

Community Plan For Holloway's (CP4H) role has been to amplify the voices of the thousands of local residents it has engaged with since May 2018, who have expressed views and concerns about the development of the Holloway site. This response is on behalf of the CP4H Board ('we').

We would like to acknowledge the initiative that LBI took, once the site's sale was announced, in quickly producing a SPD that stipulated various issues, which campaign members had been demanding. Without this move on behalf of the council, the current situation would be very different. We also recognise that LBI has pushed for and won many improvements to the original scheme. However, despite this, regrettably this response contains a series of material objections to the current plan presented by Peabody and reflects the views of many members of the local community.

We would like to express our objection to several aspects of the proposal for the redevelopment of the Holloway Prison site. The objections are numerous, in many instances material and in direct contravention of the SPD, the Local Plan, the London Plan and national planning policy.

On this basis, the application should be rejected in full and the applicant required to submit an improved proposal.

Approval of this application, in whole or in part, does not deliver the advertised benefits to the borough. It comes at great cost to the area and residents surrounding the former Holloway Prison.

Many, if not most, faults with this application are a direct consequence of the extremely high number of proposed housing units and resultant population density for this site.

The Application should be rejected for the following reasons:

1. Height, Density and Design

Please refer to Dataset: Planning permissions on the London Development Database (LDD) as published by the GLA for the following comparison. This dataset is viewable on this map: <https://maps.london.gov.uk/map/?ldd>.

a) The proposal is for a level of housing density which is rare even in London.

Whilst acknowledging the urgent need for housing in Islington, this level of density will neither solve the housing crisis, nor create homes that allow for residents' flourishing. The proposal for the development of the Holloway Prison site is the largest housing development in Islington for over three decades, providing 985 residential units on 4.16 hectares with a density of 237 residential units per hectare, comparable only to

- i) the redevelopment of Ashburton Grove (N5 - references P092187 and P011500) - totalling 1,356 residential units on 5.629 hectares with a density of 241 residential units per hectare
- ii) the redevelopment of the Packington Estate (N1 - reference P102754) for 521 residential units on 3.255 hectares or a density of 160 residential units per hectare.

iii) the 250 City Road (EC1) mixed residential / hotel development of two towers 43 and 36 storeys high, delivering 930 apartments on 1.9 hectares or a density of 490 residential units per hectare.

iv) The current housing density of St George's ward is 63 units per hectare (5350 units on 85 hectares), or 4x less than the proposed development.

St George's Ward is currently the 75th most densely populated ward out of 624 wards in London. The addition of 985 units/3,450 residents will rocket St George's ward to be the 12th densest populated ward in London.

b) On a London-wide level

Applications for residential developments greater than 500 units are very rare and only 268 have been submitted since 2006 (out of 66,814 in the dataset - or 0.4%). Of these 268 applications almost 50% came from only 6 of the 33 boroughs; Tower Hamlets, Greenwich, Wandsworth, Newham, City and Ealing. The remaining 27 boroughs share the remaining 50% (Islington accounting for only 2.6%).

Applications for residential developments greater than 500 units and with higher density than the 237 residential units proposed on the Holloway Prison site are even rarer. 124 only (including this application). Of these 268 applications, 50% came out of just 4 of 33 boroughs only, Tower Hamlets, Greenwich, Wandsworth and Newham. The remaining 27 boroughs share the remaining 50%, with zero such applications in 9 London boroughs.

This application is evidenced to be of extraordinarily high density, to London standards and certainly to Islington standards. It is completely out of context with the surrounding area.

Furthermore, the heights of most of the proposed constructions are not in accordance with the Islington Core Strategy CS9 (part E) which states: "Tall buildings (above 30m high) are generally inappropriate to Islington's predominantly medium to low level character, therefore proposals for new tall buildings will not be supported. Parts of the Bunhill and Clerkenwell key area may contain some sites that could be suitable for tall buildings, this will be explored in more detail as part of the Bunhill and Clerkenwell Area Action Plan."

5.8 of the Supplementary Planning Document (SPD) 01/03/2018 - The prevailing heights of buildings surrounding the site are generally 3-6 storeys. Buildings should respond to this local context.

In addition to this, the recent Local Plan Topic Paper Tall Buildings 2020 states that "The Holloway Prison site was also subject to detailed appraisal and was not considered suitable for tall buildings". Similarly, the Nag's Head and Holloway Spatial Strategy SP5 also explicitly identifies sites for tall buildings and does not include the Holloway Prison site.

The proposed number of homes also exceeds a reasonable density for the site, as per LBI's own Capacity Study for the site (published in the SPD). This found that 720 homes would be appropriate and even that 880 homes would be too much: "The scale of this option is judged out of character with the local area. It represents an over development of the site that risks reducing the quality of the development, levels of residential amenity, daylight and sunlighting." Pushing the density up by another 265 homes, to 985, is a matter for

concern due to the poor-quality homes created, and the severe negative effects on the surrounding area and its residents.

We therefore believe that the Application should be rejected because of failures to meet these specific policies in relation to tall buildings.

2. Lack of community facilities

We are concerned that the opportunity to create a new vibrant community place for residents and neighbours is at risk. Islington Council's own Supplementary Planning Document (SPD) for the site makes many references to the requirement for provision of community facilities, which is ignored in this application. For example: "In addition to a large amount of housing, the development will also deliver public open space and important community facilities" in the Forward, and 5.13 "The provision of community facilities should generally be located..."

The SPD also stipulates that "The provision of more sensitive community uses (such as a nursery for example) should be accommodated in a quieter location where air and noise pollution will be minimised", but no sensitive community uses, such as community nursery, cafe or centre, have been included in the proposal. The closest thing to these is perhaps the proposal that part of the 'Women's Building' may be designated as a crèche, however that would be located in the part of site with the highest air and noise pollution levels.

Residents' facilities (which, according to the developer may have a private access only "Lounge", that we have been told might contain a gym and a screening room) are provided in a large block of private housing, but this is very different from community facilities that would provide welcome to all members of the public and serve to build a strong sense of belonging and mutual support between residents and neighbours.

Policy SP5 Nag's Head and Holloway states: "The site will provide, inter alia, high levels of genuinely affordable housing, community uses including a women's building/centre and publicly accessible open green space", but the Proposal fails to deliver this Policy requirement because community uses are not proposed in addition to the Women's facility (which does not contain any space for community use in the current plan, even though including community space, alongside women-only spaces, would be beneficial for both the financial sustainability of the Women's Building and its integration into the local area).

The site is allocated by the council under Islington Local Plan Site Allocations, Site NH7, Holloway Prison, Parkhurst road. This states the "Allocation and justification" for this site as "Residential-led development with community uses (including a women's centre building), open space and an energy centre." Also "The implementation of future development should be phased in a way that minimises disruption to existing and future residents in the area, with essential infrastructure such as open spaces and community facilities completed prior to residential occupation of the site".

Policy SA1 Delivering Development Priorities states that "A. The Local Plan will deliver its objectives and priorities by ensuring that sites allocated for specific uses actually deliver particular types of development in line with the allocations. Proposals comprising uses which are not specified in the allocations will be inconsistent with the allocation and will not be permitted."

Policy DM4.12 part B states that: “The council will seek the provision of new social infrastructure and cultural facilities as part of large mixed-use developments.” and part C. ii) requires the provision of these new social infrastructure buildings to be “inclusive” and “accessible”.

Hence the proposal failing to deliver community facilities inclusive and accessible to all members of the community (beyond residents and women only) is not in compliance with policy and so should be rejected.

It should also be noted that the consultation carried out by the Applicant in January 2021 led the community to believe that community uses were to be provided as part of the Women’s Building. Statements included “the multi-purpose hall building at lower ground floor, complementing park related and other community uses and facilities that are likely elsewhere on the site.” It also made reference to the more public entrance and multipurpose hall spaces at the very least being accessible to the community, and a specific community gardening club. It was not made clear that the Women’s Building facilities would be for women only until this Application was made, meaning that this aspect of community engagement and consultation was flawed and misleading.

3. Impact on existing community service provision and facilities

The brief Equality Impact Statement delivers a very positive but highly unrealistic assessment. The document suggests that aside from temporary ‘minor negative’ impact of the construction itself on people who are elderly, disabled or pregnant, every other impact of the proposal for the site’s development is either positive or has no impact at all.

However, the Equality Impact Statement reaches this conclusion without offering any assertions that are actually evidenced by research or statistical analysis; it simply presumes this to be true.

The waiting list for nursery places is currently approximately 2 years. But an influx of 3,450 residents, of which 523 (figure from the document) would be children, according to the Equality Impact Statement, will not have a detrimental impact on the availability of nursery places.

Buses that serve the area are notoriously congested. Even now there is often standing room only, but an influx of 3,450 new residents, almost all of whom will not have access to a car, will not have a detrimental impact on bus services according to the Equality Impact Statement.

No evidence has been offered for these assertions, the impact has not even been assessed. This is negligent.

As already mentioned, there are no communal facilities in the new development, residents cannot even, as specifically highlighted by Peabody’s representatives, rent the ‘residents space’ in the private Block D for celebrations, such as children’s parties. We have been told by Peabody that there is no need for community facilities on the site because existing community centres in the area are underused. They have not substantiated this claim with any research or evidence.

New residents will have to make use of the existing Hilldrop and Williamson Community Centres. Hilldrop is already seeing very high usage and seldom has available space, certainly not with less than a few weeks' notice. Williamson is a very small centre with few facilities and its management committee has not been consulted about its capacity to cope with this huge increase in potential demand. We also have consulted other local amenity spaces, like the adjacent churches, whose halls are fully booked. Hence the impact on the wider area from the influx of 3,450 new residents, who have no access to other communal facilities, will be detrimental. Also the new residents' ability to access services will not be sufficient.

Despite claims of sufficient provision there is no actual evidence found that shows the impact in school places. Tufnell Park Primary School, the nearest school, has told us that, going forward, "it is unlikely that there will be significant capacity in most year groups".

Nor is there any actual evidence presented that shows the impact on GP surgeries, dentists, pharmacies or other health provision. Nor post offices or other local amenities.

St George's Ward is one of the most green-space deprived wards, in one of the most green-space deprived boroughs, in the whole of the United Kingdom. The additions of 3,450 new residents will, despite the inclusion of a small central 'Open Space', reduce the overall amount of green space available per local resident significantly. This is evidenced by the measures the council publishes itself in the February 2020 Green Infrastructure topic paper. Major developments are required to conduct an Urban Greening Factor assessment, in accordance with the methodology in the London Plan. This is also missing from the Application. Schemes should achieve an Urban Greening Factor score of 0.4 for developments that are predominantly residential. A loss in green space per-person in this area is not acceptable.

The application should be rejected because no actual assessment better than conjecture was carried out to understand the impact of this development on the local area. This is negligent, especially since there are likely to be many negative external effects, if properly researched.

It is noteworthy that the Equality Impact Assessment states that, as the site has been boarded up since 2016, it is considered not to have been of benefit to the local community and opening it up for housing and shared open space will be of benefit. It fails to include the prison community that lived on the site; inmates, staff and visitors. They brought material, social, employment and economic benefits locally which are not being re-provided. The proposal fails to include a matching provision of services that the prison offered to the community, both locally and London wide.

4. Sunlight and Daylight in Proposed dwellings

The documents confirm that over 200 rooms in the proposed development will not meet minimum recommended daylight levels due to the density of the buildings. Even more worryingly, these rooms are predominantly in the social housing; private tenants can choose whether or not to buy a house with inadequate daylight, whereas social tenants must take what they are offered.

We are also very disappointed that the proposed design means that over 53% of rooms will fail to meet recommended (BRE) levels of annual sunlight.

Building dark and dingy homes is unacceptable. The application should be rejected for not meeting Policy on light levels.

5. Sunlight and Daylight in Neighbouring properties

The density and height of the buildings creates a significant loss of daylight and sunlight to neighbouring homes and gardens. But how have residents been alerted to this and helped to understand the implications for their homes? The detail of the assessment is buried deep in 1000's of pages of Planning documentation, and the actual document has 1,284 pages itself.

In fact no residents have been alerted to the impact on their properties. For example the residents of Crayford House do not know they will lose on average 30% daylight following completion of the development. The residents of Kimble House will lose between 50% and 80% daylight in their kitchens, yet they have not been informed of this. The same applies to all neighbouring properties that are affected by a loss of daylight. The loss of daylight to gardens is even more hidden in the document, but no less important, especially in an area as deprived of green space as St George's ward.

The impact of a new development in terms of its effect on daylight for residents of surrounding properties is a difficult concept, but extremely important in many aspects, including liveability, mental health and the development of children. This is why very clear Building Research Establishment (BRE) guidelines exist.

The proposed development breaches the clearly set BRE thresholds on hundreds of occasions, depriving local residents of essential daylight. The Application should be rejected for not meeting these minimum light standards.

Three measures are considered here. All data is provided by the developer.

a) For the Vertical sky component (VSC) of adjacent properties

Vertical sky component (VSC) is a 'spot' measure of the skylight reaching the midpoint of a window from an overcast sky. It represents the amount of visible sky that can be seen from that reference point, from over and around an obstruction in front of the window. BRE guidelines state that a 20% reduction is the threshold for a materially noticeable change.

The developer in this instance suggests on several occasions that the surrounding streets and housing blocks are 'underdeveloped'. Though CP4H strongly disagrees with this suggestion, if the surrounding streets and housing blocks are indeed considered 'underdeveloped', then this percentage threshold for a materially noticeable change should be increased to 30%, with an upper threshold of 40%.

A review of the developer's assessment results for 1,081 windows shows:

- i) 442 (41% of the total) show a material breach of > 20% reduction in VSC, and of these
- ii) 270 (25% of the total) show a material breach of > 30% reduction in VSC, and of these
- iii) 142 (13% of the total) show a material breach of > 40% reduction in VSC.

In some blocks, for example Crayford House, Kimble House and the Dance Studios in the Islington Arts Factory, nearly all windows would suffer a > 30% reduction in VSC, sometimes over 60%.

b) Average daylight factor (ADF) of adjacent properties

Average daylight factor (ADF) is a complex measure of the adequacy of diffuse daylight within a room. For example a small room with a large window will be better illuminated by daylight than a large room with a small window, and the ADF measure accounts for this.

BRE guidelines confirm that the acceptable minimum ADF target value depends on the room use. That is 1% for a bedroom, 1.5% for a living room and 2% for a family kitchen. Unfortunately for a majority of the rooms the actual use is not known in this study.

A review of the 'total ADF' as was calculated for 692 rooms and shows:

- i) 148 rooms (or 21% of the total rooms assessed) currently already have a VERY LOW ADF of below 1% (thus below the lowest BRE minimum).
- ii) For these 148 rooms the average further reduction is 27%, a significant reduction even for the rooms with the poorest daylight already.
- iii) Following the proposed development the total number of rooms with an ADF below 1% (thus below the BRE lowest minimum) grows by 55 to 203 rooms (or 29% of the total rooms assessed).

c) No-sky line (NSL) of adjacent properties

No-sky line (NSL) is a measure of the distribution of diffuse daylight within a room. When comparing the NSL for existing buildings against that proposed following development, BRE guidelines state that if the no-sky line moves so that the area of the existing room which does receive direct skylight is reduced to less than 0.8 times its former value, then this will be noticeable to the occupants and more of the room will appear poorly lit.

A review of the NSL assessments provided in 692 instances shows:

- i) In 108 instances (or 16%) the reduction in NSL was greater than the 20% which is considered material and
- ii) Within this group of 108 the average reduction in NSL was 41%
- iii) In the worst instance the reduction in NSL was 83%

The proposed development creates an excessive loss of daylight and sunlight over the neighbourhood and should be rejected on material planning breaches.

6. Overheating and aspect

The Application proposes to build 55% of the homes with only a single aspect, with up to 9m from the back of the home to window(s) that are only on one side of the home. The inclusion of bay windows doesn't give cross ventilation in compliance with GLA design guidance and Policy.

The application confirms that the only way to stop some homes from overheating is to provide a cooling system, especially along the noisy and polluted Camden/Parkhurst Road, where windows need to be kept closed. However there is no confirmation of how many flats are affected in this way. At a time of concern over energy costs and fuel poverty it is not acceptable that the design will increase fuel and maintenance bills, as well as carbon emissions, for an unknown number of homes. An estimate suggests this is around 250 homes, the majority of which are social housing (again, even more unacceptable in homes whose tenants have no choice but to live there).

The proposal is not in accordance with Policy DM7.5 Heating and Cooling, which requires proposals "to demonstrate how the proposed design has maximised incorporation of passive design measures to control heat gain and to deliver passive cooling, following the sequential cooling hierarchy, below:

- i) (Highest priority) Passive design to minimise unwanted heat gain and manage heat (e.g. orientation, shading, fenestration, soft landscaping, thermal mass, energy efficient
- ii) Passive/natural cooling (e.g. cross ventilation, passive stack ventilation, night purging)
- iii) Mixed-mode cooling, with local mechanical ventilation / cooling provided where required to supplement the above measures using (in order of preference) low energy mechanical cooling followed by air conditioning
- iv) Full-building mechanical ventilation / cooling systems using (in order of preference) low energy mechanical cooling followed by air conditioning
- v) Measures at the highest priority level of the above cooling hierarchy shall be utilised to the fullest extent possible before the next level of the hierarchy is utilised. Use of technologies from lower levels of the hierarchy shall not be supported unless evidence is provided to demonstrate that technologies from higher levels of the hierarchy cannot deliver sufficient heat control.
- vi) Applications for major developments are required to include details of internal temperature modelling under projected increased future summer temperatures to demonstrate that the risk of overheating has been addressed."

The GLA Housing Design Quality and Standards Draft SPG Module C: Housing Design - Quality and Standards C5.5.1 Careful building design (including thermal mass, layout, aspect, shading, window size, glazing specification and ventilation), and landscaping and green infrastructure should be used to ensure good internal thermal comfort and avoid the need for active cooling.

Also the GLA London Design Guide under Standards 6.3.1 states “Development proposals should demonstrate how the design of dwellings will avoid overheating during summer months without reliance on energy intensive mechanical cooling systems”.

Furthermore, the site SPD states: “5.38 As part of designing high quality building fabric it should be demonstrated how the development maximises incorporation of passive design features to control heat gain and deliver passive cooling (in line with the sequential cooling hierarchy, identified in development management policy DM7.5.) without resorting to energy intensive cooling methods such as air conditioning.”

The Proposal discusses a number of passive measures but does not systematically detail which measures, particularly including design for thermal mass and allowing cross ventilation, are used to avoid overheating without the need for supplementary cooling. The information provided is incomplete and not systematic, simply picking a number of apartments that are thought to be at risk of overheating. Hence, to comply with the Policy requirement for “evidence to be provided”, assessments should be submitted for every single dwelling illustrating how the hierarchy has been followed, ensuring the implementation of passive means before active cooling is adopted. These assessments should be accompanied by assessments of the associated carbon emissions of the active cooling systems that are proposed.

The proposal is very poor in terms of aspect and overheating, as well as incomplete in areas that require significant detail to be compliant, and the application should therefore be rejected.

7. Social Housing and Shared Ownership

The Design and Access Statement records that 42% of the units will be social housing. This must not be reduced, even if the developer makes a plea that the reduced number of units makes the site unviable. The GLA has already paid the grant funding for the social units and a further £10m to retain the rents at Target levels, in addition to the huge amount of public funds that already went into this project for purchasing the site as both grant and loan. Any change by Peabody will break this agreement. It was fought for hard in Islington and would create huge problems if it were reneged on.

In total 18% of the homes are proposed as shared ownership. As of November 23rd 2021, a minimum income of £67,546.00 is needed in order to purchase a Peabody two-bedroom shared ownership property, in Islington, with a 25% share (<https://www.peabodysales.co.uk/developments/patchworks/prices-and-availability/shared-ownership/apartment-5-patchworks/>). This is around double the gross median income of non-property-owners in Islington and is therefore not affordable to the very households it should be aimed at (see London Borough of Islington Strategic Housing Market Assessment, 2017, identifying the gross median income for Islington non-owners to be £31,500). Therefore it is our assertion that there should not be any shared ownership properties on the site. Instead this 18% should be a mix of social rent and London Living Rent, which are more affordable for ordinary Islington households.

8. Mix and allocation of tenure

The distribution of tenure is not in accordance with Council policy, which calls for “affordable and private housing built to the same standards and indistinguishable from one another in terms of design quality, appearance and location on site. There should be no separation of amenity or facilities according to tenure.”

The design is not acceptable because there is a clear differentiation of quality of home in the overheating/air conditioning issue and the fact that the majority of homes with an attractive view over the central landscaped area are proposed as private tenure. This is evidenced for example by the entirely private ‘block D’ being located in the greenest area of the site and shielded from Camden/Parkhurst Road (on which 25,000 vehicles pass each day, with associated noise and air pollution) by two very tall blocks that are entirely social housing. In fact 85% of all new housing on Camden/Parkhurst Road is social tenure and none of the few private flats (in Block B) actually face the road, they face the park.

None of the 15 blocks are mixed tenure, all blocks are either entirely for sale, or they are entirely for social rent. This segregation is not acceptable, as it contravenes Islington Council policy.

a) the social housing mix is not the social housing mix that Islington needs.

75% of all new social tenure flats are 1 and 2 bedroom apartments. 62% of those are 2 bedroom/4 person units. These 2 bedroom/4 person units assume that all children can share a bedroom and so do not benefit from privacy. These properties are too cramped, exactly the property type that Islington families are growing out of and desperately want to change for 3 or 4 bedroom properties. But only 25% of the new social tenure properties are of significant size: this is not enough.

The proposal is very poor in terms of its mix and allocation of tenure. It shows a clear preference in both design and location for ‘properties for sale’ compared to ‘properties for social rent’. The application should therefore be rejected.

9. Women’s Building.

a) Non-compliance with Islington Planning Policy.

The requirements of the Holloway Prison SPD (which is referenced in Emerging Policy NH7, required to be given “very significant weight” in terms of any future determinations on the site) are not being met.

The SPD clearly states that lost services should be re-provided on the site and that the needs of women both within and outside of the Criminal Justice System should be considered.

Our calculations show that the area for service provision and delivery within the prison was approximately 4600sqm, used by women from both within and outside of the Criminal Justice System. The current proposal allocates approximately 920sqm of usable room space within the 1500sqm proposed for the ‘Women’s Building’. There has not been any needs assessment provided which justifies such a dramatic decrease in area. As the

population of the ward is expected to increase by approximately 20% as a result of the development, we would expect an increase in service provision to be accounted for within the design of the building.

The space provided for women is undersized and poorly designed. Award-winning architects have highlighted that a large number of the rooms are accessed via long internal corridors and that many rooms have no windows for light or ventilation. Natural ventilation is required by Council Policy; without it, the spaces are at risk of being uncomfortable, as well as having high running costs and carbon emissions.

The external facade is suggested as a chequered red-brick. This facade is bland and unimaginative, far from celebratory and not inspirational for women, or the wider community. This site is proposed as groups of angular (masculine) blocks with Block C the 'Women's Building' hosting curvy balconies to 'reflect women' (deemed by many as insulting). This is not a fitting legacy for this site of national importance.

b) Lack of viability assessment

The 'Women's Building' facilities have been designed without a thorough investigation into what services were delivered to women in HMP Holloway, and there has not been an expert sector-led feasibility study to inform requirements. The council's own Women's Building Development Brief Consultation Summary states that out of 28 respondents, 24 did not agree with the presented proposals. That's over 85% of local specialist women's service organisations, the very organisations which should be housed in the facility, stating that it is insufficient. This contributes to uncertainty over how this facility will function and be sustained.

A further concern regarding viability is that this proposal will not deliver a complete facility, but only a shell and core space. A conservative cost assessment of a full fit-out of the 1,500m² space suggests that at least £1m of additional funding would be required to turn what Peabody is offering into a complete and operational building. The lack of a completed feasibility study, or offer from the Applicant to meet this shortfall, means that there is no guarantee that this proposal will provide the facility that is called for in the SPD. This is another reason why the Application should be rejected.

The application confirms the facility solely as a women-only space which undermines its ability to support the wider community and local families. This could also prove to be divisive in its operation. We believe there is a need for both open facilities as well as women-only facilities, and this need is clearly established in Policy as outlined above, especially in the SPD requirement for both women's and community facilities on the site.

In summary, there is little evidence that 'the needs of women' have led to the design or spatial allocation, as stipulated by planning policy. There is also little evidence that the space is 'trauma-informed' as outlined in the SPD. Having been involved in the process from the beginning, we conclude that these plans have been based around what Peabody is willing to offer at a 'peppercorn rent' - ground floor space on one of the residential blocks, which is unfit for residential use.

c) The Equality Impact Assessment

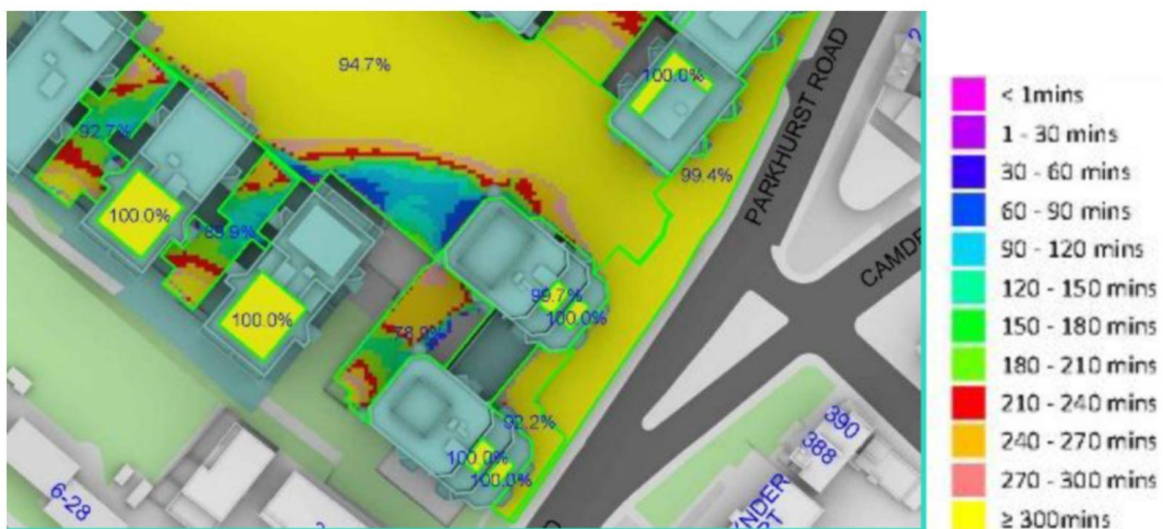
The EIA suggests that no social services were lost on this site as it was a prison, but this is not a correct representation. Holloway Prison serviced an extensive group of women and

their families. This included incarcerated women; other women who were not incarcerated but came to the prison in connection with Criminal Justice System requirements; and also women who were not under the remit of the Criminal Justice System, but came there because it was a hub for specialist services unavailable elsewhere. There was considerable provision of social services on this site. The basis of the EIA's claim is incorrect.

The proposal of delivering a ground floor in a residential block in the poorest location on the site - along Camden Road where noise and pollution are the highest - is not sufficient recognition of the most important and largest women's prison in Europe, or its 150 year history. A significantly larger building is required.

d) Women's Building Garden

The Women's Building Garden will not be the lush, tranquil, contemplative space described. For such an important amenity space it will receive a very low level of sun on ground. The BRE target for an amenity space establishes only a minimum performance level and it is only just met when an average is taken across the full garden area. The specific amenity areas for seating and crèche use by the back entrance can be seen to never receive any sun (on the image below) while the remainder of the garden will be overshadowed, receiving considerably less sunlight than would be expected for a prime garden space. The garden is also overlooked by 3 tower blocks; will suffer from downdrafts that make seating uncomfortable; is adjacent to the crèche and is near the main road, all of which may be trauma-triggering for some women.



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e) Legacy

We are concerned that the rich history of this site is being erased. The single floor offer of a 'Women's Building' located under a 14 storey block of flats is far from a fitting legacy to the capital's only women's prison. It seems tokenistic, rather than the women-led living legacy this site deserves. Legacy and women's history should have been at the heart of this development, not applied as an afterthought. This is a once in a lifetime opportunity for women and for the capital, which is in danger of being missed.

It is not suitable for a housing developer's priorities to lead the creation of this important legacy project. The Women's Building should be independently designed by experts in the sector. It should be iconic and celebratory of women; built and run by women; an exemplary visionary model of social inclusion, future sustainability and women's service delivery; a living legacy to the site's history; and a base for the future empowerment of women.

10. Environmental Responsibility and Carbon Emissions

The "highest possible sustainable design standards" are a requirement of the Council's SPD, however these are not to be found in the proposed plans. At least 4 aspects fail to meet Policy and emerging guidance, which, of course, is running ahead of Policy due to a clearer understanding of the Climate Emergency and the need for Net Zero Design.

- i) None of the non-residential areas are designed for natural ventilation and cooling, which is a GLA and Islington policy requirement and would minimise operational costs and carbon emissions.
- ii) the rooftop solar power is undersized against the Council's target by about 40%
- iii) not a single component of the existing buildings will be reclaimed for re-use
- iv) the upfront carbon emissions of the construction are proposed at over 2 times higher than current benchmarks established to meet net zero carbon targets. The overdevelopment of the site is a contributory factor to this unacceptably high footprint, requiring carbon intensive tall buildings, extensive concrete basements and large volumes of underground storm-water tanks.

We believe that the application should be rejected because of these failures to meet appropriate environmental targets.

11. Traffic and transport

The site density has also resulted in a dominant road layout with a 2-way road cutting across the back of the central park, looping around the play area for ages 0 to 4. The applicant has confirmed that this is the preferred layout to avoid extensive turning areas which would take away from the park area. However the layout still proposes 4 locations where reversing is required in otherwise pedestrian areas.

With input from Sustrans specialists, we suggested a less intrusive option, with 2 cul-de-sacs that would avoid the road across the park. Peabody said this was problematic due to the safety of vehicles reversing and loss of park space. The Application confirms however that for over 2 years of the construction period the site will operate without a 2-way road across the site, proving that the cul-de-sac option we suggested is indeed workable.

The density of the site has led to a traffic plan that has been shoe-horned in, creating dangerous arrangements and spoiling the safety and amenity of the central park. The design of the site should be revised to ensure a road layout which avoids a dominant 2-way road and excessive reversing in pedestrian areas.

The density of the site has also pushed cycle parking into basement spaces and into valuable outdoor amenity space, in some cases requiring 5 sets of doors to be opened to reach the outside, or a lift to be used. This is against policy and will not encourage a shift to cycling that will be beneficial for health, as well as reduction of traffic and air pollution, as is encouraged throughout Islington Policy and practice.

We believe the quality of the central park is undermined by the fact that it is heavily overlooked, overshadowed and windy. It also fails to respond to the fundamental requirement of the SPD lacking a layout to bring the community together: “Future development should be focused around a central public green space that provides a strong sense of place and identity to the new neighbourhood, being a destination to attract diverse users and promote positive activity”. No central community focal point is proposed, along with adjacent community indoor space, to respond to this policy requirement.

Many of the play and amenity areas will be in deep shade for much of the year, are fragmented, split up into small areas, including some that can only be accessed in resident-only areas. Large areas of the outdoor space and outdoor balconies are shown to be only suitable for “walking”, not comfortable enough for “sitting” due to winds and downdrafts from the buildings.

a) Cycle Movement Across the Site

This has to fit in with the Mayor’s Transport Strategy (March 2018) and Emerging Islington Local Plan Compliance

Page 13 of the Travel Plan 2.2.4

“a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second so far as possible to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use”

Page 8 of Travel Plan

1.3.5 Figure 1-3

Shows only 2 cycle entrances to the site which are at the road entrances. This needs to be amended. The site is car free and will become a mini Holland for pedestrians and cyclists. This generally means that pedestrians and cyclists share the same pathways across the site and at all entrance/exits. The main pedestrian entrance to the central park will be the most obvious place for cyclists to head to and use. Cyclists will then want to cycle to the block they reside in. Therefore, all pathways have to be wider than normal to accommodate this. The proposed exits on the north side to Trecastle Way and Bakersfield should also allow for cycle movement.

A concierge collection point is intended to be in Plot D facing the central park in the residents’ lounge. It will be natural for cyclists, returning from work, to cycle to this point to collect their mail, rather than walk; this expectation needs to be built in.

12. Poor and misleading consultation with the community

There are serious concerns with how the community has been informed and consulted at every stage in the process of developing the masterplan, including the current statutory consultation carried out by LBI. Concerns with the consultation by Peabody and LBI include:

a) Lack of information about consultations. The public have not been properly informed of the development and how to express their views at each stage by Peabody or LBI.

i) For example, recent notices sent out by LBI to residents were sent out with a link that did not work. We have been told this by many residents living in streets neighbouring the development, including Anson Rd, Dalmeny Rd, Bakersfield Estate and others. Emails raising this issue to the planning department were not answered until the local councillor was informed at a Community Plan public meeting.

ii) The developer, Peabody, sent out leaflets to streets surrounding the site. However, this was a very reduced area and we have been told by many people that they did not know about the development until they received the planning notice from LBI - three years after the plans were first consulted upon by Peabody.

iii) Peabody has frequently failed to inform its contact list about key updates, including the submission of final plans for planning permission and previous consultation dates. We've been told this by many people who signed up to have updates about the consultations on the Holloway Development website (<https://hollowayprisonconsultation.co.uk>)

iv) CP4H has pressed for the hoardings to be properly used, to inform people about what was going on - however, this use has been minimal.

b) Inadequate timeframes.

At each stage, CP4H has had to press for consultations to be extended to allow the community more time to understand the complex plans and feedback its views. Sometimes we have been able to achieve short extensions. However, these extensions have still not allowed enough time for local people to inform themselves and get their views across. Many local residents have told Islington that the statutory consultation was not long enough, especially in the run-up to Christmas and with the public health issue of the new Omicron Covid strain affecting daily lives.

c) Lack of face-to-face meetings with the public.

Face-to-face work has been challenging but the lifting of restrictions in Spring 2021 made it possible. Despite this, Peabody has offered minimal opportunities for local people to ask questions and discuss the plans in person.

d) Information not provided

We have been told by Peabody and by the council they are keen to respond to questions about the plans and provide the information needed by the public. However, information promised by the developer and LBI during the statutory consultation was not provided for over several weeks despite multiple messages to follow up and then failed to address key questions.

e) Inequalities - no demographic information collected

Despite pressure from Community Plan, Peabody did not collect any demographic information about the people who were responding to its consultations. This has meant that Peabody has not had any demographic information about who is having a say - and who isn't. Our own research has shown that the use of purely online methods fails to reach many key groups. We are concerned that hard-to-reach groups have not had a chance to be heard.

f) Poor organisation of documents

LBI has presented the final master plan as over 330 documents on the planning website. Many are not properly labelled and are in formats that are difficult to download. After pressure from CP4H, some of these documents were offered in downloadable pdf format on the Peabody consultation website.

g) Complex and inaccessible information

The plans are not summarised or made more accessible in any way for a non-expert reader. The DAS (Design and Access statement) is over 450 pages and a new version was uploaded one week before the consultation deadline with no clarity given around what changes had or had not been made. The public has therefore not been informed in good time of what the final version of the plans actually details: this is not good enough.

h) Lack of access to planning documents

A full set of the hard copies of planning documents was only made available in two libraries in the borough, with part-time opening hours. A further set was requested by Community Plan.

i) Problems with Islington's communications

As mentioned above, the link sent out on planning notices was not initially working; others have reported problems with accessing the application on the website; the website was also down for maintenance for several days during the consultation period. No emails or leaflets were sent out by Islington and social media was minimal - just one tweet was sent out about the statutory consultation (by the local Labour Party). Although a six-day extension was granted due to pressure from the community, the website was not initially updated and no updated notices were issued to the local press or for display in the area, despite our requests.

CP4H is therefore extremely concerned that very few people in the local community have been properly informed about this huge development.

13. Consideration of Alternatives

The submission is not valid as it fails to provide a correct consideration of alternatives which would demonstrate how the proposal has been arrived at and how it comprehensively complies with Policy.

The consideration of alternatives provided is flawed because it fails to consider any options that would have been compliant with a number of the fundamental policies relating to the massing and density of the site. The consideration of options that is provided is incomplete because there is a failure to fully assess compliance with policy, in particular the aspects that result in the overdevelopment of the site. The viability assessment is also lacking in that it fails to consider alternative densities which comply more comprehensively with Policy and have a lower risk of failing to achieve consent.

14. Inaccuracy

We are concerned that at least one of the key illustrations of the project is materially inaccurate. The cover image/first image to the Design and Access statement shows an attractive outdoor café area. This image is repeated a number of times in the documentation. However this is highly misleading because it doesn't actually illustrate the proposed landscaping master plan. The actual area on the plans consists of narrow paths, heavily over-shaded and surrounded by 'rain gardens' which in reality would be ditch-like planting areas for absorbing storm-water.

We would ask that the Applicant confirms which images are intended as an accurate representation of the proposal, and which are simply artistic images.

14. Omissions

We are also concerned that the Planning Application is inaccurate and incomplete in a number of ways:

- i. The number of homes requiring air conditioning is not confirmed, so the carbon emission impact of the proposal has not been correctly assessed.
- ii. The sun on ground analysis does not show whether all the communal gardens comply with minimum sunlight requirements (for example the sunlight access to the public space between the densely packed A2 and B1 blocks is not shown).
- iii. The sun on ground assessment does not confirm whether specific amenity areas comply with the minimum requirements. For example, the seating area of the Women's Building Garden and the memory garden in the main park are specific destinations, providing their own specific amenity. Specific assessment should be carried out for each of these defined amenity spaces. It doesn't help a child to be told that, for example, a large park complies on average with sunlight requirements, while their play area receives very little sun - being cold and damp, while also suffering from downdrafts from the neighbouring tall buildings.

- iv. In the sunlight and daylight assessments a number of the rooms in neighbouring properties have been miscategorised, and so the assessment of the impact is incorrect.
- v. Wind Assessment Model Not Synchronised with Plan (PEDESTRIAN LEVEL WIND MICROCLIMATE ASSESSMENT, RWDI #1902342 REV C 13TH AUGUST 2021). Page 22 shows Building B which fronts onto Parkhurst Road as one continuous building. However the Application is for 2 buildings in this location. Hence the wind assessment is invalid and the wind tunnel testing should be carried out on the buildings as proposed.

In summary we believe that the redevelopment proposal should be rejected for failing to meet Policy in the aspects stated above, and that the plans, as submitted, would fail to create a new neighbourhood that comprised good quality homes and amenities, with the lowest possible environmental impact, and a fitting legacy for this site of historical significance.