

Cabinet Supplementary Agenda



9. **Regina Road Project - Selection of Delivery Model - Part A**
(Pages 3 - 46)

18. **Regina Road Project - Selection of Delivery Model - Part B**
(Pages 47 - 218)

Katherine Kerswell
Chief Executive
London Borough of Croydon
Bernard Weatherill House
8 Mint Walk, Croydon CR0 1EA

Democratic Services
020 8726 6000
democratic.services@croydon.gov.uk
www.croydon.gov.uk/meetings

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LONDON BOROUGH OF CROYDON

REPORT:	CABINET	
DATE OF DECISION	25 October 2023	
REPORT TITLE:	REGINA ROAD PROJECT – SELECTION OF DELIVERY OPTION – PART A	
CORPORATE DIRECTOR / DIRECTOR:	Susmita Sen - Corporate Director, Housing	
LEAD OFFICER:	Robin Smith, Regina Road Project Lead Email: robin.smith@croydon.gov.uk	
LEAD MEMBER:	Cllr Lynne Hale, Deputy Mayor & Cabinet Member for Homes	
KEY DECISION 5823EM	Yes	Key Decision – Decision incurs expenditure of more than £1,000,000
CONTAINS EXEMPT INFORMATION?	Yes	Public with exempt appendix B Grounds for the exemption: Exempt under paragraph 3 of Schedule 12A of the Local Government Act 1972 as it relates to the financial or business affairs of any particular person (including the authority holding that information) and the public interest in withholding disclosure outweighs the public interest in disclosure.
WARDS AFFECTED:	South Norwood	

1 SUMMARY OF REPORT

- 1.1** This report follows two reports considered by Cabinet on 26 July 2023. The first was ‘Outcome of Ballot and Next Steps’ (Key Decision Ref 3823EM). The second was ‘Procurement of Architectural Professional Consultancy Services for Regina Road Project, South Norwood, and Malton House, to the grant of Planning Permission and production of technical design for contractor procurement and on-site works’.
- 1.2** This report recommends a direct delivery model by the Council for the demolition and rebuilding of Regina Road for Phases 1 and 2. The project will deliver an increase in Council housing at Regina Road, with 225 new Council homes (minimum 200 social rented and up to 25 leaseholder/freeholder products) replacing the existing 191 homes. There will also be an estimated eight new social rent homes at nearby Malton House as part of Phase 1.
- 1.3** As the Regina Road project progresses, there will be periodic update reports to Cabinet.

2 RECOMMENDATIONS

For the reasons set out in the report and its appendices, the Executive Mayor in Cabinet is recommended:

- 2.1 To consider delivery options and agree a direct delivery by the Council of:
 - 2.1.1 **Phase 1**, comprising an estimated 86 new Council homes at Regina Road (minimum of 78 replacement social rent and up to 8 leaseholder/freeholder replacements) and an estimated 8 new social rent homes at Malton House, to the estimated household sizes set out in the report. This delivery option enables the rebuilding of the social housing as soon as practicable; and
 - 2.1.2 **Phase 2**, comprising an estimated 139 new Council homes (122 social rent and up to 17 leaseholder/freeholder replacements) to the housing needs of local residents, and a replacement onsite kindergarten/community facility. The detail of the Phase 2 option would then be reviewed and agreed by Cabinet early in 2024 before moving forward with Phase 2.
- 2.2 To note that the procurement of a main contractor will be progressed in line with delegations set out in the Annual Procurement Plan and will cover Phase 1 works, with the option of Phase 2 works.
- 2.3 To note that the procurement of a demolition contractor will be progressed in line with delegations set out in the Annual Procurement Plan and will cover the clearance works for Phases 1, 2 & 3.

3 REASONS FOR RECOMMENDATIONS

- 3.1 Following the decisions of Cabinet on 26 July 2023 to rebuild that part of the Regina Road estate within the red line boundary of the Landlord Offer, the Council needs to select its delivery model and start the process of organising building contracts with competent main building contractors for early delivery of new homes in phases.
- 3.2 The recommendation for a direct delivery by the Council for phases 1 and 2 will enable the rebuilding of the social housing as soon as practicable, as compared with the option of a developer led redevelopment. The pros and cons of each option are set out at Table 5.
- 3.3 The proposed composition of Phases 1 and 2 has been informed by guidance from the Local Planning Authority as part of the pre-application process, the housing need of existing tenants at Regina Road and consultations with residents.

4 BACKGROUND AND DETAILS

- 4.1** As previously reported, the Regina Road Estate was developed as social housing by the Borough in the mid-1960s. The area includes three 11 storey tower blocks (each containing 44 flats), 5 medium rise blocks (containing 50 flats) and 9 two-storey properties, all of which are included in the scope of this report. The towers were built using the Wates Large Panel System (LPS), firstly nos 1-87 in 1964 and then the other two towers to a modified structural design. The background to this matter is set out in previous reports to members on [16 November 2022](#), [22 March 2023](#) and [26 July 2023](#). Links are provided to the reports referred to.
- 4.2** A Ballot of eligible residents in accordance with GLA funding guidelines took place between 26 April and 22 May 2023: the result was that 88.1% of eligible residents voted 'Yes' to the Council's Landlord Offer with a turnout of 81.7% of eligible voters.
- 4.3** The current position on occupancy of the 191 homes at Regina Road is as shown by Table 1:

Table 1 - Occupancy of the Regina Road Project Homes, as of 9 October 2023

REGINA ROAD	TENANTS			L/H*	VOID	TOTALS
Tower Blocks	SECURE	TA	5 Year Flexi (Secure)			
1-87 (1 bed flats)	26	0	0	1	17	44
2-56A (2 bed flats)	35	0	0	2	7	44
58-108A (2 bed flats)	30	0	2	0	12	44
Tower Block Totals	92	0	2	3	35	132
89-123 Regina Road	9	0	0	8**	1	18
1-8 Sunny Bank	12	0	0	9**	3	24
110a Regina Road	7	0	0	1	0	8
112-128 Regina Road	4	0	1	4*	0	9
Low/Medium Rise Totals	32	0	1	22	4	59
Grand Totals	121	0	3	25	40	191

*Includes three freeholders and one leaseholder

** One of these is leased by the leaseholder to Croydon Affordable Homes

- 4.4** Twelve households from nos 1-87 are expected to move out during October/early November, including eight into the Trellis Mews properties, in accordance with their housing need. The leaseholder is in the process of selling their property back to the Council. Every effort is being made to work with the remaining 14 tenant households so that nos 1-87 tower is fully decanted by the end of December, at the latest end January.
- 4.5** All tenant households will move wherever practicable in accordance with their need at the time of moving. The designs for new social housing are being progressed through pre-application discussions with the Local Planning Authority while based on meeting the existing housing need of residents within the red line boundary.

Phase 1 proposals

- 4.6** Phase 1 designs are being progressed in consultation with the Residents Working Group and will accommodate as many as possible of existing residents on site who are facing early decants so that demolition can proceed – the intention being that existing residents on site move across directly to the new build. Although, this is not possible in every case because, for example, tower nos 1-87 must be demolished first. Residents who are obliged to move off site temporarily do have the right-to-return in accordance with the Landlord Offer.
- 4.7** Table 2 below shows the proposed design mix to be provided in Phase 1, based on the current housing need of existing residents occupying nos 89-123 maisonettes and towers nos 2-56a and 58-108a:

Table 2 – Bedroom Need for residents currently occupying 89-123 + 2-56a + 58-108a

Phase 1 Regina Road Unit Type/Size	No. of Units for Social Rent	No. of Units for Resident Leasehold	Total no. of Units
2-Bedroom	59	8	67
3-Bedroom	19	0	19
Total	78	8	86

Note that Table 2 above does not include the estimated 8 units to be built as part of Phase 1 at Malton House, which will add some flexibility to future decanting in preparation for Phase 2. Malton House is a nearby former Brick-by-Brick site with an existing planning permission for nine units but with an outstanding issue to be resolved relating to a substation.

- 4.8** Phase 1 at Regina Road was planned at 120 units at the time the Landlord Offer was prepared, utilising the games area and open land behind Sunnybank. This was qualified in the Landlord Offer as subject to the Planning process and Planning Permission. The Local Planning Authority has subsequently expressed preference through ongoing pre-application discussions for Phase 1 to be relocated to the site of nos 1-87 and adjacent maisonettes and for the capacity of Phase 1 to be reduced to an estimated 86 new homes. However, as shown by Table 4, this means that Phase 2

is correspondingly larger so that the same number of new social rent homes are built over the two phases.

Phase 2 proposals

- 4.9** Phase 2 proposals, which will include the replacement kindergarten and a new park, are currently based upon the site of the two towers, nos 2-56 and nos 58-108, the games area (to be replaced in Phase 1) and the Sunnybank properties. Table 3 below shows the Bedroom Need for families currently occupying nos 110a, 112-128, 1-8B Sunny Bank, plus the Right of Return (tower nos 1-87 + early moves after 16 November 2022)

Table 3 – Bedroom Need for residents moving to Phase 2

Phase 2 Regina Road Unit Type/Size	No. of Units for Social Rent	No. of Units for Resident Leasehold	Total no. of Units
1-Bedroom	29	3	32
2-Bedroom	15	3	18
3-Bedroom	8	2	10
4 - bedroom	4	0	4
Total	56	8	64

*N.B - Leaseholder in tower 1-87 not included because buy-back progressing.
- 16 other resident leaseholders/freeholders in red line area who may choose leaseholder/freeholder product at existing occupation bedroom numbers*

- 4.10** Cabinet decided in July to build 200 new social rented homes and up to 25 leaseholder products. Taking account of Tables 2 and 3 above means that, under present circumstances and assuming all rights-of-return materialise, there is an estimated balance of 66 social rented homes and an estimated surplus of at least 9 leaseholder products that will arise in Phase 2. The bedroom mix of these will reflect general housing need so that the design and detailed costings can progress.
- 4.11** General housing need in Croydon indicates a strong need for new homes, especially as 2-bedroom and 3-bedroom homes, while there are also ageing smaller social rent properties nearby in South Norwood that will need replacement in due course. Accordingly, the estimated total balance of 75 social rented homes will be built to the following approximate mix – 17 x 1B, 24 x 2B, 24 x 3B and 10 x 4B – to add to the Council’s social rent housing stock in the Borough and to be available on completion of Phase 2.
- 4.12** Table 4 summarises the design mix for Phase 2 so that progress may be made on design, detailed design and procurement. The 39 x 2B homes have been further split, according to estimated housing need demand in Croydon, in the approximate ratio of 30/70 in favour of the larger 2 Bedroom/4 Person homes rather than the smaller 2 Bedroom/3 Person homes.

Table 4 – Design Mix for Phase 2 by Bedroom Size

Phase 2 Regina Road Unit Type/Size	No. of Units for Social Rent	No. of Units for Resident Leasehold	Total no. of Units
1-Bedroom	46	3	49
2-Bedroom/3 person	11	0	11
2 bedroom/4 person	28	3	31
3-Bedroom	32	2	34
4 - bedroom	14	0	14
Total	131	8	139

4.13 Over Phases 1 and 2 the Council will invest in building 225 new Council homes (a minimum of 200 social rented and up to 25 leaseholder products) at Regina Road to replace the existing 191 homes within the redline boundary. An estimated extra eight social rent homes will be built at Malton House as part of Phase 1. Overall, a net gain of an estimated 67 Council homes (225 + 8 – 191 and allow for 25 existing leaseholders/freeholders) from the Council’s investment.

Overall redevelopment proposals

4.14 It is not unusual to see increase in residential density when designing rebuilding schemes. These changes are made to satisfy a complex range of issues, including Planning, to make better use of land and to help ease the shortage of new homes while at the same time respecting the quality of the local environment.

4.15 There is also the key issue of financial viability to balance the extensive costs involved in, not only construction cost but also the cost of meeting Planning requirements and levies such as the provision of affordable homes and local infrastructure, unless exemptions can be agreed. Savills have been engaged to advise the Council on viability and have suggested that the Council could consider tripling the existing density from 191 homes to around 570 new homes. The Landlord Offer put to the Ballot of eligible residents suggested a range of approximately 380-450 new homes, subject to the Planning process and Planning Permission. The Landlord Offer was confirmed and approved by Cabinet on 26 July 2023.

Risks

4.16 The highest current risks relate to:

- The Council needs to finalise outstanding compliance issues on historic projects related to Brick-by-Brick – no GLA grant available until these issues resolved.

- The possibility of Compulsory Purchase Orders causing delay if negotiations to purchase fail
- The scheme requires planning permission(s) and will be determined against the London Plan 2021 and Croydon Local Plan 2018 unless material considerations indicate otherwise.
- Construction cost inflation

4.17 Future risks and their mitigation are covered within Section 5.

5 ALTERNATIVE OPTIONS CONSIDERED

5.1 There are two delivery options open for the Council to consider:

Option 1 – Developer lead/ Joint Venture with the Council

Option 2 – Direct delivery by the Council, with Phase 3 site of private housing sold

5.2 In considering which delivery option is likely to be the best, it is important to bear in mind the density of the redevelopment and which option is most likely to achieve a start on site in December 2024. This date is important, not only in terms of delivering new homes promptly to residents in accordance with the Landlord Offer, but also financially to maximise GLA and other funding that is currently available. The timescale is tight, but considered deliverable if action is taken now across the Council to facilitate progress.

5.3 The Pros and Cons of the two main options of Developer-led and Council-led are summarised below in Table 5. The Council also commissioned Savills to undertake an options appraisal, which is contained in the Part B report, Exempt Appendix B, and includes commercially sensitive information.

Table 5 – Pros and Cons of Alternative Delivery Options

OPTION	PROS	CONS/RISKS
Delivery Option 1 – Developer-led with Development Agreement	<ul style="list-style-type: none"> * Potential to achieve a better build price for the social rent housing as a result of a single development partner delivering across the whole site/economies of scale * Potential share of any profits resulting from the programme, by way of a planning and sales overage clause * Benefit from the expertise of a developer partner bringing 	<ul style="list-style-type: none"> * Extensive open procurement process takes time * Likely to require an element of Council subsidy over and above the cost of the affordable housing * Developer profit in this option may be between 20%-25% of cost (or 18.5% - 20% of Gross development Value) weighed against lower professional fees of 10% (although need to consider this against the likely

	<p>specialist resource to optimise the value from the scheme</p>	<p>higher professional fee costs in the Option B which could be significant)</p> <ul style="list-style-type: none"> * Council would less control over the social housing delivery * Council would still have some element of control over the social housing delivery, through signoff and approval gateways etc within the contract documentation. * Specification would need to be negotiated/agreed, and may result in less choice for residents * Although less direct risk, there remains the exposure to developer failure * Competent clienting resource needed to monitor Development Agreement * Potential that developers might not be interested in the opportunity * Potential longer procurement, lengthy negotiations & therefore longer timescale for replacement homes delivery * Complexity and cost of Development Agreement not to be underestimated * Developer may wish to secure more favourable Planning Permission, possibly by Appeal, before committing to Development Agreement * Negotiations with Developer may fail, causing serious delay * Developer may walk away due to adverse economic conditions * GLA grant route potentially more complex because Council likely to be claiming grant on homes being built by third party * Meeting GLA funding timescales would be difficult and might fall outside current funding round.
<p>Delivery Option 2 – Council-led process with a Design/Build tender of the</p>	<ul style="list-style-type: none"> * Direct control on timescale, quality and programme through main construction contractor 	<ul style="list-style-type: none"> * Could be a higher unit cost for the social housing due to fewer overall numbers * Need for a larger professional consultant team, with internal

<p>affordable housing only, and subsequent disposal of remainder of the site</p>	<ul style="list-style-type: none"> * Ability to provide early delivery * Bespoke home options possible for residents (although this would be budget dependent) * Ability to sell the remaining cleared site(s) with planning permission when market conditions improve, and receive a better land receipt compared to disposal now, when land value is nil * Funding already allocated in HIP * Phase 2 options can be explored to improve viability * Potential to package the remaining site(s) with other Council owned regeneration sites for a more attractive opportunity to the market * Potential to benefit from any profit associated with the market sale and (once the land is sold) through a planning and sales overage * Opportunity to mitigate contractor risk by main contractor procurement through Framework arrangements, standard contracts and financial assessment of contractor finances 	<p>project management resource to support the Council with competent clienting</p> <ul style="list-style-type: none"> * Professional fees (including framework levies) up to 18% * Risk of land remaining unsold * Risk of land remaining vacant after sale * Potential that some developers may not be interested in a fully market sale scheme, where they normally seek mixed tenure for a preferable cash flow profile * Some direct exposure to contractor risk, cost inflation and contractor failure risk
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In the selection of the best option for delivery, both the scale of each phase as well as each type of housing tenure are important.

5.4 Crucial to the financing of the social rented homes is the GLA grant. The GLA regard Regina Road as a key investment site in South London and regular contact with the GLA is being maintained. The GLA grant is potentially substantial. The grant will be secured following a bid to the GLA, assessment of the Council's ability to deliver a scheme, and restoration of Development Partner Status. The grant will not be released until the Council can demonstrate that key conditions are met such as legal ownership of land, an unconditional contract to build and can make a physical start on site. The start on site milestone if not met will put grant at risk and scheme viability as a consequence. It is therefore imperative that timescales agreed with the GLA are

achieved so the Council can benefit from the GLA investment and thereby have more resources to invest in other Council housing elsewhere in the Borough.

- 5.5 The programme for selecting a developer could be challenging in the current market until there is greater certainty on Planning regarding design and heights etc, but also greater certainty on ground conditions, trees, services, and other surveys. In the current market potential developers would see unknowns as risk and risk will almost certainly be priced pessimistically. Where gaps in information exist, this will create evaluation difficulties and could cause problems later in holding the selected developer to account. Developing the design through a professional team helps de-risk the project.
- 5.6 The current market is obviously in a difficult position. If the sales, and related profit margins, are the main motivation for developers, then sales in 4-5 years' time could be challenging. Plus, although there is clear potential, this project is not located in the most obviously valuable area in Croydon and the sales are at the end of the programme.
- 5.7 There is also the issue of visibility with residents on progress. Starting a Developer-led procurement will take time and there will be no visibility of progress to residents. A Council-led design process will be visible and continue the good work done to date.
- 5.8 Following an internal review supported by external advice and taking into considerations of today's market conditions, it is **recommended that Option 2 is the best delivery option to take forward the Council's investment in Phases 1 & 2.**
- 5.9 Option 2 covering Phases 1 & 2 represents a significant project representing approximately 50% - 65% of the Regina Road project build, depending upon the numbers of homes in Phase 3. This should attract a range of competent major building contractors able to start in December 2024.
- 5.10 The intention would be to use the new Phase 1 homes exclusively for decanting existing Regina Road residents, especially those in the two towers nos 2-56 and 58-108 in preparation for Phase 2. Phase 1, and all phases, may be subject to sub-phasing to enable maximum decanting of existing residents without the need to move off-site into temporary accommodation.
- 5.11 Savills have been advising on viability and delivery options. It is crucial that the Council takes the best possible investment decision. As previously reported in July, Savills have highlighted the challenge of designing a developer-led scheme that a developer would want to build without subsidy in the current market where the costs of construction can be greater than market value. This challenge is compounded by the scale of new social rent homes that the Council wishes to invest in for its own residents when compared with potentially fewer private sales homes feasible on the site, especially in current depressed market conditions. The private sales element is approximately 35% - 50% of the project.
- 5.12 The phased approach being proposed seeks to ensure that Phases 1 & 2 focus on investing in the delivery of Council owned homes first, taking full advantage of the current window for GLA funding support, followed by the market facing units.

- 5.13** In summarising the issues that the Council faces regarding choice of the best delivery option, it would appear unlikely that the deficit on a developer-led scheme can be eliminated in today's market, even with additional private sales. The complexity and cost of a Development Agreement that effectively secures the Council's best possible position should not be underestimated and can easily impact on timescales. It is also important to be aware of the added complexity of the GLA grant to the Council when a developer is involved.
- 5.14** The speed of delivering new homes for residents as well as quality and value-for-money are the key concerns for the Council. A Council-led Rebuild scheme for the first two phases shown above in Table 5 is the most practicable and quickest replacement option for investment, using a Design/Build approach whereby the Council obtains Planning Permission (in the context of an indicative Masterplan) and designs to RIBA Stage 4a to procure a main contractor who will then complete the detail design and build, monitored by the Council's agent.
- 5.15** The Council-led approach requires the creation of a Council team which is both skilled and competent. This is a key part of our approach to Regina Road and wider housing regeneration/ development in Housing. It addresses the key future risk, highlighted in Table 6 within this report and by Savills, that 'the Council will need a larger consultant team, and additional internal resource, to support the Council with competent clienting.' Delivering Housing Regeneration Projects require a particular skill set and on 26 July 2023 Cabinet made progress with Key Decision 4523EM in agreeing the external professional consultant resources to take forward Phases 1 & 2 of the Regina Road project over the next five years. The additional internal resource includes the employment of a small, experienced and competent project management team which will monitor the performance of the external team to pre-set time, budget and quality parameters. This is a cost-effective and efficient approach that will be funded from the capital budget. Additional internal resources have been recruited in recent weeks in preparation for an early start on site. In the medium term a new Regeneration Division is being created within Housing with a team possessing competent clienting skills and with experience of successfully delivering Housing Regeneration across all tenures working with all residents to make a lasting and positive impact to local areas.
- 5.16** Phase 3 works consisting of private sale homes would not be ready to start on site for several years, by which time market conditions may have recovered. The Council could consider this parcel of land for disposal at a future date. The advertising and disposal of this site is expected to involve a selection and negotiation process for a Developer-led Phase 3 scheme through a Development Agreement, which could be expanded to include other Council land elsewhere.
- 5.17** Treating the demolition contract as a separate phase provides maximum flexibility as to when demolition works could start on site. The first buildings for demolition are nos 1-87 tower and the adjacent nos 89-123 maisonettes. Once structural investigation of nos 1-87 is complete, demolition of the tower could start as early as Spring 2024.
- 5.18** For the main contractor procurement for Phases 1 and 2, it is proposed to procure using a Framework compliant with the Public Contract Regulations 2015. Work on the options analysis to select the optimal Framework is underway. It is proposed to

complete the procurement strategy for the contractor early next year by which time both the Architect and Quantity Surveyor will be in place and can scrutinise the procurement documents before launching the Framework competition. An award would be made in March/April which joins up with the forecast date of the submission of the application for Planning Permission. This would mean that both the contractor and professional services team would have 8 to 9 months working together collaboratively as a single unified team before the meaningful hand over of the site / breaking ground in December 2024. The procurement of the principal contractor and demolition contractor will be progressed in line with the Annual Procurement Plan.

6. CONSULTATION

- 6.1** Consultation with residents in accordance with the Residents Charter has been extensive and ongoing since July 2022, as detailed in previous reports, most recently to Cabinet on 26 July. A key element of the Landlord Offer agreed in July is the emphasis on resident engagement throughout the design and development process. Regular meetings with residents via the Residents Working Group have been ongoing since July.
- 6.2** Plans are also progressing to engage with the wide range of local businesses and organisations that will be impacted by the rebuilding of Regina Road.
- 6.3** The GLA are being kept informed of progress to ensure that they are fully aware that there is a buildable scheme capable of being delivered within the current grant window. The necessary applications are being progressed.
- 6.4** The Improvement & Assurance Panel (IAP) has been consulted on the approach in this report. They comment that 'IAP support the recommendation of direct delivery by the Council for Phase 1 works. There are many benefits to this approach including greater control over the timescale, quality of design, and easier access to GLA grant. However, the success of this approach will depend on the Housing Directorate having a skilled and well-resourced professional in-house team. The Panel would therefore want reassurance that in-house project management expertise exists or understand the plan to achieve this'.

7. IMPLICATIONS

7.1 FINANCIAL IMPLICATIONS

- 7.1.1** The Cabinet paper of 22 March and 26 July approved the gross costs of the project of £103m to allow for the purchase of and building out of properties for decant purposes. The sum also included a provisional for the demolition and Phase 1 costs.

7.1.2 The above is a gross costs budget and is prior to any grant or the use of other forms of funding. Funds would be borrowed by the HRA and then drawn down for each stage of the project as required.

7.1.3 Insert at the end of the section: Comments approved by Orlagh Guarnori on behalf of the Director of Finance. (Date 06/09/2023)

7.2 LEGAL IMPLICATIONS

7.2.1 The Landlord Offer was approved by the Executive Mayor in Cabinet on 26th July 2023. The legal comments set out in that report are relevant to the continuation of the Regina Road redevelopment project. The Council must continue to adhere to the approved Landlord Offer, which was subject to the planning process, and must continue consultation with tenants/ residents. This report confirms that recommended phasing proposals have been informed by guidance from the Local Planning Authority as part of the pre-application process, the housing need of existing tenants at Regina Road and consultation with residents.

7.2.2 The delivery options are considered in section 5 of this report and it is important to note that the delivery partner option would involve a procurement process in the circumstances. This is because, where the Council contracts with a developer to deliver works then, depending on the substance of those agreements and any relevant exemptions, this can be considered as a contract which falls under the scope of the Public Contracts Regulations 2015 (PCR). This is an area of law which has been litigated and case law principles should be assessed when considering if the PCR will apply to a proposed development agreement or similar agreement. If a Phase 3 delivery option considers a development partner, the PCR position will be considered further based on proposals at that time.

7.2.3 In relation to details in the report regarding the Local Planning Authority, it is important to note that the role and functions of the Local Planning Authority are distinct from the role of the Council. In the circumstances, the Council will be the applicant and, as such, it is important to maintain a clear separation of duties. The Council, as an applicant, will follow the usual planning procedure, which any developer would, and take into consideration the views/ recommendations of the Local Planning Authority through the pre-application process.

7.2.4 The Council have the power to do anything that individuals generally may do pursuant to section 1 of the Localism Act 2011 and the Executive Mayor has the power to exercise executive functions pursuant to s9E of the Local Government Act 2000.

7.2.5 Approved by the Head of Commercial & Property Law on behalf of the Director of Legal Services and Monitoring Officer. (Date 04/10/2023)

7.3 EQUALITIES IMPLICATIONS

7.3.1 The Council has a statutory duty to comply with the provisions set out in Section 149 of the Equality Act 2010. The Council must therefore have due regard to:

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act.
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

7.3.2 The department have sought to collate some data on protected characteristics at Regina Road and now hold some data on: ethnicity, sex, sexual orientation and religion. Over the course of the forthcoming months more data will be gathered on the remaining characteristics and efforts will be made to build trust which will support residents sharing their data. During the consultation efforts were made to pay due regard to all equality characteristics by ensuring that the consultation was accessible to all residents in particular those who may not have English as a first language and residents who are non-neurotypical.

7.3.3 An equality analysis has been carried out in respect of resident consultation at Regina Road. The data collected via the consultation at Regina Road indicates that the proposal will have a positive impact on age, disability, sex, race and religion and belief. This is a live document and will be updated with further data when available.

7.3.4 The department will continue to consider equality implications throughout the duration of the project including the needs of disabled residents affected through any transitions.

Comments approved by Naseer Ahmad on behalf of the Equalities Manager
(Date 14/09/2023)

8. APPENDICES

8.1 A - EQIA

9. URGENCY

9.1 A decision on the delivery model is essential at this meeting if the intention remains to start on site in December 2024 with building replacement homes for residents.

10. BACKGROUND DOCUMENTS

Cabinet, 16 November 2022– Regina Road Estate, Norwood, Key Decision: 5122 EM

Cabinet, 22 March 2023 – Regina Road Estate, Norwood, Outcome of Statutory Consultation and arrangements for a Ballot of residents on the Landlord Offer, Key Decision: 8622 EM

Cabinet, 26 July 2023 – Regina Road Project – Outcome of Ballot and Next Steps, Key Decision: 3823EM

Cabinet, 26 July 2023 – Procurement of Architectural Professional Consultancy Services for Regina Road Project, South Norwood, and Malton House, to the Grant of Planning Permission and production of technical design for contractor procurement and on-site works, Key decision: 4523EM

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Equality Analysis Form

1. Introduction

1.1 Purpose of Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

Undertaking an Equality Analysis helps to determine whether a proposed change will have a positive, negative, or no impact on groups that share a protected characteristic. Conclusions drawn from Equality Analyses helps us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also helps us to comply with the Equality Act 2010.

An equality analysis must be completed as early as possible during the planning stages of any proposed change to ensure information gained from the process is incorporated in any decisions made.

In practice, the term '**proposed change**' broadly covers the following:-

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service review;
- Budget allocation/analysis;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

2. Proposed change

Directorate	Housing
Title of proposed change	Future of Regina Road
Name of Officer carrying out Equality Analysis	Katherine Monk

2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

The Regina Road estate was developed as social housing by the Borough in the mid-1960s. It includes three 11-storey tower blocks built using the Wates Large Panel System (LPS), each with 44 flats. There are four medium-rise blocks close to the tower blocks, with an additional 48 flats, within the wider estate of mainly two-storey housing. There is also some green space, a play area and a kindergarten that should be considered as part of any redevelopment and re-provision.

The flats in the tower blocks – particularly in nos 1-87 - have suffered in recent years from a variety of issues including water penetration, condensation and mould that have proved difficult to rectify. The council is proposing to begin the process of addressing the current unsatisfactory situation at the Regina Road estate where three ageing tower blocks require radical action to ensure modern social housing fit for the 21st Century. In summary, improved living conditions at the blocks would involve either refurbishment or redevelopment, and a report considering the options open to the council is to be presented to Cabinet in September 2022.

It is a legal requirement under Section 105 of the Housing Act and a legal requirement as part of the Building Safety Act 2021 to ‘develop a Resident Engagement Strategy so residents can influence and are involved in decisions regarding building safety, are informed of their rights and of their obligations, have clear reporting arrangements for building safety concerns, and a clear escalation process for all residents’. Since July 2018 the GLA has required any landlord seeking GLA funding for estate regeneration projects which involve the demolition of any social homes (and the construction of 150 or more homes of any tenure) to show that residents have supported their proposals through a ballot. This is to make sure that GLA funding only supports estate regeneration projects if residents have a clear say in plans and support them going ahead.

Subject to Cabinet, next steps include exploring options for the future of the Regina Road estate with all the residents affected.

3. Impact of the proposed change

Important Note: It is necessary to determine how each of the protected groups could be impacted by the proposed change. Who benefits and how (and who, therefore doesn't and why?) Summarise any positive impacts or benefits, any negative impacts and any neutral impacts and the evidence you have taken into account to reach this conclusion. Be aware that there may be positive, negative and neutral impacts within each characteristic.

Where an impact is unknown, state so. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

3.1 Deciding whether the potential impact is positive or negative

- **Table 1 – Positive/Negative impact**

<p>Regina Road is home to a wide range of residents, including families, aging residents and a mix of backgrounds, needs and ethnicities. The data we hold about residents living on the estate regarding protected characteristics is not complete and so it is not currently possible to paint an accurate picture of the extent to which residents share a protected characteristic.</p> <p>The Council has undertaken a series of actions since March 2021 to address the concerns of residents and try to start to re-build trust and relationships with residents on the estate. A team of housing officers spoke to residents at the door to get an understanding of the issues residents were experiencing in their homes. A number of meetings - to which all residents were invited - have taken place and a drop-in has been operational since September 2021. A regular newsletter and bulletin for Regina Road is produced for residents. These contain contact details for key housing officers for Regina Road, ways to get involved, and who to talk to if there are problems. Noticeboards are updated with new information and bulletins as they are published.</p> <p>A reference group was also formed at the beginning of 2022 consisting of a small group of residents representing all three blocks on the estate. It was created to support and engage with residents about repairs, works and improvements taking place at Regina Road over the short, medium and looking ahead to the future.</p> <p>A Walkabout was held with residents of the three tower blocks during the evening of Wednesday, 13 July 2022. Main issues raised were repair issues, some dating back several years and related to general whole block fabric/service failures which re-occur. Residents present understood the difficulties associated with blocks nearly 60 years old and said they would appreciate new homes in preference to the continuous process of patching old</p>
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	<p>homes. Some residents said they would be happy to move away from Regina Road. A Walkabout Action Plan has been prepared which follows up on all the issues raised by residents to ensure progress and resolution.</p> <p>Further meetings are being held with residents to listen to their views, starting with residents of the medium-rise blocks adjacent to nos 1-87.</p> <p>We do not have any data currently which would tell us whether groups that share a protected characteristic (compared to non-protected groups have a better or worse experience of <u>housing services at Regina Road</u>. We do have some data for a small percentage of our customers following an engagement exercise carried out in Summer 2021 but this exercise took place across the borough and is worth consideration in this analysis.</p> <p>Although we do not hold information about the protected characteristics of residents in these blocks, what we do know in no uncertain terms is that the poor living conditions at Regina Road – and ongoing issues in the flats – are ongoing and continue to impact on the quality of life for many residents living in these blocks. The impact of poor housing is well documented and evidence of this for some protected characteristics groups is provided in the section below.</p> <p>(Statistics documenting protected characteristics in the borough of Croydon, and available information about our residents is documented in Appendix 1.)</p> <p>It is anticipated that the overall impact of the proposal to either refurbish or redevelop on the Regina Road estate will improve the living conditions and their experience of Croydon housing services, for most if not all residents living there. The aim is for this improvement to be experienced by all residents, including those within protected characteristic groups.</p> <p>The intensive and rigorous consultation process which is required for a programme of this scale, will enable to us to clarify the needs of the diverse group of residents living on the estate and is an opportunity to identify improvements that could be made. Listening to residents will help us to understand and address any equalities issues which arise during the consultation process. This EQIA will be updated to reflect this as engagement with residents gains pace.</p>
	<p>For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. . If it is decided</p>

that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.

Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence	Data obtained to date through outreach
Age	<p>Residents of all ages should benefit from the proposed scheme as we would anticipate seeing a significant improvement in the quality of all residents' homes and their experience of our housing services. Other benefits will be documented as the consultation process is developed and implemented.</p> <p>Any decisions about the future of the estate will be shaped in consultation with residents and designed to provide better housing for them. Individual elements of the project will need to be assessed, predominantly through the planning process, as more detailed plans are developed to ensure they produce either positive or neutral effects on people with protected characteristics. The council will adhere to the George Floyd Race Matters Pledge and Equalities Pledge as the Council's standard in equalities.</p>	None anticipated.	No clear data to evidence positive or negative impact on age but feedback from an engagement exercise in 2021 shows that females were less happy with their overall experience as a tenant/leaseholder with 28% finding the service excellent/good compared with 34% of males. 38% of females reported their experience to be poor/very poor compared with 32% males. The (small) youngest group surveyed appeared to be the most satisfied and least dissatisfied and the mid-age range groups appeared to be slightly more dissatisfied. However, there didn't appear to be any clear conclusions to be drawn from this demographic breakdown, with satisfaction levels fluctuating across the age ranges.	<p>We have obtained the following data through outreach activity on the estate to date:</p> <p>Elderly (65+): 16% Under (<65+) 72% prefer not to say: 13%</p>

	<p>The council will ensure that its engagement approach enables a wide and diverse range of tenants and leaseholders to be fully involved in the consultation process so that future changes on the estate embrace the needs of residents with of all ages.</p> <p>.</p>			
Disability	<p>Residents with disabilities should benefit from the proposed scheme as we would anticipate seeing a significant improvement in the quality of all residents' homes and their experience of our housing services, including residents in need of adaptations as a result of a disability. Other benefits will be documented as the consultation process is developed and implemented.</p> <p>Any decisions about the future of the estate will be shaped in consultation with residents and designed to provide better housing for them. Individual elements of the project will need to be assessed, predominantly through the planning process, as more detailed plans are developed to ensure they produce either positive or neutral effects on people with protected characteristics. The council will adhere to the George Floyd Race Matters Pledge and Equalities Pledge as the Council's standard in equalities</p>	None anticipated.	<p>Ref 1) Housing for older and disabled people, Department for Levelling Up, Housing and Communities.</p> <p>Feedback from an engagement exercise in 2021 showed that satisfaction and dissatisfaction levels appear to be fairly consistent between those who did not state their day to day activities were limited because of a health problem or disability and those who did. The small 'unknown' group, who did not provide an answer to this question, showed greater dissatisfaction with their overall experience.</p>	<p>We have obtained the following data through outreach activity on the estate to date:</p> <p>Disability Yes 21% No 12% Undisclosed 67%</p>

	<p>The council will ensure that its engagement approach enables a wide and diverse range of tenants and leaseholders to be fully involved in the consultation process so that future changes on the estate embrace the needs of residents with disabilities.</p>			
Sex	<p>Residents should benefit from the proposed scheme regardless of their sex as we would anticipate seeing a significant improvement in the quality of all residents' homes and their experience of our housing services. Other benefits will be documented as the consultation process is developed and implemented. Any decisions about the future of the estate will be shaped in consultation with residents and designed to provide better housing for them. Individual elements of the project will need to be assessed, predominantly through the planning process, as more detailed plans are developed to ensure they produce either positive or neutral effects on people with protected characteristics. The council will adhere to the George Floyd Race Matters Pledge and Equalities</p>	None anticipated.	<p>Feedback from an engagement exercise in 2021 showed that females were less happy with their overall experience as a tenant/leaseholder with 28% finding the service excellent/good compared with 34% of males. 38% of females reported their experience to be poor/very poor compared with 32% males.</p>	<p>We have obtained the following data through outreach activity on the estate to date:</p> <p>Male: 22% Female: 78% Prefer not to say/other: 0%</p>

	<p>Pledge as the Council’s standard in equalities.</p> <p>The council will ensure that its engagement approach enables a wide and diverse range of tenants and leaseholders to be fully involved in the consultation process so that future changes on the estate embrace the needs of residents of any sex.</p>			
<p>Gender Identity</p>	<p>None anticipated. Any decisions about the future of the estate will be shaped in consultation with residents and designed to provide better housing for them. Individual elements of the project will need to be assessed, predominantly through the planning process, as more detailed plans are developed to ensure they produce either positive or neutral effects on people with protected characteristics. The council will adhere to the George Floyd Race Matters Pledge and Equalities Pledge as the Council’s standard in equalities.</p> <p>The council will ensure that its engagement approach enables a wide and diverse range of tenants and leaseholders to be fully involved in the consultation process so that future changes on the estate embrace the needs of residents.</p>		<p>No data to evidence positive or negative impact on gender reassignment</p>	<p>Further data to be identified through ongoing outreach.</p>

<p>Marriage or Civil Partnership</p>	<p>Residents should benefit from the proposed scheme regardless of marriage or civil partnership groups as we would anticipate seeing a significant improvement in the quality of all residents' homes and their experience of our housing services.</p> <p>Other benefits will be documented as the consultation process is developed and implemented.</p> <p>Any decisions about the future of the estate will be shaped in consultation with residents and designed to provide better housing for them. Individual elements of the project will need to be assessed, predominantly through the planning process, as more detailed plans are developed to ensure they produce either positive or neutral effects on people with protected characteristics. The council will adhere to the George Floyd Race Matters Pledge and Equalities Pledge as the Council's standard in equalities.</p> <p>The council will ensure that its engagement approach enables a wide and diverse range of tenants and leaseholders to be fully involved in the consultation process so that future changes on</p>	<p>None anticipated.</p>	<p>No data to evidence positive or negative impact on marriage or civil partnership.</p>	<p>Further data to be identified through ongoing outreach.</p>
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	the estate embrace the needs of residents.			
Religion or belief	<p>Residents should benefit from the proposed scheme regardless of their religion or belief group, as we would anticipate seeing a significant improvement in the quality of all residents' homes and their experience of our housing services.</p> <p>Any decisions about the future of the estate will be shaped in consultation with residents and designed to provide better housing for them. Individual elements of the project will need to be assessed, predominantly through the planning process, as more detailed plans are developed to ensure they produce either positive or neutral effects on people with protected characteristics. The council will adhere to the George Floyd Race Matters Pledge and Equalities Pledge as the Council's standard in equalities</p> <p>The council will ensure that its engagement approach enables a wide and diverse range of tenants and leaseholders to be fully involved in the consultation process so that future changes on the estate embrace the needs of residents.</p>	None anticipated.	Currently no data to evidence positive or negative impact on religion or belief groups.	<p>Religion/belief Muslim : 1% Christian : 2% Other : 1% Not Known: 96 %</p>

	Other benefits will be documented as the consultation process is developed and implemented.			
Race	<p>Residents should benefit from the proposed scheme regardless of their race, as we would anticipate seeing a significant improvement in the quality of all residents' homes and their experience of our housing services.</p> <p>Other benefits will be documented as the consultation process is developed and implemented.</p> <p>Any decisions about the future of the estate will be shaped in consultation with residents and designed to provide better housing for them. Individual elements of the project will need to be assessed, predominantly through the planning process, as more detailed plans are developed to ensure they produce either positive or neutral effects on people with protected characteristics. The council will adhere to the George Floyd Race Matters Pledge and Equalities Pledge as the Council's standard in equalities</p> <p>The council will ensure that its engagement approach enables a wide and diverse range of tenants and leaseholders to be fully involved in the consultation process so that future changes on</p>	None anticipated.	Feedback from an engagement exercise in 2021 showed that whilst around 35% of White, Asian and other groups rated their experience of housing services as excellent or good, this was true of only 25% of Black residents and less than 20% of those in the Mixed/Multiple ethnicity group. There was also increased dissatisfaction amongst Black, Mixed/Multiple and Other groups – all around 41%, 10 points higher than the White group at 31%. These figures relate to housing services in general. The ARK report, commissioned by the council following unacceptable living conditions of some of our tenants at Regina Road, investigated allegations of discrimination on race ground. The report published in May 2021 concluded that it did not find evidence of this allegation.	<p>We have obtained the following data through outreach activity on the estate to date:</p> <p>Asian background: 7% White background): 22% Black British/Caribbean/African: 47% Mixed multiple: 17% Other ethnic group: 9% Prefer not to say/undisclosed: 5%</p>

	the estate embrace the needs of residents.			
Sexual Orientation	<p>Residents should benefit from the proposed scheme regardless of their sexual orientation, as we would anticipate seeing a significant improvement in the quality of all residents' homes and their experience of our housing services.</p> <p>Other benefits will be documented as the consultation process is developed and implemented.</p> <p>Any decisions about the future of the estate will be shaped in consultation with residents and designed to provide better housing for them. Individual elements of the project will need to be assessed, predominantly through the planning process, as more detailed plans are developed to ensure they produce either positive or neutral effects on people with protected characteristics. The council will adhere to the George Floyd Race Matters Pledge and Equalities Pledge as the Council's standard in equalities</p> <p>The council will ensure that its engagement approach enables a wide and diverse range of tenants and leaseholders to be fully involved in the consultation</p>	None anticipated.	No clear data to evidence positive or negative impact on age but feedback from an engagement exercise in 2021 shows that females were less happy with their overall experience as a tenant/leaseholder with 28% finding the service excellent/good compared with 34% of males. 38% of females reported their experience to be poor/very poor compared with 32% males. The (small) youngest group surveyed appeared to be the most satisfied and least dissatisfied and the mid-age range groups appeared to be slightly more dissatisfied. However, there didn't appear to be any clear conclusions to be drawn from this demographic breakdown, with satisfaction levels fluctuating across the age ranges.	<p>We have obtained the following data through outreach activity on the estate to date:</p> <p>Bisexual 0% Heterosexual/straight 68% Homosexual 0% Prefer not to say/undisclosed 32% Other 0%</p>

	process so that future changes on the estate embrace the needs of residents.			
Delivering Social Value	Once the future of Regina Road is determined through consultation with residents, the council would work to ensure social value provided by contractors helps more people into work This will assist the more socially excluded in our community to become financially stable thereby reducing social isolation etc. Opportunities for work experience, training, and jobs will be offered to local residents through the social value aspect of any refurbishment or redevelopment scheme.	None. The council will explore opportunities for local residents, including work experience, training and job opportunities. The council will encourage the successful contractor to adhere to and sign up to the George Floyd Race Matters Pledge and Equalities Pledge as the Council's standard in equalities. This commitment to delivering social value supports the council's Community Sector strategy 2019-2023 and the Equality Strategy for Croydon 2020-2024 to help Croydon become a more equal place through by tackling poverty, gaps in equality and inequality	Social value element of any refurbishment or redevelopment scheme. contract will ensure these benefits are delivered.	Ref 1) Housing for older and disabled people, Department for Levelling Up, Housing and Communities . Feedback from an engagement exercise in 2021 showed that satisfaction and dissatisfaction levels appear to be fairly consistent between those who did not state their day to day activities were limited because of a health problem or disability and those who did. The small 'unknown' group, who did not provide an answer to this question, showed greater dissatisfaction with their overall experience.
<p>Important note: You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.</p>				

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics.
Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact

3.2 Additional information needed to determine impact of proposed change

Table 2 – Additional information needed to determine impact of proposed change

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table. Please use the table below to describe any consultation with stakeholders and summarise how it has influenced the proposed change. Please attach evidence or provide link to appropriate data or reports:

Additional information needed and or Consultation Findings	Information source	Date for completion
<ul style="list-style-type: none"> Review data we hold about the protected characteristics of our customers at Regina Road cross-departmentally. Update 14 March 2023: Privacy statements were prepared and approved to request information about protected characteristics and this has been built into the resident engagement plan as the project progresses. Although we have been able to collect some equalities information and protected characteristics, as detailed in the breakdown in the next page, we will need to continue to collect information through additional engagement opportunities, such as the housing needs assessment. 	Social care services, major adaptations team, tenancy services, allocations, outreach team	Ongoing
<ul style="list-style-type: none"> Review how and what information will be collected once new IT system is implemented to enable us to analyse customer satisfaction levels across protected characteristics. <p>Update 14 March 2023: Reviewing collection of protected characteristics and equalities information as part of preparation for rollout of Housing Online (NEC)</p>	NEC project documentation	May 2023
<ul style="list-style-type: none"> Consider how to analyse customer satisfaction by protected characteristics as part of ongoing contract monitoring. <p>Update 14 March 2023: Once the contractors have been formally announced, they will be asked to formally sign up to the George Floyd Race Matters Pledge and Equalities Pledge as the council's standard in equalities. The same applies to the council's support of the Stop Social Housing Stigma Campaign and the Residents' Charter, which was formally adopted in December 2022.</p>	Procurement development best practice, 2022 Equalities Pledge	During mobilization From March to August 23

- | | | |
|--|--|--|
| <ul style="list-style-type: none">• Recruitment is underway to recruit a diverse group of residents to be involved in monitoring the performance of the new contractors once in place so we can monitor whether all residents are equally able to access services. | | |
|--|--|--|

Ethnicity	
Asian background	8%
White background	19%
Black British/Caribbean/African	48%
Mixed multiple	8%
Other ethnic group	8%
Prefer not to say/non disclosure	8%
*Rounded to the nearest decimal point	
Disability	
Yes	29%
No	16%
Non disclosure	55%
Sexual orientation	
Bisexual	0%
Heterosexual/Straight	70%
Homosexual	0%
Prefer not to say/non disclosure	29%
Other	1%
Gender	
Male	27%
Female	72%
Prefer not to say/Other	1%
Other (Tenants/leaseholders)	
Elderly (65+)	13%
Under (<65+)	74%
prefer not to say/ undisclosed	13%
Religion/belief	
Muslim	8%
Christian	2%
Other	2%
Not Known	83%
Prefer not to say	5%

Tenure	
Freeholder	2%
Leaseholder	12%
Secure tenants	80%
Temporary Accommodation resident	5%
Not known	1%

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

3.3 Impact scores

Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)
2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact)
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

Table 4 – Equality Impact Score

Severity of Impact	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	Likelihood of Impact			

Key

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low

Equality Analysis

Table 3 – Impact scores

Column 1 PROTECTED GROUP	Column 2 LIKELIHOOD OF IMPACT SCORE Use the key below to score the likelihood of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group. 1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact	Column 3 SEVERITY OF IMPACT SCORE Use the key below to score the severity of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group. 1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact	Column 4 EQUALITY IMPACT SCORE Calculate the equality impact score for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group. Equality impact score = likelihood of impact score x severity of impact score.
Age	1	1	1
Disability	1	1	1
Gender	1	1	1
Gender reassignment	1	1	1
Marriage / Civil Partnership	1	1	1
Race	1	1	1
Religion or belief	1	1	1
Sexual Orientation	1	1	1
Pregnancy or Maternity	1	1	1

Equality Analysis

4. Statutory duties

4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council's ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

Advancing equality of opportunity between people who belong to protected groups

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

Important note: If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

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Equality Analysis

5. Action Plan to mitigate negative impacts of proposed change

Important note: Describe what alternatives have been considered and/or what actions will be taken to remove or minimise any potential negative impact identified in Table 1. Attach evidence or provide link to appropriate data, reports, etc:

Table 4 – Action Plan to mitigate negative impacts

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.

Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability	None anticipated			
Race	None anticipated			
Sex (gender)	None anticipated			
Gender reassignment	None anticipated			
Sexual orientation	None anticipated			
Age	None anticipated			
Religion or belief	None anticipated			
Pregnancy or maternity	None anticipated			
Marriage/civil partnership	None anticipated			

6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter **X** in column 3 (**Conclusion**) alongside the relevant statement to show your conclusion.

Decision	Definition	Conclusion - Mark 'X' below

Equality Analysis

No major change	Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision. Engaging with residents about the options for the future of Regina Road is an opportunity to ensure that homes for those living on these ate are fit for purpose and provide equal and equally accessible housing provision and services across all protected characteristics. The consultation has been an opportunity to make significant enhancements in these areas where provision is currently lacking. We have facilitated consultation in a variety of methods (online, face to face, independent advisors) so that all residents are able to contribute. We have also offered to provide consultation materials in different formats or languages if required.	Yes
Adjust the proposed change	We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form	No
Continue the proposed change	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.	No
Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	No
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet		Meeting title: Date:

Equality Analysis

7. Sign-Off

Officers that must approve this decision		
Equalities Lead	Name:	Date:
	Position:	
Director	Name:	Date:
	Position:	

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Appendix 1

Croydon Council has a social housing stock of approximately 13,500 properties (61% flats, 39% street properties). In addition, there are also approximately 2,500 leaseholders. The information we hold about our residents in relation to protected characteristics is incomplete. Whilst we have insight into the age, sex and race / ethnicity of our tenants and leaseholders, information in relation to disability, sexual orientation and other protected characteristics is not available to us. Therefore, we need to draw on data that is available via Croydon Observatory to draw some conclusions about the profile of residents living in our homes.

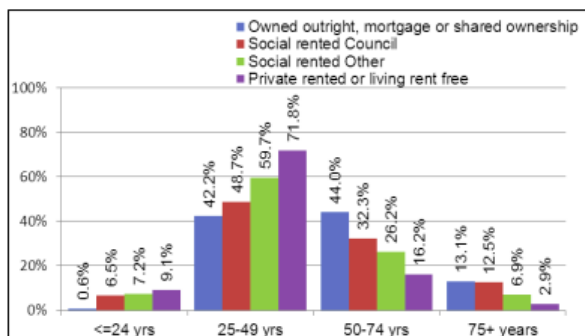
Age

We know the age of 95% of our customers (13607/14345). The majority of the missing 5% are tenancies held for many years (going back to early 1970's) so are most likely to be older/elderly. We know that 4.4% are aged between are 20-29, 15.6% are 30-39, 19.4% 40-49

Age	20-29	30-39	40-49	50-59	60-69	70-79	80+
%	4.4%	15.6%	19.4%	25.0%	17.7%	10.8%	7.1%

Equality Analysis

Figure 1 - Tenure type by age bands in Croydon in 2011



Source: ONS, Census 2011, Table DC4201EW

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Figure 1 - Tenure type by age bands in Croydon in 2011 Source: ONS, Census 2011, Table DC4201EW.

Race

We know the ethnicity of 78.3% of our customers (11236/14345). Again, where there are gaps, these are for the longer held tenancies.

Ethnicity	Asian	Black	Mixed/multiple	White	Other
%	9.2%	37.9%	4.2%	46.2%	2.5%

The Croydon population continues to grow from long-term international migration and 34.6% of the population is made up of non-UK born residents according to ONS 2020 estimates. Croydon has a higher proportion of residents from Asian/Asian British, mixed or multiple ethnic groups, Black/African/Caribbean/Black British and other ethnic groups compared to the national average. proportion of Asian and Black residents in Croydon has been increasing since the 2011 Census. The proportion of White population was predicted to decrease by almost 10% by 2021. Source: GLA 2016 Housing-led projections by ethnicity.

Gender

Records are held for 14343/14345 = 99.99% of our customers as follows:

Female	67.0%
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Equality Analysis

Male	33.0%
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Disability

We hold disability information for housing applicants and for council tenants but much of this data is held in “free text” fields making it difficult to analyse and is not easily extractable from our housing tenant database. Currently we This figure accounts for just 5% of our customers. Looking to other data for insight there is not one comprehensive figure that can give a true picture of the total number of people with a disability in Croydon. The 2011 Census figures showed that 14.1% of the population in Croydon had their day-to-day activities limited to some extent by a long-term health problem or disability. 22,493 people had their day-to-day activities limited a lot, whilst 28,134 had their day-to-day activities limited a little.

We know that since 2008, our major adaptations team in housing have carried out 1556 adaptations to council properties. On top of that figure would be any level access showers installed via the decent homes program, plus any adaptations carried out before 2008.

Social value

According to the borough profile 2018 Croydon is the bottom third (220th most deprived authority out of 336 district authorities) for the Education, skills and training domain. Social housing is often associated with the council’s more deprived residents, so social value can provide key benefits to this group of residents in a number of ways, including: employment opportunities for local and disadvantage people, improved skills for local people or those facing barriers to employment and improved employability of young people.

Deprivation

There remains geographic inequality in the distribution of deprivation in the borough with the North and East of the borough remaining more deprived than the South. Ref [Borough Profile \(croydonobservatory.org\)](http://croydonobservatory.org) Dec 2021 81% of Council owned homes are in areas identified with high levels of social deprivation, (Indices of Multiple Deprivation Decile 1-3). Four Places have large concentrations of social deprivation. These are in Addington, Broad Green & Selhurst, Shirley, and Waddon.

Sexuality

We have significant gaps in our data concerning sexual orientation in respect of council tenants, housing applicants and homeless households. Equality and Human Rights Commission guidance on this protected characteristic is to collect it where relevant, ONS produced its Integrated Household Survey for the calendar year of 2014 with its mid-year population estimates. By applying the London average to the Croydon population it was estimated that there were about 9,800 people in Croydon who would have identified as being gay, lesbian or bisexual.

Equality Analysis

Social deprivation

81% of Council owned homes are in areas identified with high levels of social deprivation, (Indices of Multiple Deprivation Decile 1-3). Four Places have large concentrations of social deprivation. These are in Addington, Broad Green & Selhurst, Shirley, and Waddon. According to the borough profile 2018 Croydon is the bottom third (220th most deprived authority out of 336 district authorities) for the Education, skills and training domain.

Working adults

Based on the ONS annual population survey for the calendar year 2020, only 5.0% of Croydon's resident population aged 16-64 years had no qualification. Adults from a White ethnic background in Croydon in the 2011 Census were more likely to have no qualifications than adults from any other ethnic background. Over a half (51.4%) of the residents from the Asian community had level 3 and level 4 qualifications which was the highest proportion compared to the other ethnic communities.

Housing

According to the 2011 Census, 60% of all Croydon 145,000 households were owner occupied, 20% were private rented and 18% were households living in social housing. Social housing in Croydon is mainly concentrated in the northern parts and the eastern edge of the borough. Census 2011 showed that in the east, the former wards of Fieldway, (now New Addington North), and New Addington, (now New Addington South), had the highest proportions of social housing (council homes and other) with 60.6% and 42.2% respectively

Gender identity

We have significant gaps in our data concerning gender reassignment; however, recent improvements in our data collection methods will address this gap over time, however we will only collect this data where relevant to service delivery.

Language

The Census 2011 showed that 14.5% of people in Croydon had a language other than English recorded as their main language. The majority could speak English well but around 1 in 6 of this group (17.2%) amounting to 2.5% of the total Croydon population at the time could not speak English well or at all. Residents are able to request that information is provided in different formats or alternative languages to ensure that they are able to understand information relating to the consultation. This provision will continue through the project and will be especially important in the event of a resident ballot.

Equality Analysis

Sexual orientation

We have significant gaps in our data concerning sexual orientation in respect of council tenants, housing applicants and homeless households. Census data provides an good estimate of the diversity of religious belief in Croydon.

Marital status

We do not hold marital status data for around one in three council tenants.

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