

Equality Impact Assessment

Full Assessment

Background document to agenda item 11, Cabinet 22.06.15

Proposed Submission Draft Core Strategy

September 2011

**Equality Impact Assessment
Full Assessment**

Proposed Submission Draft Core Strategy

I agree with the outcome of this EqIA and actions arising.	
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1. Introduction

1.1 An Equality Impact Assessment (EqIA) is the process of systematically analysing a proposed or existing policy or strategy to identify what effect, or likely effect, will follow from the implementation of the policy for different groups in the community, especially the groups who are disadvantaged or those people with protected characteristics.

1.2 The EqIA also aims to identify measures and actions to improve the policies and to eliminate, minimise or counterbalance the potential negative consequences for a particular group or sector of the community where appropriate.

1.3 The subject of this EqIA is the Proposed Submission Draft Core Strategy. In order to carry out the EqIA the assessment considers the two consultation reports that have fed into the Proposed Submission Draft Core Strategy which were “Towards a Preferred Core Strategy for Croydon” and “Towards a Preferred Core Strategy for Croydon – Supplement” (known as the Supplement), published respectively in February and September 2010.

2. Equality Acts

2.1 On the 1st October 2010 and the 1st April 2011 the Equalities Act 2010 became law bringing together, harmonising and in certain instances extending previous anti-discrimination laws contained within the Race Relations Amendment Act 2000, Disability Discrimination Act 2005 and the Equality Act 2006. The new Equalities Act 2010 requires the Council to conduct and publish assessments to determine whether their policies, practices and procedures have an adverse impact on any section of the community.

2.2 The Equalities Act 2010 protects people from discrimination on the basis of “protected characteristics” (these used to be called “grounds”). The relevant characteristics for services and public functions are:

- age;
- disability;
- gender reassignment;
- race, including ethnic or national origins, colour and nationality;
- religion or belief;
- sex/gender, including maternity and pregnancy; and
- sexual orientation.

2.3 For the purpose of this report people with these protected characteristics are referred as *equality groups*.

2.4 The law prohibits direct discrimination (including by association or by perception), indirect discrimination, harassment and victimisation.

3. The Proposed Submission Draft Core Strategy

3.1 The Core Strategy will be the key document in the Local Development Framework describing the spatial vision for the future of the borough and how it can be delivered. It will be one of the main plans supporting the Council's Sustainable Community Strategy - the over-arching strategy to improve the quality of life of everyone in the borough.

3.2 The Proposed Submission Core Strategy presents the Core Strategy in the form that the Council proposes to submit to the Planning Inspectorate for examination. It is being presented so representations can be made on matters of soundness and legal conformity and is not a full consultation.

3.3 The Core Strategy sets out the long term spatial framework for the borough. It gives physical and geographic expression to the economic, social, cultural and ecological policies and priorities of the borough. It will guide development and shape the places that make up the borough up to 2031.

3.4 The Core Strategy is not a standalone document but one piece of a wider spatial policy framework for the borough. In the light of its strategic nature, it is not the role of the Core Strategy to set out the detailed policies in relation to planning applications or to set out site specific policies and allocations. These are the subject of the lower level plans and policies and would be subject to separate EqlA if appropriate.

3.5 The Core Strategy, as the key spatial planning document, could have a significant impact on all residents, businesses and visitors of the borough.

4. Preparing the Equalities Impact Assessment

4.1 This EqIA has been based upon a combination of analysis of existing data on equalities groups and consultation responses.

4.2 Information collected from secondary data sources¹ including the Census and NHS data has provided a statistical profile of residents with different protected characteristics in the borough.

4.3 In the build up to the preparation of the Proposed Submission Core Strategy there have been three consultation periods as well as ongoing engagement with stakeholders. This EqIA has been based upon consultation responses received on specifically on the two consultation documents that have formed the basis of the Proposed Submission Core Strategy. These were:

- Consultation on *Towards a Preferred Core Strategy for Croydon* (16th February to 21st March 2010)
- Consultation on *Towards a Preferred Core Strategy for Croydon – Supplement* (6th September to 18th October 2010)².

4.4 In addition meetings were also arranged with representatives of equalities groups during summer 2010. A list of the groups who have supplied information and have been consulted on this EqIA can be found in Appendix 3.

4.5 Together the analysis of secondary data, consultations during the preparation of the Core Strategy and meetings with representatives of equalities groups have enabled profiles of each equalities group to be prepared. It has also identified the key spatial issues for each of the equality groups. The profiles and key spatial issues are presented in the next section.

¹ The sources of data are listed in Appendix 1.

² Details of the consultations can be found in Appendix 2

5. Profiles of Equalities Groups - Key facts and Spatial Issues

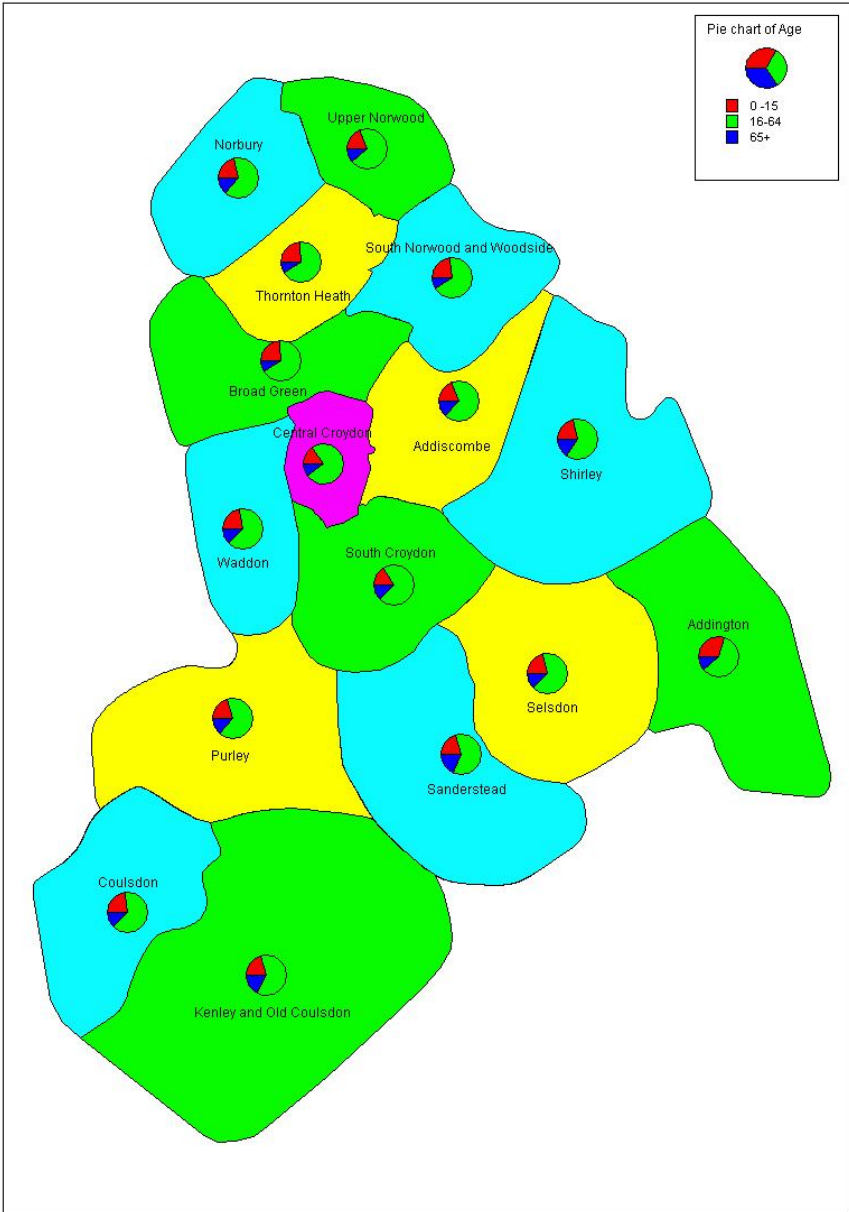
5.1 A profile of each protected characteristic is presented in turn below.

Age

Secondary data

5.2 Amongst the 16 Places of Croydon, Addington has a highest proportion of youngsters (0-15 years old) at 30% and the lowest proportion of working age (16-65 years old) at 57%. Croydon Opportunity Area and South Croydon have the highest level of working age population (both over 70%) and the lowest proportion of people under the age of 16 (both about 15%). Kenley and Old Coulsdon and Sanderstead have the highest proportion of pensionable population (65+) (all about 19%). Figure 5.1 shows the age profile of each of the 16 Places.

Figure 5.1 Age profiles of the Places of Croydon



5.3 Analysis of secondary data shows that the key statistics about Croydon's population of older people are:

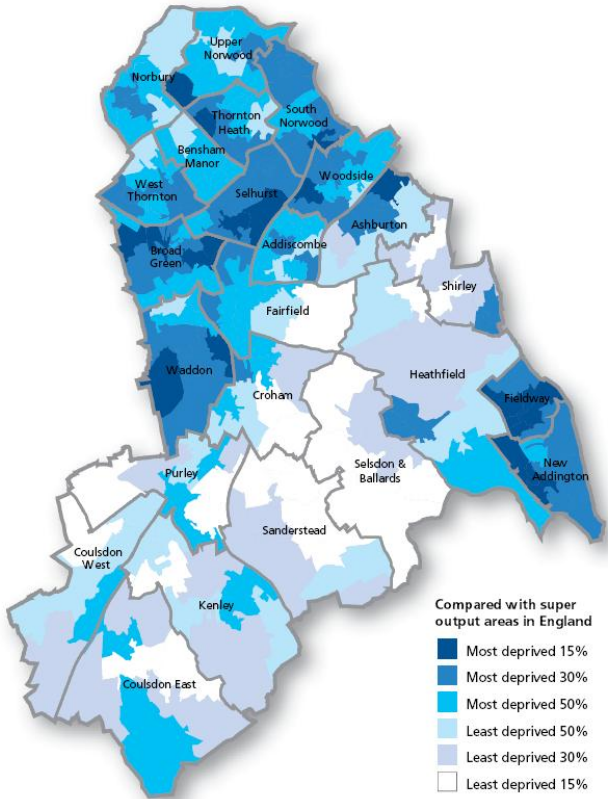
- In 2010 it is estimated that there are 60,523 people aged 60 or over in Croydon, approximately 18% of all residents in Croydon. 55% of people aged 60 or over are women and the female proportion increases as the age rises.
- In 2001, 16,626 households in Croydon (i.e. 12% of all households) are single pensioners and a further 9,181 households (7%) are pensioner-only households.
- Single pensioner households make up a much higher proportion of social housing tenants (21% council and 16% housing association tenants) than of the borough average although the proportion of other pensioner-only households is slightly lower than average.

5.4 In 2001, 17% of 50 - 74 year olds were from a BME background, but this fell to only a little over 10% of 70-80 year olds and under 5% of people aged 80 and over. Most older BME people are from an Asian Indian or Black Caribbean ethnic background.

5.5 Analysis of secondary data shows that the key statistics about Croydon's population of younger people are:

- In 2010 there were 89,671 children and young people aged 0 to 19 years living in Croydon. This is 26% of the total population and the largest population of children and young people in London. This makes Croydon the "youngest" borough in south London.
- With over 58,000 pupils Croydon has the highest school population of the London boroughs, and 22.6% of primary school pupils and 18.5% of secondary school pupils are known to be eligible for free school meals. Entitlement for free school meals is used as a proxy indicator for deprivation.
- Permanent exclusions were down to their lowest for 15 years in the academic year 2008/9.
- In September 2009, young people aged 16-18 not in education, employment and training accounted for 9% of the population in Croydon, an increase of 1.4% from 2007/08.
- In previous years, Croydon used to have a high incidence of teenage pregnancy – it was 13% higher than the London average. However, the teenage pregnancy rate in Croydon dropped in 2009. The under-18 conception rates for quarter 2 (March to June) in 2009 were 41.5 per 1,000 conceptions amongst women aged between 15 to 17 years-old representing a 33% decrease from the same period in 2008, where the figure was 62 per 1,000. These figures now put Croydon below the London average for under-18 conception rates of 42.5 per 1,000 and just above the overall average for England of 39.5 per 1,000. It is not clear whether the downward trend will continue in the future.
- Figure 5.2 shows the distribution of child wellbeing across Croydon. The index is comprised of seven domains with equal weightings: material wellbeing, health, education, crime, housing, environment, and children at need. The most deprived 15% of super output areas in terms of the index of child wellbeing are in the north and south east of the borough, covering areas in Selhurst, Broad Green, Waddon, Fieldway and New Addington. This link between deprivation and special educational needs and disability, has implications for service delivery. There is a need to focus resources to help counteract social and economic disadvantage in the more deprived areas of the borough.

Figure 5.2 Index of child wellbeing 2009 (based on Croydon super output areas)



Source: Department of Communities and Local Government, local index of child wellbeing 2009

Consultation findings

5.6A workshop was held with the Department of Adult Services and Housing on 13th September 2010 to consider potential impacts of the Core Strategy on older people. Comments were also received from the consultation on *Towards a Preferred Core Strategy for Croydon – Supplement*. A summary of the findings is presented below:

- There is a need for improved convenient, safe and reliable public transport.
- Environmental quality and accessibility of the public realm are important for older people.
- There is a need for plans to provide community facilities that benefit young people, elderly and disabled.
- There is a need to design out crime.
- To ensure smarter and improved access to transport for all, planning applications should be accompanied by transport assessment, travel plans and delivery servicing plans.

5.7A workshop was held with the Croydon Youth Council. Comments were also received from the consultation on *Towards a Preferred Core Strategy for Croydon – Supplement*. A summary of the findings is presented below:

- The targets for shared accommodation have yet to be duplicated from (the then Draft Replacement) London Plan.
- The provision of leisure centres impact on all age groups.
- There is a lack of schools and youth services.

Key Spatial Issues

Older people

- Older people are more likely to suffer from poor health and disability. They make up about half the total population with a limiting long-term illness.
- Older people are more likely to be living in poverty and suffering the associated effects of low quality and inappropriate housing. There is a shortage of sheltered and specialised accommodation for older people.
- Many older people live alone and experience isolation. Their safety and security both at home and in public spaces can be a concern.
- While many older people remain in work, many experience discrimination when it comes to gaining access to employment and training.
- Health facilities and social care in accessible location is a priority for older people.
- Convenient, safe and reliable public transport (including specialist transport services such as dial-a-ride) is important for older people to continue participating in society.
- The environmental quality and accessibility of the public realm is important for older people. Provision of accessible places to meet, to rest, public toilets and street furniture is essential to encourage older people to enjoy public realm.

Younger people

- Child poverty is a serious problem in London, most often caused when parents and guardians do not have access to employment and training opportunities. This can have serious implications on health, nutrition and levels of education attainment.
- Poverty and social exclusion contribute to a complex profile of needs for the health, education and social care of many of London's disadvantaged children. The provision of social facilities including childcare, play and recreation, leisure, cultural and educational facilities is a clear determinant of children's well being.
- Poverty can also lead to overcrowded and poor quality housing conditions, often in deprived areas where there are insufficient social facilities. A lack of access to free and inclusive play space and open space can hinder mental and physical development and independence.
- Through the consultation comments log concerns relating to crime, safety and vulnerability particularly in relation to street crime and road accidents were confirmed. Fear of "stranger danger" means that children are often prevented from going out and enjoying the public realm and are more dependent on the availability of the private gardens.
- Children and young adults are not able to drive and are more dependent on public transport.

Race

Secondary data

5.8 The overall population of Croydon is very diverse. In 2001 Census, 6% of residents classifying themselves as White Irish or White other, 3% as White mixed, 10% are Asian or Asian British, and 13% Black or Black British, and 1% Chinese. Croydon's Black and Minority Ethnic (BME) population was approximately 36.3%, compared with 40.2% in London and 13.0% in England

5.9 Figures 5.3 to 5.7 show the distribution of people of different ethnic backgrounds in the borough. Croydon's Black Ethnic population is concentrated in the central part of north Croydon, around Thornton Health, whilst the Indian sub-continent ethnic population is more concentrated in the western part of North Croydon, along London Road and in Norbury and some pocket of areas in the south east and west of the borough. The people of mixed and Chinese origins are distributed more evenly in the borough. The south of the borough are predominantly white.

Figure 5.3 Ethnic Black population (2001 Census)

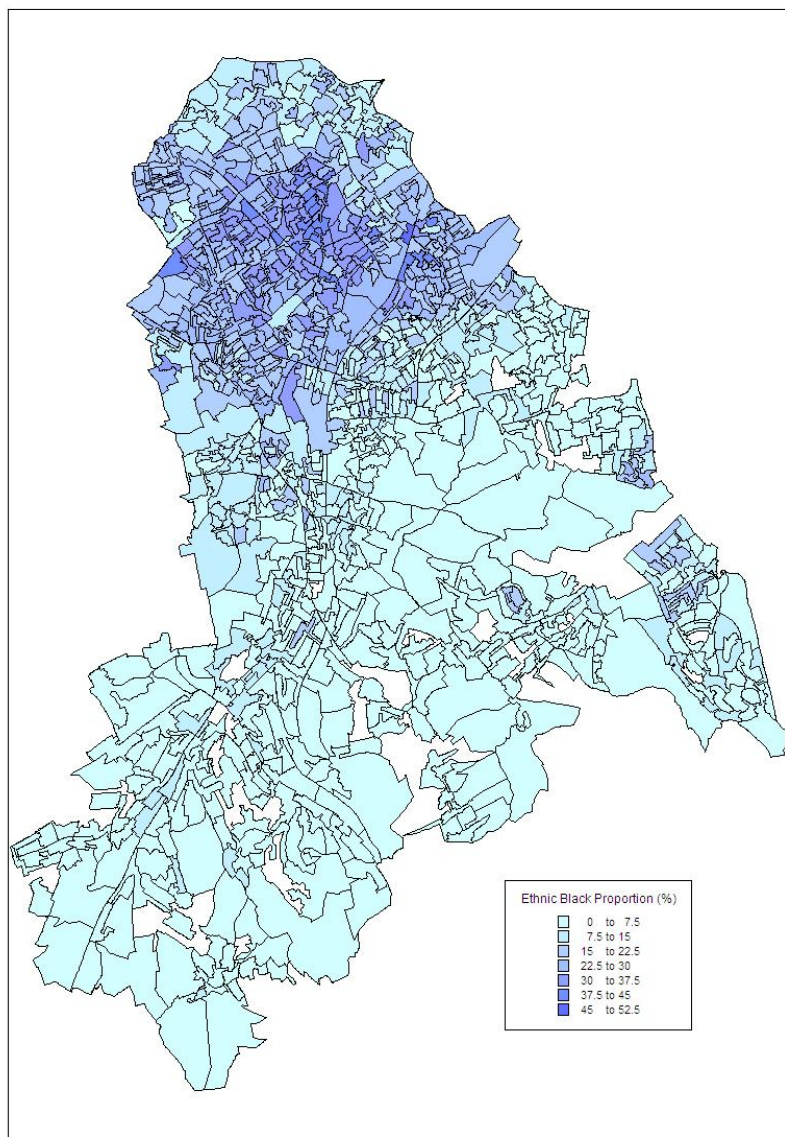


Figure 5.4 Ethnic White population (2001 Census)

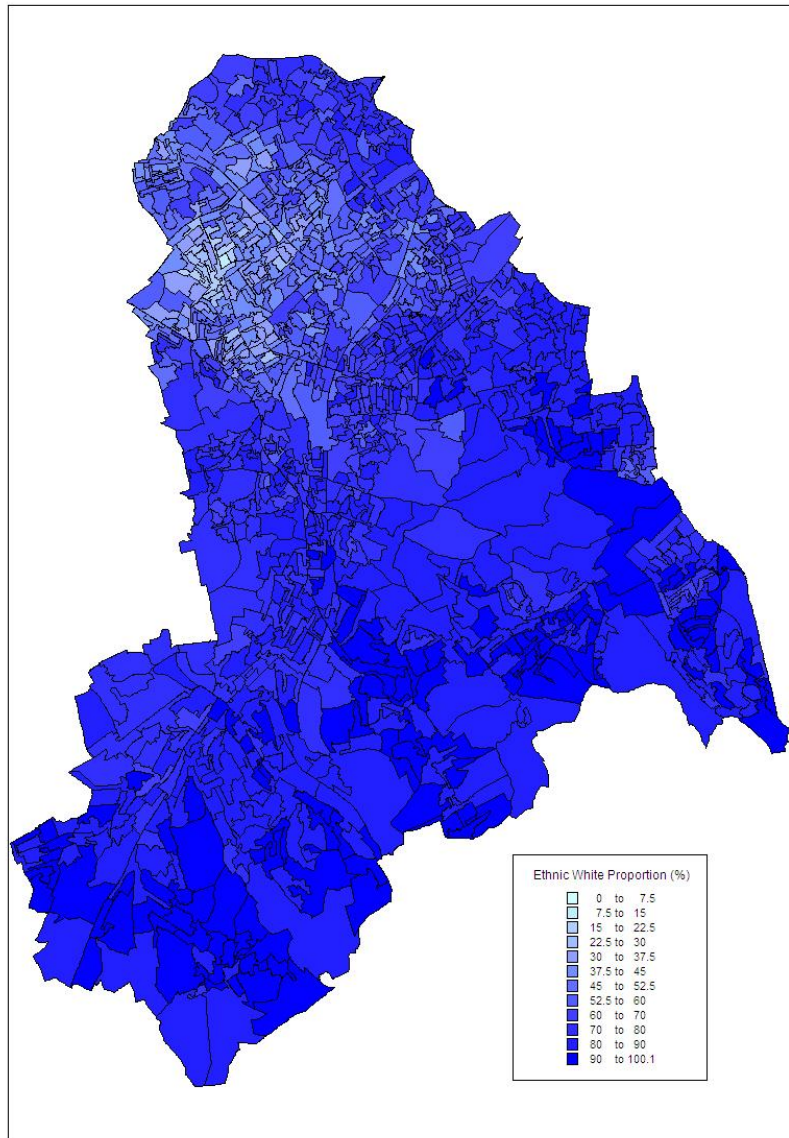


Figure 5.5 Ethnic Indian population (2001 Census)

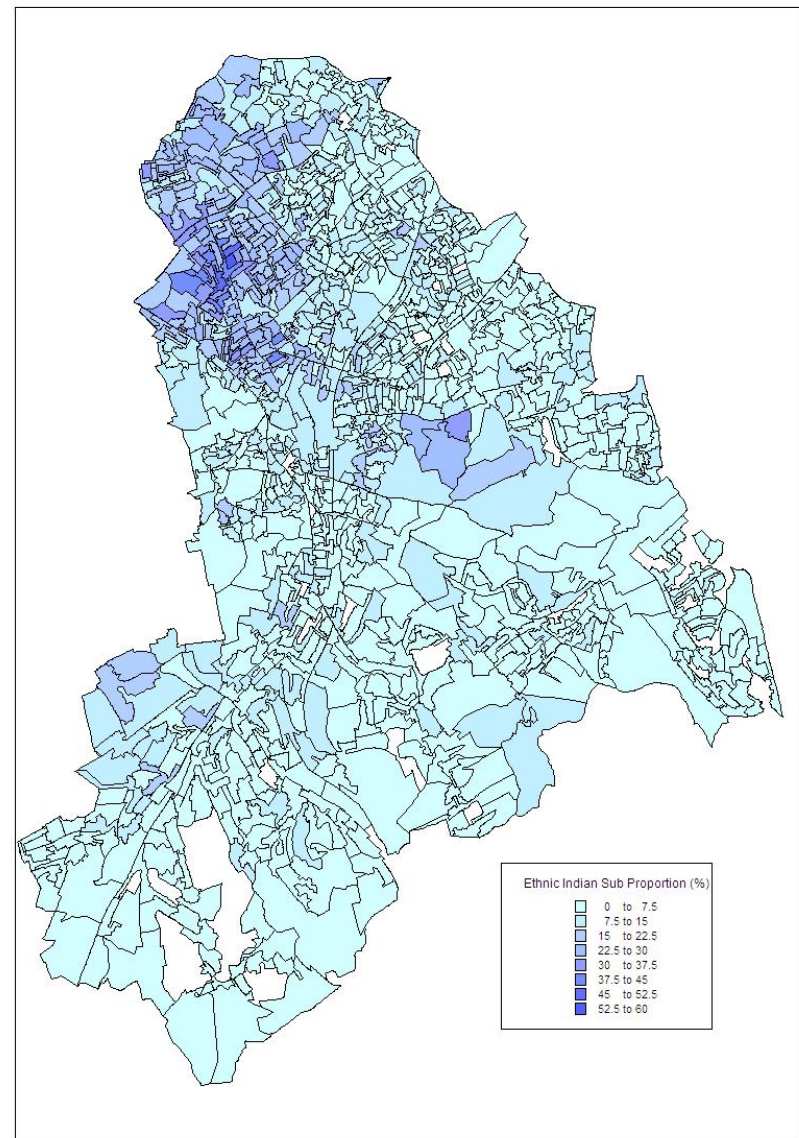


Figure 5.6 Ethnic Chinese population (2001 Census)

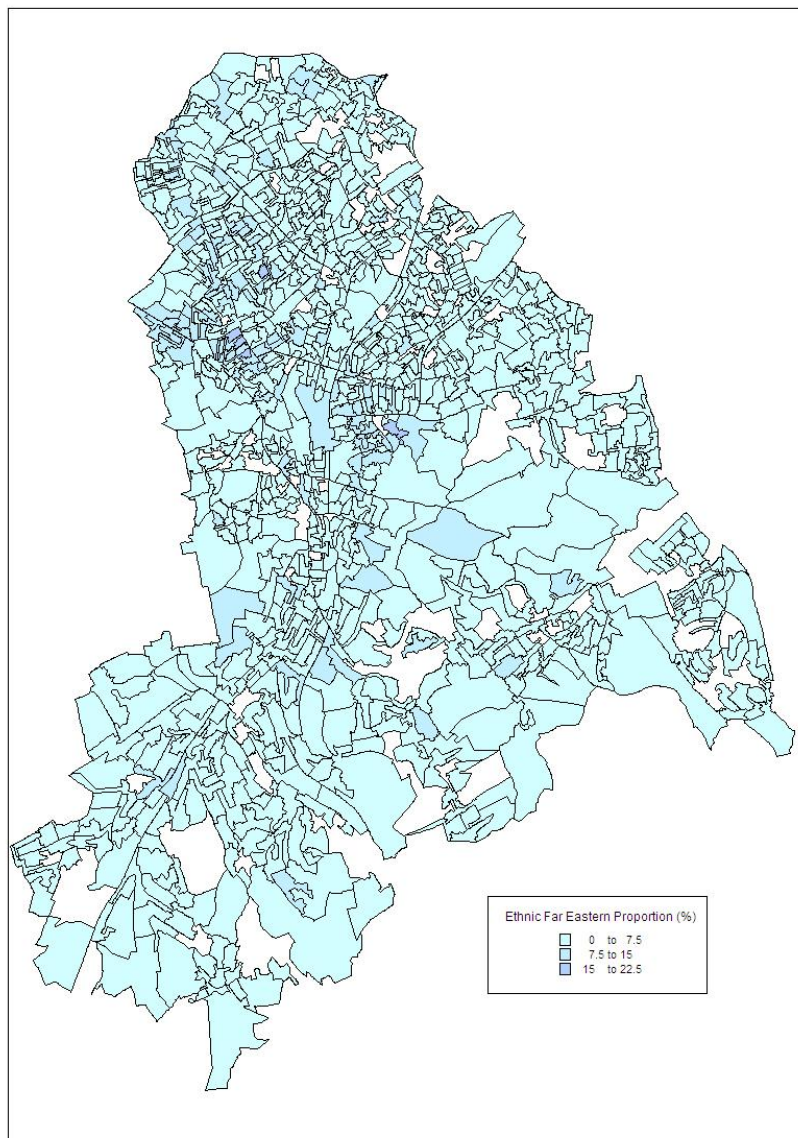
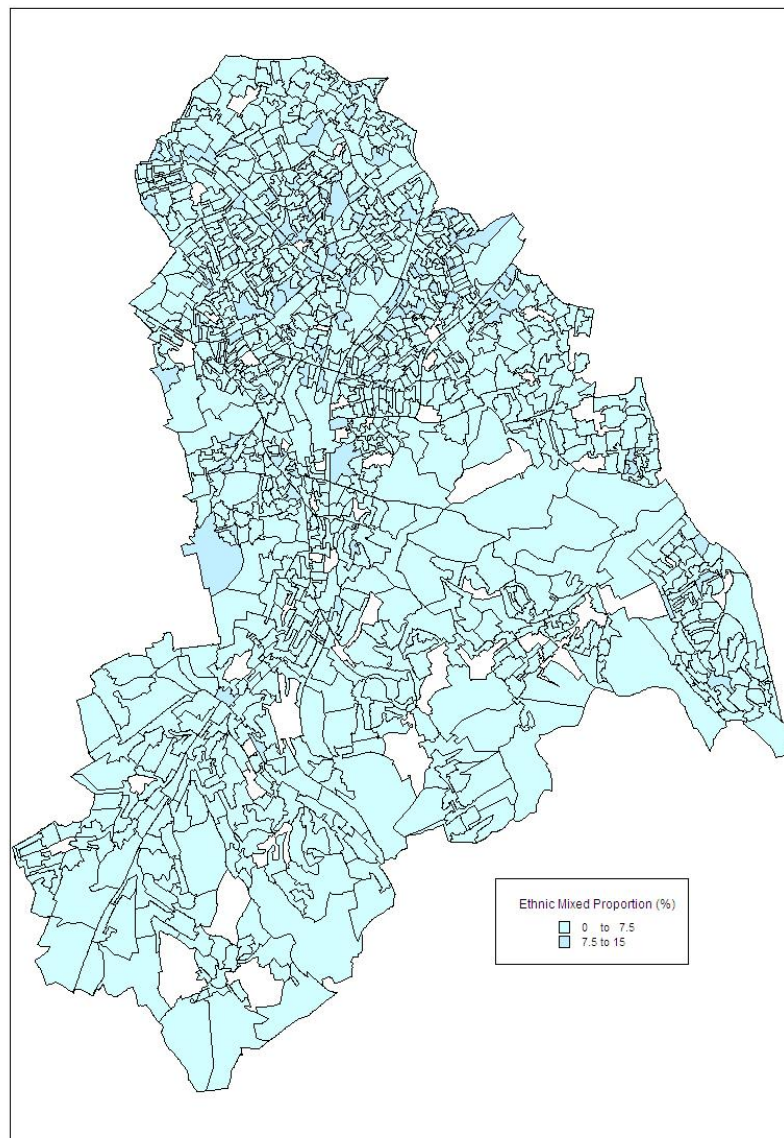


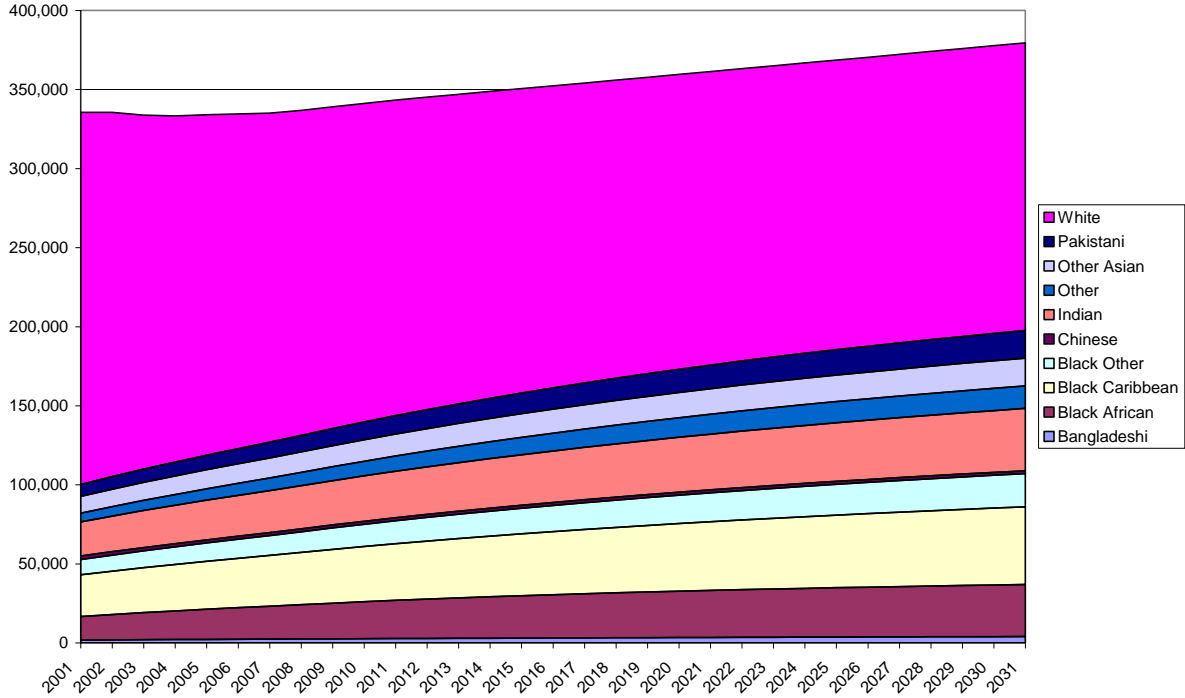
Figure 5.7 Ethnic Mixed population (2001 Census)



5.10 Analysis of secondary data shows that the key statistics relating to ethnicity in Croydon are:

- Amongst the 16 Places of Croydon, Broad Green (51%), Norbury (50%) and Thornton Health (59%) have more than half of their residents from a Black or Ethnic minority origins. Central Croydon (33%), South Norwood (39%) and Upper Norwood (29%) also have a significant proportion of population of BME background.
- Croydon’s changing BME population is one of the fastest growing in London. In the 2009 population projections produced by the Greater London Authority indicated that the BME population is rising, at 40% in 2009 and projected to be more than 50% by 2023 (see Figure 5.8).

Figure 5.8 Ethnic group population projections (GLA 2009 Low Population Projections)



- The Black and Minority Ethnic communities are younger overall than the white community with 29% of all BME residents being under 16 and 64% are aged 16 to 65.
- Only 7% of BME residents are at pensionable age or above.
- Services targeted at younger adults are therefore likely to be used by proportionately more BME people than services targeted at older adults.
- At least 40% of all school children (5-16) and 33% of working age residents (16-pensionable age) are from a Black and Minority Ethnic communities.
- In 2007 a quarter of all primary school children and a fifth of secondary school children had English as a second language.
- Exclusions relating to black Caribbean pupils have been of concern at national and borough level for a number of years. Black Caribbean pupils make up just over 11% of school population at secondary and primary phase. In 2008/9, 25% of permanent exclusions for maintained schools related to black Caribbean pupils³.

³ Attendance and Exclusions Report – Academic Year 2008/9 (Sub-committee 23rd February 2010)

- In 2004 people in employment⁴ from Pakistani, Chinese and White Irish groups were more likely to be self-employed than those in other ethnic groups in Great Britain. One in five Pakistanis in employment were self-employed (21 per cent), as were just under one in six Chinese (16 per cent) and White Irish (15 per cent) people. This compared with around one in eight (12 per cent) White British people and fewer than one in ten people from a Mixed or Black ethnic group.
- In 2001 63% of BME households lived in owner-occupied housing, 10% in council housing, 9% in other social rented housing and 16% in privately rented accommodation. The remainder live rent free or in communal establishments.
- In 2007/8 approximately 6,000 international migrants registered with a doctor in Croydon.
- More than 100 different languages are spoken and the borough's interpretation and translation service dealt with 10,659 (April-Nov 2009) requests where the greatest need came from people speaking Pashto (21.2%) and Dari (7.2%)
- In 2008 Croydon had a higher number of unaccompanied asylum seeking children and more young people than elsewhere in London. In 2009, of the 1068 children who were looked after by the local authority, 681 were unaccompanied asylum seeking children. With the UK Border Agency located in the borough, Croydon is a gateway site and the only asylum screening centre in the country.
- Research found Croydon had 42% of under 18 conceptions from White British ethnic backgrounds, 14% were Black Caribbean and 12% were Black African. 2% were from Asian ethnic backgrounds and for 6% of under 18 conceptions the ethnic group was unknown⁵.
- According to latest hate crime recorded in incident data (April 2009 – January 2010), recent concentrations of racial and religious hate crime tend to arise in the west central area of the borough with slightly lower numbers of offences recorded in the wards in north west. It is not possible to compare recorded incidents of homophobic hate crime or disability hate crime on this basis, due to the small number of recorded incidents (12 and 1 respectively) during this period.

5.11 Gypsy and Travellers are people living a nomadic habit of life following a traditional or voluntarily decision, whatever their race or origin. They experience wide-ranging inequalities, including accommodation, employment, health, education, criminal justice system and are often subject to racism and discrimination. In 2008 it is estimated⁶ that there are a total of 88 Gypsy and Travellers families in Croydon.

Consultation findings

5.12 A workshop was held in summer 2010 with Croydon's BME forum. Comments were also received from the consultation on *Towards a Preferred Core Strategy for Croydon – Supplement*. A summary of the findings is presented below: A summary of the comments is presented below:

- The forum commented that north of the borough has a greater proportion of the borough's BME population yet they felt that no resources are spent on the north of the borough.

⁴ Nomis

⁵ Conceptions for under 18s (age at estimated time of conception), 2007-2008, Birth notifications data and Marie Stopes data

⁶ London Boroughs Gypsy and Travellers Accommodation Study

- The forum felt that the existing Croydon Plan [the Unitary Development Plan] is too focused on the town centre and that there is a need for regeneration in the north.
- The forum commented that there is a need for a Strategy to share the proceeds of growth from the CMC with the deprived areas in the north of the borough and New Addington.
- The forum commented that there is not enough cultural offer for BME and the night economy not enjoyed by BME.
- They commented that there is a need for multi-use premises – a BME centre in the north of the borough never materialised.
- They commented that there is a lack of green space in the north.
- The forum commented that the north of the borough is not well connected to public transport.
- The forum supported the Learning City vision and the proposed Academies.
- The Core Strategy should include site allocation criteria which are fair, reasonable, realistic and effective in achieving London Plan targets for Gypsy and Travellers pitches.

Key Spatial Issues

- Discrimination in the labour market is a recurrent problem for many black and ethnic minority groups. Boys especially, achieve 7% below the national average for results therefore limiting access to employment opportunities for young black men with low educational qualifications⁷
- In London, the spatial location of workless households relates closely to deprived areas, which may restrict the access to essential local facilities and services. In Croydon 'income' deprivation tends to be focused around the same areas of the borough that are deprived. According to the IMD, 48 LSOAs out of the 220 LSOAs in Croydon are in the 20% most income deprived areas in England. These areas are predominantly concentrated in the north, west and south-east of Croydon⁸.
- Higher proportions of some ethnic groups run their own business or are self-employed and would benefit from initiatives to promote small businesses start up.
- The high cost of market housing and larger family size of some BME communities can mean that overcrowding and poor housing conditions can be a problem. Overcrowded Asian families are more highly represented on the transfer register amongst households requiring four or more bedrooms. Overcrowded Black families on the housing and transfer register are more highly represented amongst families that are overcrowded by two or more bedrooms according to the Croydon standard and require family homes of three or more bedrooms⁹.
- Fear of crime, racial abuse and discrimination can prevent BME communities' enjoyment of the public realm and accessing open space.

⁷ Children and Young Peoples Plan 2009

⁸ Croydon Observatory – Croydon Borough Profile

⁹ Overcrowding Reduction Strategy 2010-2014

- In respect of Gypsies and Travellers there is a lack of permanent sites in London and they are often located poorly and so barriers to education, employment and access to social and health facilities are experienced. The London GTANA estimates that the overall level of need in the borough for Gypsy and Travellers pitches between 2007 and 2017 is between 10 and 18 pitches. A Croydon survey conducted in 2008 to validate the findings locally supported the London GTANA findings and found a need for between 13 and 15 extra pitches.

Sex/Gender

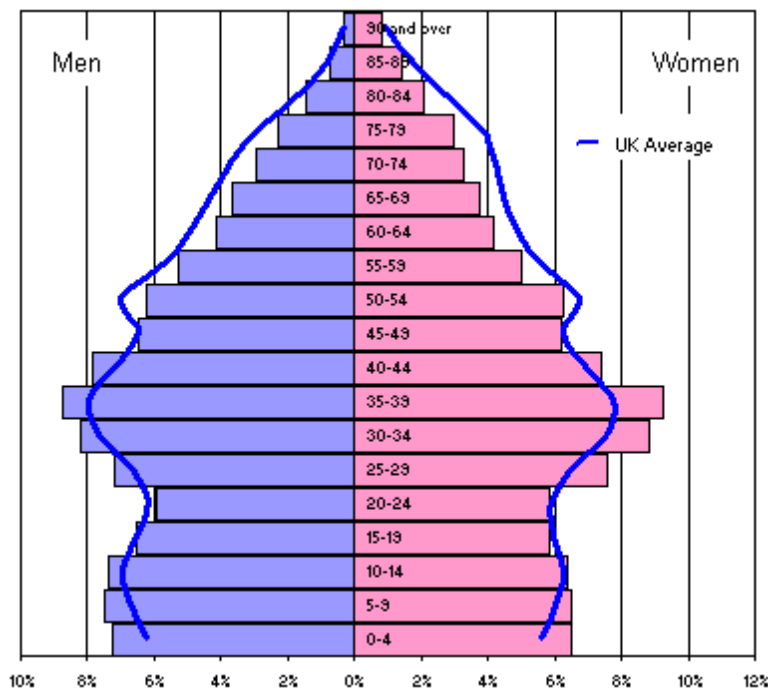
Secondary data

5.13 Gender differences create inequalities throughout life. Women live longer than men but spend more years in poor health. Women are also more likely than men to be poor when they are older.

5.14 Analysis of secondary data shows that the key statistics relating to gender in Croydon are:

- In Census 2001, 52% of Croydon residents are women and 48% men. 62% of those aged over 75 are women.

Figure 5.9 Population profile of Croydon (2001 Census)



- The overall gender pay gap, measuring the difference between all working men and all working women's hourly earnings, was 19 per cent. Between 1995-97 and 2004-7 the overall pay gap fell from 24% to 19% on the national level. The pay gap was insignificant at school leaving age, became positive at age 27 and then rose to a peak at age 45. There is no local gender pay gap data available in Croydon.

- A study on the gender pay gap by the Government Equalities Office¹⁰ showed that 10% of the overall pay gap can be attributed to occupational sex segregation. A

¹⁰ The Gender Pay Gap in the UK, 1995 to 2007, Government Equalities Office no 2010/2

10% greater share of men in an occupation is associated with 2 per cent higher average hourly wages. 12% of the gap is due to the industries in which men and women work, 21% is due to differences in years of experience of full-time work, 16% is due to the negative effect on wages of having previously worked part-time or having taken time out of the labour market to look after family and 36% of the pay gap cannot be explained by any of the characteristics that have been controlled for in the study.

- 9% of households in the borough are lone parent families and over 90% of these parents are women. The proportion of such households in the population has doubled since the 1991 census. Single parents make up a high proportion of households living in social housing (23% of council tenants and 32% of housing association tenants).
- Lone parents experience some of the greatest levels of economic and housing need, their household incomes are only about a third of the average income and they are far poorer than couples with children; they are more than three times as likely to be dependent on benefits than the average household; they are twice as likely to be in unsuitable housing¹¹ than others.
- Households headed by women are also highly represented among housing applicants. 18% of waiting list applicants and 55% of homeless households on the housing register are headed by a woman.
- Women are much more likely to suffer from gender specific violence than men, including rape and sexual violence, trafficking and prostitution and domestic violence. In the 12 months prior to July 2010, there were 17 reported incidences of rape and 24 reported incidences of other sexual crime (of both men and women) in Croydon.
- 1 in 3 women experience domestic violence in their lifetime. There were a total of 215 reported incidences of domestic crime in the 12 months prior to July 2010. According to latest hate crime recorded in incident data (April 2009 – January 2010) in Croydon, less affluent wards in the north and to a lesser extent New Addington and Fieldway tended to have greater incidences of domestic violence than more affluent wards in the south. Men can also be affected by domestic violence.
- There are more men than women sleeping rough and it can be harder to place men in hostel accommodation.
- Men are more likely to suffer from psychotic illness or have a learning disability.

Consultation findings

5.15 A workshop was held with the Croydon Women's Network on 9th February 2010 to consider potential impacts of the Core Strategy on women. Comments were also received from the consultation on *Towards a Preferred Core Strategy for Croydon – Supplement*. A summary of the findings is presented below:

- Women tend to have less access to cars and are more likely to depend on public transport for making local journeys for shopping, childcare and work. They need ramps and level access in the public realm and on public transport for pushchairs.
- There are more rough sleeping men than women and it can be harder to place men in hostel accommodation, therefore they are likely to suffer the same type of disadvantage as women in these circumstances.
- 89,671 children and young people aged 0 to 19 years live in Croydon. This is 26% of the total population and the largest population of children and young people in

¹¹ Unsuitable housing is defined by a range of factors such as unfitness and disrepair, overcrowding, and sharing or lacking amenities

London. There is “fear of stranger danger” which means that children are often prevented from going out and enjoying the public realm.

- There are not enough accessible public toilets. The provision of public toilets is particularly important to women. Provision within new community or publicly accessible developments or within the public realm should be encouraged by the Council.
- Safety is an important issue for women and therefore there was support for the proposed community safety strategy, which shows support for longer-term social design approaches to community safety as well as shorter-term enforcement approaches.
- Bringing vacant properties back into use can make a place feel safer and increase natural surveillance. This issue is particularly important for women
- The development of a Green Grid within the Borough is welcomed. However, the importance of small and informal local green spaces to women and children has not been recognised within definition of the Green Grid
- A suggested method of consulting widely would be to contact English as second language (ESOL) schools, where ethnic minorities often attend. Changes to their area could even be incorporated as a classroom activity. Additionally, a way to reach more women could be to attend mother and toddler groups, and schools.
- Women are more likely to suffer from gender specific violence than men in Croydon.
- The targets for shared accommodation are yet to be duplicated from (the then Draft Replacement) London Plan.
- The Gender Equality Duty requires that local authorities consider how their decisions impact on women and men differently and the Croydon Women’s Design Group would like to suggest that a ‘gender checklist’ is drawn up (similar to one undertaken by London Borough of Lewisham LDF team) so that impacts are considered at the earliest possible stage and are capable of influencing the final choice of LDF policy. The Women’s Design Group would welcome the opportunity of contributing to such a list. The Equalities Impact Assessment would appear to be carried out in the final stages of the policy-making and approval process, when it is too late to influence the policy approach.

Key Spatial Issues

- Many women have to balance work and domestic responsibilities. To do this they ideally need to be able to access suitable employment and training opportunities close to home. The provision of part-time work opportunities, business start up units and community and voluntary sector facilities can be used to promote women’s employment and reduce poverty and social exclusion.
- Access to affordable childcare is a key factor to women engaging fully in the labour market.
- Women are more likely to suffer from gender specific violence than men in Croydon. Facilities such as public toilets, local parks and children’s play areas are also needed for those with children.
- Because of the lower wages and higher level of part time working, women have a more restricted choice and quality of housing accessible to them and are more likely to rely on social housing.

Disability

Secondary data

5.16 The proportion of Croydon's population with a disability is at 15%, slightly below the average of London and England. In 2001 census 48,660 people described themselves as having a limiting long-term illness, health problem or disability that limits their daily activity or work. Given that the population of Croydon has increased and become older since the national census, it is likely that this figure now exceeds 50,000 and it is estimated that this will exceed 53,000 by 2018.

5.17 There are a variety of disabilities, whether it is physical or mental, which means that disabled people can have a wide range of different issues and difficulties in daily life depending on their type and level of disability. The needs of people who have mobility difficulties, for example, are different from those of someone who have learning difficulties.

5.18 Analysis of secondary data shows that the key statistics relating to disability in Croydon are:

- In 2009, there were a total of 9,490 people claiming Incapacity Benefits¹² and 1,160 for Severe Disablement Allowance¹³. The claimants were predominantly male (56%) and have claimed for 5 years or over. The main medical reasons for claiming were mental disorders (46%), musculoskeletal diseases (14%) and other (24%).
- In 2009, there were a total of 14,065 people claiming disability living allowance¹⁴ and 2,035 benefit claimants in Croydon who were disabled. The geographical distribution of these claimants in proportion to all working age population was fairly even (0.9%) in the borough with a slightly higher rate in the East spatial management area (1.1%).
- Croydon's Joint Strategic Needs Assessments (JSNA) estimated that in 2007 there were 42,796 adults with a moderate or serious disability in Croydon, 1,695 people were registered as blind or partially sighted, 2,400 were registered as hearing impaired and 6,846 people had a learning disability.
- GP recorded prevalence of learning disability (of all age) by Croydon middle super output areas as at 31 Dec 2009, showed there were a total of 1,484 persons with learning disability. Purley, Coulsdon West and New Addington have the highest percentage of residents with a learning disability in the borough.
- The most common reason for registering children and young people as disabled was communication disorders (including autistic spectrum disorders) (57%), followed by moderate (36%) and severe (28%) learning difficulties.

Consultation findings

5.19 Consultation meetings were held with the with the Croydon Mobility Forum on 24th November 2010 and the Department of Adult Services and Housing (DASH) on

¹² Incapacity Benefit was a weekly payment for people under state pension age who could not work because of illness or disability.

¹³ Severe Disablement Allowance available to persons claiming it prior to April 2001. It was for people who were assessed to be 80% disabled and were incapable for work because of illness or disability

¹⁴ Disability Living Allowance is a tax-free benefit for disabled children and adults who need someone to help look after them or have walking difficulties.

13th September 2010. Concerns of disabled people were highlighted at these meetings including:

- Disabled people continue to experience high levels of discrimination, harassment and lack of public awareness. Their disability, particularly if physically visible, might make them feel vulnerable to abuse and harassment in public. This can limit their ability to enjoy the public realm and participate fully in society.
- There are no mechanisms in place through the Core Strategy to monitor the requirement for 100% of homes to meet the Lifetime Homes standard or for 10% of new homes to be wheelchair accessible units or readily adaptable.
- There is a need for more accessible houses rather than flats.
- There is a need for a policy regarding adaptations to existing properties.
- There was support for Lifetime Homes standards in the Core Strategy homes strategy.
- There is a need for level access to buildings, public realm, local services and public transport.
- There is a lack of disabled parking in the borough.

Key Spatial Issues

- Disabled people are more likely to experience worklessness than non-disabled people.
- There is a shortage of accessible housing for disabled people, leading to lack of choice and inappropriate housing. Many who attended the consultation workshops raised the need for more accessible housing and monitoring of 10% criteria for Lifetime.
- Convenient, safe and reliable public transport (including specialist transport services such as dial-a-ride) is important for disabled people to continue participating in society. Disabled parking is also important especially in areas where access to public transport is limited. Elderly people attending the public consultation confirmed the need for improved convenient, safe and reliable public transport, environmental quality, and accessibility of the public realm are important for older people. A need for more disabled parking in Croydon was also raised.
- Surrounding environments such as schools, shops, public realm and public transport are not often fully accessible and restrict the access to employment, training and leisure for disabled people.
- Access to social facilities and services for disabled people, including easily accessible, comprehensive, accurate and timely information and support are crucial for the well-being of disabled people.

Religion and Faith

Secondary data

5.20 In the 2001 Census more people in Croydon stated they had a religious belief than in any other London borough but there is a significant proportion that either had no religion or it was not stated. The most common religion is Christianity (66%),

followed by those reporting no religion/not stated (23%), with Muslim (5%) and Hindu (5%) following.

5.21 Analysis of secondary data shows that the key statistics relating to religion and faith in Croydon are:

- Croydon is one of the most religiously diverse boroughs in the country, although this diversity tends to be in the north west of the borough. Since 2000 there have been 15 applications related to places of worship in Croydon¹⁵.
- The black majority churches are some of the fastest growing in the borough in terms of congregations. Fifty of the groups without premises were in north west Croydon and were mainly the Black led, Pentecostal or Evangelical groups who wanted to worship in their own way. Some groups were worshipping in their own language. A few were groups that had been 'planted' by other churches outside Croydon and had grown to sizeable communities.
- Islam is the second largest religious group (5%) within the Borough after Christianity (66%) 'The Need for Future Burial Land Provision' study¹⁶. conducted in 2010 highlighted the need to consider the potential future demand for Muslim burial space in Croydon due to specific burial requirements.
- Recent studies show a London-wide problem for finding space for worship, especially for Pentecostal and Evangelical churches and Muslim communities which tend to have a large and growing number of worshippers but fewer resources than the more established faith communities.
- Faith Communities in Croydon (a mapping exercise in 2006) found that there are two hundred and sixty worshipping groups in the whole of Croydon, just over half of these are to be found in north west Croydon. 78 of these groups did not have a place of worship of their own and were either sharing premises with another group or meeting in school halls or community halls.
- The Croydon study from 2006 would seem to show a need for more places of worship particularly within the north of the Borough. It would appear that the groups that will see the greatest levels of growth will be Muslim and the Christian black majority churches. The nature of the black majority churches require larger facilities as the membership tends to be drawn from a wider area than a local parish.

Consultation findings

5.22 A workshop was held with Croydon's Interfaith Group on 29th July 2010. A summary of the findings is presented below:

- There are sufficient places of worship for established faith groups but not for Muslim, Hindu and Black majority churches.
- There is a need a level playing field for availability of space/buildings for worship and community delivery of services.
- The co- location of different faith groups will not work.
- There is a lack of Muslim worship space in the north and south of the borough.
- Hindus tend to use school halls for workshops, Black majority churches are larger and often use warehouse space.
- There is competition for space with other uses such as the use of industrial space for places of worship.

¹⁵ London Development Database, GLA

¹⁶ The Need for Future Burial Land Provision (Nathaniel Lichfield and Partners Ltd)

- There is a successful Muslim school in Croydon.
- There is a need for a cultural/community centre to welcome all faith activities.
- There is a particularly important need for family housing to provide large enough homes to house extended families and address issues of overcrowding.

Key Spatial Issues

- Discrimination, harassment and hate crime are concerns of some religious groups
- Access to appropriate housing especially in relation to overcrowding
- People from faith groups are likely to require specialised service provision, including places for cultural practices, burial space, community activities and provision for places of worship that are accessible by the communities which need them.
- The newly established faith groups have different needs and patterns of worships from the more established faith group such as the Church of England.

Lesbians, gay men, bisexuals and transgender people

Secondary data

5.23 Nationally there is very little data about the Lesbian, Gay, Bisexual and Transgender (LGBT) community. It has been estimated between 5-10% of the population could potentially classify themselves as lesbians, gay men, bisexual or transgender people which would equate to about 15-30,000 residents in Croydon.

5.24 Analysis of the secondary data available shows that the key statistics relating to sexual orientation and transgender people¹⁷ in Croydon are:

- In 2001 census there were 672 people living as same sex couples in Croydon. The second National Survey of Sexual Attitudes and Lifestyles in 2004 found that 3.9% of women and 5.5% of men aged 16 to 44 and living in London had had a same gender sex partner in the last five years. The figures were lower in the rest of the UK for both women (2.4%) and men (2.1%), confirming that LGBT people migrate to large cities, especially London. Within London, LGBT people are concentrated in inner rather than outer London.
- LGBT Studies in neighbouring Lambeth (2006) found that the greatest social need amongst LGBT people resides with those who are members of groups which are already disadvantaged, such as women and ethnic minority groups.
- The 2008 Croydon Strategic Crime Assessment indicated there had been an increase in homophobic hate crimes recorded by the police.
- Recent studies in the LGBT community in Croydon conducted by Crocus indicate that there is a need for more LGBT or LGBT- friendly venues in Croydon.
- Recent studies estimate prevalence of transgender people to be about 20 per 100,000 people, (about 10,000 people in the UK in total), of whom 6,000 have

¹⁷ Transgender is a state of someone's 'gender identity' (self-identification as woman, man, neither or both) not matching someone's 'assigned sex' (identification by others as male, female or intersex based on physical/genetic gender). Transgender does not refer to any specific form of sexual orientation. Transgender is a separate equalities group from sexual orientation.

undergone transition in the UK. There is no figure for the number of transgender people in Croydon but the group is likely to be relatively small and the majority are likely to be in concealment for family or employment reason.

Consultation findings

5.25 A workshop held on 5th August 2010 with the Croydon Unison LGBT group raised the following comments:

- There is a need for LGBT space in Croydon.
- There is more hate crime against members of the LGBT community in deprived areas than elsewhere.

Key Spatial Issue

- LGBT people can face hate crime and harassment in the public realm. Personal safety in public spaces and public transport is often an issue particularly for those who are open about their sexuality.
- Discrimination and a lack of public awareness affect the well-being of these communities, particularly with regard to housing, employment, counselling advice and health services.
- The night-time and leisure economy has particular significance to some members of LGBT communities. Social and recreational facilities which are LGBT friendly would encourage the group to engaged and participate in society.

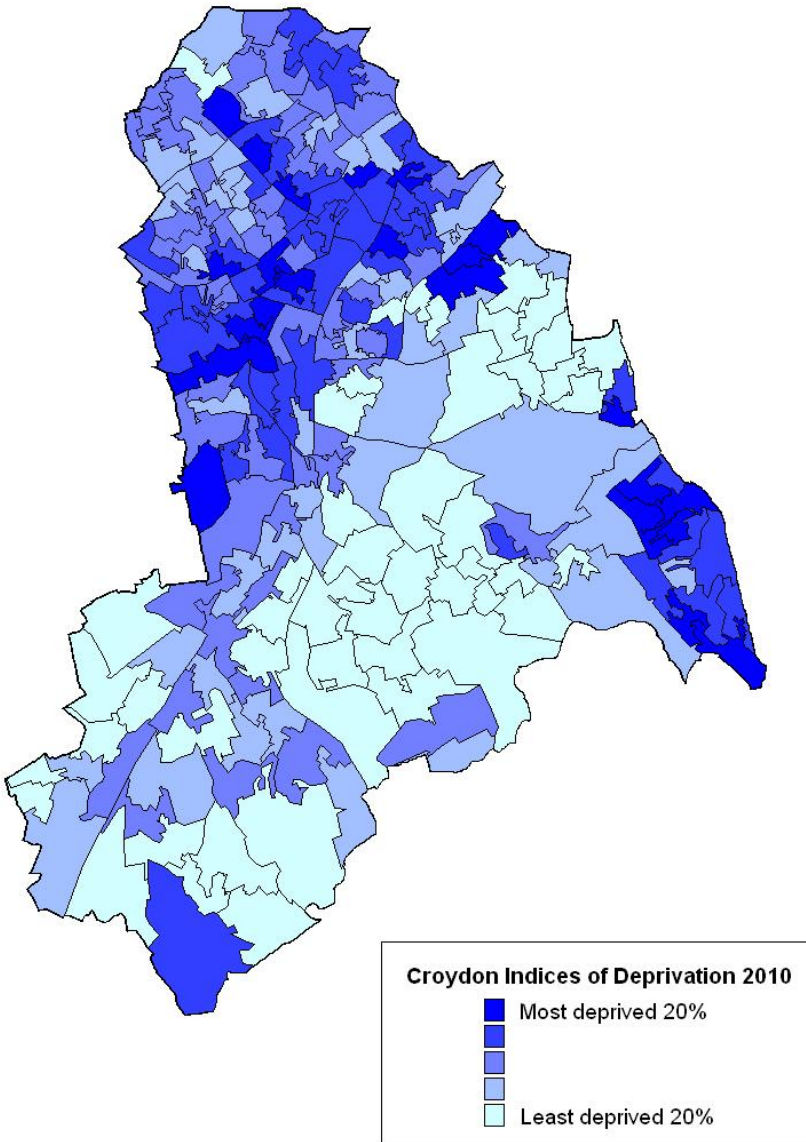
6. Impacts on Community Cohesion

Deprivation

6.1 Croydon is one of the more affluent boroughs in London, being ranked 19th out of the 33 London authorities in terms of levels of deprivation (but it is the 107th most deprived local authority out of 326 authorities in England)¹⁸. There is a north-south divide in the borough.

6.2 Borough-wide figures mask real pockets of deprivation with five wards ranked as being in the top 10% most deprived in the UK. Croydon also has the 18th highest level of child poverty in London (out of the 32 boroughs in the capital) with 1 in 4 children living in poverty.

Figure 6.1 Index of Multiple Deprivation in Croydon (2010)



¹⁸ Indices of Multiple Deprivation, Department of Communities and Local Government, 2010)

6.3 The Index of Multiple Deprivation map in Figure 6.1 demonstrates the level of deprivation in specific areas in the borough. Croydon has the six most deprived super output areas (small areas in a ward) in South West London, including parts of Fieldway and New Addington, Broad Green and South Norwood. Fieldway is the most deprived ward in South West London. At a London-wide level, Fieldway and New Addington are amongst the 30% most deprived wards while Sanderstead and Selsdon & Ballards are amongst the 10% least deprived.

6.4 On health, education and crime, Croydon performs well; and life expectancy is in line with London and national average at 78 for men and 82 for women. However crime and the fear of crime remain a major concern for many residents.

6.5 The current national economic climate is putting significant additional pressures on local communities in Croydon, reducing the opportunities for those leaving education, and putting downward pressure on the numbers of people able to access paid employment. Those in the most vulnerable groups such as the long-term unemployed, disabled people and those with low levels of literacy are likely to feel most squeezed as people with established work skills and experience re-enter the employment market.

Discrimination

6.6 The policies proposed in the Proposed Submission Core Strategy address a wide range of spatial issues which will have far reaching impact on people living and working in the borough. By providing better opportunities for jobs, homes, community facilities and transport network and promoting cultural activities the Core Strategy would have an indirect but positive impact on community cohesion and equality issues.

6.7 The policies in the Proposed Submission Core Strategy have been borne out of the draft strategies presented in *Towards a Preferred Core Strategy for Croydon* and *Towards a Preferred Core Strategy for Croydon – Supplement* which have been assessed to ensure the equalities impacts of the policies in the proposed submission draft have been considered.

6.8 Although the policies in the Proposed Submission Core Strategy do not deal with enabling equal opportunities for all groups and eliminating inequalities directly, they did seek to provide more opportunities for employment and new housing of different size and affordability to suit the needs of the residents. It also seeks to provide community facilities in accessible locations. Therefore it is likely to have positive impacts on equality of opportunity.

6.9 The Proposed Submission Core Strategy seeks to provide housing, job opportunities and community facilities in accessible locations by public transport, e.g. around town and district centres. The transport policy proposes improvement schemes on movement and access around major transport hubs, stations and town centres. It therefore is likely to have some positive impact on the accessibility needs for disabled people.

6.10 The Proposed Submission Core Strategy addresses some concerns of women: the promotion of business start up and creative industries might provide more flexible time/part time working opportunities for women. The proposal to have more homes, community facilities, and studio/workshops/creative industries (i.e. jobs) in accessible locations by public transport would be useful for women who are more

likely to depend on public transport. The improvement of access and movement in town centres and public transport is particularly useful for those people with push chairs and those using shopping trolley bags.

6.11 The Proposed Submission Core Strategy seeks to provide more opportunities for employment and new housing of different size and affordability to suit the needs of the residents. It also seeks to provide community facilities in accessible locations. It promotes the creation of a well-connected network of high quality, multi-functional public spaces. It is therefore likely to contribute positively towards good relations between people of different racial or other minority/community/social or economic groups.

6.12 Although the policies in Proposed Submission Core Strategy do not deal with unlawful discrimination and harassment directly, the London Plan and the Core Strategy together do promote a well-designed and safe public realm and safer neighbourhoods. These policies are likely to have positive impacts on elimination of unlawful discrimination and harassment.

6.13 The Core Strategy has gone through extensive public consultation campaigns and received more than 2,000 responses from members of the public and stakeholders. People were able to comment on the proposed strategy in writing and online.

7. Outcomes of EqIA

7.1 The development of Proposed Submission Core Strategy has been informed and influenced by the results of three rounds of public consultation and workshops with equalities groups carried out during its preparation and the EqIA and Sustainability Appraisal processes. This has helped to ensure that the Core Strategy proposes the most appropriate policies for the spatial development of the borough.

7.2 Inline with the recommendations of the EqIA further consideration was given to constraints that could potentially hinder the effective implementation of the Core Strategy and changes were made to the draft policies in the Core Strategy where appropriate. Issues arising from the EqIA were taken on board and addressed in the Core Strategy. The plan will be monitored and implemented through the Action Plan developed below:

Action Plan

Actions Required	Timeframe	Resources/Cost	Lead Officer	Relevant Performance indicators
Evaluate whether further EqIA work should be undertaken for subsequent projects and strategies within the Local Development Framework. If it is determined that further EqIA's should be undertaken, present these to the Council's Equality Impact Assessment Team.	2011-12	Existing budget	Dominick Mennie	<ul style="list-style-type: none"> Corporate Strategies, projects, lower tier documents including Development Management-Development Plan Documents (DPD) and Site Allocations DPD's that deal with some of the more detailed concerns of equalities groups.
Planning Division to continue to liaise with the Corporate Equalities team as necessary.	Ongoing	Existing budget	Rory Macleod/ Tim Naylor	<ul style="list-style-type: none"> Major development schemes especially those incorporating public realm.

Actions Required	Timeframe	Resources/Cost	Lead Officer	Relevant Performance indicators
Monitoring of key indicators (including infrastructure) through Annual Monitoring Report	Annually	Existing budget	Dominick Mennie	<ul style="list-style-type: none"> • Croydon Council's 5 year housing supply. • The number of new homes completed in the borough broken down by place, size, tenure. • Number of Lifetime Homes. • Number of jobs in the borough within the creative industries sector. <ul style="list-style-type: none"> • Number of new jobs occupied by young people (aged 18-24) and youth unemployment rate in the borough <ul style="list-style-type: none"> • Number of educational facilities available and distribution (especially between the north and south of the borough) <ul style="list-style-type: none"> • Number of new shared community facilities (especially between the north and south of the borough). • Number of new Places of Worship, Play facilities and Health facilities. • Percentage of residents satisfied with their neighbourhoods as a place to live. • Number of planning permissions granted contrary to Environment agency advice on flooding, defence grounds or water quality.

Actions Required	Timeframe	Resources/Cost	Lead Officer	Relevant Performance indicators
<p>The provision of the appropriate community infrastructure has been identified as an issue of concern to equalities groups. The Infrastructure Delivery Plan and Community Infrastructure Levy should plan to deliver infrastructure to address the needs of equalities groups. Neighbourhood Plans should promote further engagement with a broad cross section of the community should be undertaken to promote community cohesion.</p>	Ongoing	Existing budget	Various	<ul style="list-style-type: none"> • Neighbourhood Plans to engage with equalities groups.

8. Conclusions

8.1 The assessment has found that the Core Strategy is overall very supportive of equality groups addressing spatial inequality in the borough, and considering the needs and priorities of all sections of the community by:

- Seeking to provide a choice of housing, such as affordable housing and larger family homes to meet people's needs at all stages of life;
- Providing more job opportunities either by safeguarding industrial and warehousing premises or by fostering an environment where creative enterprises can prosper;
- Promoting cultural activities and creative industries which directly or indirectly celebrate the diversity and multiculturalism of the borough;
- Promoting well designed and co-located community, education, health and leisure facilities to meet the aspirations and needs of a diverse community;
- Taking a positive attitude to improving transport and access across the Borough, but particularly in the town centres; and
- Seeking to conserve and create spaces and buildings that are safe, accessible and that foster cohesive communities.

8.2 There are however some elements of the Core Strategy which might have significant impact on the equality groups:

- The major growth in Croydon Opportunity Area and the surrounding Places will provide the majority of new homes, and opportunities for studio/workshops and for creative industries, alongside the existing cluster of shops and night time economy. It is vital to ensure that equality groups have equal access to these new homes, jobs and facilities in this major growth area. The Core Strategy's delivery mechanisms including the Opportunity Area Planning Framework and master plans, should take on board the ways which the future growth will affect the equality and diversity of the existing communities in these areas, try to remove barriers for the equality groups, and promote social cohesion in the new communities created in these major growth areas.
- In delivering the Core Strategy it will be necessary to address the impact of the proposed growth on the BME communities in the centre and north of the borough, especially in disadvantaged areas such as Broad Green and South Norwood (and also Fieldway in the East). There are opportunities for urban renewal and regeneration in these deprived area and risks that these communities might feel threatened or displaced by new development. Effective engagement with the local BME communities around new development is particularly important. There is also restricted access to open space in the north so it will be necessary for the Core Strategy to continue to promote improving existing open spaces and the access and links to them.
- In delivering the Core Strategy it will be important to ensure that equality groups will have equal access to new enterprise and employment opportunities in the borough, especially in the envisaged growth sector in creative industries.

8.3 In view of the strategic nature of the Core Strategy policies, their impacts on equality and diversity should be treated as *potential*. Whether these impacts would materialise depends on the details of the scheme during the implementation stage and the mitigation actions. The implementation of Core Strategy will rely on lower level Development Plan Documents and other delivery mechanisms, such as the

Infrastructure Development Plan, Community Infrastructure Levy and Masterplans, which will be scrutinised in future EqlAs if appropriate.

8.4 The Core Strategy is in general found to be sound in equality issues. Mitigation measures are identified (and shown in Appendix 4) for specific areas that will need to be considered in areas other than the preparation of the Core Strategy.

Appendix 1: List of consultees

The list of individuals and organisations who have supplied information and/or have been consulted during the preparation of this EqlA are as follows:

Individual	Group
Joan Zusich	Physical Disabilities Team, OP/PD division, Croydon Council
Carole Webster	Welfare Rights Advisor, Adult Services and Housing, Croydon Council Wheelchair user
-	Croydon Council Unison LGBT Group
David Osborne	Croydon PCT GP Register data
-	Gender Identity Research and Education Society
Dr. Jagdish Sharma	Hindu community
Shuaib Yusaf	Muslim community
Pastor Damian Luke	Black Majority Church groups
Yvonne Traynor	Rape Crisis- South London
Richard Pacitti	Mind in Croydon
John Osbourne	Access Officer, Croydon Council
Sarah Taylor	Community Involvement Worker, Croydon Voluntary Action
Nero Ughwujabo	Croydon BME Forum
-	Crocus (Lesbian, Gay, Bi-Sexual and Transgender Network)
Mike McConnell	Croydon Disability Forum
Mary Lawrence	Children, Young People and Families Network
Nicole Beckford	Croydon Xpress Project (young people)
Helen Clarke	Croydon Youth Parliament
Rev Barry Goodwin Denise Wright	Faiths Together in Croydon (Croydon Interfaith Network)
Pauline Dawkins	Older People's Network
Ikenna Obianwa	Mental Health Forum
Richard Pacitti	Mind in Croydon
Denise Wright	Croydon Women's Network

Appendix 2: Sources of data

Written Representations in response to “Towards a Preferred Core Strategy” report regarding equality issues or from equality groups

Croydon Primary Care Trust - Data on GP figures on learning disability

Croydon Joint Strategic Needs Assessment 2009/10 <http://hna.csl.nhs.uk/JSNA.aspx>

Office for National Statistics (ONS) www.ons.gov.uk

Official Labour Market Statistics (Nomis) www.nomisweb.co.uk/

Census 2001, SASPAC

Department of Communities and Local Government www.communities.gov.uk/

Gender Variance in the UK: Prevalence, Incidence, Growth and Geographic Distribution, June 2009, Gender Identity Research and Education Society, www.gires.org.uk

The Gender Pay Gap in the UK: 1995 to 2007, Government Equalities Office no. 2010/2

The Full Report of Lambeth LGBT Matters – The needs and experiences of Lesbians, Gay men, Bisexual and Trans men and women in Lambeth, 2006, Sigma Research
<http://www.sigmaresearch.org.uk/go.php/projects/lgbt/project31/>

Planning for Places of Worship – Draft Report, Just Space Network

Responding to the needs of faith communities: places of worship, Final report, 2008, CAG Consultants in association with Land Use Consultants and Diverse Ethics,

Faith Communities in Croydon – Findings from the 2006 Mapping Exercise, Faiths Together in Croydon: an Interfaith network <http://www.rsleeman.fsnet.co.uk/faiths/home.htm>

The London Borough of Croydon Place Survey 2008

Equality Strategy 2010-2013, LB Croydon
<http://www.croydon.gov.uk/contents/departments/community/pdf/EqualityStrategy201013>

Equalities and Human Rights Commission website EHRC - Home

The Government Equalities Office Home Page

Croydon LGBT Survey 2008, Crocus – Croydon’s LGBT Network.
<http://www.croydoncrocus.org.uk/survey-results.htm>

Inequalities experienced by Gypsy and Traveller communities: a review, Sarah Cemlyn, Margaret Greenfields, Sally Burnett, Zoe Matthews and Chris Whitwell, 2009, Equality and Human Rights Commission.

London Boroughs’ Gypsy and Traveller Accommodation Needs Assessment, 2008, Fordham Research

Just Ageing? Fairness, equality and the life course, Final Report, 2009, Equality and Human Rights Commissions, Age Concern and Help the Aged.

Metropolitan Police Crime Figures

http://www.met.police.uk/crimefigures/boroughs/zd_month%20-%20mps.htm#c19

Croydon Observatory- Croydon Borough Profile

<http://www.croydonobservatory.org/docs/877820/877865>

Nathaniel Lichfield & Partners Ltd 'The Need for future Burial Land Provision' February 2010

Appendix 3: Public Consultation and Engagement

In accordance with the Statement of Community Involvement, both the *Towards a Preferred Core Strategy for Croydon* and *Towards a Preferred Core Strategy for Croydon – Supplement* reports were consulted upon for six weeks each.

Electronic versions of the draft LDF documents were made available for download from the Council website. Web-based social media including Facebook, Youtube, and a blog were used to signpost to the Consultation Portal and corporate website, and supply regular contact and updates to stakeholders and the public. A press release was issued, as well as a special supplement in 'Your Croydon' including information and illustrations for the Core Strategy. Copies of the Core Strategy were printed for use at dedicated Core Strategy consultation events, and made available at public libraries. All comments, representations, and responses from public consultation were collated in a consultation database.

More than 2000 representations were received as part of the *Towards a Preferred Core Strategy for Croydon* consultation and more than 400 representations were received as part of the *Towards a Preferred Core Strategy for Croydon – Supplement* consultation.

Formal public consultation for *Towards a Preferred Core Strategy* was carried out from the 16th February 2010 – 21st March 2010. Four events were held in the centre, north, south and east of the borough and were structured in a drop-in style format. Comments from these events have been used to compile the Equalities Impact Assessment for the Proposed Submission Draft Core Strategy. Venues and dates for public events were as follows:

- **27th February 2010** – Maple Room, Fairfield Halls –
- **6th March 2010** – Christchurch Hall, Brighton Road, Purley
- **13th March 2010** – Phoenix Community Centre, Westow Street, Upper Norwood
- **20th March 2010** – Selsdon Hall, Addington Road, Selsdon

Each of the events was open to the public from 10am - 3.30pm.

Formal public consultation for Supplement was carried out from 6th September 2010 – 18th October 2010 in parallel with the West Croydon Masterplan, East Croydon Masterplan, and Infrastructure Delivery Plan (IDP). Five events were held in the centre, north, south and east of the borough in the same style as those for *Towards a Preferred Core Strategy*. Venues and dates for public events were as follows:

- **25th September 2010** – Maple Room, Fairfield Halls
- **11th September 2010** – United Reformed Church Hall, Purley
- **18th September 2010** – Phoenix Community Centre, Westow Street, Upper Norwood
- **2nd October 2010** – Selsdon Hall, Addington Road, Selsdon
- **9th October 2010** – United Reformed Church Hall, Purley

The representations received made by equality groups (if identified) or related to equality issues have been taken on board in the evidence base to inform the EqIA. In accordance with the Council's guidance to all departments on carrying out equality impact assessments, the effect of the Core Strategy on a range of equality groups has been considered with the aim of ensuring fairness and equality of opportunity in relation to race, disability, gender, age, sexual orientation, faith and religions. In the initial assembly of evidence base for the Core Strategy, officers discussed the Core Strategy documents with equality groups to underpin the planning issues likely to impact upon them. This involved participation in existing forums, networks and voluntary community organisations. The initial draft of this EqIA report has been circulated to these equality groups for their comments prior to publication.

Appendix 4: The Equality Impact Assessment

The tables on the following pages show the full assessment of the strategies proposed in *Towards a Preferred Core Strategy for Croydon* and *Towards a Preferred Core Strategy for Croydon - Supplement*. It also shows how the EqlA of these draft strategies has influenced the development of the Proposed Submission Core Strategy and other mitigation activities beyond the remit of the Core Strategy that may still be required.

Throughout the tables the following is used to denote the impact of each policy:

- '+' is a likely positive impact;
- '-' is a likely negative impact;
- '?' is an unknown impact; and
- '0' is no impact.

Topic	The spatial proposals in <i>Towards a Preferred Core Strategy for Croydon</i>	What the equalities evidence says about this topic	Disability	Race	Gender	Sexual Orientation	Faith / Belief	Age	Specific equalities impacts	Recommended amendments to Core Strategy policies	Amendment made to Proposed Submission Core Strategy as a consequence of EqIA	Other mitigation activities
CS1 Modified Spatial Strategy	Develop the borough with a combination of approaches: <ul style="list-style-type: none"> • Renewal and Growth • Managed Change • Conservation and Enhancement • Proposed town centre hierarchy. 	Potentially there are significant implications for equality and diversity in this strategy. The detail within this strategy and programme are still emerging at this stage however, measures should be put in place to ensure that this strategy will contribute to the equality and diversity benefits in the Borough.	+	+	+	+	+	+	<ul style="list-style-type: none"> • Communities will benefit from the, provision of substantial numbers of new homes of mixed tenure including some affordable and access to varying new job types. • Growth in CMC and town centres where there is good public transport and concentration of services will improve access to jobs and homes and services for those disabled people, women, older and young people who have no access to cars. • From workshops with BME faith groups concerns surrounding family housing were raised. Extended family and overcrowding is a reality for this equality group and family housing is particularly important. The proposed high proportion of family homes across the borough would meet the needs of BME groups with larger family size. 	None	<ul style="list-style-type: none"> • Modified Spatial Strategy maintained in Proposed Submission Draft Core Strategy 	None

Topic	The spatial proposals in <i>Towards a Preferred Core Strategy for Croydon</i>	What the equalities evidence says about this topic	Disability	Race	Gender	Sexual Orientation	Faith / Belief	Age	Specific equalities impacts	Recommended amendments to Core Strategy policies	Amendment made to Proposed Submission Core Strategy as a consequence of EqIA	Other mitigation activities
				-			-		<ul style="list-style-type: none"> Measures need to be taken to deal with equality and diversity issues, particularly in areas suffering from multiple deprivations, such as Broad Green and New Addington. Some communities may feel threatened and displaced by the new development <ul style="list-style-type: none"> From the consultation comments the BME groups raised the need for a strategy to share the proceeds of growth from the CMC with deprived areas in the North of the borough and New Addington. Specific businesses may be adversely affected in particular small businesses or those owned by members of a BME community. 	<ul style="list-style-type: none"> Extensive community consultation on Core Strategy targeted for equality groups, including disability forum, BME forum, interfaith forum Croydon Youth Council and public workshops in deprived locations and for disadvantaged communities. Core strategy policies should be revised to address equality and diversity issues. 	<ul style="list-style-type: none"> Core strategy policies revised to address equality and diversity issue as set out in remainder of this Appendix 	<ul style="list-style-type: none"> Extensive community consultation on Core Strategy targeted for equality groups, including disability forum, BME forum, interfaith forum Croydon Youth Council and public workshops in deprived locations and for disadvantaged communities EqIA of OAPF and town centre master plans where applicable Specific equality and diversity targets for new development proposals which seek to reflect the local community in each place.
CS2 Homes	To provide 19,000 new homes by 2031 including 3,500 homes in CMC	The supply of suitable new homes is an important issue for all groups within society The strategy provides a broad brush indication on potential location for new homes.		+	+	+		+	<ul style="list-style-type: none"> Placing most new housing in areas close to safe and reliable access to local amenities and high public transport accessibility levels would be beneficial for all groups within society. Particularly for those groups within the community who raised concerns at the consultation workshops, and who tend to have less access to cars and are more likely to be dependent on public transport for making local journeys. 	None	<ul style="list-style-type: none"> New housing focussed on Croydon Opportunity Area and Places with local amenities and high public transport accessibility levels in Proposed Submission Draft Core Strategy. 	None

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			?	-			?	-	<ul style="list-style-type: none"> The indicative proportions of family housing need to meet the needs of BME and faith groups with larger family size as highlighted from the consultation responses. There is no specific detail on housing choice, housing standards, accessibility, lifetime homes, sheltered housing and affordable housing, all of which are major concerns for equality groups. <ul style="list-style-type: none"> As highlighted in the consultation responses the range of provisions fails to meet specific needs for varying family sizes of equality groups. Targets for shared accommodation yet to be duplicated from (the then Draft Replacement) London Plan a major concern for all age groups especially the younger and older age groups 	<ul style="list-style-type: none"> Extensive community consultation on Core Strategy targeted for equality groups, including disability forum, BME forum, interfaith forum and public workshops in deprived locations and for disadvantaged communities. Core strategy policies should be revised to ensure equal access to housing by equality groups to suit their needs. 	<ul style="list-style-type: none"> Core strategy policies revised to include details on providing a mix of homes to meet needs of different equalities groups Target for shared accommodation included in Core Strategy. 	<ul style="list-style-type: none"> Extensive community consultation on Core Strategy targeted for equality groups, including disability forum, BME forum, interfaith forum and public workshops in deprived locations and for disadvantaged communities. Review of supply and demand for local housing working with housing providers to ensure a relevant mix of provision to meet the needs of local communities EqlA of Housing Strategy
CS3 Industrial Locations	To set out a “5 tier” sequential approach for the protection of industrial capacity especially those within the Employment Areas	It is critical that all communities have access to employment in appropriate and convenient locations.	+	+	+	+	+	+	<ul style="list-style-type: none"> The promotion of workshop/studio in town centres could offer opportunities for small businesses and full and part time employment opportunities for women, disabled people and those who are dependent on public transport. The potential alternative use of non-employment area premises that are well served by public transport for D1 and D2 uses could provide much needed social facilities such as nursery, clinic and places of worship. 	None	<ul style="list-style-type: none"> Policy approach on workshop/studio space and D1 uses in certain employment areas maintained 	None

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				-	-			-	<ul style="list-style-type: none"> The strategy will not directly boost job creation which matches the skills level of the local communities and to remove barriers for specific equality groups, such as accessibility at work place. It needs to improve training and education to boost employability for those who are disadvantaged. Need to have recognition that some communities are disproportionately represented in the borough's unemployment figures, such as young adults, BME groups and disabled people. There is a need for part time work for women in accessible locations. Business growth does not provide employment for local people but for workers moving to the area 	<ul style="list-style-type: none"> Extensive community consultation on Core Strategy targeted for equality groups, including disability forum, BME forum, interfaith forum and public workshops in deprived locations and for disadvantaged communities. Core strategy policies should address job creation and access to employment by equality groups, such as training and education, access at workplace and to remove obstacles to equality groups, particularly those highly represented in unemployment figure. 	<ul style="list-style-type: none"> Core Strategy supports skills training and further education of residents of borough to support access to work by working with higher and further education services, modernising and enhancing the quality of libraries, assisting home learning and training at work and supporting adult education and training. Core Strategy promotes economic growth in areas of the borough with good public transport accessibility Core strategy policies promote job creation and access to employment by equality groups, such as training and education, access at workplace. 	<ul style="list-style-type: none"> Extensive community consultation on Core Strategy targeted for equality groups, including disability forum, BME forum, interfaith forum and public workshops in deprived locations and for disadvantaged communities. Communities encouraged to become engaged in business representation especially in deprived areas Neighbourhood Plans to promote business growth
CS4 Enterprise Locations	To promote greater entrepreneurial activity through the provision of enterprise and opportunity centres	Business start up and self employment are a major source of jobs. It offers flexibility and accessibility to those who find barriers to conventional labour market, particularly those who are discriminated in work place; women who need more flexible work pattern, and disabled people who can work from home.	+	+	+	+	+	+	<ul style="list-style-type: none"> The promotion of entrepreneurship would be beneficial for small businesses and self employed people in ethnic minority groups in the north of the borough. It would also provide full and part time job or home working opportunities for all equalities groups, especially women and disabled people. Improving local employment opportunities will help address worklessness, which is a major cause of child poverty. 	<ul style="list-style-type: none"> Core strategy policies should ensure the enterprise centres would provide equal access to equality groups. 	<ul style="list-style-type: none"> Enterprise Centres retained 	<ul style="list-style-type: none"> Monitor diversity ownership of business, workforces and participants in business and innovation initiatives Communities encouraged to become engaged in business representation especially in deprived areas Neighbourhood Plans to promote enterprise centres

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CS5 Education and Skills	To guide new educational development into the areas of greatest demand and high public transport accessibility	Education and training are critical to employability and upward mobility. Lifelong learning opportunities need to be afforded to all communities.		+		+	+	+	<ul style="list-style-type: none"> The expansion of new schools in areas of highest demand and of high public transport accessibility will improve access to education for children and young adults. The proposal of a multiversity gearing towards key employment sectors in Croydon would improve employability of local people in local areas and improve access to job opportunities to women, disabled people and young adults. 	None	<ul style="list-style-type: none"> Provision of new schools and a multiversity retained 	None
			?	-	?			-	<ul style="list-style-type: none"> Skills and education programmes fail to meet the market needs or the specific needs of those seeking employment and advancement Courses are not flexible and accessible for those who are disabled or with family commitment Increasing student population may have negative impact on housing provision and cohesion in local community. Access to schools may be inaccessible to some with disability if design standards haven't been applied for school building and improvement. 	<ul style="list-style-type: none"> Core strategy policies should ensure there would be equal access to education and training facilities by equality groups. 	<ul style="list-style-type: none"> Core Strategy supports skills training and further education of residents of borough to support access to work by working with higher and further education services, modernising and enhancing the quality of libraries, assisting home learning and training at work and supporting adult education and training. 	<ul style="list-style-type: none"> Evaluation of skills and education provision by Education Authority to assess coverage and reflection of the borough's population <ul style="list-style-type: none"> EqIA of key educational programme where appropriate

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CS6 Culture	To promote cultural activities, support creative industries and night time economy in central Croydon and other town centres	This strategy is crucial to celebrate the cultural diversity of the communities within the borough. It is important to promote cohesion in local communities and to discourage social exclusion.	+	+	+	+	+	+	<ul style="list-style-type: none"> Promotion of cultural activities would recognise the cultural diversity in the borough. Local leisure and cultural facilities enable social interaction and can be focal points for local communities. Local culturally specific facilities can play an important part in preserving some of the unique characteristics of areas such as those proposed in the East and West Croydon Masterplan. <ul style="list-style-type: none"> Creative industries can be a potential source of employment for local communities Night time and leisure economy would facilitate participation of local communities, especially important for young adults and LGBT groups. 	<ul style="list-style-type: none"> Core strategy policies should ensure promotion of cultural diversity of different communities, including those of ethnic minorities, faiths and religion, and of different age. 	<ul style="list-style-type: none"> Core Strategy continues to promote diversification of cultural activities in Croydon Metropolitan Centre. <ul style="list-style-type: none"> Core Strategy promotes leisure uses in Croydon Metropolitan Centre and District and Local Centre to avoid concentration of drinking premises and to address the potential impacts on crime and anti-social behaviours in town centre. Core Strategy and London Plan require all development and alterations to the built environment to create safe and secure environments that reduce the scope for crime, fear of crime and anti-social behaviour will benefit all groups particularly women, the elderly, LGBT and BME groups. 	None

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				-				-	<ul style="list-style-type: none"> The Cultural planning strategy fails to recognise the cultural diversity of different communities in the borough, including those of ethnic minorities and of different age. Creative talents leak to outside of the borough <ul style="list-style-type: none"> Anti-social behaviours and crime increases as a result of the strategy 	<ul style="list-style-type: none"> Core Strategy policies should promote diversity of leisure and night time economy to avoid concentration of drinking premises and to address the potential impacts on crime and anti-social behaviours in town centre. Requiring all development and alterations to the built environment to create safe and secure environments that reduce the scope for crime, fear of crime and anti –social behaviour will benefit all groups particularly women, the elderly, LGBT and BME groups. 	<ul style="list-style-type: none"> Creative and cultural industries promoted and supported in the Core Strategy in particular through support for new Enterprise Centres, three of which are in the centre and north of borough. 	<ul style="list-style-type: none"> EqIA of Cultural Strategy, monitoring of provision and impact on cultural diversity
CS7 Community Facilities	To provide community facilities to meet the needs of the population	The supply of social and community facilities is crucial for all and particularly for those who are disadvantaged.	+	+	+				<ul style="list-style-type: none"> Locating public facilities in accessible locations and in close proximity to each other would be beneficial for all groups within society, especially for those groups within the community who tend to have less access to cars and are more likely to be dependent on public transport and make multiple local journeys. The provision of health facilities with improved local access will particularly benefit the elderly, disabled and less mobile people and the LGBT group. The provision of housing types in town centres designed to promote inter-generational activity would promote housing choice for families with children, older and disabled people. 	<ul style="list-style-type: none"> Core strategy policies should ensure there would be equal access to community facilities by equality groups. 	<ul style="list-style-type: none"> Core strategy policies continue to promote equal access to community facilities by equality groups. 	<ul style="list-style-type: none"> The Infrastructure Delivery Plan and lower tier policies e.g. Site Allocations DPD need to identify sites for the allocation of community facilities to meet specific need.

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				-	?		?	?	<ul style="list-style-type: none"> There is no specific details on where and what these community facilities are. Who needs these facilities and who will provide them? The risk is that the strategy fails to cater for the specific needs of the local communities, especially if private development is expected to deliver the community facilities. Some places of worships have their own requirement of layout and facilities and may not easily co-locate with other faith groups. Investment and new facilities would go in the town centres and that requires equality groups to travel further into town centres. There should be a better balance with the local and district centres 	<ul style="list-style-type: none"> Core strategy policies should ensure there would be equal access to community facilities by equality groups. 	<ul style="list-style-type: none"> The Infrastructure Delivery Plan will provide specific details with regard to Infrastructure: Where we are now, where do we want to be and how do we get there? Community facilities not directed primarily to town, district or local centres 	None
CS8 Heritage and the Built Environment	To conserve historic buildings and to preserve local distinctiveness	Promoting the borough's heritage should also address multiculturalism and Croydon's distinctive history of diversity. Place making should ensure that the borough's heritage is open and accessible and inclusive of the Borough's equality groups.		+	+	+	0	+	<ul style="list-style-type: none"> Historic buildings are made accessible so that all can celebrate and visit them. Places which are high quality, accessible, sustainable, durable, attractive and integrated in to surroundings for the whole community 	<ul style="list-style-type: none"> Core strategy policies should ensure maintenance plans are in place for public realm from the start to guarantee the long-term success of public realm. 	<ul style="list-style-type: none"> Core strategy policies promote a high quality, well managed and well maintained public realm to guarantee the long-term success 	None
			?	-					<ul style="list-style-type: none"> Communities don't feel historic buildings serve them and their communities <ul style="list-style-type: none"> Distinctiveness is at the expense of equality and diversity commitments. Accessibility is not addressed. 	<ul style="list-style-type: none"> Core strategy policies should ensure there would be equal access to heritage and the built environment by equality groups. 	<ul style="list-style-type: none"> Core strategy policies promote equal access to heritage and the built environment by equality groups. 	<ul style="list-style-type: none"> Improved Accessibility built into key sites and pedestrian links

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CS9 The Public Realm	To develop a public realm framework to create sustainable places and community valued public realm	Ensure that public realm is open, safe and accessible and inclusive of the Borough's equality groups. Provision of accessible public toilets in public realm is main concern for women and disabled people.	+	+	+	+	+	+	<ul style="list-style-type: none"> Access to well designed public open space planned for particular uses for example providing legible public realm with clear way finding and improvements to signage particularly for disabled users. High quality semi-public and private amenity space benefits those groups less able to go out and enjoy the public realm particularly those pushing buggies, older people and disabled people who are more dependent on the availability of private gardens. Community valued space and multicultural events for all ages in public realm encourage interaction and ownership of local communities and promote social cohesion. Safe and inclusive public realm would prevent crime and anti-social behaviour against all equalities group, for women and LGBT group in particular. 	<ul style="list-style-type: none"> Core strategy policies should ensure that public realm is open, safe and accessible and inclusive of the Borough's equality groups. 	<ul style="list-style-type: none"> Core strategy policies promote a high quality, well managed and well maintained public realm 	<ul style="list-style-type: none"> Carry out EqIA of the development schemes which involve provision of public space.
			-	-	-				<ul style="list-style-type: none"> Lack of resources for maintaining public realm lead to poor upkeep and low usage. Sense of place is lost or devalued if there is a lack of ownership by the local communities Crime and anti-social behaviour may arise especially in town centres and discourage people using the public realm <ul style="list-style-type: none"> Accessibility is not fully integrated in the design of public realm or improvement of existing public spaces. 	<ul style="list-style-type: none"> Seek to ensure maintenance plans are in place from the start for development proposals providing public realm, to guarantee the long-term success of public realm. 	<ul style="list-style-type: none"> Core strategy policies promote a high quality, well managed and well maintained public realm to guarantee the long-term success 	<ul style="list-style-type: none"> Extensive community participation on new development involving public realm to ensure buy-in by the communities. Integration of disability access in the design of public realm and ensure that they are Disability Act Compliant.

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CS10 Community Safety	To promote community safety by a social design approach - through engagement with young people; undertaking a series of community events that involve people from different cultures and religions; supplement enforcement measures with safe and inclusive design of new buildings, spaces	Hate crime, anti-social behaviour and harassment are one of the key concerns for all equality groups.	+	+	+	+	+	+	<ul style="list-style-type: none"> Promotion of social design approaches in new buildings and public realm would improve the perception of safety for all groups particularly women, the elderly, LGBT, faith groups and BME groups. Combating hate crime and anti-social behaviour would have positive impact for all equalities groups. <ul style="list-style-type: none"> The engagement of young people and the multicultural events would encourage interaction of people of different culture and age and promote social cohesion. Measures to tackle youth crime would have a direct impact on younger population. 	<ul style="list-style-type: none"> Core strategy policies should promote community safety and crime prevention, especially in town centres and public transport. 	<ul style="list-style-type: none"> Core Strategy and London Plan require all development and alterations to the built environment to create safe and secure environments that reduce the scope for crime, fear of crime and anti-social behaviour will benefit all groups particularly women, the elderly, LGBT and BME groups. 	None
			-	-	-	-	-	-	<ul style="list-style-type: none"> Social design approach might not have immediate and direct impact on crime prevention. The proposal fails to directly tackle with youth crime and anti-social behaviour especially in town centres. 	<ul style="list-style-type: none"> Core strategy policies should promote community safety and crime prevention, especially in town centres and public transport. 	<ul style="list-style-type: none"> Core Strategy and London Plan require all development and alterations to the built environment to create safe and secure environments that reduce the scope for crime, fear of crime and anti-social behaviour will benefit all groups particularly women, the elderly, LGBT and BME groups. 	<ul style="list-style-type: none"> Crime Reduction Strategy. <ul style="list-style-type: none"> Effective consultation and participation of the local communities. SPD3 contains checklist for developers to follow when preparing planning applications.

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CS11 Transport and Movement	To create a transport network to meet the demands by <ul style="list-style-type: none"> Smarter travel in short to medium term; and New infrastructure provision and network improvement in medium and long term 	Convenient and efficiency transport network is crucial to provide access to jobs, homes, leisure and services of all equality groups. An accessible public transport system is particular important to those who have less access to private cars, such as women, older and younger generation, and disabled people.		+	+	+	+	+	<ul style="list-style-type: none"> Short term improvement to the network in the central and north of the borough will be beneficial to the ethnic minority groups in the areas who are dependent on public transport. Short term and long term improvements to East and West Croydon station and interchanges will provide convenient, safe and reliable access to local amenities and public transport, especially for those groups within the community particularly the elderly, disabled and less mobile groups who tend to have less access to cars and are more likely to be dependent on public transport for making local journeys for shopping, childcare and work. Proposals to improve public transport include provision of improved high quality accessible bus stops and bus stand facilities. Tramlink enhancement to accommodate four car trams and line extension would be beneficial for all users. 	None	<ul style="list-style-type: none"> Core Strategy policies continue to promote improvements to public transport in the borough including improvements to bus services and facilities, public transport interchanges and Tramlink. 	None

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			?	-	-			-	<ul style="list-style-type: none"> The policy does not take specific measures to improve walking and cycling, The proposal does not recognise the need of disabled and older people by including improvement of accessibility at public transport hubs and provision of disabled parking in town centres. The proposal does not promote public safety and inclusive design in public transport. 	<ul style="list-style-type: none"> Core strategy policies should have specific measures to improve walking and cycling. It needs to promote public safety and inclusive design in public transport and to improve accessibility at public transport and stations for disabled and older people. It needs to review disabled parking in town centres 	<ul style="list-style-type: none"> Core Strategy policies promote specific measures to improve walking and cycling Core Strategy policies promote improvements to accessibility of public transport hubs Site Allocations and Development Management DPDs will review disabled parking in town centres. Core Strategy and London Plan require all development and alterations to the built environment to create safe and secure environments that reduce the scope for crime. 	<ul style="list-style-type: none"> EqIA of the Transport Strategy and Local Implementation Plan Integrating the design for accessibility in all public transport stations and interchange
CS12 Climate Change, CO ₂ and Water Management	To promote district heat and power networks in the CMC and district centres; requirements for new buildings and retrofitting of existing buildings; sustainable urban drainage system	Impacts of this strategy focus on generic impacts for the borough as a whole to respond to the global need to adapt to climate change. It is vital that any adaptations are equally available and the benefits of which are accessible by all equality groups.	0	+	+	0	+	+	<ul style="list-style-type: none"> Energy efficient developments will be more efficient and cheaper to run, which could benefit the fuel poor. 	None	<ul style="list-style-type: none"> Core Strategy policies require new developments to meet Code for Sustainable Homes Level 4 or BREEAM 'Excellent' 	<ul style="list-style-type: none"> Ensure developments have strong cross representation of the borough's equality groups
									<ul style="list-style-type: none"> Specific barriers for individual communities & equality groups in getting access to the adaptations Adaptations to climate change may be restricted to those living in new development, especially if these new development are not reflective of the borough's equality profile. Equality groups who are workless, have lower income or have larger family might not be able to afford retrofitting their existing homes and benefit from the adaptations to climate change. 	<ul style="list-style-type: none"> Core strategy policies should promote sustainable building design for older and existing building stock. 	<ul style="list-style-type: none"> Core Strategy promotes EcoHomes 'Very Good' rating on conversions and changes of use of existing buildings Core Strategy does not consider adaptations policies as beyond scope of the plan. 	<ul style="list-style-type: none"> Review adaptations and ensure the benefits are distributed locally Targeted programmes and development to support communities in greatest need

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CS13 Green Grid and Rivers	To provide or enhance public open spaces; provide public access along watercourse and green areas; provide a range of formal and informal recreational uses; enhance wildlife sites; water and flood risk management; mitigate climate change	Access to recreational and open space is crucial for the health and well being of all communities. It is vital to ensure that these public open spaces and waterway paths would be accessible, convenient and safe for all equalities groups to use.	+	+	+	+	+	+	<ul style="list-style-type: none"> Provision and enhancement of public open spaces, green areas, recreational areas and wildlife sites would promote healthy living for all equality groups. The availability of small local parks and informal play areas are beneficial for those with children, young and older people. 	None	<ul style="list-style-type: none"> Core Strategy policies continue to promote access and enhancement to the borough's 'Green Grid' 	None
			-	-	-	-	-	-	-	<ul style="list-style-type: none"> It fails to tackle the existing deficiency of access to open space and nature in the centre and the north of the borough where there is a concentration of BME groups. There is a lack of positive measures and resources to improve the accessibility of open space and waterway paths for wheelchair users. 	<ul style="list-style-type: none"> Core strategy policies should address the existing deficiency and access to open space and to nature in the centre and the north of the borough. 	<ul style="list-style-type: none"> The Infrastructure Delivery Plan includes accessibility standards to support Core Strategy policies for the creation of new green spaces and improved access to existing green spaces in the north and centre of the borough. The Development Management DPD will further address issues of access to open space and nature in the centre and the north of the borough.
CS14 Waste Reduction and Management	To prepare the Joint South London Waste Plan	Waste reduction and management is a generic issue impacting on all sectors in the borough. It is vital that the promotion of waste minimisation and reuse as well as the waste recycling and disposal facilities are made available to all equality groups.		+	+	0	0	+	<ul style="list-style-type: none"> Recycling facilities in new developments will improve access for all. 	None	<ul style="list-style-type: none"> Core Strategy defers to South London Waste 	<ul style="list-style-type: none"> EqlA of the South London Waste Plan
			?	-	-			-	<ul style="list-style-type: none"> Specific barriers exist for local communities with regard to providing access to recycling facilities particularly for those living in older housing without in situ facilities and without access to cars. 	<ul style="list-style-type: none"> Core strategy policies should improve access to recycling facilities for residents living in the older and existing housing stock. 	<ul style="list-style-type: none"> Core Strategy defers to South London Waste 	<ul style="list-style-type: none"> EqlA of the Council's waste management services

Topic	The spatial proposals in <i>Towards a Preferred Core Strategy for Croydon – Supplement</i>	What the equalities evidence says about this topic	Disability	Race	Gender	Sexual Orientation	Faith / Belief	Age	Specific equalities impacts	Recommended amendments to Core Strategy policies	Amendment made to Proposed Submission Core Strategy as a consequence of EqIA	Other mitigation activities
Housing and population growth	To build 21,500 homes up to 2031; to ensure supply of 3+ bedroom homes; to provide for affordable housing; To provide 10 additional Gypsy and Travellers pitches by 2021	The supply of suitable new homes is important issue for all groups within society.	+	+	+	+	+	+	<ul style="list-style-type: none"> • Communities will benefit from the additional supply of homes. • The proposed high proportion of family sized homes in the centre and the north of the borough would meet the needs of ethnic groups with large family size. <ul style="list-style-type: none"> • The supply of affordable housing would be beneficial for those with limited means, particularly single people with children, disabled people, young adults and older people. • Supply of new homes in CMC & Environs with high proportion of family size homes and where there good access to public transport and concentration of services will improve access to homes and services for the disabled , single people with children, the elderly and young adults who tend to have less access to cars • The supply of Gypsy and Traveller pitches would contribute to meeting the accommodation needs of this BME group. 	None	<ul style="list-style-type: none"> • Core Strategy continues to promote new homes with minimum proportions for 3+ bedroom homes, affordable housing, and new Gypsy and Traveller pitches 	None

Topic	The spatial proposals in <i>Towards a Preferred Core Strategy for Croydon – Supplement</i>	What the equalities evidence says about this topic	Disability	Race	Gender	Sexual Orientation	Faith / Belief	Age	Specific equalities impacts	Recommended amendments to Core Strategy policies	Amendment made to Proposed Submission Core Strategy as a consequence of EqlA	Other mitigation activities
			-	-	-	-	-	-	<ul style="list-style-type: none"> • New communities moving into CMC would face deficient access to parks and open space, recreational and play area, high crime rate in the town centre. • Range of provisions fails to meet diversity of the local communities and the specific needs of equality groups. • There is no specific detail on shared accommodation, supported and sheltered housing. 	<ul style="list-style-type: none"> • Core strategy policies should ensure the new housing would recognise the diversity of local communities and their specific needs, including supported/sheltered housing. • The policies should ensure the well-being of the new communities in the CMC by promoting good standard of design in housing, provision of public realm and open space, and community safety measures. • Extensive community consultation to the hard to reach and equality groups, and in major growth areas and town centres. 	<ul style="list-style-type: none"> • Policy to work with partners to facilitate the provision of specialist and supported housing for the elderly and vulnerable. • Core Strategy and London Plan contain policies promoting a good standard of design in new homes including Lifetime Homes standard and meeting London Housing Design Guide minimum standards. <ul style="list-style-type: none"> • Core Strategy promotes improving access to open space and food growing in under used spaces. 	<ul style="list-style-type: none"> • EqlA of OAPF and town centre master plans where applicable • Specific equality and diversity targets for development schemes which seek to reflect the local community in each place. • Review of supply and demand for local housing working with housing providers to ensure a relevant mix of provision to meet the needs of local communities <ul style="list-style-type: none"> • EqlA of Housing Strategy • Within the IDP Green Infrastructure should promote the accessibility of open space and waterway paths for disabled people and provide better access to open space and nature.

Topic	The spatial proposals in <i>Towards a Preferred Core Strategy for Croydon – Supplement</i>	What the equalities evidence says about this topic	Disability	Race	Gender	Sexual Orientation	Faith / Belief	Age	Specific equalities impacts	Recommended amendments to Core Strategy policies	Amendment made to Proposed Submission Core Strategy as a consequence of EqIA	Other mitigation activities
Homes Strategy (CMC & Environs)	To provide 14,400 new homes up to 2031; Proportion of 1/2 vs 3/4 bedroom homes	The supply of suitable new homes is important issue for all groups within society.	+	+	+	+	+	+	<ul style="list-style-type: none"> New development proposals will provide access to new homes for the local communities. In particular, the high proportion of family size homes would meet the needs of BME communities with larger family size. As the areas are well serviced by public transport and concentration of services, it will improve access to homes and services for the disabled people, single people with children, the elderly and young people who tend to have less access to cars. 	None	<ul style="list-style-type: none"> Core Strategy continues to promote growth in areas well served by public transport and with access to services. A proportion of homes across the borough should have 3 or more bedrooms. 	None

Topic	The spatial proposals in <i>Towards a Preferred Core Strategy for Croydon – Supplement</i>	What the equalities evidence says about this topic	Disability	Race	Gender	Sexual Orientation	Faith / Belief	Age	Specific equalities impacts	Recommended amendments to Core Strategy policies	Amendment made to Proposed Submission Core Strategy as a consequence of EqIA	Other mitigation activities
			-	-	-	-	-	-	<ul style="list-style-type: none"> Substantial supply of new homes in CMC & Environs would have significant impact on the composition of the local communities. New homes in CMC may be occupied by commuters from Central London who can afford higher rent/price and would not meet the needs of local communities in terms of price and standards. New communities moving into CMC would face deficient access to parks and open space, recreational and play area, high crime rate in the town centre. Measures need to be taken to deal with equality and diversity issues, particularly in areas suffering from multiple deprivations such as Broad Green and New Addington. Some communities may feel threatened and displaced by new development. 	<ul style="list-style-type: none"> Core strategy policies should promote social cohesion in the new communities and the existing communities in the major growth areas in CMC & Environs. By providing a range of social infrastructure, including health education, childcare, leisure, library and other public services. It should also recognise the equality and diversity impact on the deprived areas, such as Broad Green. Core Strategy policies should provide adequate affordable housing for the equality groups and people with limited means that have connections with the borough. The policies should ensure the well-being of the new communities in the CMC by promoting good standard of design in housing, provision of public realm and open space, and community safety measures. Extensive community consultation to the hard to reach and equality groups, and in major growth areas and town centres. 	<ul style="list-style-type: none"> Core Strategy promotes provision of social infrastructure through policy and also through introducing Community Infrastructure Levy. Infrastructure Delivery Plan sets out schedule of infrastructure and infrastructure needs across borough related to growth proposed by Core Strategy. Core Strategy policy promotes provision of affordable homes although not by equality groups as this is role of Housing Strategy and the Council's allocations policy contained within. Core Strategy and London Plan contain policies promoting a good standard of design in new homes including Lifetime Homes standard and meeting London Housing Design Guide minimum standards. 	<ul style="list-style-type: none"> EqIA of OAPF and town centre master plans where applicable Extensive community consultation on development in major growth area and town centres.

Topic	The spatial proposals in <i>Towards a Preferred Core Strategy for Croydon – Supplement</i>	What the equalities evidence says about this topic	Disability	Race	Gender	Sexual Orientation	Faith / Belief	Age	Specific equalities impacts	Recommended amendments to Core Strategy policies	Amendment made to Proposed Submission Core Strategy as a consequence of EqIA	Other mitigation activities
Jobs Strategy (CMC and Environs)	<ul style="list-style-type: none"> To safeguard industrial/ warehousing premises which fall outside the Separated and Integrated Industrial Locations; change to D1 uses allowed in those sites with better transport accessibility; mixed use development with residential allowed in CMC and district centres; additional workshop/studio capacity in CMC and district centres; promote temporary use of vacant premises by creative industries and cultural activity. <ul style="list-style-type: none"> B1a office & hotel development in CMC; Designate Addiscombe as District Centre; <ul style="list-style-type: none"> Regenerate long term vacancy sites in Integrated Industrial Locations in Broad Green & Selhurst; <ul style="list-style-type: none"> Strong protection on Separated Industrial Location in South Croydon; Strong protection on Strategic Industrial Location in Waddon; <ul style="list-style-type: none"> Promote start up units in Purley Way North; Seek mixed-use development on retail sites along Purley Way; Potential 2 new Local Centres 	Croydon Metropolitan Centre & the surrounding areas are important locations for jobs in retail, office and industrial/ warehousing. It is vital to ensure equal access to jobs for all groups within society.	+	+	+	+	+	+	<ul style="list-style-type: none"> Potential benefit for all communities, especially those who depend on public transport for access to jobs and services. <ul style="list-style-type: none"> The strategy will provide job opportunities that will help address worklessness, which is a major cause of child poverty. Promotion of start up units would potentially be a source of flexible/ part time job opportunities for women and an opportunity for BME small businesses. <ul style="list-style-type: none"> Use of vacant premises by creative industries and cultural activity can be a source of jobs / self-employment for artists, musicians, craftsman of different age and cultural background. This could potentially benefit young people of underground/street culture by providing an alternative choice of employment. 	None	<ul style="list-style-type: none"> Core Strategy continues to promote Croydon Metropolitan Centre, district centres and the four tiers of industrial locations as important locations for jobs. <ul style="list-style-type: none"> Core Strategy continues to promote use of vacant land and premises for use by creative and cultural industries. 	None

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	at Fiveways and Valley Park		-	-	-	-	-	-	<ul style="list-style-type: none"> Jobs created may not match the skills level of the local communities and would attract people from outside the borough. <ul style="list-style-type: none"> Many Industrial/warehousing locations are not well-served by public transport or easily accessible for disabled people. Lack of community engagement may damage potential benefits 	<ul style="list-style-type: none"> Core strategy policies should provide education and training which would improve skills level and remove job barriers for equalities groups. Core Strategy should promote job creation in town centres, enable access to industrial/warehousing locations for disabled users and provide accessible public transport. Extensive community consultation to the hard to reach and equality groups, and in major growth areas and town centres. 	<ul style="list-style-type: none"> Core Strategy policies promote improving education and skills in Croydon. Core Strategy policies promote office and retail development in town centres and creation of work shop space to promote job creation in accessible locations. 	<ul style="list-style-type: none"> EqIA of OAPF and CMC master plans EqIA of Economic Development Strategy <ul style="list-style-type: none"> Effective public engagement and consultation with local communities

Topic	The spatial proposals in <i>Towards a Preferred Core Strategy for Croydon – Supplement</i>	What the equalities evidence says about this topic	Disability	Race	Gender	Sexual Orientation	Faith / Belief	Age	Specific equalities impacts	Recommended amendments to Core Strategy policies	Amendment made to Proposed Submission Core Strategy as a consequence of EqlA	Other mitigation activities
Cultural Planning Strategy (CMC and Environs)	<ul style="list-style-type: none"> To support the temporary occupation of empty buildings by creative industries and cultural organisations. A creative industries specific Enterprise Centre in the CMC Refurbishment of the Fairfield Halls Propose Croydon Airport site as a “Site with Potential for Heritage Development” 	The promotion of cultural activities can be used for celebration of the diversity and multiculturalism of the borough.	+	+	+	+	+	+	<ul style="list-style-type: none"> Use of vacant premises by creative industries and cultural activity can be used to celebrate the diversity and multiculturalism of the borough. The promotion of creative industries and Enterprise Centre can be a source of job/self-employment for people of different age and from cultural background. The use of vacant premises also might improve the occupancy rate of shops/premises, promote activities outside bars and clubs, and may improve the perception of safety in streets and the negative image of Croydon. 	None	<ul style="list-style-type: none"> Core Strategy policies continue to promote use of vacant premises by creative and cultural industries. Core Strategy policies continue to promote four enterprise centres focusing on creative and cultural industries. 	None
			-	-	-	-	-	-	-	<ul style="list-style-type: none"> There may be barriers to equality groups to participate in creative industries, such as skills level. 	<ul style="list-style-type: none"> Extensive community consultation to the hard to reach and equality groups, and in major growth areas and town centres. 	<ul style="list-style-type: none"> Core Strategy continues to promote growth of creative and cultural industries in accessible locations Core Strategy policies promote improving education and skills in Croydon.

Topic	The spatial proposals in <i>Towards a Preferred Core Strategy for Croydon – Supplement</i>	What the equalities evidence says about this topic	Disability	Race	Gender	Sexual Orientation	Faith / Belief	Age	Specific equalities impacts	Recommended amendments to Core Strategy policies	Amendment made to Proposed Submission Core Strategy as a consequence of EqIA	Other mitigation activities
Transport Strategy (CMC and Environs)	<p><u>Short Term:</u></p> <ul style="list-style-type: none"> • SCOOT along A23 • Improve bus network interchange in CMC • New interchange facilities on Wellesley Road and Dingwall Road • Seek funding for Central Croydon Links project: improvement to pedestrian crossings/cycle links/accessibility • Review parking standards • Car free development in High PTAL area <ul style="list-style-type: none"> • Review road junction capacities • Investigate cycle hubs at stations • Review strategic walking routes <p><u>Medium Term</u></p> <ul style="list-style-type: none"> • Seek funding for Central Croydon Links • Car free development in High Ptal area <ul style="list-style-type: none"> • Provide Electric vehicle charging points 	A convenient and efficient transport network is crucial to provide access to jobs, homes, leisure and services of all equality groups. An accessible public transport system is particularly important to those who have less access to private cars, such as women, older and younger generation, and disabled people.	+	+	+	+	+	+	<ul style="list-style-type: none"> • Improvement to the transport network in the centre of the borough will be beneficial to those groups who tend to have less access to cars such as students/pupils, the elderly and other equality groups living in or visiting the areas. • Improvement to the pedestrian crossings / cycle links and accessibility in the CMC would be beneficial in particular for those who are less mobile, the elderly and people with shopping trolley bags and push chairs. <ul style="list-style-type: none"> • Tramlink enhancement and line extension would be beneficial for wheelchair users and those with mobility scooters as well as people pushing buggies and pushchairs. 	None	<ul style="list-style-type: none"> • Core Strategy continues to promote improvements to transport network, pedestrian and cycle links and enhancement and extension of Tramlink 	None

Topic	The spatial proposals in <i>Towards a Preferred Core Strategy for Croydon – Supplement</i>	What the equalities evidence says about this topic	Disability	Race	Gender	Sexual Orientation	Faith / Belief	Age	Specific equalities impacts	Recommended amendments to Core Strategy policies	Amendment made to Proposed Submission Core Strategy as a consequence of EqIA	Other mitigation activities
	<ul style="list-style-type: none"> Improvement to junctions at various points. <ul style="list-style-type: none"> Bus facilities Create a strategic cycle network of dedicated routes Bids under LIP to improve access through Broad Green and Waddon Replacement of Croydon gyratory through the Wellesley Road Scheme <u>Long Term</u> Possible North-South tram route between CMC and the North Tram extension to Crystal Palace, Bromley, Sutton and Tooting Car free development in High PTAL area Safeguard land for strategic transport infrastructure improvements 		-	-	-	-	-	-	<ul style="list-style-type: none"> The review of parking standards does not refer to disabled parking. It may lead to insufficient and sub-standard parking spaces for wheelchair users in CMC <ul style="list-style-type: none"> Tramlink line extension might not materialise due to budget cut and lack of cooperation from neighbouring boroughs. The strategy does not promote public safety and inclusive design in public transport. 	<ul style="list-style-type: none"> Core strategy policies needs to promote public safety and inclusive design in public transport and to improve accessibility at public transport and stations for disabled and older people. It needs to review disabled parking in town centres. 	<ul style="list-style-type: none"> London Plan has policies promoting inclusive design and public safety. Review of car parking standards will be included in Development Management DPD and Opportunity Area Planning Framework is reviewing parking in Croydon Opportunity Area. 	<ul style="list-style-type: none"> EqIAs of Borough Wide and CMC Transport Strategies, and Local Implementation Plan <ul style="list-style-type: none"> Integration of inclusive design and accessibility standards in the improvement schemes for bus interchange, train stations and Central Croydon Links
Homes Strategy (North)	To provide 3,600 new dwellings up to 2031; Proposed proportion of family and non-family housing by place.	The supply of suitable new homes is important issue for equality groups as well as the rest of the population.	+	+	+	+	+	+	<ul style="list-style-type: none"> The supply of new dwellings would have significant impact on the local communities in the North of the borough, especially the BME groups in Thornton Heath and Norbury. New development would help to renew and regenerate the more deprived area such as South Norwood. 	None	<ul style="list-style-type: none"> Core Strategy continues to promote growth in areas well served by public transport and with access to services. A proportion of homes across the borough should have 3 or more bedrooms. 	None

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			-	-	-	-	-	-	<ul style="list-style-type: none"> Measures need to be taken to deal with equality and diversity issues, particularly in areas suffering from multiple issues of deprivation such as South Norwood. Some communities may feel threatened and displaced by the new development 	<ul style="list-style-type: none"> Extensive community consultation on hard to reach and equality groups, and in deprived areas. 	<ul style="list-style-type: none"> Core Strategy promotes provision of social infrastructure through policy and also through introducing Community Infrastructure Levy. Infrastructure Delivery Plan sets out schedule of infrastructure and infrastructure needs across borough related to growth proposed by Core Strategy. 	None
Jobs Strategy (North)	<ul style="list-style-type: none"> To safeguard industrial/ warehousing premises which fall outside the Separated and Integrated Industrial Locations; change to D1 uses allowed in those sites with better transport accessibility; within District Centre, protect industrial/ warehousing premises, promote mixed use development with residential use and provide additional workshop/studio capacity in district centres. Protect A1-A4 uses & B1c use in premises fronting Church Road, Crystal Palace. Re-designate Crystal Palace as a District Centre and support new hotel development. Re-designate Norbury and Thornton Health as District Centres. 	It is important to ensure that there is equal access to job opportunities for all equality groups.	+	+	+	+	+	+	<ul style="list-style-type: none"> Potential benefit for all communities for job opportunities <ul style="list-style-type: none"> Promotion of workshop/studio units in district centres would potentially be a source of flexible/ part time job opportunities in an accessible location for women and an opportunity of BME small businesses. Change of use of vacant employment site to D1 community facilities would potentially provide more premises for clinics, nursery, places of worships etc for the benefit of all equality groups. 	None	<ul style="list-style-type: none"> Core Strategy continues to promote Croydon Metropolitan Centre, District Centres and the four-tier industrial locations as important locations for jobs. Core Strategy continues to promote workshop/studio units Core Strategy policies allow change of use of Class B employment premises to Class D1 community uses in certain locations 	None

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			-	-	-	-	-	-	<ul style="list-style-type: none"> Jobs created might not match the skill level of the local communities and would attract people from outside the borough. <ul style="list-style-type: none"> Many Industrial/warehousing locations are not well-served by public transport or easily accessible for disabled people. Lack of community engagement may damage potential benefits 	<ul style="list-style-type: none"> Core strategy policies should provide education and training which would improve skills level and remove job barriers for equalities groups. Core Strategy should promote job creation in town centres, enable access to industrial/warehousing locations for disabled users and provide accessible public transport. Extensive community consultation to the hard to reach and equality groups, and in major growth areas and town centres. 	<ul style="list-style-type: none"> Core Strategy policies promote improving education and skills in Croydon. Core Strategy policies promote office and retail development in town centres and creation of work shop space to promote job creation in accessible locations. 	<ul style="list-style-type: none"> EqlA of Economic Development Strategy <ul style="list-style-type: none"> Effective public engagement and consultation with local communities
Cultural Planning Strategy (North)	<ul style="list-style-type: none"> To support temporary occupation of empty buildings by creative industries and cultural organisations. Provide creative industries specific enterprise centres at Crystal Palace Triangle and Portland Road, South Norwood. Provision of a sports related enterprise centre at Selhurst Park, South Norwood. 	The promotion of cultural activities can be used for celebration of the diversity and multiculturalism of the borough.	+	+	+	+	+	+	<ul style="list-style-type: none"> Use of vacant premises by creative industries and cultural activity can be used to celebrate the diversity and multiculturalism of the borough. The promotion of creative industries and Enterprise Centre can be a source of job/self-employment for people of different age and from cultural background. <ul style="list-style-type: none"> The use of vacant premises also might improve the occupancy rate of shops/premises and may improve the perception of safety in streets. 	None	<ul style="list-style-type: none"> Core Strategy policies continue to promote use of vacant premises by creative and cultural industries. Core Strategy policies continue to promote four new enterprise centres focusing on creative and cultural industries. 	None

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			-	-	-	-	-	-	<ul style="list-style-type: none"> There may be barriers to equality groups to access creative industries for example premises may not have the facilities to support disabled users 	<ul style="list-style-type: none"> Extensive community consultation to the hard to reach and equality groups, and in major growth areas and town centres. 	<ul style="list-style-type: none"> Core Strategy continues to promote growth of creative and cultural industries in accessible locations Core Strategy policies promote improving education and skills in Croydon. 	None
Transport Strategy (North)	<p><u>Short Term</u></p> <ul style="list-style-type: none"> Review of car parking provision within Local Centres Improvements to traffic flows through the High Street, Thornton Heath Works on the main bus route to London Road to the north of CMC <ul style="list-style-type: none"> Additional trams on the central sections of the Tramlink network Works on the cycle link between Thornton Heath, the BRIT school and East Croydon Station; Connect2 extension to the cycle network; greenway links in Norbury, Thornton Heath, South Norwood and Woodside; rights of Way Improvement Plan; <p><u>Medium Term</u></p> <ul style="list-style-type: none"> Improvements to orbital bus routes along key bus corridors to the east and west of CMC; investigate Bus Rapid Transit Scheme; Extending tram extension to 	Convenient and efficiency transport network is crucial to provide access to jobs, homes, leisure and services of all equality groups. An accessible public transport system is particular important to those who have less access to private cars, such as women, older and younger generation, and disabled people.	+	+	+	+	+	+	<ul style="list-style-type: none"> Improvement to the public transport network in the north of the borough will be beneficial to the young school children, ethnic minority groups and other equality groups living in or visiting the areas. Improvement to the pedestrian crossings / cycle links and accessibility in the North would be beneficial in particular for those who have mobility impairment, older people and women with children in push chairs. <ul style="list-style-type: none"> Tramlink enhancement and line extension would be beneficial for those use wheelchairs and mobility scooters as well as for mothers pushing buggies. 	None	<ul style="list-style-type: none"> Core Strategy continues to promote improvements to transport network, pedestrian and cycle links and enhancement and extension of Tramlink and also through introducing Community Infrastructure Levy. <ul style="list-style-type: none"> Infrastructure Delivery Plan sets out schedule of infrastructure and infrastructure needs across borough related to growth proposed by Core Strategy. 	<ul style="list-style-type: none"> Working with Transport for London through Local Implementation Plans to improve links to public realm

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	<p>Bromley;</p> <ul style="list-style-type: none"> Increase the number of taxi ranks at busier outlying Railway Stations Complete the Greenways network for walking and cycling linking green grid/spaces; Rights of Way improvement plan; <u>Long Term</u> Improve South Norwood Hill corridor and junctions Convert rail section for tram operation and improve tram capacity between Arena and West Croydon North-south tram route along London Road between CMC and the North <ul style="list-style-type: none"> Improve access and movement through Norbury Safeguard land for strategic transport infrastructure improvement 		-	-	-	-	-	-	<ul style="list-style-type: none"> The review of parking standards does not refer to disabled parking. It may lead to insufficient and sub-standard parking spaces for wheelchair users in District Centres <ul style="list-style-type: none"> Tramlink line extension might not materialise due to budget cut and lack of cooperation from neighbouring boroughs. The strategy does not promote public safety and inclusive design in public transport 	<ul style="list-style-type: none"> Core strategy policies needs to promote public safety and inclusive design in public transport and to improve accessibility at public transport and stations for disabled and older people. It needs to review disabled parking in town centres. 	<ul style="list-style-type: none"> London Plan has policies promoting inclusive design and public safety. Review of car parking standards will be included in Development Management DPD 	<ul style="list-style-type: none"> EqIAs of Borough Wide Transport Strategies, and Local Implementation Plan <ul style="list-style-type: none"> Integration of inclusive design and accessibility standards in the improvement schemes for bus interchange, train stations and road junctions. <ul style="list-style-type: none"> Working in partnership with the police and preparing a Crime Reduction Strategy SPD3 contains checklist for developers to follow when preparing planning applications.
Homes Strategy (East)	To provide 900 new dwellings up to 2031; proposed large proportion of larger homes	The supply of suitable new homes is important issue for equality groups as well as the rest of the population.	0		+	+			<ul style="list-style-type: none"> The supply of new dwellings with high proportion of family size dwellings would have a positive impact on the local communities. 	None	<ul style="list-style-type: none"> Core Strategy continues to promote new homes with minimum proportions for 3+ bedroom homes. 	None
				?	-	-	?	?	<ul style="list-style-type: none"> Measures need to be taken to deal with equality and diversity issues, especially in deprived areas such as Fieldway 	<ul style="list-style-type: none"> Extensive community consultation on hard to reach and equality groups, and in deprived areas. 	<ul style="list-style-type: none"> Core Strategy promotes provision of social infrastructure to tackle issues of deprivation. 	None

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Jobs Strategy (East)	<ul style="list-style-type: none"> To safeguard industrial/warehousing premises which fall outside the Separated and Integrated Industrial Locations; change to D1 uses allowed in those sites with better transport accessibility; within District Centre, protect industrial/warehousing premises, promote mixed use development with residential use and provide additional workshop/studio capacity in district centres. Re-designate New Addington as a District Centre. <ul style="list-style-type: none"> Strong protection for industrial and warehousing activities in Vulcan Way; Re-designate Selsdon as a District Centre. 	It is important to ensure that there is equal access to job opportunities for all equality groups.	+	+	+	+	+	+	<ul style="list-style-type: none"> Potential benefit for all communities for job opportunities <ul style="list-style-type: none"> Promotion of workshop/studio units in district centres would potentially be a source of flexible/ part time job opportunities in an accessible location for women. Change of use of vacant employment site to D1 community facilities would potentially provide more premises for clinics, nursery, places of worships etc for the benefit of all equality groups. 	None	<ul style="list-style-type: none"> Core Strategy continues to promote Croydon Metropolitan Centre, district centres and the four tiers of industrial locations as important locations for jobs. Core Strategy continues to promote workshop/studio units Core Strategy policies allow change of use of Class B employment premises to Class D1 community uses in certain locations 	None
			-	-	-	-	-	-	-	<ul style="list-style-type: none"> Jobs created might not match the skill level of the local communities and would attract people from outside the borough. <ul style="list-style-type: none"> Many Industrial/warehousing locations are not well-served by public transport or easily accessible for disabled people. Lack of community engagement may damage potential benefits 	<ul style="list-style-type: none"> Core strategy policies should provide education and training which would improve skills level and remove job barriers for equalities groups. Core Strategy should promote job creation in town centres and public transport accessible areas. Extensive community consultation to the hard to reach and equality groups, and in major growth areas and town centres. 	<ul style="list-style-type: none"> Core Strategy policies promote improving education and skills in Croydon. Core Strategy policies promote office and retail development in town centres and creation of work shop space to promote job creation in accessible locations. Infrastructure Delivery Plan sets out schedule of infrastructure and infrastructure needs across borough related to growth proposed by Core Strategy.

Topic	The spatial proposals in <i>Towards a Preferred Core Strategy for Croydon – Supplement</i>	What the equalities evidence says about this topic	Disability	Race	Gender	Sexual Orientation	Faith / Belief	Age	Specific equalities impacts	Recommended amendments to Core Strategy policies	Amendment made to Proposed Submission Core Strategy as a consequence of EqIA	Other mitigation activities
Cultural Planning Strategy (East)	To support temporary occupation of empty buildings by creative industries and cultural organisations.	The promotion of cultural activities can be used for celebration of the diversity and multiculturalism of the borough.		+	+	+	+	+	<ul style="list-style-type: none"> Use of vacant premises by creative industries and cultural activity can be used to celebrate the diversity and multiculturalism of the borough. The promotion of creative industries can be a source of job /self-employment for people of different age and from cultural background. The use of vacant premises also might improve the occupancy rate of shops/premises and may improve the perception of safety in streets. 	None	<ul style="list-style-type: none"> Core Strategy policies continue to promote use of vacant premises by creative and cultural industries. Core Strategy policies continue to promote four new enterprise centres focusing on creative and cultural industries. 	None
			?	-	-	-	-	-	<ul style="list-style-type: none"> There may be barriers to equality groups to access creative industries for example premises may not have the facilities to support disabled users 	<ul style="list-style-type: none"> Extensive community consultation to the hard to reach and equality groups, and in major growth areas and town centres. 	<ul style="list-style-type: none"> Core Strategy continues to promote growth of creative and cultural industries in accessible locations Core Strategy policies promote improving education and skills in Croydon. 	None

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Transport Strategy (East)	<ul style="list-style-type: none"> <u>Short Term</u> Works on the cycle network as part of greenway links and Rights of Way Improvement plan <u>Medium Term</u> Improvements to the Addington Village bus /tram stop Complete the Greenways network for walking and cycling linking green grid/spaces; Rights of Way improvement plan; <u>Long Term</u> Explore options for extending the Tram to areas in demand. Maintain a programme of tram stop maintenance, refurbishment, accessibility and personal security improvements. Improve access and movement within New Addington Safeguard land for strategic transport. 	<p>Convenient and efficiency transport network is crucial to provide access to jobs, homes, leisure and services of all equality groups. An accessible public transport system is particular important to those who have less access to private cars, such as women, older and younger generation, and disabled people.</p>		+	+	+	+	+	<ul style="list-style-type: none"> Improvement to the public transport network in the south east of the borough will be beneficial to the young school children, and other equality groups living in or visiting the areas. Improvement to the pedestrian crossings / cycle links and accessibility would be beneficial in particular for those who have mobility impairment, older people and women with children in push chairs. <ul style="list-style-type: none"> Tramlink enhancement and line extension would be beneficial for wheelchair users and those with mobility scooters as well as for people pushing buggies/pushchairs. 	None	<ul style="list-style-type: none"> Core Strategy continues to promote improvements to transport network, pedestrian and cycle links and enhancement and extension of Tramlink 	<ul style="list-style-type: none"> Working with Transport for London through Local Implementation Plans to improve links to public realm
			?	-	-	-	-	-	<ul style="list-style-type: none"> There is no review of disabled parking. It may lead to insufficient and sub-standard parking spaces for wheelchair users in District Centres <ul style="list-style-type: none"> Tramlink line extension might not materialise due to budget cut and lack of cooperation from neighbouring boroughs. The strategy does not promote public safety and inclusive design in public transport 	<ul style="list-style-type: none"> Core strategy policies needs to promote public safety and inclusive design in public transport and to improve accessibility at public transport and stations for disabled and older people. It needs to review disabled parking in town centres. 	<ul style="list-style-type: none"> London Plan has policies promoting inclusive design and public safety. Review of car parking standards will be included in Development Management DPD 	<ul style="list-style-type: none"> EqlAs of Borough Wide Transport Strategies, and Local Implementation Plan <ul style="list-style-type: none"> Integration of inclusive design and accessibility standards in the improvement schemes for bus interchange, train stations and road junctions.

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Homes Strategy (South)	To provide 2,600 new dwellings up to 2031; significant proportion of family size homes.	The supply of suitable new homes is important issue for all groups within society.	+	+	+	+	+	+	<ul style="list-style-type: none"> The supply of new dwellings some affordable and of mixed tenure, would have a significant positive impact on the local communities. 	None	<ul style="list-style-type: none"> Core Strategy continues to promote new homes with minimum proportions for affordable homes on individual sites and borough wide strategic targets. 	None
			-	-	-	-	-	-	<ul style="list-style-type: none"> Measures need to be taken to deal with equality and diversity issues Some communities may feel threatened and displaced by the new development 	<ul style="list-style-type: none"> Extensive community consultation on hard to reach and equality groups and in major growth area and town centres. 	<ul style="list-style-type: none"> Core Strategy promotes provision of social infrastructure to tackle issues of deprivation. 	None

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Jobs Strategy (South)	<ul style="list-style-type: none"> To safeguard industrial/warehousing premises which fall outside the Separated and Integrated Industrial Locations; change to D1 uses allowed in those sites with better transport accessibility; within District Centre, protect industrial/warehousing premises, promote mixed use development with residential use and provide additional workshop/studio capacity in district centres. Redesignate Coulsdon as a District Centre. <ul style="list-style-type: none"> Strong protection for industrial and warehousing activities in Marlpit Lane Industrial Area; Promote the provision of start-up and grow-on units for light industry/storage and distribution use classes within Marlpit Lane Industrial Area. <ul style="list-style-type: none"> Establish an Innovation Complex within Cane Hill / Coulsdon masterplan area. Investigate opportunities for campus facilities as part of the “multiversity” concept; Redesignate Purley as a District Centre. 	It is important to ensure that there is equal access to job opportunities for all equality groups.	+	+	+	+	+	<ul style="list-style-type: none"> Potential benefit for all communities for job opportunities. The promotion of “Knowledge Economy” (Innovation Complex and Multiversity campus) would potentially improve access to jobs for younger people. <ul style="list-style-type: none"> Promotion of workshop/studio units in district centres would potentially be a source of flexible/ part time job opportunities in an accessible location for women and disabled people. Change of use of vacant employment site to D1 community facilities would potentially provide more premises for clinics, nursery, places of worships etc for the benefit of all equality groups. 	None	<ul style="list-style-type: none"> Core Strategy policies continue to promote a Multiversity within the borough Core Strategy continues to promote Croydon Metropolitan Centre, District Centres and the four-tier industrial locations as important locations for jobs. Core Strategy continues to promote workshop/studio units Core Strategy policies allow change of use of Class B employment premises to Class D1 community uses in certain locations 	None	

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			-	-	-	-	-	?	<ul style="list-style-type: none"> Jobs created might not match the skill level of the local communities and would attract people from outside the borough. <ul style="list-style-type: none"> Many Industrial/warehousing locations are not well-served by public transport or easily accessible for disabled people. Lack of community engagement may damage potential benefits 	<ul style="list-style-type: none"> Core strategy policies should provide education and training which would improve skills level and remove job barriers for equalities groups. Core Strategy should promote job creation in town centres enable access to industrial/warehousing locations for disabled users and provide accessible public transport. Extensive community consultation to the hard to reach and equality groups, and in major growth areas and town centres. 	<ul style="list-style-type: none"> Core Strategy policies promote improving education and skills in Croydon. Core Strategy policies promote office and retail development in town centres and creation of work shop space to promote job creation in accessible locations. 	<ul style="list-style-type: none"> EqIA of Economic Development Strategy <ul style="list-style-type: none"> Effective public engagement and consultation with local communities
Cultural Planning Strategy (South)	<ul style="list-style-type: none"> To support temporary occupation of empty buildings by creative industries and cultural organisations. To provide a creative industries specific Enterprise Centre within Purley District Centre. 	The promotion of cultural activities can be used for celebration of the diversity and multiculturalism of the borough.		+	+	+	+		<ul style="list-style-type: none"> Use of vacant premises by creative industries and cultural activity can be used to celebrate the diversity and multiculturalism of the borough. The promotion of creative industries and Enterprise Centre can be a source of job / self-employment for people of different age and from cultural background. <ul style="list-style-type: none"> The use of vacant premises also might improve the occupancy rate of shops/premises and may improve the perception of safety in streets. 	None	<ul style="list-style-type: none"> Core Strategy policies continue to promote use of vacant premises by creative and cultural industries. Core Strategy policies continue to promote four enterprise centres focusing on creative and cultural industries. 	None

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			?	-	-	-	-	?	<ul style="list-style-type: none"> There may be barriers to equality groups to participate in creative industries, such as skills level. 	<ul style="list-style-type: none"> Extensive community consultation to the hard to reach and equality groups, and in major growth areas and town centres. 	<ul style="list-style-type: none"> Core Strategy policies promote improving education and skills in Croydon. 	<ul style="list-style-type: none"> EqlA of Enterprise Centre scheme
Transport Strategy (South)	<p><u>Short Term</u></p> <ul style="list-style-type: none"> Investigate the feasibility of a cycle hub with cycle parking within Purley District Centre Works on the cycle network as part of greenway links and Rights of Way Improvement plan <ul style="list-style-type: none"> Public realm improvement <ul style="list-style-type: none"> Promote delivery and collections scheme and a potential consolidation centre for construction materials Review of car parking provision within District Centres; ways to limit the number of parking spaces accessed off the A23 corridor Potential increase rail service destinations from East Croydon; access improvement to Purley, South Coulsdon and Woodmansterne Stations; <ul style="list-style-type: none"> Priority to improve the A23 with enhancements made to the Purley Cross gyratory <p><u>Medium Term</u></p> <ul style="list-style-type: none"> Priority to improve the A23 with enhancements made to the Purley Cross gyratory Works on the A235 Brighton Road between Purley Cross and High Street; potential bus lane on Brighton Road (southboard approach to Purley Cross) Introduce more covered, well lit and secure cycle parking facilities within retail centres and at local Railway Stations; 	<p>Convenient and efficiency transport network is crucial to provide access to jobs, homes, leisure and services of all equality groups. An accessible public transport system is particular important to those who tend to have less access to private cars, such as women, the elderly, younger generation and disabled people.</p>						<ul style="list-style-type: none"> Improvement to the public transport network in the south of the borough will be beneficial to pupils/students, and other equality groups living in or visiting the areas. Improvement to the pedestrian crossings / cycle links and accessibility would be beneficial in particular for those who are less mobile and those people with children in buggies/ pushchairs. <ul style="list-style-type: none"> Tramlink enhancement and line extension would be beneficial for wheelchair users and those with mobility scooters as well as for people pushing buggies/pushchairs 	None	<ul style="list-style-type: none"> Core Strategy continues to promote improvements to transport network, pedestrian and cycle links and enhancement and extension of Tramlink 	<ul style="list-style-type: none"> Working with Transport for London through Local Implementation Plans to improve links to public realm 	
			?	-	-	-	-	-	<ul style="list-style-type: none"> The review of parking standards does not refer to disabled parking. It may lead to insufficient and sub-standard parking spaces for wheelchair users in CMC <ul style="list-style-type: none"> Tramlink line extension might not materialise due to budget cut and lack of political commitment. 	<ul style="list-style-type: none"> Core strategy policies needs to promote public safety and inclusive design in public transport and to improve accessibility at public transport and stations for disabled and older people. It needs to review disabled parking in town centres. 	<ul style="list-style-type: none"> London Plan has policies promoting inclusive design and public safety. Review of car parking standards will be included in Development Management DPD 	<ul style="list-style-type: none"> EqlAs of Borough Wide Transport Strategies, and Local Implementation Plan <ul style="list-style-type: none"> Integration of inclusive design and accessibility standards in the improvement schemes for bus interchange, train stations and road junctions.

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	<p>Introduce a cycle hub in Purley District Centre;</p> <ul style="list-style-type: none"> • Complete the Greenways network for walking and cycling linking green grid/spaces; Rights of Way improvement plan; <u>Long Term</u> • Improving the A23 focusing on congestion reduction and solution to the severance to east-west movement; junction improvements and signal works at Purley Cross; enhancement to the public transport offer between Purley/Coulsdon and CMC; • Progress local improvement to access and movement towards the two Coulsdon railway stations; • Options to extend Tramlink service towards Purley and Coulsdon • Safeguard land for strategic transport 								The strategy does not promote public safety and inclusive design in public transport			