

Prison Reform Trust response to Islington Council consultation 'Holloway Prison - draft Supplementary Planning Document'

The Prison Reform Trust (PRT) is an independent UK charity working to create a just, humane and effective penal system. We do this by inquiring into the workings of the system; informing prisoners, staff and the wider public; and by influencing Parliament, government and officials towards reform.

The Prison Reform Trust's main objectives are:

- reducing unnecessary imprisonment and promoting community solutions to crime;
- improving treatment and conditions for prisoners and their families.

Between 2012-15 the Prison Reform Trust (PRT) ran a 3-year programme to reduce women's imprisonment, supported by the Pilgrim Trust. Following a major grant from the Big Lottery Fund, PRT has renewed its drive to reduce women's imprisonment with a UK-wide programme, 'Transforming Lives: reducing women's imprisonment', running from 2015-18. <http://www.prisonreformtrust.org.uk/ProjectsResearch/Women>

Introduction

In 2014, PRT held a high-level roundtable at HMP Holloway about the need to reduce women's imprisonment in London, hosted by the prison governor and attended by the Chief Executive of Islington BC as well as senior MOPAC and Ministry of Justice officials. At the time, HMP Holloway was not slated for closure, and was recognised as a 'last resort' for many women in London who had previously been failed by public services. The need for improved community based support and affordable accommodation for women with multiple and /or complex needs in North London, including Islington, was a key finding. When closure was announced, Prison Reform Trust quickly developed a proposal to retain the Visitor's Centre (which had been refurbished with charitable funds) as a Women's Centre, and this garnered considerable support. Further information about these initiatives is available on the website.

The Prison Reform Trust welcomes the publication of the draft Supplementary Planning Document (SPD) setting out planning guidance for the HMP Holloway site. We recognise that the sale and development of the HMP Holloway site will require a careful balance between the legitimate need to recoup maximum value for the tax payer, ensure adequate provision of social housing and satisfy the planning objectives set out in the Local Plan for the London Borough of Islington.

Our central concern is that the planning process should not lose sight of the history of HMP Holloway as both the first women-only prison in the country and the biggest women's jail in Western Europe. Its closure should be a matter for celebration, but only if its legacy includes a modern and humane facility that will contribute to eliminating the disadvantage, abuse and discrimination that can lead women into crime and ultimately to prison.

In our submission therefore we focus on the pressing need to ensure that the redevelopment of the HMP Holloway site delivers effective, alternative community provision for vulnerable women, including those in contact with the criminal justice system.

1. **Objectives (Section 3 of the draft Supplementary Planning Document)** Do you agree with the objectives that have been identified for the site and that form the basis for the draft planning guidance?

We strongly support the statement of objectives set out in the Supplementary Planning Document and the recognition of the value 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.

This should create a clear expectation that the development of the HMP Holloway site will include community provision for women, ideally in the form of a women's centre, providing a mix of universal and targeted services for women, including those at risk of entering the criminal justice system. Provision that supports women with their caring responsibilities, particularly for dependent children, and addresses unmet needs for mental and physical health care is badly needed in this part of London. The opportunity exists to make a radical improvement in the services offered to a highly vulnerable group of women and the planning process offers a focal point for Islington London Borough Council, MOPAC, NHS London, the Metropolitan Police, London Community Rehabilitation Company and National Probation Service, to work with women's voluntary organisations to deliver a step change in women's justice in North London. There is significant local interest in the development of the HMP Holloway site and a recent [Robertson Trust discussion paper](#) provides useful insights into how local people can be engaged in the development and design of a new women's space.

2. Uses (Section 4 of the draft Supplementary Planning Document) To what extent do you agree with the following uses in the document that have been identified for the site:

We welcome and commend Islington Council for recognising that the existing land-use of the site, as a prison, should be considered a community use, part of the social infrastructure of the borough and London.

We also strongly support the conclusion that *'the purposeful location of a number of women's services into one building would be beneficial in assisting and enabling the rehabilitation and integration of hard to reach groups of women beyond those in the criminal justice system; including those that are vulnerable, homeless, and those that fall between services and agencies'*.

Our analysis suggests that the closure of HMP Holloway and the commitments set out in the government White Paper on Prison Safety and Reform together have significant implications for services in Islington and London as a whole. With the closure of HMP Holloway there is a pressing need for alternative community use in Islington that reflects the ethnic diversity of the local population and the high proportion of specialist women's services found in Islington, including those that support vulnerable foreign national and trafficked women. We have proposed that a percentage of the proceeds from the sale of the Holloway site must be reinvested in community services, ideally a women's centre providing a mix of universal and targeted services to vulnerable women, including those at risk of entering the criminal justice system.

PRT considers that there is sound evidence in favour of the women's centre model, ideally with provision of supported accommodation for women with and without children, and there are three main reasons for including this in the planning brief:

- a) The legacy argument: The closure of HMP Holloway sends a clear message to the courts that prison is not the place for vulnerable women who have committed low-level, non-violent offences and who have so often been victims of domestic violence and sexual abuse themselves. To secure a genuine legacy for the site, for staff and the women who were held at HMP Holloway, it is essential that those words are followed up with meaningful investment in women's services. As one senior figure at HMP Holloway put it a women's centre on the site 'would give us all heart' and offers a once in a generation opportunity for the government to realise its longstanding commitment to improve treatment of women in the criminal justice system.
- b) The justice re-investment argument: Most of the solutions to women's offending lie outside prison walls in treatment for addictions and mental health problems, protection from domestic violence and coercive relationships, secure housing, debt and financial management, employment, education and skills development. The average cost of keeping a woman in HMP Holloway for one year was in the region of £38k. In contrast, the average cost of a community order is £2,800 and approximately £1,500 for support in a women's centre. HMP Holloway is expected to generate a significant sale value and it would require only a small reinvestment of these proceeds to deliver effective community alternatives

that enable women to take control of their lives, care for their children and address the causes of their offending.

- c) The operational argument: If the government is successful in reducing the women's prison population and making greater use of non-custodial alternatives in London, there will be a pressing need for improved options in the community that command the confidence of the courts. At present these services do not operate at this scale in North East London, and custodial sentences result in London women being sent to prison further away from their homes with all the negative outcomes that follow. Our initial analysis of the Holloway prison population suggests that a women's centre in North East London offering holistic services would contribute to reducing the number of women on remand, those serving very short sentences (particularly for those serving sentences of under three months) and increased use of electronic monitoring for those serving 1-4 years – together small shifts in these areas would fundamentally alter the criminal justice landscape for women in London.

3. **Other comments**: Please use the space below for any other comments on the draft document, in particular the sections on site history (section 1), context (section 2), design (section 5) and delivery (section 6).

Design

We are disappointed by the Ministry of Justice statement that their primary objectives for the disposal of the site are a) the maximisation of capital receipt to help fund improvements to the prison estate elsewhere and b) the maximisation of housing potential for the site to support the Government's Public Land for Housing Programme. PRT had constructive discussions with the MoJ following announcement of HMP Holloway's closure about the Visitors Centre and the need for women's services on the site. We understood from a number of comments made by Government Ministers that the Ministry of Justice supported the provision of a women's centre as part of the redevelopment.

We believe that the development of the HMP Holloway site should reflect the need for improved accommodation options for women in London. It is relevant in this context to note the recent Supreme Court ruling in the case of *R v Coll* [2017] that the lack of Approved Premises (APs) for women in London constitutes sex discrimination. Living in APs may be made a condition of release on licence for certain prisoners. The Supreme Court noted that the Ministry of Justice has never properly addressed the problem of providing sufficient and suitable places in APs for women which achieve, so far as practicable, the policy of placing them as close to home as possible. In the absence of any attempt by the Ministry of Justice to address the possible impact upon women, assess whether there is a disadvantage, how significant it is and what might be done to mitigate it or to meet the particular circumstances of women, the Supreme Court found that the discrimination in the present system had not been justified.

Delivery

We strongly support the conclusion that *'given the length of time that the planning and development process may take meanwhile (temporary) uses on the site prior to and, where appropriate, during implementation are strongly encouraged. This could include the temporary use of the buildings such as the visitors centre for community use and/or events and temporary use of spaces for public amenity'*. It has been reported that the Ministry of Justice spent more than £137,000 in just six months on utility bills for an empty building since the closure of HMP Holloway. This simply does not represent value for money for taxpayers in London and we regret the missed opportunities to deliver much needed services for women from the visitors centre at HMP Holloway. There are advantages to staggering the development of the site as follows:

- Short-term: It is likely that the sale of HMP Holloway and subsequent clearing of the site will take a considerable period of time. While this is undertaken PRT proposes that the visitors' centre is retained in the short term and adapted to provide much needed gender-specific services for women in North East London. Reflecting wider learning from the Manchester 'whole systems approach', the IOM Cymru Women's Pathfinder, and recent MOJ 'whole systems' grant funding, this Centre could receive voluntary admissions, police referrals at the point of arrest, community orders and those on licence following their release from prison.

- Medium-term: We propose that the visitors' centre, which is already physically split off from the main prison estate by an entry road through the site, is hived off and re-developed with a requirement that it includes adequate community use for women. We understand that housing in this part of the London Borough of Islington is dense and new developments tend to be 8-10 floors in height. Separating off the visitors' centre site would allow for the site to be sold and developed as a distinct mixed use development incorporating a women's centre, sheltered accommodation and social housing for women on the upper floors.
- Long-term: While the sale and development of the site is undertaken, it would be necessary to find an interim site for the 2-3 years that the site is being developed. On completion of the new facility a range of public sector and voluntary sector organisations would migrate into the new purpose-built building providing a range of gender-informed criminal justice, health and social care interventions.

As an organisation that has engaged over many years with women who passed through the gates of HMP Holloway, and with the Governors and staff and others involved in the prison, PRT is aware of the national as well as the local significance of the prison closure and redevelopment of the site. We look forward to supporting the delivery of a positive outcome for women in London affected by the criminal justice system.

4. Contact details

For further information please contact

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