery that will be planted.
 - Roofs of buildings are shown as public green space whereas in practice is nearly impossible to achieve.
- The consultation material is in general inadequate and fails to address key information about heights, volume and massing and the design response to the character of the area which is predominantly 3 to 6 storeys. The site is an enclosed site and in order to meet the public realm successfully it needs to address its relationship to the street in terms of heights and relationship to topography and local character. The permeability requirement is answered only with an indication of potential new access routes which are by no means certain.

With regard to the draft masterplan:

The proposal constitutes over-development and therefore will not address the principal requirement for this which is the creation of quality homes and open spaces.

- A density comparison of the proposed development compared to the surrounding streets should be included to allow respondents to understand the impact.
- The proposal should include evidence for this capacity and contrast this with the capacity studies included in the Supplementary Planning Document, in which the highest proposal provided for 15% fewer housing units than the draft masterplan does.
- The proposal should include detail on the expected number of additional residents for the area and how local facilities such as GPs, dentists, schools and shops will cope.
- The proposal provides no context for the development and should provide information on how the development will impact the surrounding areas visually and physically. It is otherwise not reasonable to assume that the average respondent will be able to understand this. For example, in terms of:
 - Will there be any shading and loss of sunlight?
 - What is the visual impact? Both in winter and summer as there will be quite different tree cover.
 - What does it look like from the various neighbouring streets?
 - What does it look like from inside the flats?
 - What does it feel like? Does it feel dense, open, steep, cliff, gradual, green, quiet, busy?
 - Where are the community facilities?
 - Where are the shops? (The SPD includes a requirement for 'active frontages' on Camden/Parkhurst Road which are not in the draft masterplan).

- Based on the proposed form and layout of the apartment blocks on the drawing provided it seems that only about 1 in 5 of the new housing units will have good cross ventilation. This is essential if the housing is to be resilient to hotter summers anticipated with climate change.
 - The layouts provided on the drawing would suggest that at least half of the new housing units will only have single-sided ventilation – with windows on one side only, of which a significant number potentially with a windows only on Camden / Parkhurst Road.
 - This implies that hundreds of the new housing units will be at risk of overheating. This must be addressed.
- The proposal shows numerous flats facing Camden / Parkhurst Road. This road sees around 25,000 vehicle movements per day. This will affect air quality and noise pollution. No impact assessments have been included and this issue must be accounted for.
- The proposal provides no information with regard to the quality of daylight in summer and winter for the different flats and as this will differ significantly, with hundreds of flats potentially daylight deficient, this information must be included in the draft masterplan.
- The proposal should provide detail regarding shading and the impact on the public space. The central garden appears to be surrounded by high-rise which will highly likely have a shading impact on the open spaces. It will also likely cause open spaces to be windy.
- The proposal should provide detail – aside for the included statement of 9,500m² of open space (which no person will be able to comprehend) – of how much open space is accessible, how it 9,500m² broken up into different areas and how does this proposed open space relate to the number of new residents (at least over 2,500) and existing residents of the local area.
 - How will these spaces for example provide quiet space, play areas, nature-led areas etc?
 - How will community facilities be positioned compared to these open spaces?
 - How will the public access the public open spaces created on the roofs?
- The proposal provides little to no information about transportation and connectivity of the site, especially regarding access to the site and connectivity off the site.
- There is a central two-way road for cars that meanders from one end of the site to the other. This appears to be a central design feature.
 - As this is a car-free development. How many car parking spaces will be provided, who will use them and what will be the location of these?
 - How many vehicle movements are expected daily? As the proposal is for over 1,000 housing units this may be significant and near constant flow of traffic.
 - How is access for cars expected to be organised? The proposal provides for a two-way road, but given that Parkhurst Road is a one-way street, vehicles can probably only enter and exit in one direction, so why a two-way road?
 - This should be genuinely a car free development with any parking for service vehicles at the edge of the site with no through movement apart from pedestrian and cycle traffic.
- What measures are taken to guarantee pedestrian priority and pedestrian safety? The road meanders through almost the entire development, and surrounds half the central park area, leaving about half the residents (including children) of the development with no option to reach the park, but to cross the road. Section 5 of the SPD provides detailed requirements regarding Connectivity including several requirements regarding pedestrian safety such as the requirement that pedestrian routes should be continuous. Why has this requirement not been considered in the draft masterplan?
 - How wide is the road?
 - How wide are the pavements?
 - How wide are any cycle paths?
- The proposal assumes no changes in the road layout of Camden Road / Parkhurst Road / Hillmarton Road. Has this been discussed with TfL and Islington Borough Council?

- All new pedestrian access paths to the development are indicated as 'potential'. What is the status of negotiations with the landowners and the residents that will be affected by the new access ways? And why are these labelled as pedestrian and not as pedestrian and cyclist?
- The SPD provides numerous requirements regarding sustainability. While Islington Planning Policy demands that "*all developments must clearly demonstrate how the highest possible sustainable design standard have been achieved*", (see Core Strategy Policy CS10, Development Management Policies DM6.5 – DM7.5 and the Environmental Design SPD) no such information is available in the draft masterplan at all. Example questions are:
 - Have BREEAM Communities been used?
 - How will the development achieve net zero Carbon?
 - Where will the Energy Centre be located? The space required for the Energy Centre is likely to be 500 – 1,000m²
 - Has shared heating been explored?
 - How will energy efficiency be maximised as required in the SPD?
 - How will water efficiency be maximised? And does the design incorporate rain/grey water recycling?

With regard to the Women's Building:

The location of the women's building is not actually communicated in the consultation document. But it is understood to be in the southern corner (adjacent to the Cat and Mouse Library) corner of the site, facing Camden Road. This means that the south facing frontage is on to the busy road, and the associated external (garden) space is on the north side of the 9 Storey building with adjacent 12 storey buildings, meaning little or no sunlight at any time of year. Given the potential for this to form the central community and social hub for the site with a greater London-wide significance, the chosen location is problematic and should be reconsidered. A central location actively engaging with the public space would be more suitable. The omission of this building from the consultation documents also suggests an incomplete consultation document.

It is disappointing that the proposed Women's Building is not a landmark dedicated building but appears to have been incorporated into a residential block. It is not clear from the proposals if the allocated space will be dedicated to the Women's Building only, or whether this is to be shared with other community facilities.

There should be an iconic and dedicated Women's Building that does justice to the legacy of the site and the needs of women's groups in Islington (and London) for secure space. We ask that the London Mayor, Islington Borough Council, and Peabody seriously consider this need and provide proposals that meet the expectations set with the public.

We ask that the plans for the Women's Building are reconsidered entirely and given the prominence they require and deserve.

On a general note, the design of the housing, the Women's Building and the development as a whole should be inspirational, unique, innovative, and ground-breaking. This development should be a landmark for inclusivity and sustainability.

We expect significant improvements in the consultation process, the documentation, the design, the prominence of the Women's Building and the sustainability of both build and development.

ISLINGTON GREEN PARTY JUNE 2020