

**The Community Plan for Holloway Board of Director’s response to Peabody's July 2021 Holloway Prison Masterplan Consultation, for the redevelopment of the former Holloway Prison - August 6 2021**

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**Introduction**

"I would like to see a pro-active approach from Peabody; proper engagement and transparency and collaboration with a community which has a real vision for its future and one that will really do justice to the extraordinary and unique legacy which the site provides."

*Quote from a local resident in response to the current consultation*

This document is the Community Plan for Holloway Board response to Peabody's plan for the redevelopment of Holloway Prison. It draws on a wide range of local people and organisation’s views garnered since the first Community Plan survey, which itself drew over 950 responses in 2017.

In particular, it has been informed by contributions from our Working Groups – Environment and Architecture, Co-Housing, Women's Building and Social Housing whose participants are drawn from the local community and who have a range of expertise in their fields.

Their knowledge and contacts have been key to CP4H supporters gaining significant insight into the details of different aspects of the development, enabling us to better inform the community as a whole.

The working groups also contain many community members who, while not experts in development, environment or women's services, are passionate about their neighbourhood. In particular, they are insistent that the Holloway project, being the largest development in our borough for over 30 years, serves the needs of our community. Especially as this was public land, bought with loans of public money and massively subsidised by public grants.

In short, although we welcome the provision of social housing, community facilities and public space we feel there is still significant room for improvement in the quality and quantity of these provisions. We also have ongoing concern that the environmental standards across the development are insufficient during the current climate crisis.

In addition to this combined response, we are submitting supporters' views received by the Community Plan so their opinions can be heard in their own words.

**The lack of a meaningful consultation**

We feel it necessary to state that the standards of the consultation have not been high enough for a development of this size and significance. Our concerns include:

a) The amount of information provided at this stage was not sufficient, given that when the plans are next presented they will be finalised and Peabody has said they will not be accepting further input.

b) For a final stage of consultation significant information is lacking, leaving our community without a voice on many issues including, among others, carbon usage, impact on the local environment (wind, daylight, traffic, etc.), tenure distribution and community facilities.

c) The consultation period was held during school holidays when many people are away or busy with childcare with a submission window of just three weeks - far too short for a development of this size and significance.

d) The reach of promotion announcing the consultation was insufficient – the geographical area for announcements via post is half that which we covered in our last postal mail out.

e) The hoardings surrounding the site have been greatly underused.

f) The London Borough of Islington agreed to the Community Plan’s request to promote this important consultation for free via their email, postal, notice boards and social media channels, Peabody failed to take up the offer.

g) Despite frequent attempts to persuade them otherwise, Peabody refused to collect demographic data that would evidence whether this consultation had reached a representative cross-section of the local community. Our own extensive research exercise Community Voices ( https://plan4holloway.org/community-voices/ ) illustrated various ways in which this consultation’s reach could be improved and we are disappointed they were not adopted.

**Background**

For 164 years HMPH was a site of incarceration for thousands of people, most of them women. Many had their freedom removed by a criminal justice system run almost entirely by men, for reasons which, to the modern lens, are woefully unjust. These include homosexuality, campaigning for women’s rights, being foreign, accruing small debts, producing materials deemed to be indecent and blasphemy, among others.

The site’s long and dark history, which includes state sanctioned murders, force-feeding, deaths in custody, corporal punishment, wrongful imprisonment, discrimination, abuse and neglect has been entirely ignored in its redevelopment. The legacy element of this site must be appropriately addressed and it cannot be treated as just any other brownfield site.

These comments are in 2 parts: Part One addresses the nature of the consultation itself, and Part Two addresses the Draft Masterplan proposals illustrated in the consultation.

There are many aspects of this development, all of which are key to creating a process and outcome that serves our community and the people who will be living on and visiting the site into the future; therefore, each of the headings below are equally important.

In summary, CP4H is concerned about the poor quality of the consultation documentation, especially the drafting of the questionnaire. We also have serious concerns about the poor quality of homes and external space that will be created by the proposed high-density redevelopment - resulting in many homes with poor daylight and dangerously prone to overheating, and heavily overshadowed windy streets and parks.

We are very concerned that an aim to maximise the number of homes will override wider considerations of quality and best practice.

We are seeking an inspirational vision for all aspects of this significant redevelopment.

The proposal for the Women’s building does not fulfil the LBI requirement for “an outstanding, multifunctional, women’s facility” (*Women’s Building development brief production and consultation summary*, July 2021). It shows a poverty of imagination and lack of thought or understanding of the significance of the project or its heritage.

We therefore encourage Peabody to respond meaningfully to the following comments:

**1. Consultation Questionnaire Comments**

We are concerned about the poor drafting of the questionnaire, which ignores accepted survey methodologies. For example, it includes many leading questions that force uninformed respondents to reply in a way that appears to support the scheme unless they say that they need more information or don’t agree with the aspirations. It appears to be specifically designed to avoid collecting meaningful information on topics that the community are most concerned about. Some specific comments:

1. **Duration:** Even in normal circumstances, the consultation period was too short to ensure that all individuals and organisations have time to review and discuss, and respond to it. The extension by one week has not been publicised so can’t have made much difference. Despite our suggestion of a minimum period of 6 weeks being ignored, we nonetheless have made every effort to encourage responses from our networks and the general community, and hope this will have boosted the response rate.
2. **Covid-19:** The impact of Covid-19 has been seriously constricting, another reason why the three-week consultation period was not enough.
3. **Poorly constructed questions:** We are told by respondents that the “Need more information” response has been used frequently – meaning that this is a missed opportunity for meaningful consultation.
4. **Unnecessary questions:** Some questions are needless because they refer to topics where a requirement is already clearly established as a design aim in Planning Policy or the site SPD, such as cycle storage or through routes across the site. Four different questions are asked about the Women’s Building Garden, 2 of which are duplicates, and none of them are likely to determine whether respondents approve of its location in relation to wind downdrafts, proximity to residential flats and overshadowing.
5. **Misleading question**:The question beginning “I support the reduction of building heights…” are simply misleading, some buildings are taller than proposed in the previous masterplan.
6. **Misleading information:** Trees are shown with fully mature canopies that appear to be approximately 4 or even 5 stories high. It is highly unlikely that this size of tree will be planted, or allowed to grow that high in some cases, and so a misleading impression is given of the amount of greenery that will be planted. New offsite landscaping and trees are shown, when of course there is no certainty that these will be planted. Existing mature trees are not identified.

As mentioned above, it is implied that building heights have been reduced, but in some cases the buildings are actually taller. Clear information is not given on this, unlike the last consultation document which did confirm numbers of storeys.

**g. Sunlight information.** The information showing sunlight percentages in the site is unexplained and therefore misleading. It suggests high percentages of sunlight in spaces on the north side of tall buildings, which obviously can't be the case. It states that sunlight to the Women’s Building garden has increased, yet it is detailed at just 1% - this is insignificant and thus misleading.

**h**. **Missing information:**  Critical information is missing from the presentation.

1. The number of homes to be built is not stated. This is essential information. At the most basic level it allows respondents to understand the site density and compare it with the last proposal, or the LBI site Capacity Study which, for example, states that 880 homes would be overdeveloped.
2. No cross-sections are provided or confirmation of building heights, and no comparison with other similar projects. Heights were at least provided last time around but have inexplicably been omitted this time.
3. The document states that 95% of the apartments are dual aspect. This is a welcome initial target, but around 50 of the homes will still be single aspect and at risk of overheating. No floor plans are provided to clarify how the 95% will be achieved.
4. The Women’s Building part of the master plan has less detail than previous consultations, no detail on the uses of the proposed spaces, and no indication as to how it complies with the SPD.

**i. Equalities:** We also wish to stress the importance of better consulting with the full breadth of the local community, including BAME communities, tenants, people with disabilities and young people, vulnerable and ex-offender women, and the criminal justice sector. There appears to have been little attempt made to improve the diversity of the consultation, to specifically include less well-represented communities.

**j. Planning Context:** The introduction should summarise the headlines of the site SPD and the Capacity Study. The absence of this information makes it very hard for the layperson to understand the significance of the proposals. For example, the proposed 980 homes should be set in the context of the capacity assessments of 720 homes and 880 homes, the latter having been found to represent overdevelopment of the site.

**2. Draft Masterplan Comments**

The masterplan presentation is very patchy and key information is left out which makes it impossible to fully understand and assess the quality of the proposal. It includes generic descriptions of design approaches but gives no details of how these apply to the project, despite specific requests by Community Plan for Holloway in advance for more detailed information.

The following comments are grouped under a number of headings, which summarise the key areas of concern that Community Plan For Holloway’s research suggests are important for the local community.

**2.1 Quality Homes – not overdeveloped or overheating, with good daylight.**

Important information on the design and quality of the homes is not included (except for 3 example layouts). 95% dual aspect flats are stated but from the material provided it appears that many dwellings facing Camden Road and all the elderly care accommodation are single aspect and so prone to overheating, especially during heat waves.

1. **Wellbeing of residents:** This density of the development and apartment type risk creating poor quality homes, with many homes experiencing poor daylight or dangerously prone to overheating. Given the high proportion of residents likely to face physical and mental health challenges, a clear strategy needs to be put in place that addresses basic health and wellbeing issues for all those who are to live in these homes. There is no indication of what social infrastructure will be available to residents on the site or what benefits will be available to the surrounding community.
2. **Ventilation and overheating:** It is stated that 95% of the homes will be dual aspect and so benefit from effective cross ventilation. The first concern is that around 50 homes will be single aspect, so highly prone to overheating, unless air conditioning is proposed, which is expensive for tenants and environmentally damaging.

Also, without floor plans, it is hard to see how the proposed form and layout of the apartment blocks achieves the 95% figure. We are concerned that a definition of “dual aspect” is being used that includes corner apartments or those with a stepped façade. These forms cannot develop the pressure differential required to create cross-ventilation and so cannot be relied on to promote effective cross ventilation, avoiding overheating.

CP4H still believes that the massing of the site should be adjusted to create apartments that are not accessed via internal corridors, but via external decks, allowing for cross-ventilation and providing attractive outdoor social space for residents. Recent award-winning precedents for deck access apartments should be referenced to inform this approach.

1. **Noise and Pollution** Camden Road has a vehicle movement of approximately 25,000 per day, creating a challenge for creating good living conditions. There will be approximately 100 bedrooms facing the road, so it is essential that the design addresses this challenge.
2. **Daylight**  No information is given on the quality of daylight in the dwellings. An initial assessment suggests there could be up to 100 homes failing to meet adequate daylight levels.

**2.2 Maximise social housing at council rents**

1. **Number of homes:** The number of homes is very difficult to find in the consultation, which is highly surprising given the concerns expressed by the community about 1050 flats being overdevelopment of the site, and the conclusions of the LBI Capacity Study that even 880 flats would be overdevelopment. The total number of units has to be added up on page 44 of the Consultation Exhibition Boards as follows: the site total is 981 broken down to 388 market sale, 593 affordable. The social rent units will be 412 across the site.
2. **Tenure mix and social housing:**  Most importantly, this site represents a unique opportunity to address the pressing housing needs in the area and across the borough of Islington more widely. Islington Council’s SPD is clear about this and earlier consultations have re-emphasised the strength of local views on this issue. The Community Plan for Holloway welcomed the early commitment to 60% affordable housing, with 42% of the total being for rent at Islington council rent levels. This is absolutely central to our priorities for this development and must be included in the final plan.

Whilst this commitment to 42% of homes at social rents represents a very welcome step forward, there remain issues to be resolved in relation to the remaining 18% of affordable housing to be provided on the site.

CP4H rejects Shared Ownership as we don't believe that Shared Ownership is an affordable model of housing for people in Islington. We are therefore opposed to any amount of the affordable housing on the Holloway site being allocated for shared ownership. This position is supported by Islington Council.

We prefer the London Living Rent model for the entirety of the 18% of the development as the 'least bad option'. Whilst we oppose the fact that London Living Rent homes have to be sold after 10 years, we support the fact that it is offered as a rental product at 1/3 of median incomes.

There are no plans so therefore we cannot see what the tenure is or where the tenure will be placed. We are told that the 1st phase will have 229 affordable homes and 195 market homes.

This phase works forward from Parkhurst Road, north-west to the back of the site. All we know is that the Old People’s Housing block at the back of the site contains 60 social units. This means that of the l remaining 169 units, 69 will be for Shared Ownership, leaving roughly 100 units for social rent in phase 1. Where will they put the social units? Will it be at the front of the site in the two tower blocks? Without seeing plans we do not know if segregation is in place. Will the market sales be kept in separate blocks, set apart from the Shared Ownership and the Social Rent?

1. The Older People's Housing block is a stand-alone block. It was a request from the Council Housing Needs department. Yet when we ask for a stand-alone Women’s Building it is not granted. Even though there is another stand-alone building adjacent to the Older People’s Housing that has not been seen as an option

**2.3 Co-housing - Intergenerational community-building homes:**

**Omission of co-housing opportunities:** It is very disappointing that there is no mention of the provision of co-housing.

We propose that the former Holloway prison site should include a cohousing project. This would provide genuinely affordable homes with a mixture of tenures and a nucleus of community and solidarity within the wider community.

Cohousing is an innovative way of bringing affordable homes to a multigenerational and inclusive community. It brings many benefits including for the health and wellbeing of its residents of all ages, creating a community that looks after each other and its surroundings. To build homes that support multi-generational living.

The cohousing residents will provide each other with mutual support, sharing facilities and taking decisions collectively to self-manage the community and building a sense of community on the site and in the surrounding area.

* Our housing mix would mirror the scheme’s overall housing mix, including 42% affordable housing at council rents.
* We would work in cooperation with the Council’s housing service to house people from existing social rent homes or the waiting list who want to live in a cohousing project.
* We would aim for other residents to benefit from our presence and the shared facilities that are integral to cohousing projects.
* Through the Community Led Housing (Hub for) London, supported by the Mayor, we are being connected with another local RP who might act as landlord for the social rent homes, if Peabody did not want to take on that role.
* The Secretary of State, Robert Jenrick, featured the cohousing development at Marmalade Lane (Britain's best new housing development) as one of two exemplar projects for the introductory film at his launch of the Office of Place and the latest version of the NPPF, on Tuesday this week. (https://policyexchange.org.uk/pxevents/building-beautiful-places/ View at 4.25-5.50)
* Until March 2023, the Mayor has both capital and revenue grants for cohousing projects that could be introduced to the overall development plan, in addition to the existing grants and loans to Peabody.

**2.4 Quality Outdoor Space - not windy & overshadowed by 14 storey blocks**

1. **Sunlight, Wind and the creation of Quality Public Spaces:**  The site layout, building massing and location of the open spaces appears to have been adjusted to reduce density and improve sunlight penetration. The sunlight analysis is extremely basic and not explained so we are still very concerned that the central green space will not provide a true ‘park’ experience because of the extreme overlooking by tall buildings and the high level of overshadowing.

The tallest buildings are located all around the central green space, heavily shading this area and creating windy conditions. The 14-storey building in particular will generate significant downdrafts.

A tall building analysis in terms of over shadowing and wind dynamics must be provided to demonstrate that the density of the Draft massing provides viable public spaces. The spaces between blocks seem too small, especially where proposed as play or amenity space, creating a poor environment especially in terms of acoustics and overlooking.

Public facilities such as the women’s building and other community spaces should be located in areas of maximum sunlight (even into the winter) to create the best possible external environment for an outdoor social space. The site layout can then link the green space to these public facilities to maximise the amenity value and likely success of these facilities.

1. **Green Space and Play Space:**  We are concerned about the overshadowing of the green spaces, which is not explained clearly by the consultation.
2. **Management Strategy for Green Spaces:**  The consultation doesn’t mention the approach to be taken for the management of the green spaces. There is a big opportunity for the community and the Women’s Building to be engaged in the management and maintenance of the various green spaces, including the central park, secondary landscaped spaces, wildlife areas, growing areas and play spaces. We would welcome a workshop with local community park, gardening and food growing organisations to discuss these opportunities.

CP4H request a 3D model of the current proposal so that the quality of the space can be analysed.

1. **Rooftop play:** The general response to the suggestion of rooftop play in the last consultation was negative, due to the challenges of providing universal access, and poor quality environment compared with ground level facilities. This consultation seems to go quiet on this topic. Is any rooftop play proposed?

**2.5 Women's Building - a fitting legacy meeting the needs of women.**

The most recent proposal from Peabody offers next to no improvement for the facilities offered in the Women’s Building and its heavily overshadowed garden. The current design is referred to as a Building, when in reality it is only a split-level floor tucked away beneath residential blocks. Nor is it a discrete entity, as it is apparently intended to also function as the site’s community centre.

The Women's Building needs to be completely re-thought if it is to provide a proper legacy for HMP Holloway and a transformative, ground-breaking and iconic building that will change women's lives for generations to come.

1. **Overall approach - the opposite of “outstanding”:** The proposal in no way fulfils the LBI requirement for “an outstanding, multifunctional, women’s facility” (*Women’s Building development brief production and consultation summary*, July 2021). It shows a poverty of imagination and lack of understanding of the significance of the project or its heritage.

As we suggested two years ago, the design opportunity should have been subject to a public competition open to women-led architect’s practices with experience and knowledge of the specific requirements, particularly the need to be “flexible, trauma informed, sociable and welcoming, able to offer benefit to a broad range of women” (Ibid).

We do not see any evidence of trauma informed design embedded in the scheme or concept design. The current proposals are not flexible or outstanding and the images shown are not ‘welcoming’ (a local architect described the aesthetic as that of a “barracks”). We have more specific comments on different aspects of the design below.

1. **Front elevation and entrances:** This is not something that people would be proud of. The choice of external finish, red shiny brick, is inappropriate and reminiscent of the entrance to nearby underground stations. This area is the sunniest spot on the whole site but also the noisiest and most polluted. The large stair and winding ramp create segregation of mobile and less mobile people at the outset. What is a ‘discreet entrance’ and how will the multiple entrances be managed regarding security?
2. **Women’s Building Garden:**  Overcrowded and poorly designed, the garden will be in shadow most of the year and suffer from large downdrafts from the surrounding towers. It lacks any sense of privacy, being highly overlooked. Also, it is separated by a full storey level change from the amenity of the park with space for relaxation and play. There does not appear to be a crèche area, or connection to the crèche within the building.
3. **Layout:** The arrangement of spaces around the two housing cores reduces flexibility of use. Valuable space is lost to corridors and some of the rooms look awkward to use (too narrow/small, no daylight).
4. **Fit Out strategy:** Will the centre be handed over as ‘Shell and Core’ for LBI and agencies to fit out as required?
5. **Cr**è**che:** Is the intention that this space will be for multiple use; if so, which activities? The division of space shown does not look suitable for the crèche requirements. There is no buggy store. The kitchen is small and will need a separate milk kitchen and more storage for the crèche and other activities. It is not clear how the design permits safeguarding of the children. How will the garden be accessed by the crèche?
6. **Art and craft studios:** there needs to be differentiation between publicly accessible studios and those intended for therapy. The therapy art/craft will need to be located near to therapy spaces and some break out space. It is unlikely that the art studios across the busy road at Islington Arts Factory can provide the therapy sessions required. Art and Craft studios will also provide vital upskilling and social opportunities for women and the wider community.
7. **Multipurpose Hall:** What is the intended use of the hall? If it includes sports, why is it an odd shape and is it suitable for sports use? The smaller cut back area on the south elevation cannot be accessed as shown if the hall is divided into three rooms.
8. **Multipurpose Use:** The ambition to maximise the use of spaces for multiple activities is recognised. However, for this strategy to be successful, the multipurpose hall especially needs to have easy access and generously sized storage facilities. It must also be recognised that certain spaces such as a crèche or art rooms are very hard to manage as multipurpose spaces. The current layout is not realistic in that the implied multiple use of spaces needs to be revisited.
9. **Entrance area, exhibition, artwork:** The images in the 2020 consultation document of the café and reception are sterile and lacking in imagination, and do not provide a welcoming experience.
10. **Exhibition and legacy:** The LBI documentation calls for exhibition and information space that refers to the legacy of the site, services provided and the women who have been associated with the prison. There is no evidence of this in the consultation document.

The public area would benefit from a permanent exhibition and interpretation space providing a legacy memorial. The external space would also benefit from artwork that provides reference to the site’s legacy.

1. **Back of house, plant rooms, risers, and management rooms:** where are these and is there enough space provided?
2. **Commercial opportunity:** There is a retail space, shown at the back of the ground level (behind the hall) on the original proposals, which is not included in the July iteration. This could provide a retail opportunity linked to the centre and run by women. Is this still included? If not, could other units on the site be allocated for WB use?
3. **Environmental Sustainability:**  Why is there no plan to re-use or retain any buildings or materials? Refer to comments elsewhere regarding the lack of environmental targets for the entire project.
4. **Social Sustainability:** This is an excellent opportunity to provide exemplary social value through training of women for construction related trades and careers. It is also an opportunity to support the employment of women during the development and construction periods. Why is there no mention of these critical aspects of the proposals included? Why is there no information on social value provided?
5. **Business requirements:** We have repeatedly called for a Feasibility Study to provide baseline information for this and other issues. Without it, the project planning is effectively “flying blind.”
6. **Design for expansion:**  CP4H feel that it is extremely important the Women’s Building Design is flexible to allow for extension should additional funding be brought forward over the lifetime of this project.
7. **Integration with the masterplan:** The Women’s Building has the potential to be at the very heart of a vibrant new community. It can provide a supportive and positive environment for residents and visitors if designed and handled intelligently and with imagination. CP4H believe there are significant benefits to locating the Women’s Building and community facilities at the northwest side of the site, possibly at the head of the park and on the axis with Hillmarton road. There is a strong synergy between the facilities provided by the Women’s Building and the older person’s building, available to all local residents, well used and more cost effective. The co-location would benefit the integration of the residents of all ages and backgrounds and provide a community focus for many to participate in. Associated activities could include other site wide facilities such as gardening, retail outlets, art displays, sport, fitness, promoting indoor and outdoor wellbeing. These factors would be something to be proud of indeed.

**2.6 Community Facilities – supporting the people of Holloway**

The community facilities are located at the noisy and polluted front of the site and don't relate to the play area and central public open space. No information has been given on whether rooftop play is still proposed, and what are the public access arrangements. There needs to be clarity about the location of other community facilities on the site.

**2.7 Green Transport – a site not dominated by roads**

CP4H expressed clear concern about the excessive amount of roads on the site and have contributed expert guidance suggesting this can be reduced, which is not acknowledged, and in fact the amount of site roadway appears to have increased.

1. **Road Layout:**  The central green space is compromised as a park space by the excessive 2-way ‘loop road’ that cuts through the centre of the site. (It also appears to loop round the northernmost residential bloc?). The road layout dominates the masterplan, taking space from the central green area and cutting it off from the adjacent buildings which would be best suited for communal facilities. As we responded previously, options should be explored where the site is served by a reduced road layout to the east and west of the site, avoiding day-to-day movement of private vehicles across the central park. If required for infrequent but essential access such as maintenance or fire-fighting, these two roads may be connected via a shared surface, but this would only be used when required, allowing the best possible environment around the central green space.

We have advice from Sustrans that confirms a reduced amount of road could serve the site. In the light of current council Low Traffic Neighbourhood and People Friendly Streets strategies, and the mention of a Home Zone design in the SPD we can’t understand this approach. We are told by Peabody that this is directed by the Islington Highways team. We will be organising a workshop on this aspect with all stakeholders to explore the options for reducing the extent of the public highway.

1. **Road Safety:** What are the measures that will make pedestrian and cycle access from the south of the site safe and easy? Does the western connection to Camden Road require a traffic light for safe vehicle movement? What are the most recent proposals from TfL and why have they not been cross-referenced in the document?
2. **Cycle Facilities:**  The confirmation of 2000 cycle spaces is noted and welcomed in principle. However, the design of these facilities is all-important if they are to properly serve the future residents. There are many design approaches that can be used to make cycling easy, but nothing is illustrated. Access must be simple and quick, at grade and not via long corridors with lots of doors. Given the size of the project we believe that a cycle hub should be provided that provides maintenance and hire of different types of cycle.

**2.8 Priority Green – zero carbon emissions target, sustainable development**

In terms of the environmental performance of the project and its construction and operational carbon emissions, only generic design approaches are described.

**Environmental Sustainability** No details are given confirming the environmental and carbon emissions impacts of the construction and operation. In this Climate Emergency, which has been fully recognised in GLA and LBI Planning policy, Peabody should be confirming the proposed performance of the project.

**2.9 Green construction training - skills for women and zero carbon**

**Commitment to Training for Women and Green Construction:** Aside from mention of Peabody's membership of the Women’s' Training Network, no commitment is given to green construction training related to this site, particularly including women. There is an urgent need for this given the crisis of training in construction, the lack of training for low energy construction and the white male domination of the industry.

**2.10 Design and integration with the local townscape**

1. **Proposed Scale and Visual Impact:** The visual presentation fails to communicate the visual and physical impact that the proposed scale of development will have on neighbours and residents. It is extremely hard for the layperson to understand the proposed scale. Only one single street level view from outside the site is provided, showing almost none of the existing context. The SPD and Capacity Study identify the importance of the impact on the streetscape, including the statement “It will be essential that development on the site clearly relates to and responds to its setting.”

This is especially important for the way it relates to local topography as tall buildings will appear even taller in some locations due to the 8m level change across the site (nearly 3 storeys).

Trecastle and Penderyn Way tenants and residents association have asked us to raise their concerns about the heights of buildings and how these will overshadow their community garden and neighbours who directly back on to the site.

Bakersfield residents are worried that the level change between Bakersfield and the site also needs to be considered, as well as how high, and how far from Bakersfield, the buildings would be compared to the existing prison buildings. They say “It's difficult to tell and could affect us.”

At the previous consultation stage, we suggested that a series of precedents and examples of the proposed scale should be provided to assist respondents’ understanding of the massing. For example, will the proposed eastern street feel canyon-like, like Hornsey Street near Holloway tube station? Unfortunately, this has not been provided.

The location of this site in between the busy local area of Holloway’s Nags Head, and nearby Camden Town and its impact and implication for these two areas has not been explored.

The legacy aspect of this site, reflecting the site’s rich 170 year history has not been explored or demonstrated in any meaningful way and has been notably absent in offer and visualization.

1. **Townscape and Streetscape Strategy** In order to fit successfully into the surrounding public realm the enclosed site needs to address its relationship to the streets in terms of heights and relationship to topography, local buildings and character. It is unclear how the site level change has informed building heights to reduce the visual impact.
2. **Views**  As a matter of urgency, views from surrounding key locations should be provided. These should include from Camden and Parkhurst Roads and from Hillmarton Road and surrounding residential roads to the rear of the site. Also, the wider impact on local townscape views more generally outside the local landmark viewing corridor to the church spire should be presented. Aerial and bird’s eye views are provided but these will never be seen by anyone in the day-to-day experience of the development. They are also unclear because the way the greenery is indicated blurs the edges of the buildings and reduces the reality of the visual impact of the building. No views from inside apartments are provided, which is important to inform future residents of the nature of their potential homes.

**Conclusion**

The Community Plan For Holloway shares the hopes of many that the redevelopment of the Holloway Prison will be inspirational and ground breaking. It was a huge win for the local community when the land was not sold to a developer focused simply on producing the maximum amount of private flats. The provision of 42% social housing, and the London Borough of Islington’s welcome call for “an outstanding, multifunctional, women’s facility” opened the way for a truly visionary development.

We want this to be an exemplar of high-quality regeneration, which demonstrates best practice well-being and environmental responsibility with recognition of historical heritage, bringing a sense of delight to those that live there and visit.

However, we are very concerned that an aim to maximise the number of homes will override wider considerations of quality and best practice and the current plan for a Women’s Building will not be outstanding and is not sufficient to provide the comprehensive range of services for women and the community and does not provide a fitting legacy to this site of historical significance.

We ask for improvements to the quality of consultation, design proposals and the flexibility that will be needed in order to see this vision delivered successfully.

If the overall tone of this response is one of disappointment with Peabody's current plans, it is because we have a strong sense that a wonderful, once-in-a-lifetime opportunity is in danger of being squandered.

The redevelopment of HMP Holloway is not simply a technical problem to be solved (X units on Y terrain at Z cost = job done): it is a creative, historic, and social challenge to be risen to. Our hope is that in 50 years, the people of Islington will look at the redeveloped site of HMP Holloway - its buildings, its gardens, its public art, its confident buzz and community spirit - with pride, and with admiration at the ambition that drove its success.

The idea of a dynamic new community that both respects the past and looks ahead to the future with a visually striking and functionally innovative Women's Building, is ultimately a positive, even joyful one. We believe that the opportunity is still open, and hope that Peabody will take on that challenge, working with the Council and the community to make the vision a reality.