



2 July, 2020

## Community Plan for Holloway response to the Draft Masterplan consultation on the Holloway site.

These comments are in 2 parts; addressing the nature of the consultation itself, and then the Draft Masterplan proposals illustrated in the consultation.

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 this significant redevelopment, and would encourage Peabody to respond meaningfully to the following comments.

### Consultation Questionnaire Comments

1. **Duration** In normal circumstances, the consultation period is too short to ensure that all individuals and organisations have time to find out about it, review and discuss, and respond.
2. **Covid-19** The impact of Covid-19 has been seriously constricting, hence the importance of extending the consultation period to take these factors into account. A three week consultation period was not enough - we would suggest a minimum of six weeks for the next phase.
3. **Ease of use** The PDF document is not inviting to respond to, the text and click-through buttons are hard to read, and the PDF on the opening page should be a button to take you through to the exhibition. There should be something on the first page of the site rather than having to find it in a menu.
4. **Relevance** Many questions are not relevant to the key decisions that need to be made at this time of confirming the essential characteristics of a masterplan. For example, questions about style of planting and building appearance. These distract respondents from the essential decisions around height and massing that are being made at this stage of the design process.

5. **Clarity** Some questions are unclear and use terms that are likely to be unfamiliar to the average member of the public, such as ‘commercial-led’. (Does this actually mean ‘offices’?). The “Need more information” response is likely to be highly used - meaning that this is a missed opportunity for meaningful consultation.
6. **Unnecessary** Some questions are needless because they refer to topics where a requirement is already clearly established as design aim, in Planning Policy or the site SPD, such as cycle storage or through routes across the site.
7. **Confusing** Two questions ask about 2 fundamental issues at the same time, meaning that a clear answer can’t be given, or conclusion drawn. In questions 4 and 21 the issues of building height and proportion of social housing have been conflated. This is unacceptable as responses will be potentially distorted as a result of asking two separate questions as if they were a single question. Question 4 does allow the option of “Need more information” but Question 21 is one of the few that doesn’t have this as a possible response. Given the tension between the negative impacts of a dense tall development, and the number of homes, at the very least, this risks being confusing for the consultees.
8. **Misleading** Many of the images illustrating the landscaping are misleading. Heights are not accurately depicted in relation to the neighbouring streets and surrounding townscape. Trees are shown with fully mature canopies approximately 5 or even 6 stories high. It is highly unlikely that this size of tree will be planted, 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 there is no certainty that these will be planted. The way in which building heights are presented is also confusing if not actually misleading. The slide that shows building heights appears towards the end. This means that people need to click back and forth between slides in order to gain a realistic picture of what is being proposed.
9. **Equalities** We also wish to stress the importance of improving on consulting BAME communities, tenants, people with disabilities and young people.

### **Draft Masterplan Comments**

We believe that the density proposed represents over-development and will not allow the creation of quality homes and open spaces. The density and resulting building heights will have a detrimental impact on the surrounding neighbourhood and properties.

10. **Context** The introduction should explain the document’s relationship to the site Supplementary Planning Document and its evidence base including the Capacity Study. The footprint of the proposal seems to follow one outline suggestion in the Capacity Study but loses the virtues of that design by exceeding the parameters of the recommended development by doubling the density.
11. **Proposed Scale and Density of the buildings** 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 the site in the distance, behind an existing large building. This is also important for the way it relates to local topography as tall buildings will appear even taller on the higher ground of the site.

A series of precedents and examples of the proposed scale should be provided to assist respondents understanding. For example, will the proposed eastern street feel canyon-like, like Hornsey Street near Holloway tube station?

The consultation states that “Our proposals work locate the tallest buildings in the centre of the site to minimise the impact on surrounding homes”, but this is incorrect, as 11-storey buildings are located at the southern edge of the site and at the higher northern edge, overshadowing the homes in Penderyn Way. No explanation is given for this decision.

**12. Site topology and landscape strategy** There is no explanation of how the combination of the site form, rising site topology and orientation has informed the proposed building massing or the choice of building forms and heights, and the impact from key viewpoints. The 8m change in level across the site is explained but no potential landscape features are proposed that might respond to this characteristic. The masterplan claims to be landscape-led, when in fact it diminishes the existing landscape considerably, losing most of the 7 garden areas. It compromises the quality of open spaces with the creation of bulky tall buildings that do not relate well to the elegance of the character area and the planning of open space. The justification seems to be ‘tree-led’ rather than a vision of form and the interrelation of different elements.

**13. Townscape and Streetscape Strategy** In order to fit successfully in to 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, for example with taller buildings in the lower part of the site. The proposals show the tallest buildings on the higher part of the site, with no explanation.

The prison walls currently provide a dead frontage to the street. The Draft Masterplan fails to offer a design response to the character of the area which is predominantly 3 to 6 storeys. The block form needs to be broken down with more entrances from Parkhurst Road into the site. Active frontages should also be planned to improve natural surveillance and overlooking whilst welcoming residents and visitors to the site.

**14. 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 views more generally outside the local landmark viewing corridor to the church spire should be presented, illustrating the impact in the local townscape. Aerial and bird’s eye views are provided but these will never be experienced by anyone in the day-to-day experience of the development. They

are also unclear because of the way the greenery is shown 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 would be important to inform future residents of the nature of their potential homes.

**15. Sunlight, Wind and the creation of Quality Public Spaces** The site layout, building massing and location of the open spaces does not appear to have been carefully considered to maximise sunlight penetration. In the central green space a true 'park' experience will only be created with an open feel and high level of sunlight. However, the Draft Masterplan shows the tallest buildings all around the central green space, heavily shading this area and creating windy conditions. The western 10-12 storey building in particular is very long, adding to this sense of enclosure.

Furthermore, the primary playground is located towards the southern end of this central open green space where it will be more heavily overshadowed by the 10-12 storey buildings to its west, south and east. Other green space to the north of the site is also heavily overshadowed.

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 internal spaces or courtyards of the perimeter blocks seem too small, especially if it is proposed as play space, due to amenity impacts.

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. Areas of high shade should be shown so that respondent can understand the outcome of the density of the proposals.

## **16. Amount of Green Space and Play Space**

The open space deficiency in this part of the borough will become even more depressed with the addition of at least 2,500 residents. The implications of the pressures on existing open spaces need analysis as well as the risks this raises for the health of residents.

What is the size of the central garden area? How can this become a meaningful public park when the density of the site does in effect propose an open space deficiency in relation to the number of residents? The proposal is misleading.

The layperson will not have any idea what a total of 9,500m<sup>2</sup> of "open space" will feel like. What is the size of the central green space? What are the distances between the buildings? Consultees will only have a chance of understanding what is being proposed with the help of local comparisons, or maybe those from other parts of London.

It appears ridiculous to suggest that public play space will be provided at roof level. Is it proposed that the public will share residents' lifts to the roof of 12 storey buildings?

17. **Connections** The possibility of connectivity to adjacent streets is, of course, welcome. However, the lack of progress in confirming with the relevant landowners that these can be made is disappointing. Creating permeability away from the Camden road is a key opportunity which Peabody should explore and establish as soon as possible.
18. **Road Layout** The central green space is compromised as a park space by the presence of the 'loop road' that cuts through the centre of the site. 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. 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 through movement of private cars, servicing and delivery vehicles. If required for infrequent but essential access such as maintenance or fire-fighting, these 2 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.
19. **Road Safety** What are the measures that will make pedestrian and cycle access from the south of the site safe and easy? Two-way traffic is shown on Parkhurst Road, which is incorrect, and suggests that the transport strategy has not been thought through. 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?
20. **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.
21. **Ventilation and overheating** The proposed form and layout of the apartment blocks means that approximately only 20% of the homes have good cross ventilation. There is a real concern that initial drawings show an unacceptable proportion of approximately 55% of apartments with single sided ventilation. This leaves hundreds of homes at risk of overheating, unless air conditioning is proposed which is expensive for tenants and environmentally damaging. 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.
22. **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.
23. **Daylight** No information is given on the quality of daylight in the dwellings. An initial assessment suggests there could be approximately 100 homes failing to meet adequate daylight levels.

- 24. Women's Building and community facilities** The location of the women's building is not actually communicated in the consultation document. It was mentioned in a meeting to CP4H - understood to be in the southern corner (adjacent to the Cat and Mouse Library) corner of the site, facing Camden Road. This means that the south facing frontage is on to the busy road, and the associated external (garden) space is on the north side of the 9 Storey building with adjacent 12 storey buildings, meaning little or no sunlight at any time of year. Given the potential for this to form the central community and social hub for the site with a greater London-wide significance, the chosen location is problematic and should be reconsidered. The omission of this building from the consultation documents also suggests an incomplete consultation document. A complete re-think should be implemented around the Women's Building and how its influence permeates the site to provide a proper legacy for the site and a transformative, ground-breaking and iconic building that will change women's lives for generations to come.
- 25. Community facilities.** There needs to be clarity about the locating of other community facilities on the site.
- 26. Environment** No information is provided at all to confirm the environmental and carbon emissions impacts of the construction and operation, let alone any consideration given to the implications of the current Corona virus crisis. In this Climate Emergency, which has been fully recognised in GLA and LBI Planning policy it is unacceptable that this issue is not even mentioned as part of the proposed design.
- 27. Construction** Peabody has confirmed that full construction period could be up to 7 years. Given the long-term disruption that this could cause it is reasonable that, even at this early stage, an outline construction and logistics strategy is provided that seeks to minimise impact on neighbours and residents as they start to move in.
- 28. 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.
- 29. Resident concerns** Finally, the consultation acknowledges the elements that residents have confirmed they wanted to see ("Listening to your views" - Board 13) but then simply omits to mention them in the consultation, or ask further questions about them.

Five specific areas acknowledged as important but then wholly unaddressed are:

**30. Sustainability**

**31. The Women's building (it's location in particular, and facilities proposed)**

32. **Cycle Parking**
33. **Community Hub**
34. **Cultural Space.**

We request that further information on each of these topics is provided as a matter of urgency so that the community can understand what is proposed and input their views at this important formative stage.

### **Conclusion**

The Community Plan For Holloway shares the hopes of many that the redevelopment of the Holloway Prison will be inspirational and ground breaking. We are very concerned that an aim to maximise the number of homes will override wider considerations of quality and best practice.

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

Yours,

The Board of the Community Plan for Holloway