



COMMUNITY PLAN FOR HOLLOWAY

Community Plan for Holloway

St George's Church
Crayford Road
London
N7 0ND

24th July 2020

Linda Aitken,
Principal Urban Planner,
Planning and Development,
Environment and Regeneration,
Islington Council.

Dear Linda,

Re: Holloway Women's Building Draft Development Brief

This is the response of Community Plan for Holloway's Working Group on the Women's Building. We have read the Brief carefully and discussed it among our members, who represent a diverse set of organizations and individuals with a stake in the redevelopment of the former HMP Holloway.

As it stands, the draft Development Brief does not represent the views of local groups. In the 14 months since the sale of the prison to Peabody, neither Peabody nor the Council to date have attempted a real public consultation. Working Group member organizations Reclaim Holloway, Hibiscus and Treasures were not formally consulted, though they appear on the list; and voluntary and community sector (VCS) groups, local community centres, and ethnic/religious/cultural organizations have been largely ignored. **The content of the Brief, and the questions that are asked, show that the views of local groups have not been taken into account.**

The organizations listed as having been consulted for the Brief are heavily skewed towards those connected to the criminal justice system. The Mayor's Office for Policing and

Crime (MOPAC) has clearly had a strong influence on the Brief and is intended to play a major role in the Building's future. We oppose this level of involvement by MOPAC. "Policing" and "crime" are not words that should be associated with a Women's Building. Instead, we would welcome the involvement of City Hall through other departments, such as Community Engagement team or the London Legacy Development Corporation.

We consider that best practice would be to publish the detail of consultation activities undertaken, questions being asked in consultation, and job roles of people consulted. The remit of the consultation also needs to be expanded. There has been no discussion of whether or not the building will be freestanding, or of the selection processes for the organisation that will manage the building, or of the vital issue of co-production (which the draft Brief, incredibly, does not even mention). It is crucial that women-centred and women-led governance structures be fully explored and implemented.

At a time when many women's organizations, venues and services are being shut down or squeezed financially, the Women's Building offers an opportunity to provide vital services and safe spaces, while explicitly recognizing the site's profound importance to the history of women in the UK.

In answer to your questions:

Question One: Do you agree with the proposal that the building should accommodate a women's centre that will support women in the criminal justice system and women who are at risk of entering the criminal justice system alongside a wider ranging package of services and facilities for women contained within a women's building?

There should be no separate women's centre within the Women's Building. Section One of the development brief reveals that Council and MOPAC intend to make a criminal justice system-oriented women's centre the core of the proposed building. We oppose this orientation completely. Segregating spaces and services in this way will inevitably be stigmatizing. The section also refers to an "emerging consensus" about this division within the building, but we reject the statement. There can be no consensus without a properly designed, widespread consultation.

Inclusivity of the building and its services, rooms and amenities is central to our vision of the site. Services in the Women's Building should be available to all women who need them, not just those directly affected by the criminal justice system. While specialist services should be offered that can help women who are directly affected by the criminal justice system, any other women who can benefit from them should be able to access them.

Question Two: Do you think that all of the building should be for women only or do you think that all members of the community including men should be allowed to use some of the building?

Whether and how much of the building is accessible to men should be decided at a later date by the body that eventually runs the Women's Building. The Building should have women-only spaces designated for activities that require an extra degree of safety and of sensitivity to women's concerns and needs. Women-only spaces will be inclusive of all

women, trans, intersex and non-binary people, those with disabilities, and of all ethnicities and faiths.

Question Three: Do you agree with the proposal that the women's centre [...] should be located in the more private parts of the building with these more private areas being provided alongside more publicly facing areas that will facilitate a more wide ranging package of services and facilities to all women?

There will clearly be a need for quiet, safe and private places within the Building for the provision of advice, therapy and support. All women, not just those caught up in the criminal justice system, should be able to access these spaces. The Women's Building should provide a holistic alternative to the criminal justice system. Bolting together a women's building (for everyone) and a women's centre (for women in the criminal justice system) limits the holistic function of the Building, risks attaching stigma to those accessing women's centre services, and prioritises criminal justice rather than social transformation, healing, and support.

Question Four: Do you agree with the overarching design principles that the council has established for the building? And Question Five: Has the council failed to identify any key design principles that should be incorporated into the brief for the building?

We agree with some of the principles: a celebratory and public presence; a main entrance close to public transport links as well as additional safe and discrete secondary access; that the Building be 'trauma informed' and include a range of open, public spaces and more private spaces; and that the Building should conform to the highest standards of accessibility and sustainability.

However, the draft fails to take on board a fundamental design principle: The Women's Building has always been envisioned as freestanding – not part of a residential block, as the draft proposes – and architecturally distinctive. The Women's Building cannot be a distinctive landmark if it is designed as merely a part of a residential block.

The design principles give no clue as to how the social history of HMP Holloway will be reflected in the architecture. Rather, the draft's focus on design with women-only services in mind minimizes the legacy role of the Women's Building, and indeed the entire site. History and commemoration should be at the heart of the development, reflected not only in the Women's Building's commercial and community spaces but throughout the site.

While we fully support the aspiration to provide as many genuinely affordable housing units as possible, we feel that incorporating the women's building as part of a residential block is not the only way to meet the Council's targets. A robust study identifying different options for how the Women's Building can be incorporated into the masterplan should be conducted in consultation with relevant stakeholders. **If such a study has already been undertaken, we urge the Council and Peabody to publish the findings which led to the decision of incorporating the Women's Building into a residential block.** If such a study has not been undertaken then due diligence has not been conducted and we urge the Council to not proceed with the current plans.

Question Six: Does this DRAFT brief identify all the space requirements for the building? Is there anything that we have missed? And Question Seven: Do you have any thoughts about the proposed sizes of the different elements of the building as outlined above?

While we appreciate the thought that has gone into these sections, it is impossible to answer Questions 6 and 7 at the moment. A properly funded Feasibility Study and a real public consultation should be carried out first.

Regarding what has been missed, provision should be made within the Building for a museum or exhibition centre commemorating the site's history. At the moment, the draft makes provision for 'exhibition space' but not for a permanent museum.

Question Nine (there is no question 8): What can the council do to ensure that the physical layout of the building facilitates a sustainable funding model for its future operators

As with Questions 6 and 7, this question cannot be answered until a Feasibility Study and public consultation has been carried out first, **and until the issue of co-production has been addressed**. The Brief says on page 9 that "together with MOPAC and other expert bodies, women's organizations, and local community groups, the council will develop a service specification for the building." MOPAC is not an expert body in this area, and there is no reason for it to be so deeply involved in creating the specifications. We repeat our previous point, that "policing" and "crime" should have no association with the Women's Building; at the same time, we would welcome the involvement of some other department or unit of the Mayor's Office.

Section Six - Commissioning Architects (page 9)

It is essential to the concept of the Women's Building that the architects be chosen through a transparent competition for women-led architectural practices. Peabody was initially open to this, and there is no convincing reason why it should change its position.

In addition, the Brief should state that a majority of the tradespeople working on the Building and indeed on the whole prison re-development will be women.

Question Ten: What do you think of these examples [of buildings shown in Appendix 2]? Can you think of any other examples of best practice?

While the appendix contains many attractive examples of contemporary architecture, we do not believe that this appendix is useful at this stage of the consultation.

In conclusion

We are deeply concerned that this Brief has been drawn up without proper consultation of local community groups. **Despite the assertions made in the Brief, here is no consensus that a separate women's centre should be housed within the Building;**

instead, the organizations and individuals our Working Group represents envision the entire Building as a holistic, transformative space that has no connection to the criminal justice system. The Brief does not respond to local groups' repeated calls for the Building to be freestanding and distinctive. Neither does the Brief discuss the selection processes for the architectural design, building, development and governance of the Building, which must be women-led. The issue of co-production should be addressed, a properly funded Feasibility Study should be carried out and a widespread, transparent public consultation held as soon as possible.

Yours sincerely,

Community Plan for Holloway's - Women's Building Working Group (consisting of local residents, activist organizations, community groups and women's service providers)