

# Croydon Council

## Equality Analysis Form

### Stage 1 Initial Risk Assessment - Decide whether a full equality analysis is needed

At this stage, you will review existing information such as national or local research, surveys, feedback from customers, monitoring information and also use the local knowledge that you, your team and staff delivering a service have to identify if the proposed change could affect service users from equality groups that share a “protected characteristic” differently. You will also need to assess if the proposed change will have a broader impact in relation to promoting social inclusion, community cohesion and integration and opportunities to deliver “social value”.

Please note that the term ‘change’ is used here as shorthand for what requires an equality analysis. In practice, the term “change” needs to be understood broadly to embrace the following:

- Policies, strategies and plans
- Projects and programmes
- Commissioning (including re-commissioning and de-commissioning)
- Service Review
- Budgets
- Staff structures (including outsourcing)
- Business transformation programmes
- Organisational change programmes
- Processes (for example thresholds, eligibility, entitlements, and access criteria)

You will also have to consider whether the proposed change will promote equality of opportunity; eliminate discrimination or foster good relations between different groups or lead to inequality and disadvantage. These are the requirements that are set out in the Equality Act 2010.

#### 1.1 Analysing the proposed change

##### 1.1.1 What is the name of the change?

A partial review of the Croydon Local Plan: Strategic Policies with changes to the following policies:

SP2- Homes  
SP3- Employment  
SP4- Urban Design and Local Character  
SP5- Community Facilities  
SP6- Environment and Climate Change  
SP7-Green Grid  
SP8- Transport and Communication

##### 1.1.2 Why are you carrying out this change?

Please describe the broad aims and objectives of the change. For example, why are you considering a change to a policy or cutting a service etc.

The Croydon Local Plan: Strategic Policies was adopted in April 2013. A partial review of the Strategic Policies is required to take account of the Further Alterations to the London Plan (FALP). The FALP has increased Croydon’s housing requirement from 1,330 homes per annum to 1,435 homes per annum. As a result, a review of policy SP2: Homes is required to take account of updated evidence on the need for homes, affordable housing and additional pitches for the gypsy and traveller community. Changes are

proposed to SP3, SP4 and SP5 in light of updated evidence on employment site designations, a move from Local Areas of Special Character to Local Heritage Areas and the protection given to community facilities. Changes to SP6: Environment Climate Change have been made in light of the FALP and National Housing Standards. Changes to SP7 include amendments to Green Grid designations from Metropolitan Green Belt to Metropolitan Open Land, additions to the Metropolitan Green Belt, and De-designation of Metropolitan Open Land in Shirley Oaks as it does not meet the criteria for designation. Changes to SP8: Transport and Communication are in light of planned transport infrastructure projects and improvements.

**1.1.3 What stage is your change at now?**

See Appendix 1 for the main stages at which equality analyses needs to be started or updated. In many instances, an equality assessment will be started when a report is being written for Cabinet or Committee. If that report recommends that a proposed change takes place, the same equality assessment can be updated to track equality impacts as it progresses.

The Croydon Local Plan: Strategic Policies Partial Review (Preferred and Alternative Options) was consulted on from 6 November 2015 to 18 December 2015, post Cabinet on 21 September 2015. The draft Croydon Local Plan: Strategic Policies – Partial Review (Proposed Submission) takes into consideration the responses to the November 2015 consultation on the Strategic Policies – Partial Review.

**Please note that an equality analysis must be completed before any decisions are made. If you are not at the beginning stage of your decision making process, you must inform your Director that you have not yet completed an equality analysis.**

**1.2 Who could be affected by the change and how**

**1.2.1 Who are your internal and external stakeholders?**

For example, groups of council staff, members, groups of service users, service providers, trade unions, community groups and the wider community.

The wider community, including residents, visitors, developers and those who work within the borough of Croydon.

**1.2.2 What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders?**

The partial review of the Croydon Local Plan: Strategic Policies Partial Review will result in an up to date Local Plan. It will ensure the borough addresses its housing need, provides local employment opportunities, provides community facilities and improves accessibility through planned transport and infrastructure projects, and has its green space correctly designated to enable its protection from inappropriate development.

**1.2.3 Does your proposed change relate to a service area where there are known or potential equalities issues?**

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. If you don't know, you may be able to find more information on the Croydon Observatory (<http://www.croydonobservatory.org/>)

Yes, equalities issues relate to:

- Ensuring access to affordable housing and reducing deprivation, homelessness and overcrowding.
- Creating and protecting local education and employment opportunities which can be accessed by all residents.
- Ensuring the provision and protection of community facilities and associated local services which are accessible to all residents.

- Ensuring the continued protection of Croydon's open spaces that service the local community and Metropolitan Open Land, and that they are accessible to all.

**1.2.4 Does your proposed change relate to a service area where there are already local or national equality indicators?**

You can find out from the Equality Strategy <http://intranet.croydon.net/corpdept/equalities-cohesion/equalities/docs/equalitiesstrategy12-16.pdf>). Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

Yes, the proposed change relates to a service area where there are already local equality indicators. It relates to a number of strategic priorities in the council's Equality and Inclusion Policy as listed below:

- Make Croydon a place of opportunity and fairness by tackling inequality, disadvantage and exclusion
- Encourage local people to be independent and resilience by providing responsive and accessible services offering excellent customer care

**1.2.5 Analyse and identify the likely advantage or disadvantage associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a "protected characteristic"**

Please see Appendix 2 (section 1) for a full description of groups.

	<b>Likely Advantage</b> 😊	<b>Likely Disadvantage</b> ☹️
Disability	<p>Meeting Croydon's housing need should increase the number of Lifetime Homes and the number of homes which are wheelchair accessible.</p> <p>Planned infrastructure projects and improved public transport will offer greater access to employment opportunities, local services and community facilities.</p>	<p>Population projections show a significant growth in the number of households with disabilities over the lifetime of the Plan. Excluding care homes from the community facilities definition will mean care homes are no longer protected from redevelopment for other uses. While there is currently an oversupply of residential care houses, there is a potential risk that the supply of residential care houses may not meet increasing demand for people with disabilities in future.</p>
Race/ Ethnicity	<p>Black ethnic minority groups have a requirement for larger homes and are more likely to live in overcrowded housing. They are also less likely to be owner occupiers. Meeting Croydon's housing need should reduce the number of families in overcrowded homes, increase the number of houses with three or more bedrooms and provide a greater amount of affordable housing.</p> <p>The partial review responds to updated evidence for additional pitches to provide for Gypsy and Traveller accommodation. The changes will ensure the Plan addresses the needs of gypsies and travellers in future site allocations.</p>	N/A
Gender	<p>Lower wages and part-time work mean women can have difficulty in</p>	N/A

	<p>accessing affordable housing with more reliance on social housing. Increased requirements for affordable housing, particularly social rent, can improve women's access to suitable housing. Single parents also often rely on social housing and are less likely to be owner occupiers and live in overcrowded housing. Meeting Croydon's housing need is likely to reduce the number of families living in overcrowded housing.</p> <p>As women often have responsibility for domestic work and parental care, they are more likely to work closer to home and/or in part-time employment. Protecting existing office stock in the Opportunity Area and protecting industrial and employment uses offers local employment opportunities. The designation of Neighbourhood Centres and the focus on the provision of community facilities can assist in balancing women's role in domestic work and paid employment.</p> <p>Women are less likely to have access to a car and rely more on public transport. Planned infrastructure projects and improved public transport offer greater access to employment opportunities, local services and community facilities.</p>	
Transgender	N/A	N/A
Age	<p>Young people often have difficulty in accessing housing due to lower incomes and difficulties in securing mortgages. Meeting Croydon's housing need and increasing the number of affordable homes and starter homes will give young people more opportunities to access suitable housing and live independently.</p> <p>Protecting existing office stock in the Opportunity Area and protecting industrial and employment uses offers local education, skills training and employment opportunities for young people.</p> <p>Single pensioners have a high demand for affordable housing, particularly social rent. Meeting Croydon's housing need and increasing the amount of affordable</p>	<p>Older people have requirements for specialised types of housing. While there is currently an oversupply of residential care houses, removing them from the definition of community facility would mean that they are no longer protected from redevelopment for other uses. There is a potential risk that removing this protection means the supply of residential care houses may not meet increasing demand for people with disabilities in future.</p>

	<p>housing will mean older people have access to suitable housing. It will also increase the number of Lifetime Homes.</p> <p>An increase in the housing stock available would increase choice, and may help encourage downsizing of housing types for older generations, freeing up larger homes for young families.</p> <p>Planned infrastructure projects and improved public transport offer greater access to employment opportunities, local services and community facilities for older people and young people who are less likely to have access to private transport.</p>	
Religion /Belief	The identification and designation of Neighbourhood Centres offers greater opportunities for the provision of community facilities. This will improve access to facilities for faith groups.	N/A
Sexual Orientation	The identification and designation of Neighbourhood Centres offers greater opportunities for the provision of community facilities. This will improve access to facilities for sexual orientation groups.	N/A
Social inclusion issues	An increase in affordable housing and a requirement for a mix of housing by type and tenure offers opportunities for all groups to access suitable housing, particularly young people, women, single parents and older people. Protecting offices and industrial and employment uses ensures that local employment, education, and skills training is available in the borough for all groups.	N/A
Community Cohesion Issues	An increase in affordable housing requirements in residential development increases community cohesion by creating mixed communities, and enhancing social interaction between different ethnicities, religion, gender, race and other protected groups. Residents from different groups would also have increased access to a variety of housing options which are suitable for their diverse needs. The designation of neighbourhood centres and the opportunity for a greater provision of community facilities offers different groups and communities access to the same local facilities and services.	N/A

	Further, the protection of public houses as community facilities retains and expands the opportunities for more local community facilities, social interaction and cohesion.	
Delivering Social Value	The proposed changes to the Croydon Local Plan: Strategic Policies delivers social value by ensuring the borough meets its housing need. This provides social benefits such as improving health and wellbeing through reduced overcrowding and ensuring that all residents have access to suitable housing. It provides economic benefits by protecting the borough's employment uses to ensure local employment, education and skills training opportunities. An improvement to public transport offers social and environmental benefits by improving access to services for all groups and also reducing car use in the borough, improving air quality, thus health and wellbeing.	N/A

<b>1.2.6</b>	<b>In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider?</b>
	For example, geographical / area based issues, strengths or weaknesses in partnership working, programme planning or policy implementation.

In 2011 the borough ranked as the 14<sup>th</sup> least deprived borough in London (out of 33 authorities). Deprivation levels, however, differ greatly, with greater concentrations in the north of the borough and in the places of Addington and an area of Shirley. The Victorian and Edwardian areas of the borough suffer from deprivation as do some of the inter and post-war local authority built housing estates. In general the south and east of the borough incorporate some of the least deprived areas of London. Due to differences in characteristics and the inequalities that exist in each area, the changes to the strategic policies may impact some geographic areas more than others. In general, the changes need to benefit all residents across the borough by reducing social, economic and environmental deprivation, consider measures to reduce unemployment, improve skills and education, community and environmental conditions and renew housing.

The implementation of policy SP2: Homes, in particular the equality and inclusion outcomes relating to access to affordable housing, is dependent on a range of factors including local housing market conditions, viability of development sites, as well as rent setting and restructuring for social housing, and incomes.

In the Croydon Local Plan: Strategic Policies, "affordable housing" is defined as:

*Affordable housing is housing that is provided to meet the housing needs of households whose needs are not met by the private market. It can either be social rented housing, affordable rented housing or intermediate affordable housing.*

*Social rented housing is rented housing owned and managed by local authorities and registered providers of social housing, for which guideline target rents are determined through the national rent regime, and which is made available to eligible households nominated by the Council.*

*Affordable rented housing is rented housing provided by registered providers of social housing which is similar to social rented housing except that it is outside the national rent regime, but is subject to other rent*

controls that require it to be offered to eligible households at a rent of up to 80 per cent of local market rents.

*Intermediate affordable housing is housing at prices and rents above those of social rent but below market price or rents, and which meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices and include provisions for the home to be retained for future eligible households or for any subsidy to be recycled for alternative affordable housing provision. These can include shared equity and shared ownership homes for sale, and intermediate rent, but does not include affordable rented housing.*

**1.2.7 Would your proposed change affect any protected groups more significantly than non-protected groups?**

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix.....

Yes, while there is currently an oversupply of residential care houses, removing them from the definition of community facility would mean that residential care houses are no longer protected from redevelopment for other uses. There is a potential risk that the supply of residential care houses may not meet increasing demand for people with disabilities in future.

**1.2.8 As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who do not?**

*In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes etc.*

**Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response**

Yes, the proposed changes to the Strategic Policies are likely to help the Council in advancing equality of opportunity by ensuring that all residents in the borough have access to suitable, adequate and affordable housing, local employment, local services and community facilities. The provision of additional pitches for gypsies and travellers is considered to be targeted work undertaken to address the needs of an ethnic minority group who has faced historic disadvantage, in part, by means of lack of opportunities and/or provision for appropriate facilities. The change would assist Council to advance equality by providing them with facilities to meet their needs, and by reducing instances of camping in unauthorised areas.

**1.2.9 As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic?**

*In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act*

**Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.**

Don't know, unsure whether any of the proposed changes to the strategic policies are likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation of those groups which share a protected characteristic. However, identifying site location criteria for additional sites for gypsy and traveller pitches (that are not allocated) may ultimately allow sites to come forward in future and

may reduce some unlawful encampment, which assists Council to eliminate unlawful discrimination and may assist with social cohesion.

**1.2.10 As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?**

*In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation etc.*

**Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response**

Yes, the proposed changes will help the Council in fostering good relations between people who belong to any protected groups and those who do not by facilitating a diverse mix of communities with housing of different types, size and tenure and ensuring that all residents have access to suitable community facilities and local services. However, recent consultation highlighted that many are adverse to a growth in housing of different types, size and tenure in their community, in particular the provision of accommodation for gypsies and travellers.

### 1.3 Decision on the equality analysis

**If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different / significant impact on groups that share a protected characteristic (compared to non-protected groups) or because you don't know whether it will (and it might).**

Decision	Guidance	Response
<b>No, further equality analysis is not required</b>	<p>Please state why not and outline the information that you used to make this decision. Statements such as 'no relevance to equality' (without any supporting information) or 'no information is available' could leave the council vulnerable to legal challenge.</p> <p><b>You must include this statement in any report used in decision making, such as a Cabinet report</b></p>	
<b>Yes, further equality analysis is required</b>	<p>Please state why and outline the information that you used to make this decision. Also indicate</p> <ul style="list-style-type: none"> <li>• When you expect to start your full equality analysis</li> <li>• The deadline by which it needs to be completed (for example, the date of submission to Cabinet)</li> <li>• Where and when you expect to publish this analysis (for example, on the council website).</li> </ul> <p><b>You must include this statement in any report used in decision making, such as a Cabinet report.</b></p>	<p>Further equality analysis is required of the Croydon Local Plan: Strategic Policies - Partial Review as it has been identified that some of the changes will impact on groups which share a protected characteristic. The impact of some of the changes is also not known. A full equality analysis will take place in early 2016 to accompany the Proposed Submission version of the Croydon Local Plan: Strategic Policies Partial Review.</p>



Decision	Guidance	Response
Officers that must approve this decision	Name and position	Date
Report author	Dominique Barnett (Project Officer) Jaimee Semmens (Project Officer)	27/08/2015 (updated 8/6/2016)
Director	Heather Cheesborough (Director of Planning & Strategic Transport)	16/06/2016

#### 1.4 Feedback on Equality Analysis (Stage 1)

Please seek feedback from the corporate equality and inclusion team and your departmental lead for equality (the Strategy and Planning Manager / Officer)

Name of Officer	David Claydon	
Date received by Officer	06/06/2016	Please send an acknowledgement
Should a full equality analysis be carried out?	Yes. It has been identified that some of the changes will impact on groups which share a protected characteristic. A full analysis needs to be undertaken to assess the impact and take mitigating actions where required.	Note the reasons for your decision

#### Stage 2 Use of evidence and consultation to identify and analyse the impact of the change

##### Use of data, research and consultation to identify and analyse the probable Impact of the proposed change

This stage focuses on the use of existing data, research, consultation, satisfaction surveys and monitoring data to predict the likely impact of proposed change on customers from diverse communities or groups that may share a protected characteristic.

Please see Appendix 2 (section 2) for further information.

2.1	<p>Please list the documents that you have considered as a part of the equality analysis review to enable a reasonable assessment of the impact to be made and summarise the key findings.</p> <p>This section should include consultation data and desk top research (both local and national quantitative and qualitative data) and a summary of the key findings.</p>
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The following documents and data have been used to help inform this Equality Analysis:

##### DOCUMENTS REVIEWED

##### Croydon's Community Strategy 2016-2021

The overall aim of the Community Strategy is to deliver the benefits of growth and regeneration to local

people and ensure that no one is left behind. The strategy brings together the outcomes and priorities of the main partner agencies in Croydon and focuses on developing Croydon into:

- A great place to learn, work and live, where Council will deliver new jobs and new homes for its residents, enable its local economy to grow, develop an exciting cultural offer and evening economy, in a safe and pleasant environment.
- A place of opportunity for everyone, where Council will tackle poverty and deprivation, prevent homelessness, and support children, families and individuals to achieve their full potential and live a long healthy life.
- A place with a vibrant and connected community and voluntary sector, where we will enable and empower our communities to connect and collaborate in developing community-led responses to the many challenges we face.

The Strategy was developed in consultation and engagement with Council's themed partnerships, and through the Croydon congress which brings together key stakeholders twice a year to discuss important emerging issues. The consultation findings were informed by a wide range of data presented in the borough profile that helped Council to understand how the borough is changing and the challenges and opportunities these changes present.

Two key themes that inform the Strategy which are relevant to the Equality Analysis of the Croydon Local Plan: Strategic Policies (Partial Review) are:

- Finding homes for all: support for tenants; promoting lodging; maximising use of land, more tenure options in New Addington and Fieldway; social impact bonds to tackle homelessness.
- Supporting residents towards better times: supporting small businesses; improving work experience and job opportunities; supporting long term sick and disabled people return to work; reducing debt and increasing financial security; and encouraging more childcare options.

The Strategic Objectives of the Croydon Local Plan: Strategic Policies (Partial Review) are consistent with the priorities and key themes of the Strategy, in particular:

Strategic Objective 3: *"Provide a choice of housing for people at all stages of life"*

Strategic Objective 4: *"To reduce social, economic and environmental deprivation, particularly where it is spatially concentrated, by taking priority measures to reduce unemployment, improve skills and education and renew housing, community and environmental conditions"*.

Strategic Objective 7: *"Conserve and create spaces and buildings that foster safe, healthy and cohesive communities"*.

### **Croydon's Equality Policy (2016-2020)**

The Equality Policy 2016-20 sets out the Council's commitment to equality and its ambition to create a stronger, fairer borough where no community is held back. The policy is supported by the new equality objectives set out in the Opportunity and Fairness Plan 2016-2020 that sets out the statutory equality objectives in line with the specific duties in Regulations made under the Equality Act 2010. Both documents aim to create a place where people share a sense of belonging, are united by a sense of shared values and are able to lead fulfilling lives through access to fair and equal opportunities and life chances.

The proposed equality objectives for 2016-20 focus on tackling disadvantage and differences in outcomes in relation to service access and delivery, satisfaction with services, opportunities for employment and community trust and confidence that certain groups of people face due to their socio-economic circumstances. In particular to:

- Increase the rate of employment for disabled people, young people, over 50s and lone parents who are furthest away from the job market
- Increase the support offered to people who find themselves in a position where they are accepted as homeless especially those from BME backgrounds and women
- Reduce the rate of child poverty especially in the six most deprived wards
- Improve attainment levels for white working class and Black Caribbean heritages, those in receipt of Free School Meals and Looked After Children, particularly at Key Stage 2
- Increase the percentage of domestic violence sanctions
- Increase the reporting and detection of the child sexual offences monitored
- Reduce the number of young people who enter the youth justice system
- Reduce social isolation among disabled people and older people

- Improve the proportion of people from different backgrounds who get on well together
- Reduce differences in life expectancy between communities

The above objectives have been considered in the Equality Analysis set out in in Section 2.2.

## **DATA REVIEWED**

A summary of the demographic situation for each of the groups with a protected characteristic is provided below. This provides a starting point for the analysis of likely impacts of the Croydon Local Plan: Strategic Policies Partial Review on these groups. Data used includes the 2011 Census, statistics sourced from the Strategic Partnership Croydon – Borough Profile 2015, Annual Population Survey April 2012-2013, the Department for Work and Pensions, the Department of Health, Transport for London (Technical Notes) as well as data sourced from the Croydon Observatory.

Evidence supporting the Croydon Local Plan: Strategic Policies Partial Review has also been reviewed. Relevant data sourced from evidence documents (e.g. Strategic Housing Market Assessment (2015), Croydon Gypsy and Traveller Accommodation Needs Assessment (2013)) is also included in the summaries below.

### **Croydon population and deprivation**

- Croydon's population is growing. The borough is home to 380,700 people and is expected to reach 465,600 in 2041.
- According to the 2011 Census, 60.1% of all Croydon households were owner occupied, 22.1% were private rented or rent free households and 17.8% were households living in social housing. These proportions are identical to those seen across the Outer London boroughs. Across London as a whole, owner occupation is lower, with the rental (social and private) considerably higher.
- Croydon has the largest number of housing stock compared to other London boroughs, but its social housing stock is smaller than many other London boroughs. Social housing in Croydon is mainly concentrated in the north and the eastern edge of the borough. According to the 2011 Census, the wards of Fieldway and New Addington had the highest proportions of social housing (council homes and other) with 60.6% and 42.2%.
- The percentage of 1 bedroom properties in Croydon is 17%, 29% having two bedrooms, 37% have 3 bedrooms, 13% have 4 bedrooms, and 4% have 5 or more bedrooms. These figures are similar to those seen across the outer boroughs<sup>1</sup>, but they show a greater proportion of 1 and 2 bedroom properties than the national average and fewer larger properties.
- In 2013, overall 72% of residents agreed that their local area is a place where people from different backgrounds get on well together, while 69% strongly feel that they belong to their local neighbourhood. Residents in the south (the more affluent areas) are more likely to say they get on with the people in their community and are satisfied with where they live, while those living in the north of the borough (in higher areas of deprivation) are least likely to agree.
- Between 2010 and 2015, Croydon became relatively more deprived compared to other local authorities in England between 2010 and 2015.
- In 2015, Croydon was the 19<sup>th</sup> most deprived district authority in the country for barriers to housing and services.
- In 2015, Croydon was within the bottom third (220<sup>th</sup> most deprived authority out of 336 district authorities) for the education, skills and training domain.
- Between 2001 and 2011 the 4 northern wards of Waddon, Broad Green, Selhurst and Norbury saw an increase in population of more than 19% whereas Selsdon and Ballards in the south saw a slight decrease of 1.4%. Deprivation levels in the different wards differ greatly however, in general, greater population increase has been experienced in the areas with greater concentrations of deprivation. In general the south and east of the borough incorporate some of the least deprived areas of London.
- Overall, life expectancy is increasing but the life expectancy gap between the most deprived areas in Croydon and the least deprived is 9.5 years for men and 5.8 years for women. There are significant differences in preventable deaths between the most and least deprived areas in

<sup>1</sup> The definition of Outer London boroughs taken from Census 2011 includes: Barking and Dagenham, Barnet, Bexley, Brent, Bromley, Croydon, Ealing, Enfield, Greenwich, Harrow, Havering, Hillingdon, Hounslow, Kingston upon Thames, Merton, Redbridge, Richmond upon Thames, Sutton, Waltham Forest.

Croydon, with circulatory diseases, cancers and respiratory diseases causing the majority of deaths in deprived areas. Many of these diseases are related to unhealthy lifestyles and socio-economic circumstances such as child poverty.

- In 2015, the proportion of people claiming job seekers allowance in Croydon was above the regional and national averages.
- In 2015, Croydon remained one of the most affordable areas to live in London both to buy and to rent. However, the number of homeless households in temporary accommodation remains high, and the number of homeless acceptances remains high.
- The number of homeless people varies across the borough. Fieldway has the highest number of homeless people, whilst the northern wards of Selhurst, Waddon and South Norwood each have in excess of 130 homeless people. The southern wards of Selsdon and Ballards, Coulsdon West, Sanderstead and Kenley have the lowest number of homeless people in the borough.

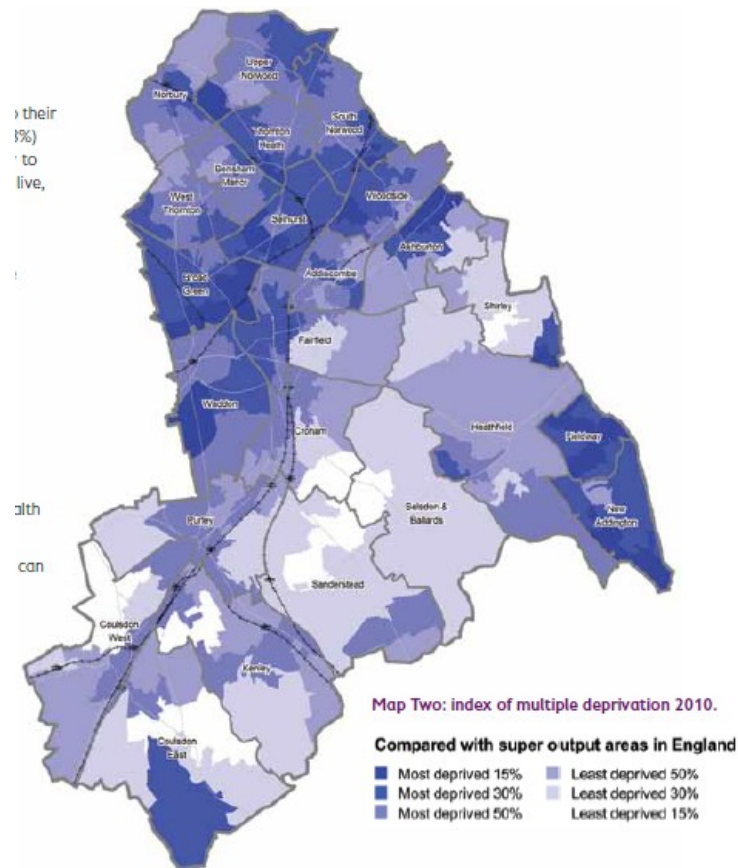


Figure 1 Index of multiple deprivation 2010

### Disability

- Across Croydon in 2011 some 22.8% of households contained someone with a long term health problem or disability, which is lower than the equivalent figure for England and in line with the London average.
- Within Croydon in 2011, 22,493 people had their day-to-day activities limited a lot by a long-term health problem or disability, whilst 28,134 had their day-to-day activities limited a little. As shown in Figure 2 the proportion of people whose day-to-day activities were limited to some extent increased with age. For example some 79% of people aged 85 and over have a long term health problem or disability.

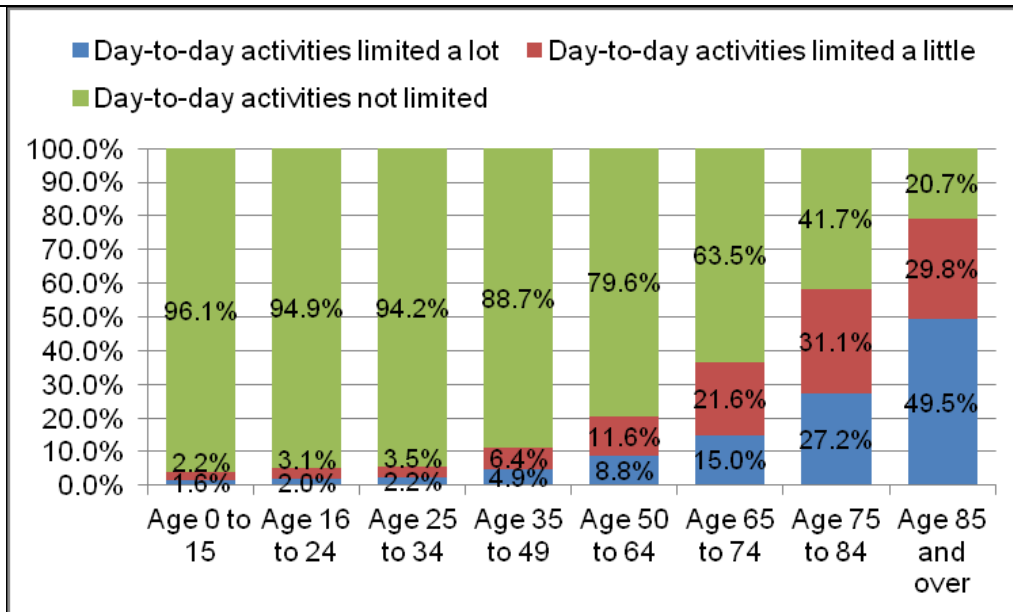


Figure 2 Proportion of people whose day-to-day activities were limited by a long-term health problem or disability

- In 2015, 4.1% of the Croydon population received a disability living allowance (slightly higher than London, of which 3.85% of the whole population received a disability living allowance).
- In 2015, 0.41% of the Croydon population received the incapacity benefit for being out of work as a result of poor health or disability (consistent with London, of which 0.42% of the population were incapacity benefit claimants). Within Croyden, 96.52% of incapacity benefit claimants had received it for 5 years or more.
- In 2010, 4,061 people (per 100,000 of population) within Croydon were supported to live independently through social services (all ages). This has significantly increased since 2005 when 1,971 people (per 100,000 of population) were supported to live independently through social services.
- In 2009, the majority of social care clients in Croydon had a physical disability (7,150). 2,210 had a mental health problem, 965 had a learning disability, 70 had a substance misuse problem and 120 received social care for other reasons.
- It is estimated that the number of people with a long term health problem or disability will increase by around 25,600 (a 47% increase) from 2013 to 2036. Most of this increase is expected to be in age groups aged 65 and over.
- Disability and long term health issues can have a number of social exclusion implications, people with long term illness or disability can face exclusion from the labour market and may require significant support to meet their social care needs.
- Disability, mental and physical ill-health can severely impact on the quality of life of those suffering from it and those immediately around them. It is also closely associated with deprivation. Some people have chaotic and complex needs that can expose them to greater risks of increased experience of mental health problems as well as drug and alcohol use.

### Race/ethnicity

- Croydon's population is very diverse. Croydon's communities speak more than 100 different languages and 45% of the population are from a black or minority ethnic (BME) background, higher than the national average. As shown in Figure 5, the younger population is more diverse than the older population in Croydon.

### Race/ethnicity - Black or minority ethnic communities

- Croydon has one of the fastest growing BME communities in London. Between 2001 and 2011, there was a notable increase in the BME population (65%) compared to a 19% decrease in the white (British/Irish) population.
- Although the overall percentage of residents from BME communities in Waddon, Ashburton, New Addington and Kenley are still much lower than the Croydon average, the number of residents from BME communities in these areas more than doubled between 2001 and 2011.
- Black or minority Ethnic (BME) households, as a group, are quite often found to have distinct

characteristics in terms of their housing needs, or may be disadvantaged in some way. Figure 3 indicates that all BME groups (with the exception of Asian) are significantly less likely to be owner-occupiers (no mortgage) and all groups are far more likely to live in private rented accommodation.

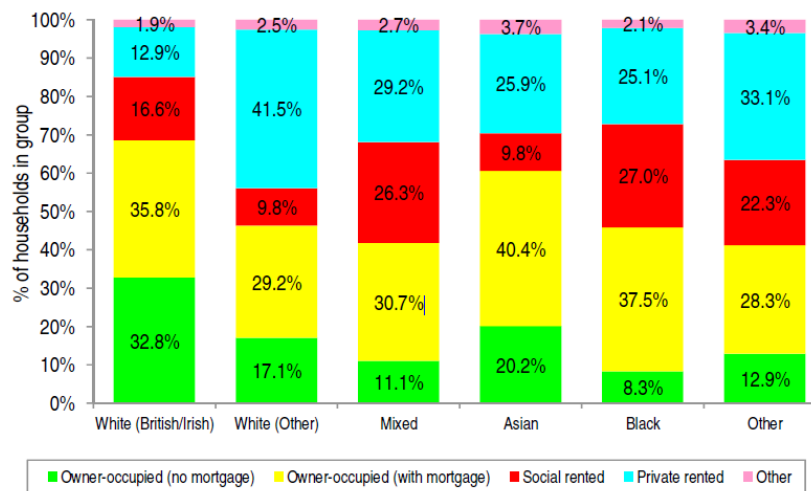


Figure 3 Tenure by ethnic group – Croydon (2011)

- BME groups are also more likely to be over-crowded (i.e. have a negative occupancy rating) than White (British) households. Census data suggests that around 16% of Asian households are overcrowded, along with 15% of the black group - this compares with only 5% of the White (British) group. Levels of under-occupancy amongst BME communities are generally low (see Figure 4).

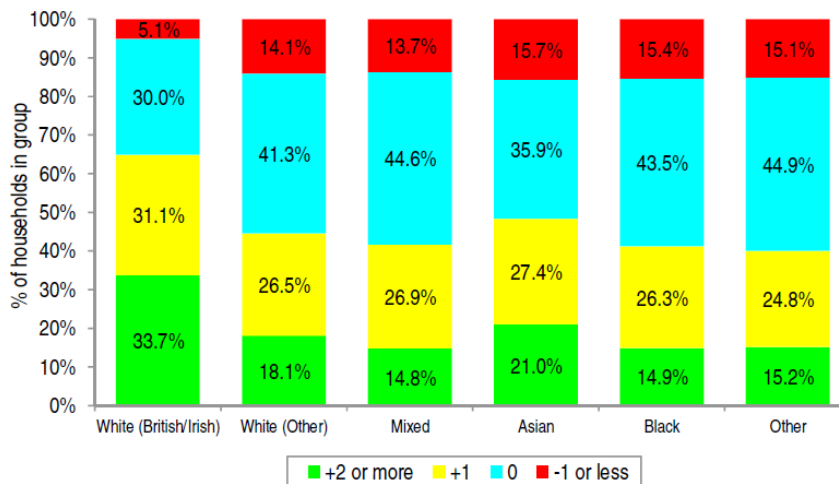


Figure 4 Occupancy rating by ethnic group (2011)

- A disproportionately high percentage of homeless people are from the black community in every age group. Overall, 5 in 10 homeless people are from the black community, 3 in 10 are from the white community and 1 in 10 is from the Asian community.
- There is a noticeably lower proportion (69%) of pupils from black ethnic backgrounds achieving level 4 education in reading, writing or maths in Croydon, compared to 78% and 77% in London and England respectively. Whilst attainment has stayed the same or improved for other ethnic groups, the proportion of pupils from a black background achieving this level has fallen slightly, from 72% in 2012 to 69% in 2014.

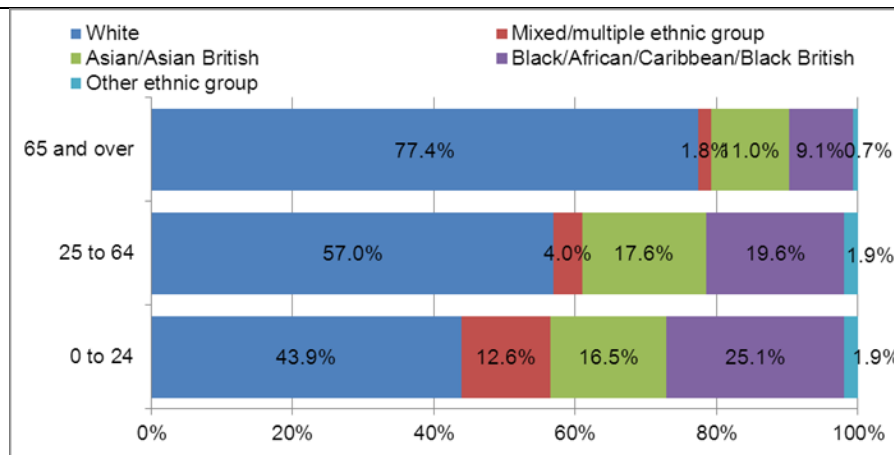


Figure 5 Ethnic Group by Age (2011)

### Race/ethnicity - Gypsy and Traveller groups

- There are a range of gypsy and traveller groups found within Croydon, including English gypsies, Irish travellers, New Travellers and Travelling Showpeople across different tenure types.
- London contains one of the smallest numbers of caravans of any English region. When the population of London is taken into account, the density of caravans is the lowest in England at 11 per 100,000 settled population, compared to 36 for England.
- When adjusted for population, Croydon's caravan count is one of the lowest in south London, and is very low compared to some neighbouring local authorities such as Sevenoaks and Tandridge. However, this should be considered in the context of Croydon's dense urban character and that most open space within the borough is protected.
- Within England, approximately one fifth of gypsies and travellers reside in unauthorised development or encampments, primarily due to inadequate permanent and transit/emergency site provision by housing authorities.
- As stated in the Croydon Gypsy and Traveller Accommodation Needs Assessment (2013), between 2012 and 2013 in the Croydon area, there were persistent numbers of unauthorised caravan days, some due to the movements of a small number of families, and others due to Irish Traveller families who desire permanent accommodation within Croydon.
- A stakeholder consultation session was conducted in April 2013 with local authority officers involved with gypsy and traveller issues, and a survey was undertaken with gypsies and travellers in Croydon. This survey determined a preference for small, privately owned permanent/residential sites, which tend to have fewer inter-family tensions and would be easier to manage compared to larger sites.
- As at 2013, there were 19 existing residential pitches within Croydon. Based on calculations set out in the Croydon Gypsy and Traveller Accommodation Needs Assessment (2013), over 20 years, there is a need for an additional 49 residential pitches, 1 emergency stopping place, and no travelling showpeople yards. However, as only 79% of the need for bricks and mortar housing will be met within the urban area within the borough, only 79% of the need for Gypsy and Traveller pitches can be met (representing approximately 36 new pitches).

### Sex/Gender

- In 2011, the Croydon population was made up of 51.5% females and 48.5% males. The age and gender profile in Croydon (see Figure 6) is similar to that of London, except that the proportion of males and females aged 20-29 and 30-34 in Croydon is approximately 3% lower than that of London.
- In 2011 within Croydon, 49.95% of males (aged 16-74) were full time employees, compared to 34.70% of females. 6.65% of males (aged 16-74) were part time employees compared to 18.16% of females.
- In 2011 within Croydon, a higher percentage of females aged 16-74 were unemployed to look after home or family (8.94%) compared to 0.89% of males.
- Of all single parents in Croydon in 2011, 91.05% were females, compared to 8.95% males. This is generally consistent with London (92.45% and 7.55 respectively).
- In 2011, the mean weekly earnings for residents of Croydon was £560 for males, compared to £466



for females.

- In London general, car ownership is higher amongst men than women (46% compared to 34%). This gap is higher in lower income households.
- Based on the Croydon local housing management system, as at 31 March 2015, there was a gender bias in the people approaching the council for social housing assistance, with 83% being females and 17% being males. The statistics record the gender of the applicant so these figures are slightly distorted by the fact that it is more common for the women in households to approach the council for assistance.

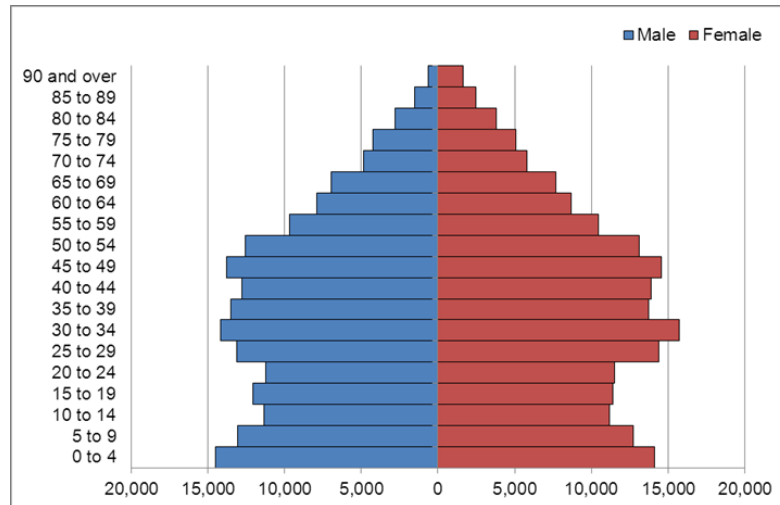


Figure 6 Age and gender profile in Croydon (2015)

### Sex/Gender – Gender Variance

- Data on the gender identity of the population is not routinely captured. There are some estimates of the proportion of the population who experience gender variance, those who experience a different gender to the sex assigned to them at birth. This condition is thought to begin before birth and can be experienced to different degrees. The Gender Identity and Research Society has estimated that nationally 1% of the population may be gender variant to some degree, with 0.2% of the population likely to seek medical treatment, at some stage, to present in the opposite gender.

### Age

- Croydon has the largest population of young people in London (approximately 84,000) than any other London borough with 20.8% of the population aged 0-15, compared with 19.2% for London and 19.1% for England.
- As shown in Figure 6 there is a large population of younger children and working age adults in Croydon. The borough has a lower proportion of people in their 20s and 30s, but a higher proportion of people aged 45 and under 18, meaning that the borough has a greater representation of middle aged families with children than Inner London boroughs, for example.
- The proportion of older adults, aged 65 and over, in Croydon is much lower than the national average, although the demographic will change as the current younger population ages (further discussed below).

### Age - Children<sup>2</sup>

- The number of families in Croydon (defined as any household which contains at least one dependent child), in 2011 totaled 51,100 accounting for 35% of households – a notably higher figure than seen across both London and England.
- When compared with other areas, the proportion of lone parent households is notable (11.6%), compared to 7.1% in London and 8.5% in England (2011) (see Figure 7).
- There are some considerable differences in the tenure of households with dependent children – lone parents have a very high proportion living in the social rented sector and also private rented accommodation. Only around 22% of lone parent households are owner-occupiers compared with

<sup>2</sup> Note: Age as covered by the Equality Act 2010 does not protect young people under the age of 18, although they are protected under other protected characteristics. Reference to this group has been included under Age in this Equalities Analysis, however, in order to make it easier to understand the link between Local Plan: Strategic Policies and young people.



70% of married couples with children (see Figure 8).

- Overcrowding is five times more likely to occur in houses with children compared to other houses. In total, some 20% of all households with dependent children are overcrowded, including 22% of lone parent households.
- Croydon has the highest number of looked after children of any London boroughs, due to the high numbers of unaccompanied asylum seeking children (UASC) looked after by the borough. The number of UASC looked after in Croydon fluctuates over time and is influenced by international events. In 2015 there were more UASC looked after in Croydon than children indigenous to the borough.
- In 2012, approximately 21% of children in Croydon were estimated to be living in poverty, compared to 23% in the London area and 19.5% in England. A child is classified as living in poverty if they live in families in receipt of out of work benefits or in receipt of in-work tax credits where their reported income is less than 60% of median income.
- In 2011, approximately 6.75% of children in Croydon were living in households where no adult was in paid work, which is high compared to 5.6% in London and 4.25% in England.

Household Type	Croydon		London	England
	Number	%	%	%
Married couple	22,469	15.5%	15.3%	15.0%
Cohabiting couple	5,034	3.5%	4.0%	2.8%
Lone parent	16,821	11.6%	7.1%	8.5%
Other households	6,729	4.6%	2.6%	4.6%
All other households (no dependent children)	93,957	64.8%	70.9%	69.1%
Total	145,010	100.0%	100.0%	100.0%
Total with dependent children	51,053	35.2%	29.1%	30.9%

Figure 7 Households with dependent children (2011)

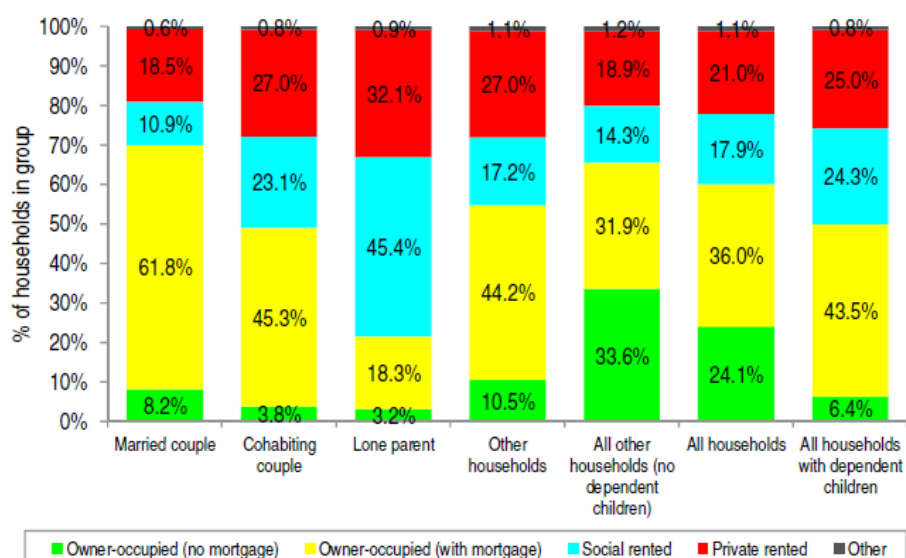


Figure 8 Tenure of households with dependent children - Croydon (2011)

### Age – Young People

- In 2013 there were around 31,000 households headed by someone aged under 35. This is set to increase to around 36,200 over the period from 2013 to 2036.
- As well as households headed by a younger person there will be others living as part of another household (typically with parents). Figure 9 shows the number of households in the Borough with non-dependent children. In total, some 11% of households (15,400) contain non-dependent children. This may to some degree highlight the difficulties faced by young people in accessing housing. Young people may be less likely to be eligible for social housing, have lower household incomes and have difficulty in accessing the owner-occupied sector due to mortgage constraints and deposit requirements. All of these factors contribute to the current trend for young people moving in with or continuing to live with parents.

- Considering households that are headed by a younger person (less than 35 years of age), very few younger households are owner-occupiers with a particular reliance on the private rented sector and to a lesser degree, social rented housing (Figure 10).

Household Type	Croydon		London	England
	Number	%	%	%
Married couple	8,292	5.7%	5.6%	4.8%
Cohabiting couple	724	0.5%	0.5%	0.4%
Lone parent	6,339	4.4%	3.5%	4.1%
All other households	129,655	89.4%	90.4%	90.7%
Total	145,010	100.0%	100.0%	100.0%
Total with non-dependent children	15,355	10.6%	9.6%	9.3%

Figure 9 Households with non-dependent children (2011)

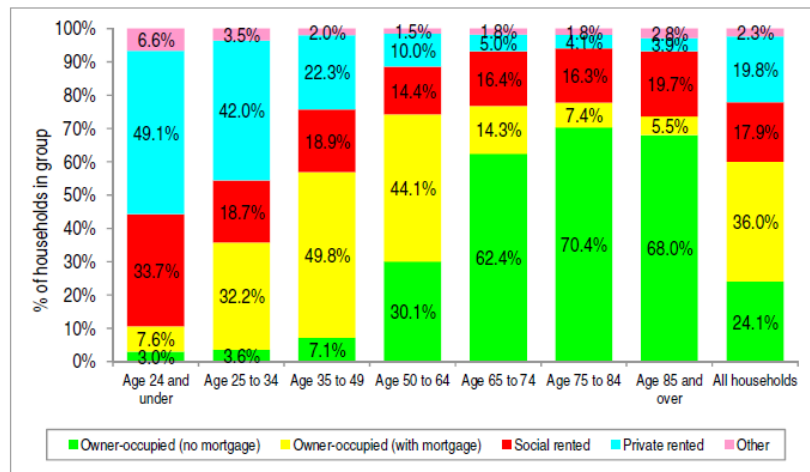


Figure 10 Tenure by age of household reference persons (2011)

### Age - Older People

- While Croydon is the “youngest” borough, the population is also aging – it is anticipated that by 2026, Croydon will have almost 40,000 people over 65, and some 6,500 over 85.
- Croydon (in line with other areas) is expected to see a notable increase in the population of older people; the total number of people aged 55 and over expected to increase by 63% over the next 23 years (Figure 11).

Age group	Croydon	London	England
Under 55	11.9%	17.0%	5.0%
55-64	42.9%	48.6%	11.0%
65-74	72.1%	64.1%	38.0%
75-84	71.4%	60.7%	58.1%
85+	121.2%	115.1%	143.2%
Total	23.4%	25.7%	14.9%
Total 55+	63.1%	60.6%	39.8%

Figure 11 Projected change in population of older people (2013 to 2036) (Source: ONS 2012 based SNPP and demographic projections)

- Many of Croydon’s older population live independent lives, but some experience disability as they age. There is a need to recognise and provide for the various facilities, services and organisations that support older people, which should ideally be close to where they live, and which would encourage independency as well as fulfilled lives.
- In 2011, 15% of houses were comprised entirely of people aged 65 and over. 9.7% were occupied by a single pensioner and 5.4% were occupied by 2 or more pensioners.
- Given that the number of older people is expected to increase in the future and that the number of single person households is expected to increase, this would suggest (if occupancy patterns remain

the same) that there will be a notable demand for affordable housing from the aging population. That said, there is a high proportion of older person households who are outright owners (with significant equity – see Figure 12), which may mean that market solutions will also be required to meet their needs.

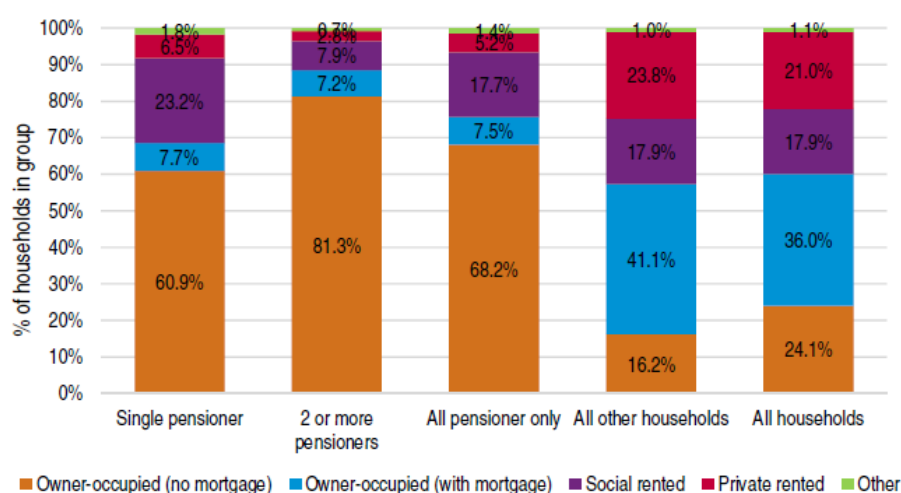


Figure 12 Tenure of older person households - Croydon (2011)

- The illnesses/disabilities associated with many older people are expected to increase significantly in the future, although this would be expected given the increasing population. In particular there is projected to be a large rise in the number of people with dementia (up 99%) along with an 88% increase in the number with mobility problems (see Figure 13).

	Type of illness/disability	2013	2036	Change	% increase
Main analysis (2,437 dpa)	Dementia	3,292	6,551	3,259	99.0%
	Mobility problems	8,653	16,306	7,653	88.4%
Alternative analysis (1,807 dpa)	Dementia	3,331	6,422	3,092	92.8%
	Mobility problems	8,710	15,551	6,841	78.5%
Alternative analysis (1,435 dpa)	Dementia	3,331	6,315	2,985	89.6%
	Mobility problems	8,710	15,283	6,572	75.5%

Figure 13 Estimated population change for range of health issues (2013 to 2036) (Source: Data from POPPI and demographic projections)

- Taking into account an aging population and availability of residential care homes in 2015, it is anticipated that by 2020, there will be demand for 619 bed spaces, and by 2030, there will be demand for 828 bed spaces. In 2015 there was 1,754 bed spaces available, meaning that there is an over-provision of care homes, residential homes and nursing homes, which is more than sufficient to provide for the aging Croydon population.
- However, given the anticipated increase in disability and health problems amongst older people, there is likely to be increased demand for specialist housing. In particular, the Strategic Housing Market Assessment (2015) estimates<sup>3</sup> that a total of 2,285 specialist (extra care) houses will be required by 2036 (equating to approximately 99 per annum, or 4% of total additional housing units).
- In Croydon in 2015, 17% of older people (over 60 years) were income deprived. This was the 100<sup>th</sup> highest score out of the 326 district authorities in England, putting Croydon in the top third most deprived areas. The majority of income deprived older people are concentrated in the northern areas of the borough.
- In 2015, 14.29% of the Croydon pensionable age population were attendance allowance claimants (consistent with London, of which 14.24% of pensionable age population were attendance

<sup>3</sup> Based on a range of assumptions, to be treated as indicative.

allowance claimants).

### Pregnancy/Maternity

- The number of live births in Croydon rose dramatically from just over 5,200 a year in 2009 to around 5,900 a year in 2012. Latest figures for 2013 record around 5,500 births supporting predictions that the birth rate will return to previous levels.
- The increase in birth rate has varied across the borough. Fairfield ward saw an increase from 235 live births in 2009 to 329 live births in 2013. Meanwhile in Fieldway ward the number live births fell from 222 to 169.
- Croydon has a higher proportion of mothers who were born outside of the UK (51.6%) compared to the national average (27.3%). Although there are variations between groups overall, non-UK born mothers have a higher total fertility rate than UK born mothers (2.19 compared to 1.79 nationally).

### Sexual orientation

- Sexual orientation was not captured by the 2011 Census. The ONS produce regional estimates of the percentage of the population who identify themselves as gay, lesbian or bisexual. Across London it is estimated that 2.6% of the population in 2014 identified themselves as gay, lesbian or bisexual, higher than the national average of 1.6%.
- Applying the London percentage to Croydon results in an estimated 9,800 people who would have identified themselves as gay, lesbian or bisexual.

### Religion/belief

- Just over half the respondents to the 2011 Census in Croydon stated that they were Christian. About 1 in 5 stated that they had no religion. Significantly, 7.6% respondents did not state their religion.

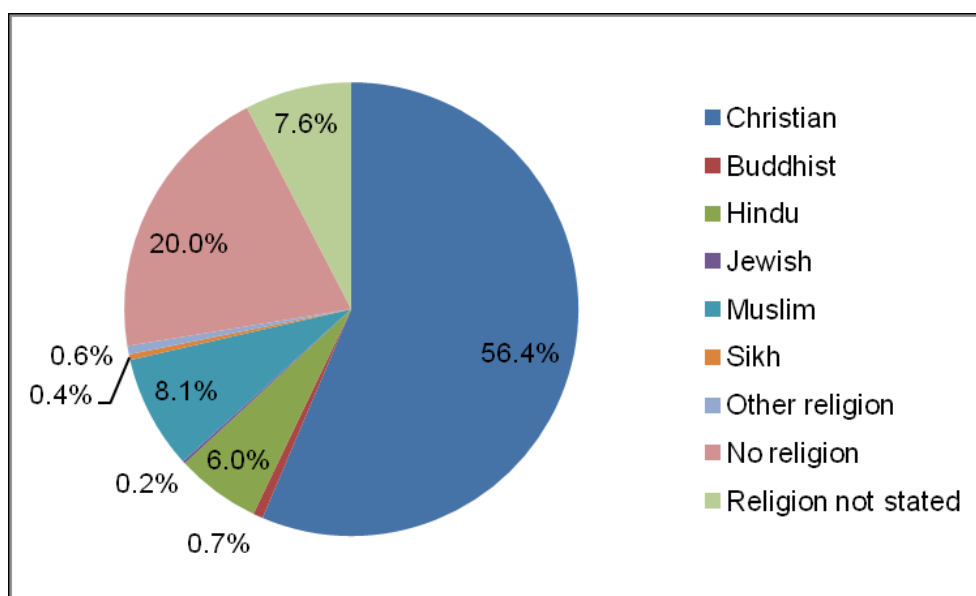


Figure 14 Religion of Croydon residents

## CONSULTATION

The Croydon Local Plan: Strategic Policies-Partial Review (Preferred and Alternative Options) was consulted on from 6 November to 18 December 2015. Posters were displayed in the libraries and copies of the documents made available. The consultation was also publicised on the Council's website, and on Facebook and Twitter, the latter daily reminding the public about the dates and locations of the consultation. It was also included in the Council's weekly email alert and its e-bulletin "Your Croydon". A new platform of social media called Street Life also posted the same post as the Facebook page onto their webpage. Six separate joint drop in events were held for the Croydon Local Plan: Strategic Policies – Partial Review at various locations and times throughout the borough. A total of 831 people signed in at the events.

At the end of the consultation period 295 individual people and organisations made representations on the Croydon Local Plan: Strategic Policies – Partial Review (Preferred and Alternative Options). The draft Croydon Local Plan: Strategic Policies – Partial Review (Proposed Submission) takes into consideration the responses to the November 2015 consultation on the Strategic Policies – Partial Review. Some of the key changes made as a result of consultation were:

- Policy SP2.4 revised to be reflect the evidence of the Local Plan viability report. The policy has been made clearer on types of affordable housing that will be provided on site, and new fixed lower 30% minimum requirement based on a development viability assessment; introduction of review mechanisms outside Croydon Opportunity Area if minimum requirement is not met but still with a requirement for some affordable housing on site;
- Policy SP2:4 revised from 75:25 ratio to 60:40 ratio between affordable rent and intermediate with starter homes explicitly referred to as an intermediate product. The proposed higher ratio was unlikely to be deliverable without significant grant for the affordable rent, which is unlikely to be available.
- New town area near East Croydon is to be designated as a Local Heritage Area.
- The proposed Local Green Space at Shirley Oaks is proposed to be extended to include the area of the allotments as it meets sufficient criteria for designation as Local Green Space.

On 24 November 2015, a Community Facilities and Equalities Workshop was held between Croydon planning and housing officers, Croydon Community Partnership, and approximately 30 representatives from the travelers community. Although the workshop was specific to the Croydon Local Plan: Detailed Policies, those that are relevant to the Croydon Local Plan: Strategic Policies – Partial review, the comments from the traveler community of most relevance are summarised as follows:

- Support for provision for additional pitches for gypsy and traveler accommodation.
- Suggestion to accommodate five more pitches at the Laytham’s way site (existing site 19)
- Care homes are still a community use and should be protected like any other community use.
- Many churches have underused facilities and a flexible approach toward letting these premises out for commercial use would be beneficial
- Support for community uses and flexibility where they are needed.

The draft Croydon Local Plan: Strategic Policies – Partial Review (Proposed Submission) takes into consideration the responses from this workshop.

**2.2 Please complete the table below to describe what the analysis, consultation, data collection and research that you have conducted indicates about the probable impact on customers or staff from various groups that share a protected characteristic.**

Group’s with a “Protected characteristic” and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
<b>Disability</b>  People with specific disabilities such as learning disabilities, hearing impairment, blind/visually impaired, mental health and well-	The increased housing target to meet housing need, alongside amendments to the affordable housing policy (to increase the percentage of all new homes to be either affordable rented homes, homes for social rent) is likely to provide a greater choice of housing options for people with disabilities, including the anticipated demand for 4% of new homes	While there is currently an oversupply of residential care houses, the change to remove care homes from the definition of community facility (previously protected from redevelopment by policy), there is a potential risk that the supply of residential care houses may not meet increasing demand for people with disabilities in future. However, the Strategic Housing Market Assessmentnotes	Croydon Observatory  Census (2011)  Strategic Housing Market Assessment (2015)

<b>Group's with a "Protected characteristic" and broader community issues</b>	<b>Description of potential advantageous impact</b>	<b>Description of potential disadvantageous impact</b>	<b>Evidence Source</b>
being, etc.	<p>to be specialist (extra care) homes.</p> <p>An increase in affordable housing and mixture of housing options would benefit people with disabilities who are disadvantaged in the housing market, including those on disability living allowances, incapacity benefits and/or unable to obtain employment. The provision for a mix of housing options would encourage independence and the ability for people with disabilities to improve quality of life, and lead fulfilling lives.</p> <p>Retaining policies for all homes to lifetime standards and 10% as wheelchair accessible homes enhances the chances of someone being able to remain in their home if their circumstances change, which enhances independence and resilience.</p>	<p>that there is currently a significant supply of residential care housing.</p> <p>Further, over the past few years there has generally been a move away from providing sheltered and residential care housing towards extra-care housing, with an estimated demand for 4% of new homes to be specialist (extra care) homes to 2036. Development of extra care housing is generally provided for as a dwelling unit and would be generally supported by the changes to Policy SP2: Homes. Further, many extra care housing schemes are provided by the borough therefore council will monitor supply/demand accordingly, separate to the Croydon Local Plan: Strategic Policies - Partial Review.</p>	
<p><b>Race/ethnicity</b></p> <p>Black and Minority Ethnic (BME) groups Refugee Communities Gypsy and Traveller communities White Minority Groups</p>	<p>The increased housing target to meet housing need, alongside amendments to the affordable housing policy (to increase the percentage of all new homes to be either affordable rented homes, homes for social rent) is likely to provide a greater choice of housing options for ethnic minorities, and may potentially assist in reducing the high percentage of homeless people in general (including the disproportionate percentage of homeless people from the black community).</p> <p>An increase in affordable housing and mixture of housing options would benefit ethnic minorities who are disadvantaged in the housing market, particularly black or</p>	<p>Reduction in strategic target for 60% of new homes to have 3 or more bedrooms to 50% slightly reduces the aspiration for larger homes in the borough and may not provide housing stock that can address overcrowding issues, resulting in a disadvantage in the housing market for the BME community who are more likely to live in overcrowded houses. However, it is also recognised that 3 bedroom houses are less likely to be delivered according to the current market model. By reducing the target to 50%, the number of individual homes may still be increased albeit with less of these being 3 bedroom homes in the first few years of implementation of the Local Plan Strategic Policies.</p> <p>Recent consultation highlighted</p>	<p>Croydon Observatory</p> <p>Census 2011 data</p> <p>Strategic Housing Market Assessment (2015)</p> <p>Croydon Gypsies and Travellers Needs Assessment (2013)</p> <p>Representations on the November 2015 consultation on the Croydon Local Plan:</p>

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
	<p>minority ethnic communities who are significantly less likely to be owner-occupiers, more reliant on private rented accommodation, and more likely to be over-crowded.</p> <p>An increase in the housing stock available would increase choice, and may help encourage downsizing of housing types for older generations, freeing up larger homes for young families.</p> <p>Increasing housing options may mean that ethnic minorities have better quality living environments, and improved access to health, education, and support services, which may assist in improving attainment levels.</p> <p>The allocation of additional gypsy and traveler's pitches, as well as criteria for proposals for additional future sites would meet the needs of Croydon's gypsy and traveler community, by providing appropriate accommodation, and better access to appropriate services, including employment, education, skills training, and health facilities. It would reduce unlawful encampment, discrimination, victimisation and displacement, and would increase opportunities for participation in community events, which in turn, over time, may reduce racial harassment from settled members of community.</p> <p>Provision for a mix of housing types, greater percentage of affordable housing for new developments, and additional gypsy and traveller pitches may</p>	<p>that many residents are adverse to a growth in housing of different types, size and tenure in their community, in particular the provision of accommodation for gypsies and travelers. This indicates that gypsies and travelers may be excluded from the settled community, and may be subject to harassment, discrimination and victimisation.</p>	<p>Strategic Policies (Partial Review)</p>

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
	<p>lead to diverse neighbourhoods, increasing the value of diversity in the community and facilitating positive relationships between people from different ethnic backgrounds.</p> <p>The advantages of the changes to SP3-SP8 applicable to the wider community would also apply to this group; the changes are likely to result in increased employment, education and skills training opportunities, better infrastructure, transport, community facilities, protection of green spaces and quality of the built environment.</p>		
<p><b>Sex (Gender)</b></p> <p>Women Men Female headed households etc. Gender identity (transitioning or transgendered people)</p>	<p>Women are more likely to have lower incomes than men, more likely to be in part time employment or unemployed to look after home or family, and generally have more responsibility for domestic work. Women are also more likely to approach the council for social housing assistance. Women also are significantly more likely to be sole parents (91% of sole parents within Croydon are women), of whom a very high proportion living in the social renting sector and private rented accommodation. Therefore the increased housing target to meet housing need, alongside amendments to the affordable housing policy (to increase the percentage of all new homes to be either affordable rented homes, homes for social rent) is likely to advance equal opportunities and provide choice of housing options for women who are disadvantaged in the housing market. In turn, this would enable sole mothers to more effectively fulfil their caring responsibilities for dependents.</p>	N/A	<p>Croydon Observatory</p> <p>Census 2011 data</p> <p>Strategic Housing Market Assessment (2015)</p> <p>Transport for London, Roads Task Force – Technical Note 12.</p>



Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
	<p>Protecting existing office stock in the Opportunity Area and protecting industrial and employment uses offers local employment opportunities. The designation of Neighbourhood Centres and the focus on the provision of community facilities is likely to assist in balancing women's role in domestic work and paid employment.</p> <p>Those that are gender variant are likely to also be represented through one or more other protected characteristics, meaning that benefits will be experienced by this group in more subtle ways.</p> <p>The advantages of the changes to SP3-SP8 applicable to the wider community would also apply to this group; the changes are likely to result in increased access to employment, skills training and education opportunities, better infrastructure, transport, protection of green spaces and quality of the built environment.</p> <p>Car ownership is higher amongst men than women, with a greater gap in lower income households. Therefore, women are less likely to have access to a car and rely more on public transport. Planned infrastructure projects and improved public transport would provide greater access to employment opportunities, local services and community facilities.</p>		
<p><b>Age</b></p> <p>Older people People over state retirement age Younger people (16-21 year olds)</p>	<p>21% of children in Croydon are living in poverty. A large proportion of houses in Croydon (35%) contain at least one dependent child, 20% of which are over-crowded. In addition, there is a notable proportion of</p>	<p>While there is currently an oversupply of residential care homes, the change to remove care homes from the definition of community facility (previously protected from redevelopment by policy), means there is a potential</p>	<p>Croydon Observatory  Census 2011 data  Strategic</p>

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
<p>Children (including unaccompanied asylum seeking children)</p>	<p>lone parent households compared to other areas. Lone parent households and houses with dependent children are more likely to be living in the social or public renting sector, therefore the increased housing target to meet housing need, alongside amendments to the affordable housing policy (to increase the percentage of all new homes to be either affordable rented homes, homes for social rent) is likely to advance equal opportunities, provide affordable choice of housing options, reasonable quality of housing in the private sector, and associated improved access to education, skills training, services, and quality of life for disadvantaged children.</p> <p>In addition, Croydon has a high number of asylum seeking children looked after by the borough who would benefit from additional social housing.</p> <p>The provision for affordable housing would also assist in tackling the difficulties for young people to access housing (due to lower incomes and difficulties in securing mortgages), and increase the potential to access suitable housing, become owner-occupiers and to live independently.</p> <p>Protecting existing office stock in the Opportunity Area and protecting industrial and employment uses offers local employment, and education and skills training opportunities for people of all ages.</p> <p>Croydon is expecting a notable increase in the population of</p>	<p>risk that the supply of residential care houses may not meet increasing demand for people with disabilities in future. This is a potential disadvantage due to the projected large rise in the number of people with dementia or mobility problems (99% and 88% respectively). However, the Strategic Housing Market Assessment (2015) notes that there is currently a significant supply of residential care housing. Further, over the past few years there has generally been a move away from providing sheltered and residential care housing towards extra-care housing, with an estimated demand for 4% of new homes to be specialist (extra care) homes to 2036. Development of extra care housing is generally provided for as a dwelling unit and would be generally supported by the changes to Policy SP2: Homes. In addition, typically the greatest support needs for the aging population are alterations to properties (such as to bathrooms, showers and toilets, provision of emergency alarms or help maintaining homes). Many of these can be resolved in situ through adaptations to existing properties and would not be affected by the changes to Policy SP2: Homes.</p>	<p>Housing Market Assessment (2015)</p>

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
	<p>older people with an aging population. The housing policy to achieve a mix of housing is likely to achieve a good mix of housing for older people (those who need affordable housing as well as those who are outright owner-occupiers). This enables older people to exercise choice and control over housing options, encouraging independence and enabling fulfilling lives.</p> <p>An increase in the housing stock available would increase choice, and may help encourage downsizing of housing types for older generations, freeing up larger homes for young families.</p> <p>The advantages of the changes to SP3-SP8 applicable to the wider community would also apply to children, young people, and older people as the changes are likely to result in increased employment, education and skills training opportunities, better infrastructure, social services, transport, protection of green spaces and quality of the built environment.</p>		
<p><b>Sexual orientation</b></p> <p>Gay Lesbian Bisexual People</p>	<p>The advantages of the changes to SP2-SP8 applicable to the wider community would also apply to the approximate 2.6% proportion of the Croydon population who identify themselves as gay, lesbian or bisexual. The changes are likely to result in increased employment, education and skills training opportunities, better infrastructure, social services, community facilities, transport and quality of the built environment. In particular, sexual orientation groups would</p>	N/A	Croydon Observatory

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
	benefit from improved access to facilities.		
<b>Religion or belief</b>  Member of faith/religious groups such as Christian's, muslims, Hindus, Sikhs, Jews etc. Non-believers	56% of the Croydon population is Christian, 8.1% Muslim and 6% Hindu. The identification and designation of Neighbourhood Centres offers greater opportunities for the provision of community facilities to support people from different faiths/religion. This will improve access to facilities for faith groups.	N/A	Croydon Observatory
<b>Pregnancy and Maternity</b>	The advantages of the changes to SP2-SP8 applicable to the wider community would also apply to this protected characteristic. Pregnant women and parents would benefit from access to suitable housing, education, skills training opportunities, better infrastructure, social services, community facilities (e.g. childcare services), transport and quality of the built environment.	N/A	Croydon Observatory
<b>Community cohesion issues</b>	<p>The changes to increase affordable housing requirements would result in more diverse communities in terms of cultures, religions or beliefs, ethnicities and social backgrounds by ensuring that there are "clusters" of affordable housing and a mix of housing types, size and tenure integrated into new development.</p> <p>The provision of additional pitches for gypsies and travellers may improve community cohesion by promoting good relations between gypsies and travellers and settles communities, increasing awareness and understanding of gypsy and traveller needs, culture and</p>	Recent consultation highlighted that many residents are adverse to a growth in housing of different types, size and tenure in their community, in particular the provision of accommodation for gypsies and travelers. This indicates that gypsies and travelers may be excluded from the settled community, and may be subject to harassment, discrimination and victimisation. However the provision of sites for gypsies and travelers may reduce the number of unauthorized encampments and thereby reduce tensions with the settled community.	Community Strategy 2016-2021  Representations on the November 2015 consultation on the Croydon Local Plan: Strategic Policies (Partial Review)

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
	<p>lifestyle.</p> <p>All residents can benefit from enhanced meaningful interaction from those with different backgrounds, including greater inter-faith engagement and interactions between young and older people, or people from different ethnic backgrounds (those who belong to a protected characteristic and those who do not). When people from different backgrounds get on well together, there is a greater sense of community cohesion.</p> <p>Residents from different groups would also have increased access to a variety of housing options which are suitable for their diverse needs, which would support vulnerable or disadvantaged people by enhancing their opportunities to lead fulfilling lives, have a sense of belonging, and a united sense of shared values. Providing a choice of housing for people at all stages of life, would facilitate a reduction in social, economic and environmental deprivation, and is likely to assist in creating more cohesive communities and increase in community sense of belonging and satisfaction with the local area.</p> <p>The designation of neighbourhood centres and the opportunity for a greater provision of community facilities offers different groups and communities access to the same local facilities and services. Further, the protection of public houses as community facilities retains and expands the opportunities for more local</p>		

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
	community facilities, social interaction and cohesion.		
<b>Delivering social value</b>	<p>The proposed changes to the Croydon Local Plan: Strategic Policies delivers social value by enabling the borough to provide for its housing need. This provides social benefits such as improving health and wellbeing through ensuring that all residents have access to suitable housing through all stages of life, including vulnerable people and protected groups, and reducing the amount of homeless households in temporary accommodation. The policy changes are targeted at addressing the needs of groups who have inadequate housing, and will assist to reduce deprivation, in particular where it is spatially concentrated.</p> <p>Lifetime homes standards encourage flexibility and adaptability to support the changing needs of individuals and families at different stages of life.</p> <p>The Local Plan provides economic benefits by protecting the borough's employment uses to ensure local employment, education and skills training opportunities. An improvement to public transport offers social and environmental benefits by improving access to services for all groups and also reducing car use in the borough.</p>	N/A	

<b>2.3</b>	<b>Are there any gaps in information or evidence missing in the consultation, data collection or research that you currently have on the impact of the proposed change on different groups or communities that share a protected characteristic? If so, how will you address this?</b>
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Please read the corporate public consultation guidelines before you begin:  
<http://intranet.croydon.net/finance/customerservices/customerserviceprogramme/stepbystepguide.asp>.

No.

**2.4** **If you really cannot gather any useful information in time, then note its absence as a potential disadvantageous impact and describe the action you will take to gather it.**

Please complete the table below to set out how will you gather the missing evidence and make an informed decision. Insert new rows as required.

Group's with a "Protected characteristic" and broader community issues	Missing information and description of potential disadvantageous impact	Proposed action to gather information

**Stage 3 Improvement plan**

**Actions to address any potential disadvantageous impact related to the proposed change**

This stage focuses on describing in more detail the likely disadvantageous impact of the proposed change for specific groups that may share a protected characteristic and how you intend to address the probable risks that you have identified stages 1 and 2.

**3.1** **Please use the section below to define the steps you will take to minimise or mitigate any likely adverse impact of the proposed change on specific groups that may share a protected characteristic.**

Equality Group (Protected Characteristic)	Potential disadvantage or negative impact	Action required to address issue or minimise adverse impact	Action Owner	Date for completing action
<b>Race/ethnicity</b> Black and Minority Ethnic (BME) groups Refugee Communities Gypsy and Traveller communities White Minority	Reduction in strategic target for 60% of new homes to have 3 or more bedrooms to 50% slightly reduces the aspiration for larger homes in the borough and may not provide housing stock that can address overcrowding issues, particularly for the	<ul style="list-style-type: none"> <li>Croydon Monitoring Report to assess effectiveness of the Croydon Local Plan: Strategic Policies.</li> </ul>	Head of Spatial Planning Service	N/A

Groups	BME community.			
<b>Race/ethnicity</b> Gypsy and Traveller communities	Recent consultation highlighted that many residents are adverse to a growth in housing of different types, size and tenure in their community, in particular the provision of accommodation for gypsies and travellers. This indicates that gypsies and travellers may be excluded from the settled community, and may be subject to harassment, discrimination and victimisation.	<ul style="list-style-type: none"> <li>As new gypsy sites are allocated and occupied, organise workshops between gypsy and traveller communities and affected residents to promote good relations, and increase awareness and understanding of gypsy and traveller needs, culture and lifestyle.</li> <li>Through promotion and education initiatives, generate knowledge and understanding of hate crime and incidents, and encouraging gypsy and traveller communities to report them.</li> </ul>	Head of Tenancy and Caretaking	N/A
<b>Age and Disability</b> Older people and others with disabilities in need of specialist (extra care) homes.	While there is currently an oversupply of residential care houses, the change to remove care homes from the definition of community facility (previously protected from redevelopment by policy), means there is a potential risk that the supply of residential care houses may not meet increasing demand for people with disabilities in future. This is a potential disadvantage due to the projected large rise in the number of people with dementia or mobility problems (99% and 88% respectively). However, the Strategic Housing Market Assessment (2015) notes that there is currently a significant supply of residential care	<ul style="list-style-type: none"> <li>Croydon Monitoring Report to assess effectiveness of the Croydon Local Plan: Strategic Policies.</li> <li>If demand for residential care homes or specialist care homes exceeds supply, then consider methods to encourage and develop council or privately-funded residential care homes or specialist care homes.</li> <li>Consult tenants on proposals for converting existing sheltered provision into extra care housing which will better cater to them</li> </ul>	Head of Spatial Planning Service  Senior Joint Commissioner – Supported Housing  Senior Joint Commissioner – Supported Housing	N/A



	housing. Further, over the past few years there has generally been a move away from providing sheltered and residential care housing towards extra-care housing, with an estimated demand for 4% of new homes to be specialist (extra care) homes to 2036. Development of extra care housing is generally provided for as a dwelling unit and would be generally supported by the changes to Policy SP2: Homes.	as they grow older.		
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**3.2 How will you ensure that the above actions are integrated into relevant annual department or team service plans and the improvements are monitored?**

To be completed following the publication period and post examination by Planning Inspectorate. The report to Council for adoption for the Croydon Local Plan: Strategic Policies – Partial Review would include the Equalities Analysis conclusions with actions identified for relevant heads of service.

**3.3 How will you share information on the findings of the equality analysis with customers, staff and other stakeholders?**

The publication period on the Croydon Local Plan: Strategic Policies – Partial Review and associated documents, including the Equalities Analysis, will occur between 5 September and 17 October 2016. The consultation will provide people with an opportunity to comment on the overall ‘soundness’ of the Local Plan Strategic Policies, namely that they are ‘justified’, ‘effective’, and consistent with national and London Plan policy, and meet local needs. In addition, people may comment on the Equalities Analysis provided that any comments are related to a specific policy.

**Section 4 Decision on the proposed change**

**4.1 Based on the information in sections 1-3 of the equality analysis, what decision are you going to take?**

Decision	Definition	Yes / No
<b>We will not make any major amendments to the proposed change because it already includes all appropriate actions.</b>	Our assessment shows that there is no potential for discrimination, harassment or victimisation and that our proposed change already includes all appropriate actions to advance equality and foster good relations between groups.	Yes
<b>We will adjust the proposed change.</b>	We have identified opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the proposed change. We are going to take action to make sure these opportunities are realised.	No

<b>We will continue with the proposed change as planned because it will be within the law.</b>	We have identified opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the proposed change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned.	Yes
<b>We will stop the proposed change.</b>	The proposed change would have adverse effects on one or more protected groups that are not justified and cannot be lessened. It would lead to unlawful discrimination and must not go ahead.	No

**4.2 Does this equality analysis have to be considered at a scheduled meeting?**  
If so, please give the name and date of the meeting.

A summary of the equality analysis will be included in the report which has been prepared for the cabinet meeting on the Croydon Local Plan: Strategic Policies – Partial Review (Proposed submission) (11 July 2016). The Equality Analysis can be made available to any cabinet members.

**4.3 When and where will this equality analysis be published?**  
An equality analysis should be published alongside the policy or decision it is part of. As well as this, the equality assessment could be made available externally at various points of delivering the change. This will often mean publishing your equality analysis before the change is finalised, thereby enabling people to engage with you on your findings.

The publication period on the Croydon Local Plan: Strategic Policies – Partial Review and associated documents, including the Equalities Analysis, will occur between 5 September and 17 October 2016. Copies of documents will be made available at local libraries and on the Council website, Facebook and Twitter, the latter reminding the public about the dates and locations of publication period.

The consultation will provide people with an opportunity to comment on the overall ‘soundness’ of the Local Plan Strategic Policies, namely that they are ‘justified’, ‘effective’, and consistent with national and London Plan policy, and meet local needs. In addition, people may comment on the Equalities Analysis provided that any comments are related to a specific policy.

The next stage in preparing the Croydon Local Plan: Strategic Policies- Partial Review is to publish the Proposed Submission draft for comment with all comments to be sent to the Planning Inspectorate for consideration by an independent planning inspector at an Examination in Public. This report is seeking endorsement to publish the Croydon Local Plan: Strategic Policies- Partial Review (Proposed Submission) report for comment. This will fulfil the requirements of Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council’s adopted Statement of Community Involvement 2012. The publication is not a consultation as the Council is not able to make changes to the Local Plan following publication. Any proposed changes will be considered by the independent planning inspector. The Council is however able to recommend main modifications to the planning inspector. Any main modifications arising from the publication of the Proposed Submission report will be presented to Council with the report seeking approval to submit the Croydon Local Plan: Strategic Policies- Partial Review to the Secretary of State.

**4.4 When will you update this equality analysis?**  
Please state at what stage of your proposed change you will do this and when you expect this update to take place. If you are not planning to update this analysis, say why not

The equality analysis considers the recommended changes to Croydon Local Plan: Strategies Policies (Proposed Submission) for submission, in response to the November-December 2015 consultation. If any of those changes are implemented prior to publication in September 2016, the equalities analysis can be updated to track equality impacts as it progresses.

**4.5 Please seek formal sign of the decision from Director for this equality analysis?**  
 This confirms that the information in sections 1-4 of the equality analysis is accurate, Comprehensive and up-to-date.

Officers that must approve this decision	Name and position	Date
<b>Head of Service / Lead on equality analysis</b>	Steve Dennington, Interim Head of Spatial Planning	14/06/2016
<b>Director</b>	Heather Cheesbrough (Director of Planning & Strategic Transport)	15/06/2016

**Email this completed form to [equalityandinclusion@croydon.gov.uk](mailto:equalityandinclusion@croydon.gov.uk), together with an email trail showing that the director is satisfied with it.**