

Equalities Impact Assessment: Full Assessment

Before completing this form you should have completed an Equalities Screening Tool and had sign off from your Head of Service and the Fairness and Equality Team.

This Equality Impact Assessment should be completed where the Screening Tool identifies a potentially negative impact on one or more specific groups but it can also be used to highlight positive impacts.

Summary of proposal

Name of proposal	Holloway Prison Site Planning Application – Fit out Costs of Women’s Building. Report to the Executive dated 24 March 2022. <u>NB This is not an assessment of the planning application but solely of the decision to be made by the Executive.</u>
Reference number (if applicable)	Not applicable
Service Area	Community Wealth Building
Date assessment completed	16 March 2022

Before completing the EQIA please read the guidance and FAQs. For further help and advice please contact equalities@islington.gov.uk.

1. Please provide a summary of the proposal.

Please provide:

- Context on how the service currently operates (if relevant) and the scope of suggested changes
- The intended beneficiaries and outcomes of the proposal
- Reference to any savings or income generation

Holloway Prison closed in 2016 with its female prisoners being relocated to HMP Downview and HMP Bronzefield. In 2018 the council adopted the Holloway Prison Site Supplementary Planning Document (SPD) following public consultation. The purpose of the SPD was to guide the future purchasers of the site in respect of the council's key planning policies and priorities.

Section 3.1 of the SPD describes the key planning and development objectives for the site including:

'The provision of a women's building/centre that incorporates safe space to support women in the criminal justice system and services for women as part of a wider building that could also include affordable workspace to support local organisations and employment opportunities'.

The Ministry of Justice sold the site to Peabody in 2019. Peabody submitted a planning application for the site in November 2021. This application includes proposals for a Women's Building. The building will be located on the upper and lower ground floor levels of two residential buildings containing social housing. The building has a primary frontage onto Camden Road and Parkhurst Road, a secure courtyard garden to the rear, and a secondary entrance from a new public park. The total internal floor space of the building is 1,489sqm.

In accordance with the SPD, the building has been designed with the needs of two user groups in mind i.e.:

- the provision of support and rehabilitation services to women with experience of the criminal justice system; and
- local women wishing to access support services and other women centred services and activities.

Peabody proposes to deliver the Women's Building to a shell and core standard only. There is no universally accepted definition of a 'shell and core' standard although this is generally held

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to mean that the construction of the exterior of the building is complete, but the interior would be a shell with no lighting or other facilities. Such a building is not considered to meet the planning policy requirements for a Women's Building on the site.

To meet the council's planning policy requirements, the building must be fitted out to a Category B standard. Again, there is no single agreed definition of a Category B fit out. However, this is generally held to mean the fit out of a building so that it is available for the tenant to move into and that has been fitted out for their specific needs and requirements. The cost of this fit out is estimated to be £2.9 million.

Peabody submitted a planning application for the Holloway Prison site in November 2021. This application was presented to the Planning Committee on 10 February 2022 and 8 March 2022. At its meeting on 8 March 2022 the Planning Committee resolved to grant planning permission subject to: planning conditions as set out in the Committee report; consultation with the GLA (known as a Stage Two referral to the Mayor of London); completion of a s106 agreement; and a £2.9 million contribution to the fit out of the Women's Building being secured.

Beneficiaries

The development will deliver 985 new homes. 60% of these homes will be affordable. This includes 415 homes for social rent including 60 extra care homes for older people. The development will also deliver a new public park and substantial employment and training benefits including apprenticeships. The delivery of the Women's Building is an important opportunity to provide a dedicated high - quality space in which to deliver services and activities for women and girls in Islington and across Northeast London.

The key beneficiaries of the proposal are likely to include:

- the women and girls who will benefit from the services and activities that will be provided in a dedicated Women's Building (including women with experience of the criminal justice system);
- people who are currently on the council waiting list for genuinely affordable housing and older people who need extra care homes;
- people who are disadvantaged in relation to the local labour market; and
- the wider community who will benefit from the new public park.

It should be noted that these benefits will only materialise if planning permission is granted, and the scheme is built out.

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Peabody states that the scheme is unable to afford the fit out of the Women's Building for financial viability reasons. Peabody indicates that the Holloway Prison development has a financial deficit of circa £44 million.

The council has appointed BPS consultants to undertake an independent review of the financial viability of the proposals. BPS advise in a report dated 4 February 2022 that the scheme is in deficit by £3,375,186.

To enable the development to move forward to deliver the homes for social rent, the new park, the Women's Building, and jobs and training the Executive is being asked to underwrite the costs of fitting out the Women's Building via strategic CIL. This decision is recommended subject to Peabody taking all practical steps to raise the funding for the fit - out costs by other means.

A positive decision by the Executive will provide greater certainty that planning permission can be granted and the benefits of the planning application can be delivered. In the event of that Peabody cannot raise the £2.9 million by other means there will be an opportunity cost in relation to any CIL that is allocated towards the fit-out costs of the Women's Building. Without knowing what this money would otherwise be spent on it is impossible to state how this decision will impact on the equalities target groups who would otherwise benefit from this funding.

2. What impact will this change have on different groups of people?

Please consider:

- Whether the impact will predominantly be external or internal, or both?
- Who will be impacted – residents, service users, local communities, staff, or others?
- Broadly what will the impact be – reduced access to facilities or disruptions to journeys for example?

Residents, service users, local communities and council staff are all potentially impacted by these proposals.

There will be external impacts on users of the Women's Building (this will offer services and activities to women and girls from Islington and across Northeast London); people on the housing waiting list (subject to a local lettings policy); people seeking opportunities for jobs, apprenticeships, and training; and park users.

Broadly speaking the external impacts will be:

- 415 new high-quality homes for social rent to be made available to people on the waiting list with the reduction of overcrowding in existing homes. This includes 60 extra care homes for older people. These residents will secure housing that better meets their needs enabling them to retain their independence for longer.
- The Women's Building will provide a dedicated space to deliver services and activities to women and girls including women who have experience of the criminal justice system. The impacts on specific equalities target groups are set out in greater detail below. It is not anticipated that the proposals will have a negative impact on any equalities target group (although there may be unquantifiable opportunity costs in relation to the investment that would otherwise be secured via CIL).
- The proposals will create 51 construction apprenticeships (with a focus on green construction skills) with a target of 30% of these apprenticeships going to women. Peabody has also committed to offering any permanent jobs on the development to local people first.

The operating arrangements of the Women's Building have not been agreed and are subject to the detailed negotiation and implementation of the s106 agreement. It is too early to say how these arrangements will impact council run services or staff (if any) particularly ahead of an operator of the building being appointed. However, there is likely to be continuing engagement with service providers, potential service users, strategic bodies, and other interested parties to shape exact nature of the services and activities that will be provided.

3. What impact will this change have on people with protected characteristics and/or from disadvantaged groups?

This section of the assessment looks in detail at the likely impacts of the proposed changes on different sections of our diverse community.

3A. What data have you used to assess impacts?

Please provide:

- Details of the evidence used to assess impacts on people with protected characteristics and from disadvantaged groups (see guidance for help)
- A breakdown of service user demographics where possible
- Brief interpretation of findings

In line with the relevant corporate guidance the relevant data set out in the council's 'State of Equalities' report has been considered. Of particular note:

Women's Building and support for women in the criminal justice system

- 119,000 women live in Islington.
- 66% of young people cautioned or sentenced by youth offending teams were from an ethnic minority background. No breakdown by gender provided.
- People of black ethnicity are four times more likely to be stopped and searched than white people. No breakdown by gender provided.
- Individuals who interact with the criminal justice system are more likely to experience poor mental health. 30% of female prisoners have experienced a psychiatric acute admission to hospital.
- According to the Prison Reform Trust Women were sent to prison on just over 5000 occasions in 2021 (either on remand or to serve a sentence). Women are more likely than men to self-harm in prison. More than half the women who are imprisoned have experienced domestic violence. Over half of women who are imprisoned have experienced abuse as a child. 17,000 children are affected by maternal imprisonment each year. This data is not available for Islington residents or residents of Northeast London.

Provision of 415 homes for social rent including extra care and accessible homes

- 1,200 children aged under 18 are in temporary accommodation in Islington.
- Older people in Islington are more likely to live in social housing and have lower incomes. 12% of the over 65s act as unpaid carers.
- 62% of the statutorily homeless population of the borough are black, Asian or another non-white ethnicity.
- 15% of residents have a disability.

Please provide:

- Details of the evidence used to assess impacts on people with protected characteristics and from disadvantaged groups (see guidance for help)
- A breakdown of service user demographics where possible
- Brief interpretation of findings

This data is not intended to be comprehensive. Nonetheless it indicates that the implementation of the planning permission for the Holloway Prison site is particularly likely to benefit women (including women with experience of the criminal justice system), girls, older people and people who are on the council's housing waiting list including children, disabled people, and people from black, Asian, and non - white backgrounds.

However, the precise distribution of any benefits to equalities target groups will be subject to the local lettings policy for the social housing and extra care homes; and the precise package of services and activities to be delivered in the Women's Building.

3B: Assess the impacts on people with protected characteristics and from disadvantaged groups in the table below.

Please first select whether the potential impact is positive, neutral, or negative and then provide details of the impacts and any mitigations or positive actions you will put in place.

Please use the following definitions as a guide:

Neutral – The proposal has no impact on people with the identified protected characteristics

Positive – The proposal has a beneficial and desirable impact on people with the identified protected characteristics

Negative – The proposal has a negative and undesirable impact on people with the identified protected characteristics

Characteristic or group	Positive/Neutral/Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced, or negative impacts be eliminated or reduced?
Age	Positive	<p>Approval of the planning application will deliver 60 extra care homes for older people to better meet their housing needs.</p> <p>All age groups will be able to access the park.</p> <p>For those of working age there will be employment and training opportunities arising from the development.</p>	Not applicable
Disability (include carers)	Positive	Approval of the planning application will deliver wheelchair accessible housing and lifetime homes.	Not applicable

Characteristic or group	Positive/Neutral/Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced, or negative impacts be eliminated or reduced?
Race or ethnicity	Neutral	It is not possible to quantify the impacts of this decision on this group at present. No negative impacts are currently anticipated.	Not applicable
Religion or belief (include no faith)	Neutral	It is not possible to quantify the impacts of this decision on this group at present. No negative impacts are currently anticipated.	Not applicable

Characteristic or group	Positive/Neutral/Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced, or negative impacts be eliminated or reduced?
Gender and gender reassignment (male, female, or non-binary)	Positive	The construction and fit out of the Women's Building will provide a dedicated space to provide services and activities for women and girls.	Not applicable
Maternity or pregnancy	Positive	The construction and fit out of the Women's Building will provide a dedicated space to provide services and activities for women and girls. This is likely to include spaces to provide support and services for parents, carers, and children.	Not applicable

Characteristic or group	Positive/Neutral/Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced, or negative impacts be eliminated or reduced?
Sex and sexual orientation	Neutral	It is not at present known how this proposal will impact on people of different sexual orientations. This matter will be determined in the management plan for the Women's Building.	Not applicable
Marriage or civil partnership	Neutral	Not known at present but unlikely to have any significant impacts.	Not applicable

Characteristic or group	Positive/Neutral/Negative	What are the positive and/or negative impacts?	How will potential benefits be enhanced, or negative impacts be eliminated or reduced?
<p>Other Age (e.g. elderly) (e.g. people living in poverty, looked after children, people who are homeless or refugees)</p>	<p>Positive</p>	<p>The Women’s Building will provide a space to deliver services for women who have experience of the criminal justice system.</p> <p>Employment, training, and apprenticeships will provide access to the labour market and carer development for local people.</p>	<p>Not applicable</p>

4. How do you plan to mitigate negative impacts?

Please provide:

- An outline of actions and the expected outcomes
- Any governance and funding which will support these actions if relevant

No negative impacts on equalities target groups have been identified.

If Peabody is unable to secure all the funding by other means and the council pays all or part of the £2.9 million fit out costs, there will be an opportunity cost in terms of the social infrastructure that could otherwise be funded through CIL. However, the impact of this potential opportunity cost on equalities target groups cannot be predicted or quantified at present.

No mitigating actions are therefore needed at this stage but this EQIA is a live document that will continue to be updated.

5. Please provide details of your consultation and/or engagement plans.

Please provide:

- Details of what steps you have taken or plan to take to consult or engage the whole community or specific groups affected by the proposal
- Who has been or will be consulted or engaged with
- Methods used or that will be used to engage or consult
- Key findings or feedback (if completed)

Extensive consultation on the planning application has been carried out with over 10,000 local households being consulted by letter. The consultation responses were reported to the Planning Committee and local groups were able to verbally address the Planning Committee at length at its two meetings. This formal consultation followed on from informal public consultation carried out by Peabody at the pre-application stage.

Please provide:

- Details of what steps you have taken or plan to take to consult or engage the whole community or specific groups affected by the proposal
- Who has been or will be consulted or engaged with
- Methods used or that will be used to engage or consult
- Key findings or feedback (if completed)

The current design of the Women's Building has evolved through extensive research and engagement with a broad range of women's organisations including: women with lived experience of the criminal justice system; local grass roots women's organisations; the operators of women's buildings; and groups with expertise in relation to women and the criminal justice system.

The current proposals are not however universally supported with some organisations calling for a larger stand - alone building. There are however no planning policy requirements for a larger or standalone building and the current proposals are considered to comply with the relevant planning policies subject to the internal fit out of the building being secured.

Further community engagement and engagement with stakeholder groups including future service users will be needed if the planning permission is granted and implemented. The exact terms of this engagement are still to be determined. Peabody has also committed to further engagement with the future residents of the development including the formation of a TRA.

6. Once the proposal has been implemented, how will impacts be monitored and reviewed?


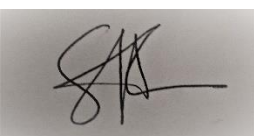
Please provide details in the table below.

Action	Responsible team or officer	Deadline
The arrangements for the commissioning of services and activities within the Women's Building will be set out in the s106 agreement in line with the Heads of Terms agreed by the Planning Committee. All other benefits including the genuinely affordable housing, employment, skills and apprenticeships	Women's Building Champion for the Council/Planning Officers/Legal Officers/Public Health	April/May 2022

Action	Responsible team or officer	Deadline
and the public park are also to be secured through the s106 agreement.		
Any arrangements to be secured through the s106 agreement will be monitored by the relevant council officers in line with the council's standard practice for s106 agreements.	Women's Building Champion/Planning Officers/Legal Officers/Public Health	Ongoing
This EQIA is a live document which will be updated if any negative impacts emerge, and appropriate mitigations will be implemented if this is the case.	Women's Building Champion/Equalities/Public Health	Ongoing

Please send the completed EQIA to equalities@islington.gov.uk for quality checking by the Fairness and Equality Team. All Equality Impact Assessments must be attached with any report to a decision-making board and should be made publicly available on request.

This Equality Impact Assessment has been completed in accordance with the guidance and using appropriate evidence.

Member	Name	Signed	Date
Staff member completing this form	Karen Sullivan		16 March 2022
Fairness and Equality Team	Sal Asghar		16 March 2022

Member	Name	Signed	Date
Director or Head of Service	Stephen Biggs	<i>SCBiggs</i>	16 March 2022