

Former Holloway Prison

Equality Impact Assessment





Peabody

HOLLOWAY PRISON REDEVELOPMENT - EQUALITY IMPACT ASSESSMENT



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APPENDICES

APPENDIX A

POLICY GG1 – LONDON PLAN 2021

1 OVERVIEW

INTRODUCTION

- 1.1.1 WSP has prepared this Equality Impact Assessment (EqIA) on behalf of Peabody. The EqIA considers the temporary and permanent effects of the redevelopment proposals for the Holloway Prison redevelopment at Parkhurst Road in the London Borough (LB) of Islington on the protected groups identified by Section 149 of the Equality Act 2010.
- 1.1.2 The legislation requires local authorities to fulfil a public sector equality duty by considering the impact of policies and proposals on people with protected characteristics.
- 1.1.3 The full list of protected groups identified by the Equality Act 2010 is outlined in Table 1-1 below.

Table 1-1 - Protected Groups identified in the Equality Act 2010

Protected group
Age
Disability
Gender (sex)
Gender reassignment
Marriage and civil partnership
Pregnancy and maternity
Race/ethnicity
Religion and belief, including non-belief
Sexual orientation
Across groups

- 1.1.4 Islington Council already uses the preparation of EqIAs as a review tool to ensure that equality is considered in the design and development of key policies and services.
- 1.1.5 For the regeneration scheme proposed for Holloway Prison, the preparation of an EqIA enables the Applicant to demonstrate to Islington that it has systematically considered the potential impacts of the Development proposals on members of protected groups. This therefore can be used by the Council to inform their decisions in discharging the public sector equality duty (PSED), as required by the Equality Act 2010.
- 1.1.6 Whilst an EqIA is not a validation requirement in Islington, through pre-application discussions it was identified that this assessment would also assist in demonstrating compliance with the recently adopted London Plan Policy GG1 'Building strong and inclusive communities' (as included in Appendix A). Advice provided was as follows:

An Equalities Impact Assessment (EqIA) is requested as a way of measuring the potential impacts (both positive and negative) that a development proposal may have on the key protected characteristics covered by the Public Sector Equality Duty, and on Human Rights. The EqIA process

supports decent decision making by enabling a good understanding of the need and differential impacts that policies may have on different groups.

- 1.1.7 Consultation was undertaken with the Head of Fairness and Equality at LB Islington in February 2021. Through these discussions, it was highlighted that EqlAs are generally only completed in Islington for internal Council matters (such as when new policies or programmes are incepted). On this basis, there is no accepted methodology or guidance to be used for external parties, or for those being completed for proposed redevelopment schemes such as the Holloway Prison. Despite this, the Council's general approach to EqlAs was discussed, including reference to the 'State of Equalities in Islington' Annual Report 2020. It was discussed during this scoping conversation that attention should be afforded to socio-economic status and resultant deprivation as part of the equalities assessment. Whilst not considered a protected characteristic, many persons with protected characteristics also experience heightened levels of deprivation and can further exacerbate the way impacts are experienced.
- 1.1.8 Additional consultation between the Applicant, architect, landscape architect, Inclusive Design Consultants and LB Islington Access and Planning Officer took place in August 2021. This meeting was held to discuss specific access and inclusive designs provisions within the masterplan and to ensure that these were clearly articulated within the Design and Access Statement (DAS).
- 1.1.9 This report prepared by WSP seeks to demonstrate systematic consideration of the potential impacts of the redevelopment proposals on members of protected groups. Importantly, in line with The Equality Act 2010, this will highlight if the scheme will result in disproportionate impacts upon one group over another. The assessment will be conducted against a series of themes relating to the redevelopment, with impacts for each group of persons with protected characteristics summarised.
- 1.1.10 At the conclusion of the assessment, WSP have prepared recommendations as part of an Improvement Action Plan. Consideration of these suggested measures have the potential to further the advancement of equal opportunity as a result of the redevelopment.

SCHEME DETAILS

- 1.1.11 The site is located in the LB of Islington, comprising 4.16 hectares and broadly bounded by:
- Residential uses to the north.
 - Parkhurst Road / Camden Road (A503) to the east to south-east.
 - Rear of residential properties off Dalmeny Road, Carleton Road and Penderyn Way to the south, west, and through to the north.
- 1.1.12 The main elements of the proposed Development are summarised as follows:
- Housing
 - 985 residential units of varying unit size, including 60 dedicated Extra Care units.
 - 60% affordable housing.
 - 12% wheelchair homes.
 - 1334 sqm residents' facilities including concierge.
 - Non-residential
 - 1,489 GIA sqm Women's Building (Land Use Class F.2).

- 1,822 GIA sqm of flexible commercial floorspace (Land Use Class E).
- Open space
 - 10,480sqm of public open space, comprising a Public Garden (public park), nature garden and Trecastle connection.
 - 5,292 sqm of play space, all at ground and podium level.
- Access
 - Car free with exception of 30 Blue Badge accessible parking spaces
 - 2,009 cycle spaces
 - Plant space / Waste storage / collection facilities.
 - Vehicular servicing / access appropriate to all land uses proposed.
 - Dedicated space for a Women's Building to incorporate a safe space to support women in the criminal justice system and services for women as part of a wider provision for local organisations and employment opportunities.

1.1.13 An outline of the site of the proposed Development is shown in Figure 1-1 below.

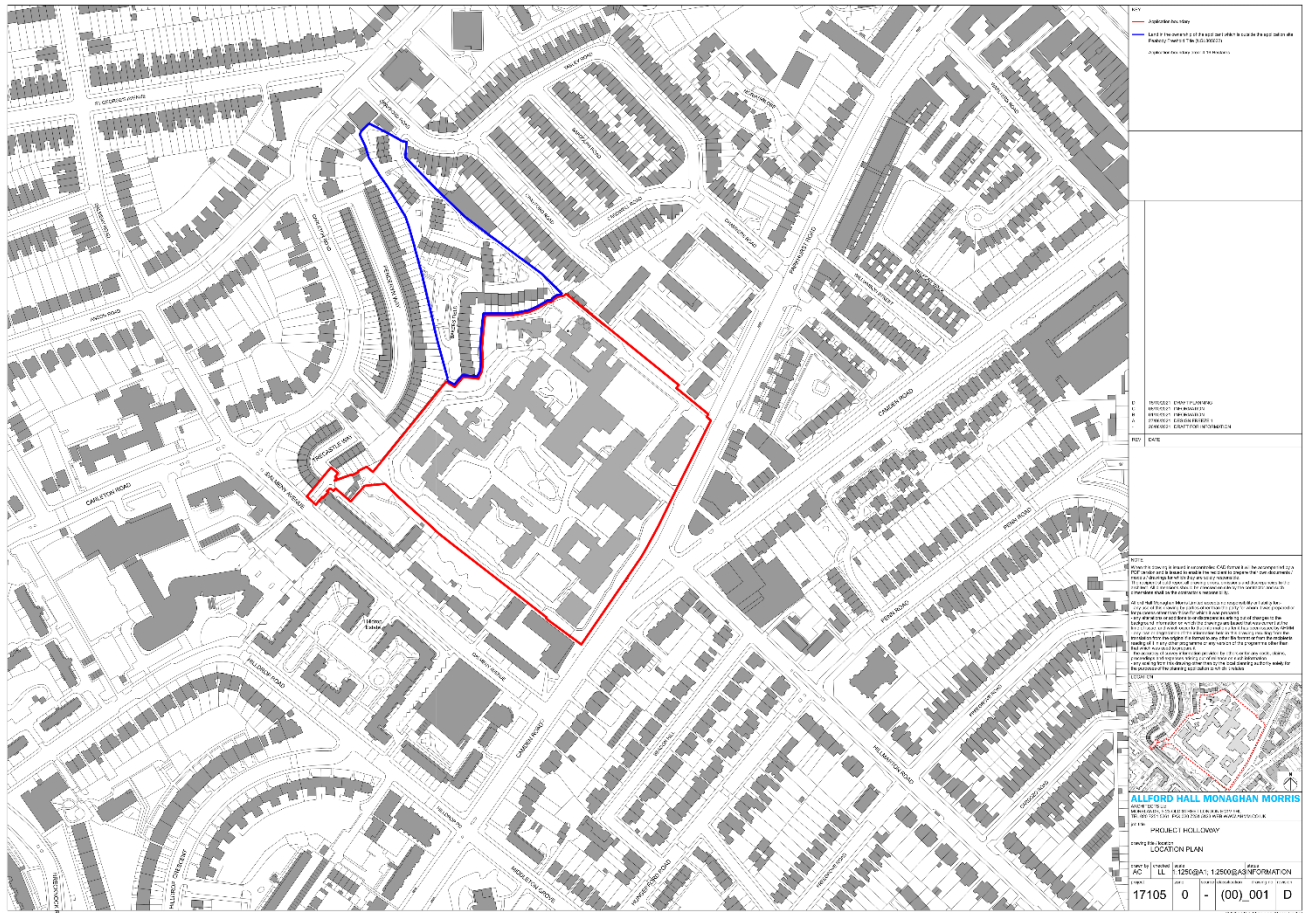


Figure 1-1 - Holloway Prison site

ANALYSIS OF NEED AND IMPACT

BASELINE ASSESSMENT

1.1.14 In order to understand the relative size of protected groups in the local area, we have determined impact areas. For this EqIA, they are as follows:

- **Site area** – buildings within the planning application red line boundary outlined in Figure 1-1;
- **Neighbourhood impact area** – properties within the Lower-layer Super Output Area (LSOA) encompassing the Holloway Prison site and surrounding immediate neighbours, referred to as Islington 010E and shown in blue in Figure 1.2;
- **Local impact area** – properties within the St George’s ward, as depicted in green in Figure 1-2 below; and
- **Wider impact area** – the broader area of LB Islington.



Figure 1-2 - Site, neighbourhood and local impact areas

1.1.15 In order to provide an assessment that best reflects the immediate area surrounding the site, the neighbourhood impact area will be the main area emphasised in the EqIA. Where relevant however, data pertaining to this area will be compared with the local and wider impact areas.

- 1.1.16 In undertaking the baseline assessment for this EqIA in order to reflect the conditions experienced in the impact areas defined above, WSP has drawn on data from the following sources:
- Islington Council, State of Equalities Report (2020);
 - London Borough of Islington Strategic Housing Market Assessment. Report of Findings. June 2017;
 - GLA, Ward Profiles and Atlas (2015);
 - GLA, LSOA Profiles and Atlas (2014);
 - ONS, 2011 Census (2011);
 - ONS, Mid-year population estimates (2019);
 - Pitney Bowes, GeoInsight mapping tool (2018);
 - Public Health England, Borough Public Health Profiles (2020);
 - Public Health England, Ward Public Health Profiles (2020); and
 - Ministry of Housing, Communities and Local Government, Indices of Multiple Deprivation (2019).
- 1.1.17 Where relevant, this report has also sought to reflect analysis undertaken in other reports prepared for the planning application, including the Health Impact Assessment (HIA) and the Environmental Statement (ES) Chapter on socio-economic effects.

LIMITATIONS

- 1.1.18 The latest published data available has been used throughout this EqIA, however some of the most up to date data is from the 2011 Census, along with ward and LSOA profiles from 2014/2015. Because of this, some of the baseline data may therefore not provide an entirely accurate representation of the local population in 2021. To alleviate this, more recent data has been used wherever possible, such as the English Indices of Deprivation (2019) and the health profiles published by Public Health England.
- 1.1.19 There are also limitations in the availability of data that can be used as part of the baseline assessment pertaining to particular protected groups. Statistics on populations within the sexual orientation and gender reassignment categories are especially difficult to obtain data on, given the sensitivity of the topics. Similarly, some details on religious beliefs and ethnicity can be subject to survey bias and may not present an accurate picture of the prevalence of these groups within the local populations. Furthermore, the ability to undertake in-person surveying and sampling of the local population has been limited due to impacts of the COVID-19 pandemic. On this basis, information where available has been used. This has been supplemented by ONS surveys and research papers where relevant to provide an indicative view of the potential proportions of the population who may identify as part of a particular group.

2 EVIDENCE AND DATA ANALYSIS

INTRODUCTION

- 2.1.1 As outlined in the previous chapter, in order to understand the baseline conditions of protected groups within the local area, WSP has gathered information from a range of sources to understand the likely presence of populations with protected characteristics in the local area. This has used the neighbourhood impact area, defined as the Islington 010E LSOA. For comparison however, data pertaining to the St George's ward and LB Islington have also been referred to.
- 2.1.2 In undertaking this EqIA, WSP has referenced other reports prepared as part of the Holloway Prison planning application, including the Health Impact Assessment (HIA) and the ES chapter on socio-economic effects. This has incorporated the scoping request made by Islington Council to include consideration of socio-economic status and resultant deprivation. Whilst these are not officially considered as part of the Equality Act 2010, they have been identified as being factors which influence equality in the local neighbourhood and are therefore an important consideration for this EqIA.
- 2.1.3 In addition to the specialist reports prepared by other consultants, WSP has drawn on data from the following sources:
- Islington Council, State of Equalities Report (2020);
 - GLA, Ward Profiles and Atlas (2015);
 - GLA, LSOA Profiles and Atlas (2014);
 - ONS, 2011 Census (2011);
 - ONS, Mid-year population estimates (2019);
 - Pitney Bowes, GeoInsight mapping tool (2018);
 - Public Health England, Borough Public Health Profiles (2020);
 - Public Health England, Ward Public Health Profiles (2020); and
 - Ministry of Housing, Communities and Local Government, Indices of Multiple Deprivation (2019).

AGE

- 2.1.4 The proportion of each age group within the impact areas is demonstrated in Table 2-1.

Table 2-1 – Population by age group – neighbourhood, local and wider impact area compared to Greater London (Mid-2019 population estimates)

	Islington 010E	St George's	LB Islington	Greater London
0-15 years	16%	16%	16%	20%
16-29 years	31%	26%	29%	22%
30-44 years	27%	28%	28%	25%
45-64 years	18%	21%	19%	22%
65+ years	8%	9%	9%	12%

- 2.1.5 The population proportions evident for Islington 010E, St George's ward and LB Islington are broadly in line with each other. This consistency differs from the figures for Greater London, which has a lower population aged under 30 years (42% compared to 47% evident within Islington 010E) and persons aged 16-29 years (22% compared to 31% within Islington 010E). Similarly, there is a

lower population of persons aged over 65 years (8-9% across the LSOA, ward and borough) compared to Greater London (12%).

2.1.6 Table 2-2 below shows the total proportion of populations within each geographic area for working age populations (ages 16-64 years).

Table 2-2 – Proportion of total population of working age

	Islington 010E	St George's	LB Islington	Greater London
Percentage of total population of working age	75.5%	74.7%	75.3%	68.3%

2.1.7 As shown in Table 2-2, Islington 010E has the highest proportion of working age residents when compared to all other impact areas, closely followed by the LB Islington local area. The most notable difference is compared with Greater London, which had 7.2% less working age residents.

DISABILITY

As part of the 2011 Census, respondents were asked to provide a subjective assessment of their general health. There are five different types of rating, ranging from “very bad health” to “very good health”. The findings provide a useful indicator of self-perceived health. The findings from the Census relevant to the impact areas are demonstrated in Table 2-3 below.

Table 2-3 – Self-assessment of health (2011 Census)

	Islington 010E	St George's	LB Islington	Greater London
Good or Very Good Health	77%	82.0%	82.4%	84.0%
Fair Health	14.3%	11.7%	11.2%	11.2%
Bad or Very Bad health	8.6%	6.3%	6.4%	4.8%

2.1.8 Residents in St George's ward and Islington are as likely to perceive themselves to be in a good health condition (82.0% and 82.4%) as the average London residents (84.0%). Islington 010E, however, has a slightly lower proportion of residents who consider themselves to have 'good' or 'very good' health – 77%, and a higher proportion of residents with 'bad' or 'very bad' health – 8.6%. This is almost double the proportion of the population who self-assessed to have this level of health within Greater London, highlighting that residents of Islington 010E are more likely to have poorer health outcomes than the average Greater London population.

2.1.9 Another mechanism for estimating rates of disability within a community relies upon the census results relating to the limiting of day-to-day activities. For Islington 010E, 82.5% of residents in 2011 did not have any of their day-to-day activities limited. 8.5% however reported that their day-to-day activities were limited a lot. These results are demonstrated in Table 2-4 below.

Table 2-4 – Islington 010E residents day-to-day activities limited (2011)¹

Day-to-day activities limited a lot	Day-to-day activities limited a little	Day-to-day activities not limited
137	147	1,336
8.5%	9.1%	82.5%

2.1.10 In addition to the limiting of day-to-day activities, the numbers of persons with an officially recognised disability or long-term illness were recorded during the 2011 census². The borough performance is demonstrated in Table 2-5 below.

Table 2-5 – LB Islington households by number of persons with a long-term health problem or disability (2011)

	No people in household with a long-term health problem or disability	1 person in household with a long-term health problem or disability	2 or more people in household with a long-term health problem or disability
Islington	71.9%	23.5%	4.5%
London	72.1%	22.4%	5.4%
England	67.3%	25.7%	7.1%

2.1.11 As demonstrated in Table 2-5, 28% of LB Islington households in 2011 had at least one resident with a long-term health problem or disability. Whilst this was slightly higher than the London average, it remained lower than the national rate across England.

2.1.12 The number of households that had more than one person with a long-term health or disability issue was lowest in Islington when compared to other geographies.

2.1.13 Reflecting on more recent data, the Islington State of Equalities Report 2020 estimates that there were 33,996 persons with a disability, making up 14% of the Islington population³.

2.1.14 More broadly, LB Islington overall is characterised by discrepancies in health levels. As demonstrated in the HIA prepared for the scheme, average life expectancies in the borough are in line with London and national averages. Despite this however, there is a large in-borough discrepancy in life expectancy of 7.7 years below average for men and 4.9 years below average for women, based on Public Health England data available for the period of 2016-2018.

2.1.15 The English Indices of Deprivation (EID 2019) enable comparisons to be made for a range of deprivation indicators at the small area level. The local area has a higher than average level of deprivation, with Islington 010E ranking 7,051 out of 32,844 neighbourhoods in England, placing it

¹ Greater London Authority (2014) LSOA Atlas [Online] Available from: <https://data.london.gov.uk/dataset/lsoa-atlas>

² ONS (2011) Household composition by number of people in household with a long-term health problem or disability [Online] Available from: <https://www.nomisweb.co.uk/census/2011/dc1301ew>

³ Islington Council (2020) State of Equalities in Islington – Annual Report 2020 [Online] Available from: <https://www.islington.gov.uk/~media/sharepoint-lists/public-records/communications/information/adviceandinformation/20192020/20200131stateofequalitiesreport20201.pdf>

within the 21.5% most deprived neighbourhood in the country. The locality has a lower (more deprived) ranking when assessed via the health deprivation domain, ranked 4,241 out of 32,844, placing it within the 12.9% most deprived neighbourhoods in the country. Of all the domains of deprivation assessed as part of the EID 2019, health is the lowest performing domain, followed closely by 'Living Environment' where Islington 010E is ranked in the 14.4% most deprived.

GENDER (SEX)

- 2.1.16 The ONS mid-2019 population estimates provide data on males and females within each of the impact area geographies. The data does not provide any options for persons who do not identify with male or female genders and therefore the figures may not be a true representation of the broader range of genders evident within the community.
- 2.1.17 Despite this, the estimates provide the most up to date and reliable data available. This demonstrates that whilst the split between males and females is identical between LB Islington and Greater London, there is a higher proportion of males at the LSOA and ward level. This is most prominent within the Islington 010E area where 54% of the population are males, versus 46% who identify as being female. This is demonstrated in Table 2-6 below.

Table 2-6 – Gender proportion based on mid-2019 population estimates⁴

	Islington 010E	St George's	LB Islington	Greater London
Male	54%	52%	50%	50%
Female	46%	48%	50%	50%

GENDER REASSIGNMENT

- 2.1.18 A limited amount of local data makes it difficult to gauge the number of people who have undergone a gender reassignment or who are in the process of this. The Government Equalities Office estimates that there are approximately 200,000 – 500,000 trans people in the UK which represents between 0.3% and 0.75% of the total population³. Based on the mid-2019 LSOA population of 1,454 persons, this might represent approximately 4 to 11 residents within Islington 010E. Whilst not being the same as gender reassignment, these proportions do provide some indication of the number of persons who may be likely to undergo a gender reassignment. Similarly, this large number of people shows that there are vast discrepancies between what is currently documented in national statistics and what is assumed, largely based on issues of bias in survey questionnaires, along with perceived barriers to honest answering. The 2021 census in England and Wales undertaken in March 2021 now includes a question "*Is the gender you identify with the same as your sex registered at birth?*". This will mean that in the coming years, there will be more national data surrounding this issue. Until then however, it remains difficult to ascertain these statistics.

⁴ ONS. 2020. Mid-2019 Population Estimates [Online] Available from: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/wardlevelmidyearpopulationestimatesexperimental>

MARRIAGE AND CIVIL PARTNERSHIP

- 2.1.19 The protection of those in marriages or civil partnerships, as set out in the Equality Act 2010, tends to pertain more to employment matters, such as wrongful dismissal due to marital status, rather than the redevelopment of a future mixed-use site. In this instance there is limited evidence to suggest that those in marriages or civil partnerships are likely to represent a prominent user group of the proposed Development, or one whose presence would be disproportionate relative to their prevalence amongst the general population. On this basis, further data on marriage and civil partnerships has not been included within the baseline assessment.

PREGNANCY AND MATERNITY

- 2.1.20 The Office for National Statistics (ONS) does not currently collect comprehensive, ward-level data on the total number of people who are pregnant and are unlikely to publish this data in the future, due to the difficulty of assuring up-to-date data.
- 2.1.21 The assessment has proceeded under the assumption that these groups are likely to be represented across the neighbourhood impact area.

Table 2-7 - Household Composition – Local area relative to LB Islington and London (2011 Census)

	Islington 010E (LSOA)	St George's (ward)	LB Islington	London
One person household	35.1%	37.4%	38.7%	31.6%
One family household	22.0%	24.5%	23.7%	53.5%
One family household: Lone parent	15.2%	12.5%	13.3%	12.7%
Other household types	42.9%	38.1%	37.5%	15.0%

- 2.1.22 As demonstrated in Table 2-7, at the LSOA level there is a higher proportion of lone parent households when compared against all other geographies. This is despite the LSOA having a lower proportion overall of family households compared to other regions – particularly the London average.
- 2.1.23 There is a higher number of one-person households in LB Islington overall, at 38.7% against the London-wide average of 31.6%. This is likely to be related to the large numbers of students and working professionals who choose to rent close to central London and whom may not yet have families or be in shared accommodation.

RACE AND ETHNICITY

- 2.1.24 Based on Table 2-8, the overall proportion of Black, Asian and minority ethnic (BAME) persons residing within the LSOA is 36.6%. This is compared to the ward (28.1%), LB Islington (31.8%) and London (40.2%).

Table 2-8 - Population by Self-Described Ethnic Group – Local area relative to LB Islington and London (2011 Census)

	Islington 010E (LSOA)	St George's (ward)	LB Islington	London
White	63.4%	71.9%	68.2%	59.8%
Mixed/multiple ethnic groups	7.5%	6.5%	6.5%	5.0%
Asian/Asian British	8.7%	6.6%	9.2%	18.5%
Black/African/Caribbean/Black British	15.6%	12.4%	12.8%	13.3%
Other ethnic groups	4.9%	2.6%	3.4%	3.4%

- 2.1.25 The LSOA, ward and borough all have higher proportions of white residents compared to the London average. At the LSOA level however, 15.6% of residents identified as being Black/African/Caribbean/Black British, a larger share than the borough (12.8%) and London (13.3%) proportions.
- 2.1.26 Other disproportionately represented ethnic groups at the LSOA level (compared to the share across Islington) include groups identifying as mixed/multiple ethnic groups and those identifying as 'other' ethnic groups.

RELIGION

- 2.1.27 Table 2-9 highlights that there are a broad range of religions evident within the local area. The LSOA demonstrates a higher proportion of Christian residents when compared to the ward and borough, although is generally in line with the London averages. Christianity makes up the largest proportion of religions in all geographic areas.
- 2.1.28 Focussing on the Islington 010E area, the other predominant religions include 'no religion' (27.6%), 'religion not stated' (14.7%) and Muslim (8.3%). Other religions, as listed in Table 2-9 represented less than 1% of the neighbourhood population.
- 2.1.29 The number of persons with no religion or whose religion was not stated in the 2011 census was significantly larger for the LSOA (42.3%), ward (50.1%) and LB Islington (46.6%) when compared to the London average (29.2%).

Table 2-9 – Population proportion per religion type (2011 Census)

	Islington 010E (LSOA)	St George's (ward)	LB Islington	London
Christian	46.2%	38.2%	40.2%	48.4%
Buddhist	0.9%	1.0%	1.0%	1.0%
Hindu	0.9%	0.8%	1.0%	5.0%
Jewish	0.6%	1.6%	0.9%	1.8%
Muslim	8.3%	7.5%	9.5%	12.4%
Sikh	0.4%	0.3%	0.3%	1.5%
Other religions	0.4%	0.5%	0.5%	0.6%
No religion	27.6%	34.4%	30.0%	20.7%
Religion not stated	14.7%	15.7%	16.6%	8.5%

LANGUAGES SPOKEN

- 2.1.30 The local area is more linguistically diverse than all other geographies, with Islington 010E residents having a higher proportion of the population (17.3%) without English as a main language. As shown in Table 2-10, this is higher than the ward, borough and London averages.

Table 2-10 – Languages spoken at home (2011 Census)

	Islington 010E (LSOA)	St George's (ward)	LB Islington	London
No people in household have English as a main language	17.3%	10.6%	12.2%	12.9%
At least 1 person in household has English as a main language	82.7%	89.4%	87.8%	87.1%

SEXUAL ORIENTATION

- 2.1.31 The ONS does not currently collect comprehensive, local-level data on sexual identity or non-binary gender identity. In 2018 however, the ONS identified that an estimated 94.6% of the total UK

population aged 16 years and over identified as heterosexual or straight⁵. The outcomes of this are shown in Table 2-11 below.

- 2.1.32 It is noted however that many persons who identify as not being heterosexual may not state this in official surveys, such as those conducted by the ONS. Despite this however, there are no other nationally recognised statistics that can be relied upon and therefore in this case, the proportions for the national population have then been applied to the LSOA and ward populations to provide an overview of the assumed population of the local area. This is demonstrated in Table 2-12.

Table 2-11 – Sexual orientation of UK population (2018)

Sexual orientation	% of national population
Heterosexual or straight	94.6
Gay or lesbian	1.4
Bisexual	0.9
Other	0.6
Do not know or refuse	2.5

Table 2-12 – Estimated population of impact areas (based on mid-2019 population estimates)

	National proportions	LB Islington
Heterosexual or straight	94.6%	192,998
Gay or lesbian	1.4%	2,856
Bisexual	0.9%	1,836
Other	0.6%	1,224
Do not know or refuse	2.5%	5,100

- 2.1.33 Further to the national proportions published in 2018, the Islington State of Equalities Report 2020 estimates that based on proportions for London, there are approximately 5,300 lesbian, gay or bisexual residents in LB Islington³. Combining the proportions in Table 2-12 above, the total gay, lesbian and bisexual residents is estimated to be 4,692 which is roughly in line with the estimates from the State of Equalities Report.

SOCIO-ECONOMIC STATUS

RATES OF ECONOMIC ACTIVITY AND UNEMPLOYMENT

- 2.1.34 The State of Equalities Report contends that as of 2019, 27.5% of the Islington residents are facing income deprivation, compared with 21.3% in London³.

⁵ ONS (2019) Sexual orientation, UK: 2018 [Online] Available from: <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualidentityuk/2018>

- 2.1.35 As of the 2011 Census, the percentage of the working age population (aged 16 to 64 inclusive) of St George's ward who were economically active was 74.7%⁶; slightly above the average for the borough, but below that across England and Wales (76.8%). As of 2011, 9.7% of Islington 010E and 9.2% of both St George's and LB Islington's working age population were unemployed. These were all notably higher than the average across England and Wales of 7.6%⁶.
- 2.1.36 As set out in Table 2-13, St George's population, and the wider population of Islington, is more likely to be employed within highly skilled occupations and less likely to be employed in elementary or lower skilled occupations than the equivalent population of London.
- 2.1.37 As of the 2011 Census, 64.1% of the local working population were employed within Standard Occupational Classification (SOC) Groups 1 to 3, encompassing Managers and Senior Officials, Professionals and Associate Professional groups. This was in line with the figure for LB Islington (64.7%) and considerably higher than the proportion of Greater London's working age population (50.3%).
- 2.1.38 A correspondingly smaller share of St George's population were employed in SOC Groups 7 to 9 - lower-skilled occupations comprising Sales and Customer Services (5.3%), Process Plant and Machine Operatives (2.8%) and Elementary Occupations (7.7%). This equals a total of 15.8%, similar to that for LB Islington (15.3%), but considerably lower than Greater London (21.8%).

Table 2-13 - Working Population by Occupation (2011)⁶

Occupation	St George's (ward)	LB Islington	Greater London
Managers and Senior Officials.	10.8%	11.5%	11.6%
Professional.	30.8%	31.2%	22.4%
Associate Professional and Technical.	22.5%	22.0%	16.3%
Administrative and Secretarial.	9.0%	9.1%	11.7%
Skilled Trades.	5.6%	5.1%	8.3%
Personal Services.	5.6%	5.8%	7.8%
Sales & Customer Services.	5.3%	5.7%	7.5%
Process Plant and Machine Operatives.	2.8%	2.7%	4.7%
Elementary Occupations.	7.7%	6.9%	9.6%

HOUSING

- 2.1.39 As of the 2011 Census, there were a total of 5,627 household spaces across St George's ward, compared to 98,196 across LB Islington and 3,387,255 across Greater London⁷.

⁶ NOMIS. 2011 Ward Labour Market Profile – St George's [Online]. Available from: <https://www.nomisweb.co.uk/reports/lmp/ward2011/1140858095/report.aspx>

⁷ Greater London Authority (2015) Ward Profiles and Atlases [Online] Available from: <https://data.london.gov.uk/dataset/ward-profiles-and-atlas>.

- 2.1.40 As set out in Table 2-14, the mix of tenures across households in the Islington 010E LSOA and St George's ward were distinctly different, along with both not resembling LB Islington or Greater London as a whole.
- 2.1.41 The majority of the Islington 010E neighbourhood is housed within social housing, compared with the wider St George's ward population that live in properties which they own either fully or with a mortgage. The percentage of properties owned in the immediate neighbourhood was 18.9%, significantly lower than all other geographies⁶.
- 2.1.42 Given the high rates of social renting within the LSOA compared to the wider St George's ward, it is presumed that the area immediately surrounding the site is where a large concentration of the wards total social housing is located.
- 2.1.43 The share of residents living in privately rented accommodation across all four geographical areas are broadly in line, with 25.4% of the LSOA population, 26.1% of St George's population, 27% across LB Islington and 25.1% across Greater London as a whole all renting via the private sector.

Table 2-14 - Residents by Tenure (2011)

Tenure	Islington 010E	St George's (Ward Level)	LB Islington	Greater London
% Privately Owned (outright or with mortgage).	18.9%	33.6%	28.4%	48.2%
% Social Rented.	53.8%	38.0%	42.1%	24.1%
% Privately Rented.	25.4%	26.1%	27.0%	25.1%
% Other (shared ownership, living rent free).	1.9%	2.3%	2.5%	2.6%

- 2.1.44 The Strategic Housing Market Assessment (SHMA)⁸ for LB Islington was updated in June 2017. Using 2015 data, the SHMA considers tenure based on age profile for the borough overall. It found that two thirds of households aged 65 years and over lived in Social or Affordable Rented housing (62%). Over a half of those aged 50 to 64 lived in Social or Affordable Rented housing (54%) and around a third each of those aged 25 to 49 (35%) and under 25 (32%).
- 2.1.45 The SHMA also demonstrated that 59% of households aged 24 years and under live in private rented housing and 36% of those aged 25 to 49. Considerably smaller proportions of the older age groups live in privately rented properties; 9% of those aged 50 to 64 and 7% aged 65 and over.
- 2.1.46 In summary, Social and Affordable Rented housing is the majority tenure for those aged 50 or above, and in particular for households aged 65 or over. In contrast, the private sector is the majority

⁸ Opinion Research Services (2017) London Borough of Islington Strategic Housing Market Assessment Report of Findings June 2017 [Online] Available from: <https://www.islington.gov.uk/-/media/sharepoint-lists/public-records/planningandbuildingcontrol/publicity/publicconsultation/20192020/20191001islingtonshma2017.pdf?la=en&hash=1E40BEC643185E45D581D5E0A45A1AF13930C2D3>

sector for households aged under 50, with higher proportions of each of the under 50 age groups living in privately rented accommodation rather than living in in owner occupation.

- 2.1.47 The dominance of residents living in social housing and private rental accommodation raises further issues relating to overcrowding. The Housing in London report publishes by the Greater London Authority (GLA) in October 2020 shows that 15% of social housing and 13% of privately rented households were overcrowded⁹. This compares to just 2.7% of owner-occupied properties being classified as overcrowded.

VEHICLE USAGE AND ACCESSIBILITY

- 2.1.48 The 2011 census demonstrated that the majority of residents within the Islington 010E LSOA did not own a private vehicle (68.2%). It is highly likely that this proportion has further increased since 2011, due to the wider range of car-sharing options available throughout LB Islington. The census findings relating to private vehicle ownership for the LSOA neighbourhood area are demonstrated in Table 2-15 below.

Table 2-15 - Islington 010E private vehicle ownership (2011)¹

No cars or vans in household	1 car or van in household	2 cars or vans in household	3 cars or vans in household	4 or more cars or vans in household
68.2%	27.0%	4.3%	0.2%	0.3%

- 2.1.49 In addition to the assessment of private vehicle ownership, accessibility was also considered as a way of understanding the current public transport links to the local neighbourhood. Public Transport Accessibility Levels (PTAL) are provided at the LSOA level. In 2014, the average PTAL score for Islington 010E was 5.0. This indicates ‘good’ access to public transport¹. The PTAL scores for the overall population are demonstrated in Table 2-16 below.

Table 2-16 – Islington 010E PTAL results (2014)¹

% 0-1 (poor access)	% 2-3 (average access)	% 4-6 (good access)
0.0	39.5	60.5

ACROSS GROUPS

RACE AND SOCIO-ECONOMIC STATUS

- 2.1.50 Children growing up in BAME households in Islington are more likely to be living in poverty in comparison to white children³. In 2018/19, more than half of the statutorily homeless population in Islington was of a BAME group (60%), compared to 40% of a White ethnicity.

⁹ GLA Housing and Land (2020) Housing in London 2020 – The evidence base for the London Housing Strategy [Online] Available from: <https://data.london.gov.uk/dataset/housing-london>

2.1.51 As of the 2011 census, the rates of economic activity in Islington showed discrepancies between race. Table 2-17 below shows the proportion of economically active populations in Islington and the relative percentages of that population who were unemployed at the time of the 2011 census.

Table 2-17 – Economic Activity of Islington residents aged over 16 years (2011)¹⁰

Economic Activity	White	Mixed /multiple ethnic group	Asian/Asian British	Black/African/ Caribbean/ Black British	Other ethnic group
Economically active: Total	88,563	5,683	9,288	11,380	3,082
Economically active: Unemployed: Total	5,896	786	1,023	2,503	533
Economically active: Unemployed: %	6.7%	13.8%	11.0%	22.0%	17.3%

2.1.52 As demonstrated in the table above, the proportion of the economically active population within Islington had a far higher rate of persons unemployed from non-White ethnicities. The starkest statistic is that over one fifth of economically active residents identifying as Black/African/Caribbean/Black British were unemployed in 2011.

2.1.53 This demonstrates that unemployment and resultant deprivation arising from this low socio-economic status is more likely to be evident in the non-White population throughout Islington.

DISABILITY AND SOCIO-ECONOMIC STATUS

2.1.54 Within LB Islington, residents of economically active age who are disabled are more likely to be unemployed than those who do not have a disability¹¹. Results from the 2011 census are show in Table 2-18 below.

Table 2-18 – Economic activity by long-term health problem or disability (2011)

Economic activity and hours worked	Day-to-day activities not limited	Day-to-day activities limited a little	Day-to-day activities limited a lot
Economically active: Total	110,019	5,737	2,240
Economically active: In employment	100,673 (92%)	4,711 (82%)	1,871 (84%)
Economically active: Unemployed	9,346 (8%)	1,026 (18%)	369 (16%)

¹⁰ NOMIS (2011) DC6107EW - Economic Activity by sex by age [Online] Available from: <https://www.nomisweb.co.uk/query/construct/submit.asp?forward=yes&menuopt=201&subcomp=>

¹¹ NOMIS (2011) DC6302EW - Economic activity by hours worked by sex by long-term health problem or disability [Online] Available from: <https://www.nomisweb.co.uk/query/select/getdatasetbytheme.asp?opt=3&theme=&subgrp=>

2.1.55 Resulting from unemployment, disabled persons are therefore more likely to be reliant on others for economic support, including welfare payments.

AGE AND DISABILITY

2.1.56 The 2011 census collected data on household types and composition, which can be compared with the presence of persons with a disability or long-term illness. The population of Islington in 2011 by age group and limiting of day to day activities is demonstrated in Table 2-19 below.

Table 2-19 – Islington residents age by disability as of 2011 census¹²

Age	Total population (2011)	Number of persons with day to day activities limited	Percentage of age group
Age 0 to 15	32,807	1,468	4%
Age 16 to 24	25,690	1,290	5%
Age 25 to 49	99,034	10,066	10%
Age 50 to 64	25,098	8,075	32%
Age 65 and over	17,505	10,268	59%
Total	200,134	15,881	16%

2.1.57 As shown in the table above, the proportion of residents above the age of 50 are more likely to have some form of disability compared with younger age groups. This is especially true of residents aged over 65 years in Islington with almost two-thirds reporting some form of limiting of day-to-day activities. This demonstrates that where there are elderly populations identified within the local area, they are likely to have a protected characteristic of both age and disability.

RACE AND RELIGION

2.1.58 Table 2-20 below shows that persons in Islington as of the 2011 census who identify as being Asian, Black or part of an 'Other' ethnic group are more likely to have a religion compared to those who are either White or Mixed Race.

¹² NOMIS (2011) Household composition by number of people in household with a long-term health problem or disability [Online] Available from: <https://www.nomisweb.co.uk/census/2011/dc1301ew>

Table 2-20 – Ethnic group by religion in Islington (2011)¹³

	White	Mixed/multiple ethnic group	Asian/Asian British	Black/African/ Caribbean/ Black British	Other ethnic group
Has religion	49%	41%	64%	74%	66%
No religion	37%	30%	19%	7%	12%
Religion not stated	14%	30%	17%	20%	22%

SEX AND MATERNITY

2.1.59 In the 2011 census, 6,644 residents of Islington aged over 16 years (3.8%) were economically inactive as a result of looking after home or family. This is demonstrated in Table 2-21 below.

Table 2-21 – Islington residents aged over 16 years looking after home or family (2011)¹⁴

Sex	All categories: Economic activity	Economically inactive: Looking after home or family	Proportion of population aged over 16 years
All persons	173,300	6,644	3.8%
Males	84,691	737	0.9%
Females	88,609	5,907	6.7%

2.1.60 Table 2-21 above shows that less than 1% of males looked after home or family, compared to almost 7% of all females. Of the total number of residents staying at home for care duties, 11.1% (737) were male and 88.9% (5,907) were female. This demonstrates that females are more likely to be stay-at-home carers and to be economically inactive as a result of this.

SUMMARY

2.1.61 The LSOA of Islington 010E has a low proportion of elderly people (8%) with the majority of residents (76%) between the ages of 16 and 64 years. This is consistent with the ward profile, showing that the area surrounding the site is younger than the London average.

2.1.62 Islington 010E has a higher proportion of residents with bad or very bad perceptions of own health. Correspondingly, the LSOA had the lowest proportion of its population who rated themselves as

¹³ NOMIS (2011) Ethnic group by religion [Online] Available from: <https://www.nomisweb.co.uk/query/construct/submit.asp?forward=yes&menuopt=201&subcomp=>

¹⁴ NOMIS (2011) DC6107EW - Economic Activity by sex by age [Online] Available from: <https://www.nomisweb.co.uk/query/construct/submit.asp?forward=yes&menuopt=201&subcomp=>

having good or very good levels of health when compared across the Borough and London averages. Overall, 17.5% of Islington 010E population reported that their day-to-day activities were limited to some extent. Taking these factors together, the LSOA is ranked in the 12.9% most deprived neighbourhoods in the country relating to health deprivation. The majority of persons who are elderly (aged 65 years and over) are also likely to have a disability (59%). For those who are under the age of 65 years and considered to be of economically active age, the rate of unemployment is over double the rate for persons without a long-term health problem or disability.

- 2.1.63 There are slightly more males (54%) than females (46%) within Islington 010E. The large majority of persons who were economically inactive to stay at home to care for family throughout Islington were female (88.9%) compared to males (11.1%).
- 2.1.64 63.4% of the LSOA identifies as being White with the next largest ethnic group being Black/African/Caribbean/Black British (15.6%), followed by Asian/Asian British (8.7%). As demonstrated in 'across group' impacts, those who did not identify as being White were more likely to belong to a religious belief. 46.2% of Islington 010E were Christian, with the next dominant forms of belief being 'no religion' (27.6%) and Muslim (8.3%). 14.7% of the population however did not state a religion at all.
- 2.1.65 Linguistic diversity remains evident in the neighbourhood area with 17.3% of the Islington 010E population not having English as their main language.
- 2.1.66 The majority of the population identify as being heterosexual, however this relies upon data which is likely to be skewed by answer-bias on sensitive topics such as sexual orientation. This also applies to persons who are transgender or undergoing gender reassignment.
- 2.1.67 9.7% of the Islington 010E population were unemployed at the time of the 2011 census with the majority of the population living within socially rented properties (53.8%) or privately rented households (25.4%). This proportion leaves less than one-fifth of residents as owner-occupiers, a rate that is significantly less than the averages across the ward, borough and London areas. Reflecting on LB Islington averages from their most recent SHMA, the majority of households aged over 50 years were either social or affordable rental housing. Reflecting on London wide rates of overcrowding, it is therefore likely that some of the social and privately rented properties currently experience overcrowding.
- 2.1.68 Throughout Islington it is evident that the proportion of unemployed persons within each ethnic group is significantly higher for all ethnicities when compared to White residents. Given this, it is unsurprising that the Islington State of Equalities Report 2020 identified that children in BAME households are more likely to be living in poverty and that homeless people are more likely to not be White. As a result, there is a high likelihood that BAME residents in Islington are also socio-economically deprived.
- 2.1.69 Whilst the majority of residents within Islington 010E did not have access to a motor vehicle (68.2%), all residents had average or good access to public transport with the majority (60.5%) of the population rated as having PTAL scores of 'good'.
- 2.1.70 Overall, there is a broad mix of persons across a range of protected characteristics within the neighbourhood, ward and borough impact areas, reflecting the diversity of the persons who live there and whom would likely move to the area in the future.

3 ASSESSING POTENTIAL IMPACTS

APPROACH

- 3.1.1 This section considers the anticipated impacts of the scheme on protected groups as identified within the baseline assessment.
- 3.1.2 It assesses both temporary impacts that will arise during the construction phase of the proposed Development, along with permanent impacts that will take effect once the Development is complete and operational.
- 3.1.3 In assessing the permanent impacts of the scheme, WSP have considered the likely effects on protected groups using the following thematic areas:
- Construction impacts;
 - Housing;
 - Open space;
 - Play space;
 - Resident facilities;
 - Access to employment opportunities;
 - Access to social infrastructure;
 - Transport connectivity; and
 - Opportunities for social interaction.
- 3.1.4 To fulfil the requirements set out within Section 149 of the Equality Act 2010, the assessment will identify if there will be any disproportionate effects upon any particular protected groups as identified within Table 1-1 of this report.
- 3.1.5 The assessment will consider the development proposals and will then articulate what the likely effects may be. A summary table at the conclusion of the chapter will demonstrate whether the overall impacts are considered to be either:
- Major positive
 - Minor positive
 - Neutral
 - Minor negative
 - Major negative
- 3.1.6 Depending on the type of effect, this will also be categorised as either short-term (temporary) or long-term (permanent). The impact of these effects has been assessed based on the anticipated effect on protected groups in the neighbourhood impact area, defined as being the boundary of the Islington 010E LSOA.
- 3.1.7 In the absence of defined guidance from LB Islington for EqlAs of this nature, this approach has been adopted by WSP based on professional experience of undertaking EqlAs for other local authorities across England. In addition to this, 'Resident Impact Assessments' undertaken by LB Islington have also been reviewed to understand similar methods for assessing impacts upon persons with protected characteristics.

TEMPORARY IMPACTS DURING CONSTRUCTION OF THE SCHEME

- 3.1.8 The proposed development will include an extensive construction phase which will take place over a period of approximately five years.
- 3.1.9 During this time there will be temporary impacts to the environment immediately surrounding the site. As such, there may be temporary effects upon the neighbourhood which may impact residents within Islington O10E. The period during which the construction phase is anticipated to have an impact will vary because of the phasing of the development, meaning that not all temporary impacts will occur at the same time.
- 3.1.10 A development of this scale will require significant investment and will mean that there will be the capacity to promote jobs for apprentices and other upskilling and training activities. In addition to this, the increased number of construction workers on site will depend upon local facilities for food and leisure. This will create an increase in spending in the local area, supporting small businesses within the neighbourhood. As set out within the ES Chapter on Socio-economic effects, the temporary economic benefits of the construction phase will be as follows:
- Creation of 1,082 construction jobs at the district level (LB Islington);
 - Creation of an additional 578 construction jobs at the regional level (Greater London); and
 - Gross value added of up to £105.1 million to the regional economy.
- 3.1.11 In addition to this, the development has a number of skills and training initiatives that have been agreed to with the Skills and Training team at LB Islington for the duration of the construction period. This includes the following:
- Construction Apprentices
 - One apprentice per 20 homes and one apprentice per 1,000 sqm (Gross External Area) of commercial floorspace. This will equate to approximately 51 26-week placements. This is a requirement as set out within the Section 106 agreement for the scheme.
 - Of these apprentices to be delivered, the scheme has an aspirational target that 30% of these apprenticeships opportunities will be filled by women. This will be assisted through the Women's Trade Network of which Peabody is a founding member.
 - These opportunities will be advertised and promoted in partnership with the London Borough of Islington's employment brokerage service.
 - Procurement initiatives
 - 'Meet the Buyer' events will be hosted with local businesses to discuss packages available and ability to partake in the scheme.
 - Procurement training will be provided in order to help local businesses to become 'tender ready' for future involvement in the scheme, along with other similarly sized developments.
 - Procurement opportunities will be listed on CompeteFor.com, which is an inclusive local procurement platform to encourage a broader range of suppliers and their involvement in the project.
 - Skills Centre
 - An on-site classroom cabin will be made available for the construction period for green skills training, Construction Skills Certification Scheme (CSCS) training and other potential

training programmes. This will facilitate further upskilling initiatives, providing convenient access throughout the duration of the construction period.

- 3.1.12 Alongside the apprentices, skills centre and procurement initiatives, Peabody have also committed to promote a range of employment policies through supply chain organisations. These will be focussed on the promotion of diversity and inclusion; continuous professional development; well-being; net zero (e.g. cycle to work); and flexible and part-time working.
- 3.1.13 There will also be some benefits of the construction phase through the additional employment of local people and the economic opportunities that flow from this.

CONSTRUCTION IMPACTS

- 3.1.14 The development comprises the demolition of the existing buildings which make up the former Holloway Prison and garages to the west which lead onto Trecastle Way. While operational, the Prison provided ancillary services on-site for the occupants of the prison. These ancillary services ceased on-site upon the Prison being made vacant, and no further social or community uses have taken place. The Holloway Prison Site SPD (2018) refers to the prison as social infrastructure, however due to the cessation of operations, there will not be any loss of community facilities to the general public as a result of the construction period. Furthermore, the site is currently boarded up and is not accessible to the public. The construction phase will therefore not drastically alter the presence of the site when used as a prison, where it was purposefully disconnected from the neighbourhood as a means for providing security.
- 3.1.15 The construction period may represent a sustained period of disruption compared to day-to-day activity in the absence of the proposed redevelopment. As previously stated, the construction period is expected to last approximately five years and will result in changes to the site as it currently stands with increased noise and dust and changes to existing lighting levels for the residential population which back onto the site. This may have an impact upon groups whose mobility is constrained, such as elderly and disabled residents along with pregnant women and new parents who are likely to spend a large proportion of time at home and whom may therefore be more exposed to these changes and experience them more intensely. Despite this however, there are extensive mitigation measures in place to limit the impacts of these temporary effects throughout the construction period and any disproportionate impacts these may have upon protected groups. The construction period is also subject to phasing, therefore meaning that effects caused by certain activities will not be felt by the same residents for the whole duration of the construction period.
- 3.1.16 The bordering up of the site will be maintained which will mean that the footpath access currently in-situ will remain for the majority of the construction period, ensuring that the surrounding areas remain accessible and that the community can continue to reach key areas for transport and amenities, such as the nearby Holloway Road. This is demonstrated within the Construction Environmental Management Plan (CEMP) prepared by London Square which also states that regular inspections will be carried out to ensure that good housekeeping measures are maintained at all times. This will help to alleviate disrepair to the surrounding footpath and the overall visual amenity of the site to neighbouring residents. Further measures to ensure that the site is well kept are detailed within the Site Waste Management Plan prepared by London Square.
- 3.1.17 Wheel washing practices have also been set out within the CEMP, ensuring that *'no vehicle that is likely to deposit mud or other material on the road surface will be permitted onto the public highway'*. This will also be beneficial to others who use the roads surrounding the site, including cyclists,

pedestrians and other vehicle drivers who may belong to a protected characteristic and therefore dependent on a particular transport mode.

- 3.1.18 In addition to this, the hours of construction will be controlled to ensure that no work takes place during early mornings and late evenings on Monday to Saturday, and not at all on Sundays and Bank Holidays. The CEMP also includes a plans to proactively manage construction traffic to minimise the potential for disturbance to residents nearby.
- 3.1.19 In addition, there will be a commitment on the part of the applicant (and its contractors) to keep residents informed throughout the construction process and to be responsive to concerns. This will be bolstered through the site registering as part of the Considerate Constructors Scheme (CCS) for the duration of the construction period. By being a registered CCS site, The Code of Considerate Practice '*commits the site to care about appearance, respect the community, protect the environment, secure everyone's safety and value their workforce*'. This will be enhanced by the procedures that will be implemented to ensure effective liaison with the neighbouring properties, adjacent residents and local community as set out in the CEMP.
- 3.1.20 Construction processes have also been specifically chosen to ensure that there is a reduced impact on the local environmental health of the neighbouring residents. Specific measures include:
- Monitoring of dust, noise and vibration
 - Frequent on-site inspections
 - Use of dust-suppression tools and techniques;
 - Re-use of materials on-site to reduce vehicle movements on local roads; and
 - Reduction of unnecessary lighting at night.
- 3.1.21 Further details of these can be found within the CEMP along with the Health Impact Assessment and ES prepared for the scheme (including specific chapters on construction effects relating to noise, air quality, transport, daylight and sunlight).

SUMMARY

- 3.1.22 The effects of the construction phase of the scheme, with regard to the employment and skills initiatives, will have a positive impact upon persons considered to be of low socio-economic status which is considered to be a key determinant across protected groups, as identified within the baseline assessment.
- 3.1.23 Additionally, the measures implemented throughout the construction phase to reduce environmental and health impacts whilst maintaining community amenity will minimise adverse effects to the local populations living near the site, including those within protected groups who may be more likely to spend more time at home than others.
- 3.1.24 The positive effects relating to employment and mitigation of adverse environmental and health concerns during the construction phase mean that the overall impact taken together with potential disruptions will be neutral. This is closely related to the fact that the site is currently underused and separate from the local neighbourhood, rather than being in a location where development works might sever the community and drastically alter their day to day practices.

PERMANENT IMPACTS ON COMPLETION OF THE SCHEME

- 3.1.25 Upon completion of the redevelopment, the site will introduce a new community to the local area through residential units, the Women's Building and new commercial spaces. It is important

therefore to identify how the operation of this scheme will impact the existing neighbourhood and whether the presence of the new uses will detrimentally impact any group considered to have protected characteristics.

HOUSING

- 3.1.26 Increasing the number of dwellings in the borough will positively impact persons with protected characteristics. This is especially true through the inclusion of housing of a range of sizes and types which can cater to a broader range of people.
- 3.1.27 There is a current shortage of accessible housing in London¹⁵. By enhancing choice and enabling independent living, disabled people can live more fulfilling lives and further help to reduce differences between communities by being inclusive of more diverse people. The development will incorporate 120 homes for wheelchair users across a range of tenure types. Through the commitments to accessible housing, the development will have a positive impact upon people who are less mobile, including those within the age, disability and pregnancy and maternity protected groups. Management measures as identified within the Inclusive Design Strategy included within the DAS will also ensure that any maintenance required for single lifts during the operation of the development (which are depended upon by persons within these protected groups) will be incorporated to reduce any temporary impacts to residents and visitors.
- 3.1.28 The inclusion of larger properties with a higher number of bedrooms (including 569 two-bedroom, 114 three-bedroom and 14 four-bedroom units) caters to families, therefore benefitting those within the pregnancy and maternity and age protected groups. The redevelopment scheme also includes 60 specifically designated 'Extra-Care' homes which could cater to persons within the disabled protected characteristic, providing beneficial accommodation to a high-quality standard.
- 3.1.29 The affordable housing policy and subsequent commitment to provide 60% (593 units) affordable housing units will also benefit a number of groups, including age and disability. Affordability is key for disabled persons who are more likely to be unemployed than those who do not have a long-term health problem or disability. This is already evident within LB Islington (see Table 2-18), along with the existing elderly population whom are most likely to be limited in their day-to-day activities. The Islington 010E LSOA is predominately made up of properties that are socially rented. Providing additional affordable housing will therefore mimic the nature of the existing households surrounding the site. This will assist in ensuring that the redeveloped area is not seen as a regeneration scheme that alienates the existing community, their current way of life and demographic makeup.
- 3.1.30 Ensuring housing is built to the standards of the London Plan is also of high relevance to, and will have, a positive impact on persons across all protected characteristics. Design that is of a high quality does not adversely affect neighbouring occupiers and will improve the aesthetic appearance of the environment. This also improves the attractiveness of the future residential units, ensuring that they will remain occupied and sought after, which will further promote activity in the area, which will likely be positive for the neighbouring community.

¹⁵ Greater London Authority (2021) London Accessible Housing Register [Online] Available from: <https://www.london.gov.uk/what-we-do/housing-and-land/improving-private-rented-sector/london-accessible-housing-register>

OPEN SPACE

- 3.1.31 The development proposals include the provision of open space, including the following aspects of the masterplan design:
- 'Public Garden' – this is the central public open space within the Development.
 - 'Nature Garden' – this is the public open space north-west of Plot A (triangular areas that lies between Plot A and Bakersfield Estate).
 - 'Trecastle Connection' – this is the public pedestrian and cycle connections that lies adjacent to Plot E and leads onto Trecastle Way.
 - 'Women's Garden' – this is the garden that serves the Women's Building to Plot C.
 - 'Communal Resident Gardens' – these are communal gardens which serve the residents of Plot A, Plot B and Plot D respectively.
 - 'Extra Care Garden' – this is the garden that serves the 60 extra care homes to Plot E.
 - 'Rooftop Gardens' – these are the communal gardens at roof level which serve the residents of Plot A, Plot B, Plot C, Plot D and Plot E, which serve the residents with direct core access.
 - 'Residential Street' – this is the proposed internal two-way street within the Development.
- 3.1.32 Overall, the development provides 10,480 sqm of public open space with an additional provision of 2,595 sqm private amenity space serving residential units, 5,949 sqm communal amenity space serving residential units and 699 sqm garden dedicated to the Women's Building. Further details of the typologies of open space and the layout plans can be found within the Open Space Recreation Assessment and Landscape Design Strategy prepared by Exterior Architecture.
- 3.1.33 This will be beneficial as there is currently no publicly accessible green space currently within the LSOA neighbourhood area. Furthermore, the provision of open space to residents and users of the Women's Building will provide a range of options to new residents, meaning that there will be more opportunities for others within the neighbourhood to utilise the publicly accessible space.
- 3.1.34 Academic sources have long supported the benefits of open spaces in their ability to promote better health outcomes, particularly in areas of evident health inequality¹⁶. Open spaces enable greater likelihood of physical activity, social interaction and can therefore improve mental health.
- 3.1.35 Elderly and disabled people will also benefit from having close access to open spaces which can offer both active and passive recreation opportunities in proximity to their homes and other familiar areas. This is beneficial as it decreases barriers to reaching open spaces, such as through longer travel times using transport which may not be as accessible.
- 3.1.36 Having open space close to home will also be beneficial to persons on low incomes who can then use the space for recreation, rather than having to pay for transport to travel to other open spaces outside the immediate area. As identified in the baseline, low socio-economic status is closely linked to persons within the race and disability protected groups. Consequently, this will have a positive benefit to these groups.

¹⁶ Robinson, J. M., & Breed, M. F. (2019). Green prescriptions and their co-benefits: Integrative strategies for public and environmental health. *Challenges*, 10(1), 9.

- 3.1.37 A virtual Public Realm Workshop was held in August 2020 as a means of exploring and discussing the proposals for the open space to be included within the redevelopment proposals¹⁷. The inclusion of community groups, including 'Community Plan 4 Holloway' heighten the potential for the plans to reflect the local community and the likely end-users of the space.
- 3.1.38 In addition to this, the plans incorporate a dedicated communal garden for the Extra-Care units with the design of this space centred around the creation of small intimate environments which seek to encourage mental well-being. The garden is also designed for a range of users and abilities. Whilst this will not be able to be used by existing residents surrounding the site, if any were to be moved into the Extra-Care units, they may have the opportunity to benefit from this garden. As a result, this will be a further benefit to persons who may be part of either age or disability protected groups.

PLAY SPACE

- 3.1.39 As part of the proposed development, there will be 5,292 sqm of children's play space which will support the child yield for the scheme (523 children, as noted within the ES Chapter on Socio-economic Effects). This will all be provided on the ground floor/podium gardens. Play space is included within the public open space which will be publicly accessible. Further details of this space are provided within the Open Space Recreation Assessment and Landscape Design Strategy prepared by Exterior Architecture
- 3.1.40 The immediate area surrounding the site is not currently serviced by play facilities, with the closest likely being the play area located within Tufnell Park playing fields.
- 3.1.41 Providing new play space will be beneficial as it will provide needed playground facilities within the local area. This will improve access and will be a positive impact upon those within the age and maternity protected groups. This will ensure that children who cannot walk far distances or who may rely upon a pram/pushchair can reach these areas more conveniently. This will therefore increase the likelihood of children using these spaces, which can help to instil healthy lifestyle habits which focus on spending time outdoors and interacting with others in a leisure setting.
- 3.1.42 The play space designs were also developed during a virtual workshop with local stakeholders with a background in young people's play, education and outreach¹⁸. This inclusion of professionals with experiences of the local areas and the needs of young people provide further assurances that the play space will seek to reflect the young people in the local area.
- 3.1.43 As the current site does not have play facilities which will be removed as part of the redevelopment, there are no negative consequences relating to this additional provision. Furthermore, the play areas proposed will promote 'inclusive play' through the inclusion of sensory activities to assist children with impairments affecting mobility. As a result, there is likely to be further benefits to persons within the age, pregnancy and maternity and disabled protected groups.

¹⁷ Peabody (2020) Public Realm Workshop August 2020 [Online] Available from: <http://hollowayprisonconsultation.co.uk/publicrealmworkshop/>

¹⁸ Peabody (2020) Playspace Workshop October 2020 [Online] Available from: <http://hollowayprisonconsultation.co.uk/play-workshop/>

RESIDENT FACILITIES

- 3.1.44 The development proposes commercial areas, which are being secured through this planning application as flexible Class E space. As a result, these spaces could come forward as a wide range of uses which would ensure that there could be uses catered for all user groups, ensuring that the spaces can be proactively used to foster positive relations across the community and with persons from different backgrounds, including those with protected characteristics.

ACCESS TO EMPLOYMENT OPPORTUNITIES

- 3.1.45 The proposed development includes the provision of commercial facilities under Use Class E (flexible commercial floorspace), along with employment supported by the Extra Care units, the Women's Building and concierge services.
- 3.1.46 The baseline identified that 9.7% of the LSOA residents in the immediate neighbourhood to the site were unemployed. Additional opportunities to employment in the local area will therefore be beneficial. This will transcend across groups, however will be of most notable impact to persons considered 'across groups', being those who are BAME (belonging to the race protected group) or whom are disabled, as the baseline identified that they were most likely to be of low socio-economic status.
- 3.1.47 The benefits of the new employment to be generated at the site are described in more detail within the ES chapter on socio-economic effects.

ACCESS TO SOCIAL INFRASTRUCTURE

- 3.1.48 Whilst a prison may be considered a form of 'social infrastructure', the groups of people it services are not the general population. As a result, the prison and the library and medical facilities it previously hosted, do not constitute a loss of social infrastructure to residents in the local area.
- 3.1.49 Conversely, the proposed redevelopment will provide beneficial new social infrastructure facilities including the new Women's Building which will have benefits to the protected characteristic of gender. The facility incorporates safe space to support women in the criminal justice system and services for women, who may be vulnerable. Internally, the Women's Building has been designed flexibly to enable the space to meet the needs of future operators. Indicative internal layouts are shown in the Design and Access Statement, which accompanies this application submission. The Women's Building is served by a dedicated and secure garden.

TRANSPORT & CONNECTIVITY

- 3.1.50 The site is currently connected by bus routes along Parkhurst Road, with the main bus stop labelled 'Hillmarton Road' serviced by three bus routes during both the day and night timetables (29/N29 to Wood Green, 253/N253 to Hackney and N219 to Waltham Cross). In addition to this, the site is in walking distance to London Underground and National Rail stations including:
- Holloway Road (Piccadilly Line, 1.2km);
 - Tufnell Park (Northern Line, 1.4km);
 - Kentish Town (Northern Line and National Rail services, 1.5km); and
 - Finsbury Park (Piccadilly and Victoria Lines, along with National Rail services, 1.8km).
- 3.1.51 The proposed redevelopment will not have any impact upon the connectivity of the surrounding neighbourhood with these existing public transport networks. As a result, there will be no disproportionate impact upon any persons within a protected group.

- 3.1.52 The current site did have parking for staff members; however, this was never publicly accessible and therefore there will not be any loss of parking for residents nearby. This is further seen to not have an impact as the majority of residents in the local neighbourhood (68.2%) reported to not have access to a motor vehicle in 2011. This is likely to have increased since this date, given the number of car sharing platforms now available, coupled with other initiatives such as the introduction of the Ultra-Low Emissions Zone (ULEZ) in central London.
- 3.1.53 Furthermore, there will be no loss of designated disabled parking for existing residents in the local neighbourhood. Given this, the no net loss of parking in the local area will not have a detrimental impact upon the neighbourhood.
- 3.1.54 The new residential community is proposed to be a 'car-free' development. A permit restriction is to be secured in the S106 Agreement to prevent future occupants from obtaining a permit to park in the surrounding Controlled Parking Zone (CPZ), operated by the Council. Therefore, there will be no ability for new residents with cars to use existing car spaces on surrounding road network. This ensures that there will not be any decreases in the availability of spaces for existing residents who may need it for special uses – such as those with reduced mobility.
- 3.1.55 To mitigate this, the proposed redevelopment will include 30 blue badge accessible car spaces for disabled places. This will mean that those within the new development will benefit from a car space if they so require it, thereby reducing any impact which may have arisen to existing residents who currently have access to a disabled car parking space.
- 3.1.56 Additionally, the roads surrounding the site require parking permits for vehicles which therefore must be registered to Islington addresses. Given the conditions of the redevelopment being a 'car-free' development, this will mean that residents cannot be granted a car space on neighbouring streets if they were to reside at the new development. As a result, there will also likely not be any impacts to other residents in the accessibility to private vehicle transport. This will be secured through the Section 106 agreement for the scheme.
- 3.1.57 Further health benefits are also evident in the promotion of cycling as the main mode of transport for the site. Through improved facilities, this can enhance perceptions of safety and the user-friendliness of cycling. This benefits people across groups, especially people who are unable to drive and are comparatively less mobile such as the young/adolescence, and for those who have a low income and are unable to afford other private transport means.
- 3.1.58 Additional benefits relating to cycling are also evident in the integration of accessible bicycle parking spaces within the development with a total of 1,956 proposed. As demonstrated within the Transport Assessment prepared by Velocity, this will include three different types of bike stands which can be used by a wide variety of bicycles. This can include smaller bikes for children and also adaptive cycles which may be used by people with a disability. As noted within the Inclusive Design Strategy, a minimum of 5% of all cycle storage spaces in each plot will suit the needs of disabled cyclists.

- 3.1.59 Research has found that 75% of disabled cyclists report that they find cycling easier than walking¹⁹. In light of this, the provision of accessible bicycle storage options will be a further benefit to the promotion of cycling to disabled people. Correspondingly, a low-car development will also help to alleviate the effects of the site being dominated by vehicles and as such, improve confidence levels in the uptake of cycling.
- 3.1.60 Additional benefits to users of the site will be the provision of mobility scooter parking within the development, therefore accommodating disabled persons who may rely upon this as a dominant mode of transport.

OPPORTUNITIES FOR SOCIAL INTERACTION

- 3.1.61 The current site is bordered up and acts as an island within the local community. Residents who may live within the LSOA area are disconnected by the former Prison, which may discourage social interaction and can increase disengagement.
- 3.1.62 The opening up of the prison site through the redevelopment will be beneficial in enhancing the local area, along with becoming an inviting place for leisure and recreation purposes.
- 3.1.63 This could negatively impact persons within the disability and age protected groups. Often, persons who are elderly and have lived in a community for long periods of time may find it confronting and concerning that their local area is changing. This can also be experienced by people with neurodivergent and neurodegenerative conditions who may become unfamiliar with their surrounding environments.
- 3.1.64 This can be mitigated through the consultation phases of projects, which seek to inform the community of the development proposals, as has been done through the engagement undertaken by Peabody to date. It is then hoped that through this forewarning that carers and other support staff or family and friends can help to prepare these people for what could become disorientating.
- 3.1.65 Importantly, the designs of the redevelopment will encourage enhanced permeability throughout the local area. This will likely mean that whilst residents may be disoriented at first, this will eventually aid in their ability to access the site and services nearby (for example, reducing distances and walking times to public transport). Wayfinding will also be enhanced through accessible signage with an emphasis on the inclusion of both text and pictograms to assist people in finding their way around and through the new development. Pictograms are particularly for people with dyslexia and people who cannot read English. Further details on accessible signage are included within the Inclusive Design Strategy.
- 3.1.66 The site will also include the development of numerous open spaces, as listed in paragraph 3.1.31 above. Whilst these will offer beneficial opportunities for physical activity, they will also foster social interaction.
- 3.1.67 The provision of social housing will also seek to ensure that there is a diverse mix of persons from different backgrounds. In doing so, the new development can be a place that celebrates different

¹⁹ Wheels for Wellbeing (2018) 'Assessing the needs and experiences of Disabled cyclists' – annual survey [Online] Available from: <https://wheelsforwellbeing.org.uk/wp-content/uploads/2019/04/Survey-report-FINAL.pdf>

backgrounds, rather than becoming a site which is perceived to be a gated community, and one which can only be lived in or used by people with high incomes – as can be the case in many regeneration sites across London. Through this, those currently living in social and rented accommodation (as found to be the predominant type of tenure in the local neighbourhood) will likely be more inclined to mix and feel included within the proposed development, rather than as an alienated party on its outskirts.

- 3.1.68 In addition to this, all communal areas of residential buildings, will have finishes that assist people with visual impairments by providing sufficient visual contrast between key surfaces (floors, walls, ceilings and doors) and accessories (door handles, post-boxes, dwelling identification). The end user of the commercial units and the Women’s Building could also introduce these elements. As detailed within the Inclusive Design Strategy, this will minimise visual contrast where necessary to help to avoid the risk of confusion or discomfort for people who may have visual impairments. This will therefore seek to make the buildings more inclusive and able to accommodate a broader range of visitors and/or users.
- 3.1.69 Overall, the creation of a permeable site with increased public open space, enhanced connectivity and integration with the surrounding neighbourhood will likely be beneficial to all persons in the local area.

SUMMARY

- 3.1.70 The effects of the scheme across the themes identified have demonstrated that whilst no groups will be disproportionately impacted by the development, some benefits will be felt more intensely by some groups over others. These have been summarised within Table 3-1 below.



Table 3-1 – Equalities impacts across protected groups summary outcomes

	Construction impacts	Housing	Open space	Play space	Resident facilities	Access to employment opportunities	Access to social infrastructure	Transport connectivity	Opportunities for social interaction
Age	Minor negative	Major Positive	Major Positive	Major Positive	Neutral	Neutral	Neutral	Neutral	Major Positive
Disability	Minor negative	Major Positive	Major Positive	Major Positive	Neutral	Neutral	Neutral	Neutral	Major Positive
Gender (sex)	Neutral	Minor Positive	Minor Positive	Neutral	Neutral	Neutral	Minor Positive	Neutral	Minor Positive
Gender reassignment	Neutral	Minor Positive	Minor Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Minor Positive
Marriage and civil partnership	Neutral	Minor Positive	Minor Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Minor Positive
Pregnancy and maternity	Minor negative	Minor Positive	Major Positive	Major Positive	Neutral	Neutral	Neutral	Neutral	Major Positive
Race/ethnicity	Neutral	Minor Positive	Minor Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Minor Positive
Religion and belief, including non-belief	Neutral	Minor Positive	Minor Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Minor Positive
Sexual orientation	Neutral	Minor Positive	Minor Positive	Neutral	Neutral	Neutral	Neutral	Neutral	Minor Positive

4 IMPROVEMENT ACTION PLAN

- 4.1.1 The assessment undertaken in the previous chapter demonstrates that the redevelopment proposals for the site will be transformational to the current disused site and will deliver a series of positive benefits to the local neighbourhood. Whilst some minor negative impacts have been identified, these all relate to the construction period, which will be for a temporary period of time and is therefore not a permanent impact on protected groups.
- 4.1.2 Opportunities to further advance equality outcomes with respect to the construction phase have been detailed in Table 4-1 below. Through the consideration of these additional measures, the redevelopment proposals will further enhance the positive impact it is likely to have upon persons across all protected characteristics.
- 4.1.3 As the scheme progresses and the different phases are completed, the measures listed below should remain open to continuous review and further improvement.

Table 4-1 – Areas for improvement

Thematic area/phase	Opportunities to improve equality outcomes
Construction phase	<p>Ensure that any hoarding which extends beyond the current bordering of the site considers neighbourhood accessibility issues during the construction phase, particularly with regard to disabled people who may be traveling along the Camden/Parkhurst Road.</p> <p>Ensure that any additional construction consultation documentation is able to be provided in additional languages other than English, along with other alternative formats including large print and Braille where required.</p> <p>Ensure that construction timings for works are adhered to and that the Considerate Contractors Scheme is upheld to reduce amenity impacts to persons more likely to remain at home in neighbouring properties for longer periods of time. Ensure that any signage developed throughout the construction period is accessible (ie, through the use of infographics and pictograms where able) to assist with wayfinding.</p>

5 CONCLUSION

- 5.1.1 WSP has prepared this EqlA for the redevelopment of the former Holloway Prison site. This assessment has included a review of current baseline conditions with a focus on the immediate neighbourhood area referred to as the Islington 010E LSOA.
- 5.1.2 The baseline assessment highlighted evident deprivation and inequalities across the neighbourhood, along with issues existing across the ward, borough and greater London areas. This therefore demonstrated that it was highly likely that persons considered to have a protected characteristic as defined within Section 149 of the Equality Act 2010 were resident within the community.
- 5.1.3 The site currently hosts the former Holloway Prison site. In its operation and since its closure, the site has been bordered up to maintain high security measures. As a result, the site has not ever been used by the community and has remained inaccessible. Acting as a physical island, the redevelopment of the site and the introduction of a permeable mixed-use development will unsurprisingly be highly beneficial when compared to its current state and non-use by the surrounding community.
- 5.1.4 The EqlA assessed these impacts through considerations of the construction and operation of the development, along with a review of eight thematic areas including:
- Housing;
 - Open space;
 - Play space;
 - Resident facilities;
 - Access to employment opportunities;
 - Access to social infrastructure;
 - Transport connectivity; and
 - Opportunities for social interaction.
- 5.1.5 Through the assessment, it was found that the proposals would induce:
- 11 major positive impacts;
 - 20 minor positive impacts;
 - 47 neutral impacts; and
 - 3 minor negative impacts.
- 5.1.6 To further enhance these outcomes, additional opportunities for improvement were also detailed as part of this assessment and should be considered by relevant parties throughout the construction and of the Development. Through the implementation of these measures, it is anticipated that all minor negative impacts will be mitigated against, with the residual impacts being neutral.
- 5.1.7 Through this mitigation and given the context of the site and the proposals, the scheme is seen to be beneficial to persons with protected characteristics living within the local area. This builds upon other positive effects identified within the HIA and ES Chapter on socio-economic effects also prepared for this scheme.

Appendix A

POLICY GG1 – LONDON PLAN 2021



GG1 Building strong and inclusive communities

Good growth is inclusive growth. To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must:

- A encourage early and inclusive engagement with stakeholders, including local communities, in the development of proposals, policies and area-based strategies
- B seek to ensure changes to the physical environment to achieve an overall positive contribution to London
- C provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation
- D seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, more inclusive and more equal city
- E ensure that streets and public spaces are consistently planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging, which encourage community buy-in, and where communities can develop and thrive
- F promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for building relationships during the daytime, evening and night time
- G ensure that new buildings and the spaces they create are designed to reinforce or enhance the identity, legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements
- H support and promote the creation of a London where all Londoners, including children and young people, older people, disabled people, and people with young children, as well as people with other protected characteristics, can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation

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- I support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face.

Making the best use of land

- 1.2.1 London’s population is set to grow from 8.9 million today to around 10.8 million by 2041. As it does so, employment is expected to increase on average by 49,000 jobs each year, reaching 6.9 million over the same period. This rapid growth will bring many opportunities, but it will also lead to increasing and competing pressures on the use of space. To accommodate growth while protecting the Green Belt, and for this growth to happen in a way that improves the lives of existing and new Londoners, this Plan proposes more efficient uses of the city’s land.
- 1.2.2 The key to achieving this will be taking a rounded approach to the way neighbourhoods operate, making them work not only more space-efficiently but also better for the people who use them. This will mean creating places of higher density in appropriate locations to get more out of limited land, encouraging a mix of land uses, and co-locating different uses to provide communities with a wider range of services and amenities.
- 1.2.3 The benefits of this approach are wide-ranging, going well beyond the simple ability to provide more homes and jobs. High-density, mixed-use places support the clustering effect of businesses known as ‘agglomeration’, maximising job opportunities. They provide a critical mass of people to support the investment required to build the schools, health services, public transport and other infrastructure that neighbourhoods need to work. They are places where local amenities are within walking and cycling distance, and public transport options are available for longer trips, supporting good health, allowing strong communities to develop, and boosting the success of local businesses.
- 1.2.4 Making the best use of land means directing growth towards the most accessible and well-connected places, making the most efficient use of the existing and future public transport, walking and cycling networks. Integrating land use and transport in this way is essential not only to achieving the Mayor’s target for 80 per cent of all journeys to be made by walking, cycling and public

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