

Croydon Council

Equality Analysis – Croydon Growth Zone

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

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

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

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

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

1.1 Analysing the proposed change

1.1.1 What is the name of the change?

London Borough of Croydon is preparing for significant growth over the next 20 years. **The Croydon Growth Zone** was established in 2014 (and approved at Cabinet in 2016) as a framework for identifying, developing, funding and delivering infrastructure projects in the central area of Croydon, to enable increased economic growth through sustainable development. The Government identified Croydon as a Growth Zone in its 2014 Autumn Statement and subsequently confirmed the designation in the 2015 spring budget.

The Growth Zone programme comprises of 46 projects, totaling £520million of improvements supported by a loan of up to £309.9million with the balance (circa £210million) met from other sources including TfL, the GLA or planning obligations. The business case and detailed background for these projects were included in the Growth Zone Delivery Plan and Programme produced by Peter Brett Associates in March 2018.

Significant progress has been made with town centre developments (including the Whitgift Centre redevelopment) to move to the delivery stage of the Growth Zone programme. The package of

measures aim to support the growing borough through providing enhanced transport capacity, reduced air pollution, an exciting cultural offer and the creation of new jobs as part of a larger, stronger local economy. It is anticipated that the Growth Zone framework will be in place until 2034, when the necessary infrastructure projects will have been fully implemented using funding drawn down from the loan financed by the business rate uplift in addition to funding from various other sources.

1.1.2 Why are you carrying out this change?

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

Context

The Croydon Opportunity Area (COA) is located in the north west of LB Croydon and is a prominent metropolitan centre in south London. It functions as one of the regional centres for London as a whole and for the south-east of England. It also forms part of the Capital to Coast Local Enterprise Partnership (LEP) area.

One of the COA's key strengths is its transportation connections and the COA acts as a key transport interchange for people travelling both north (into London) and south (to Gatwick and Brighton). Future rail upgrades and airport expansion decisions will be critical to the future success of the COA and Croydon. The current physical environment within the COA detracts from people's perceptions of Croydon and is a significant barrier towards attracting inward investment. The redevelopment and renewal of the urban core within the COA is therefore an important catalyst for stimulating change and instilling confidence in Croydon as a place to both live and work and will be critical to Croydon's future.

The proposed change will have a broader impact in relation to promoting social inclusion, community cohesion and integration and opportunities to deliver "social value". Delivering the Growth Zone is a key priority of the administration to support investment in jobs, housing, economic growth and the regeneration of the Town Centre. The benefits of the Growth Zone will be realised across the board with improvements made to transport and the public realm on key corridors as well as greater employment and cultural opportunities.

Why are we considering the change?

In the Croydon Local Plan: Strategic Policies (2016) the need for a total of circa 33,000 new homes was identified for the period 2016-2036, of which at least 10,500 net additional homes to be provided within the Croydon Opportunity Area (COA). Subsequent reviews have suggested that the Borough will see more than 23,000 new jobs created and 15,000 new homes started over the next 5 years. The Growth Zone framework was developed from the Local Plan aspirations and the Opportunity Area allocation in the London Plan (2011), with the Opportunity Area Planning Framework (OAPF) adopted by the Borough as a Supplementary Planning Document in 2013. The geographical scope for the Growth Zone programme was aligned with the Opportunity Area boundaries, with the area to include the urban core from West Croydon Station to the A232, from Old Town to East Croydon Station.

The OAPF identified a need for strategic infrastructure to support the Borough's growth ambitions: "Critical to building a new residential community of 17,000 people is the provision of social and community infrastructure."

And in the context of transport specifically:

"A strategy for sequencing the delivery of infrastructure improvements and securing new funding

will need to be developed in order to manage the delivery of infrastructure in a timely manner.” The OAPF evidence base includes several reports and studies which have subsequently informed the development of infrastructure projects, including the OAPF Strategic Transport Study (2013), five central area Masterplans, Connected Croydon (2011) and the Transport Vision (2016).

In 2014 a Development Infrastructure Funding Study (DIFS) was undertaken to provide an assessment of OAPF infrastructure needs and develop a strategy for infrastructure funding to inform the future planning and funding decisions. The DIFS was evaluated against an agreed level of growth in population, new homes and commercial development in the central area of Croydon. The initial DIFS identified 92 infrastructure projects, including utilities, social infrastructure, environment and transport schemes, at an overall cost of £1.014 billion and with a funding gap of £805 million. The study recommended further business case review and an assessment of potential funding sources, including planning obligations (S106), Community Infrastructure Levy (CIL), Revolving Infrastructure Funds and Business Rates Retention.

A DIFS prioritisation study in 2015 reviewed the project costs and established a priority programme of 39 projects, at a total cost of £492.3m with £59.8m committed and therefore a funding requirement of £432m. It envisaged 26 projects delivered by 2021 and all 39 by 2026. The Growth Zone package of infrastructure projects would be supported by new Council borrowing of £309m and additional funding would be sought from TfL, GLA and developers.

Policy as a driver for change

- A new London Plan is expected by 2019 and it is anticipated to confirm the Borough’s growth strategy and ambitions for the COA.
- The Mayor’s Transport Strategy (2017) identifies several potential transport projects in central Croydon, including significant rail and tram improvements, plus a new emphasis on ‘healthy streets’ that accords with the Borough’s ambitions for an enhanced public realm and better strategic links.
- The previous Mayor’s Vision for Cycling sort to ‘normalise’ cycling across London, making it something anyone feels comfortable doing. This objective continues in the MTS which sets an ambitious 80 percent mode share target for public transport, cycling and walking by 2041.
- The objective of building a ‘smarter city’ also comes through all current London wide policy development, from economic, planning and transport strategies, through environment, energy and digital initiatives. The Smart London Plan (2013) and its 2016 update, The Future of Smart, set out the Smart City framework and key areas of development, which are now being brought forward in Borough plans.
- To ensure the Growth Zone aligns closely with the MTS, slight changes were made to the list of prioritised projects. This included the addition of a Cycling Project (originally identified in the 2014 DIFS but not in the list of 39 prioritised projects) and four Corridor Projects. The Corridor Projects combined existing walking, cycling and bus scheme proposals along strategic routes that serve the Growth Zone with the intention that they would be combined in a holistic scheme in line with the outcomes of a ‘healthy street’.

1.1.3 What stage is your change at now?

See **Appendix 1** for the main stages at which equality analyses needs to be started or updated.

We have an outline programme of improvements and a funding mechanism in place. A detailed Equalities Analysis will be developed as and when the Growth Zone projects evolve and in particular, as detailed feasibility and detailed business cases are prepared for individual schemes.

Equalities Analysis will be an intrinsic part of this as we will need to ensure equality and social inclusion considerations are part of the process. Equality Analyses will be kept under review throughout planning and development, and where necessary action will be taken to mitigate any negative impacts to groups that share protected characteristics.

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

1.2 Who could be affected by the change and how

1.2.1 Who are your internal and external stakeholders?

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

The principal internal stakeholders are the Cabinet Member for Environment, Transport & Regeneration, Chair of Traffic Management Advisory Committee. Other important stakeholders include the Growth Zone Sub-groups and Steering Group, Highways and Parking Services, Planning, Strategic Transport, Economic Growth, Regeneration, Public Health and Environmental Health Teams and other internal departments relevant to the programme delivery.

The external stakeholder groups include residents, businesses, developers, NHS, Police, utilities, digital providers, partnerships such as BID, etc. Also including public transport users, those driving in and through the Town Centre, mobility and disability forums, schools, young people and the wider community including groups that share protected characteristics.

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

The majority of the Growth Zone programme consists of public realm and transportation projects within the Town Centre that are aimed at improving and enhancing the public space, transport and highway interchanges and its connecting corridors.

The main benefits of the programme include:

- provision of physical highways and road safety improvements for cyclist and pedestrians
- promotion and facilities to encourage more sustainable and healthier travel modes
- improvements to air quality
- enhancements to public transport capacity
- improved public spaces and accessibility within the street environment
- improved pedestrian permeability and ease of access
- creation a sense of place and character

- more connected Town Centre with its surrounding districts
- improved perception of safety
- improved cultural offer

More specific outcomes per theme are as follows:

Buses

These highway-based schemes are designed to improve the punctuality, reliability and service levels on bus routes that serve the Growth Zone. The projects include measures to isolate buses from congestion and delay; supporting infrastructure to ensure bus stops have sufficient capacity and the necessary levels of passenger accessibility; new bus stands with improved driver welfare facilities; and potentially enhanced bus stations offering improved interchange.

Cycling

These cycling measures seek to create a network of safe and attractive cycle routes across the Borough that connect the Growth Zone with adjacent residential areas. The proposals upgrade the existing London Cycle Network routes and introduce new routes and local links to make the town centre more permeable and easily accessed by cycle.

Corridors

In line with the Mayor of London's Healthy Streets policies the Council has identified three corridors within the Borough where walking, cycling and public transport will be encouraged by creating safer and more attractive environments for these modes of transport. The Corridors identified include London Road, Brighton Road, Mitcham Road and the route identified by the proposed Crystal Palace Tram Extension.

Energy

Energy projects include a requirement for a District Energy Centre to provide heat and potentially electricity to buildings in the Mid Croydon area, with a possible extension to new developments around East Croydon station.

Highways

These projects seek to address significant constraints within the highway network that supports travel to and from the Growth Zone. These projects focus on major junctions on the strategic road network where additional capacity is required to support the tram, bus, cycle and walking networks while still ensuring the efficient movement of goods and services by vehicle. The Highway theme includes two operational projects, one addresses the supply and accessibility of town centre car parking while the other focuses on improving traffic management on the local and wider road networks.

Public Realm

The focus of the public realm projects is improving the environment for pedestrians within the COA by removing barriers to movements and creating attractive spaces that encourage walking and the use of public spaces. The importance of the public realm enhancements is in their role in the integration of facilities, amenities and transport nodes.

Rail

Longer term infrastructure improvements are planned for West Croydon and East Croydon stations. The projects include redeveloping the station buildings and track works to improve accessibility, permeability and increase the number of platforms so providing additional capacity to accommodate greater demand for rail travel to and from Croydon.

Social Infrastructure

This group of infrastructure projects are required to support the current and future social needs of residents within and close to the Growth Zone. Investment in social infrastructure is recognised as key to ensuring a viable, sustainable community in the long term. Requirements arising for social infrastructure in the COA include Education (Schools Provision), Health (Primary Health Care), Employment (Croydon Works - Job Brokerage) and Community Facilities (Community Spaces, Play Spaces, Clocktower Complex upgrade).

Smart City Infrastructure

This group of projects are designed to support new technologies that:

- Deliver efficiency by reducing costs of infrastructure and service provision
- Improve quality of life and wellbeing
- Support growth through job creation and attracting investment
- Enable environmental sustainability (air quality, energy use)
- Create a safe city with reduced crime and quicker emergency responses.

Trams

New track, vehicle stabling and power projects to support an increase to the frequency of services across the tram network but also ensure that the network is more resilient with service performance less impacted by delays and cancellations.

Culture

A programme of events, celebration of art and music and lighting projects. Culture makes a significant contribution to the successful growth agenda through improving the case for inward investment and the Fairfield Halls specifically will be an engine for growth in Croydon's economy. Cultural projects create supportive and educational opportunities for our residents. Initiatives support young people in terms of life chances, routes to employment and their wellbeing. Croydon's cultural offer is an increasingly important part of improving the borough as a place to live, work, study in and visit and have contributed to increasing the profile of Croydon in a positive way. All of this improves the overall case for inward investment and business retention; establishing Croydon as a place with a vibrant cultural offer with places that are engaging and welcoming to spend time in.

A key priority for the Council is to work with all our stakeholders to make Croydon a stronger fairer place for all our communities. Croydon's Opportunity and Fairness Plan 2016-20 outlines action to tackle inequalities such as educational attainment, health, homelessness, unemployment, crime and social isolation, particularly in the borough's six most deprived wards. Successful delivery of the Growth Zone programme outlined above will create more opportunities for Croydon residents and contribute towards greater equality, fairness and better outcomes for all.

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

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

Yes, there are issues in relation to traffic congestion, way-finding, access to public transport, levels of car ownership for some groups and casualty and accident rates which are known to be higher amongst more deprived communities.

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

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

Yes, Croydon is one of largest boroughs in London in terms of overall population and one of the largest populations of children and young people whilst also having an ageing population. The programme is of some relevance to the protected characteristics of age and disability, and will benefit people who share these characteristics by helping to ensure more inclusive design of streetscapes. This will help people who are less mobile to have relatively easier access to essential services and amenities. Social cohesion is promoted via vibrant cultural offer to engage young people from different backgrounds in cultural and community activities.

The programme supports a number of the Council's Equality Objectives as set out in the Opportunity and Fairness Plan for 2016 – 20, namely:

- Employment: Investment in Croydon Works seeks to increase the rate of employment for disabled people, young people, over 50s and lone parents who are furthest away from the job market.
- Attainment: Investment in Croydon Works seeks to improve attainment levels for white working class and BME heritages, including those living in six most deprived wards. The training programme and work placements bring a reduction in the number of adults who have no qualifications in the borough.
- Community Safety: Cultural activities and improvements to social infrastructure look to reduce the number of young people who enter the youth justice system.
- Social Isolation: Transport and accessibility improvements will reduce social isolation amongst disabled people and older people.
- Community Cohesion: Providing a more attractive and vibrant environment and better local amenities seek to improve the proportion of people from different backgrounds who get on well together.
- Health: By creating and developing healthier and sustainable places, the Growth Zone programme seeks to reduce differences in life expectancy between communities.

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

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

	Likely Advantage 😊	Likely Disadvantage 😞
Disability	Schools, shops, public realm and public transport are not always fully accessible and restrict access to employment, training and leisure for people living with a disability. People with impaired mobility will benefit from the area wide approach to improving access. The programme includes improvements to	N/A

	<p>footways, including dropped kerbs, tactile paving and adjustment to bus stops to enhance accessibility, improved pedestrian crossings facilities and road safety improvements.</p> <p>The improvements will also deliver improved accessibility within the street environment and access to public transport at rail and tram stations. The work will attempt to design out as many barriers to movement as possible, including step free access, kerbs and steep ramp gradients.</p> <p>Implementation of inclusive design that meets the need of people living with disabilities. Major public realm improvements are planned within the Town Centre each of which is the subject of separate access audits and will look to enhance accessibility.</p>	
Race/ Ethnicity	<p>Cultural offer is designed to be diverse and inclusive of all races and ethnicities. Opportunities presented by the cultural programme support young people from BME backgrounds in terms of life chances, routes to employment and their wellbeing.</p>	N/A
Gender	<p>Car ownership amongst women is lower than that amongst men, suggesting women are more reliant on other forms of transport including walking. This element of the delivery programme seeks to improve the pedestrian environment at local centre and transport corridors. It also seeks to support centre vitality and viability and thus sustain local services more readily accessed on foot.</p>	N/A
Transgender	N/A	N/A
Age	<p>The improvements will look to address the following statement:</p> <p>Children and young people often have their independent mobility curtailed due to concerns over road safety.</p> <p>Convenient, safe and reliable public transport is important for older people to continue participating in society.</p> <p>Safe and attractive walking and cycling routes facilitate travel by means other than the car as a way reducing congestion.</p>	N/A

	<p>The environmental quality and accessibility of the public realm is important for older people. Provision of accessible places to rest and street furniture is essential to encourage older people to enjoy the public realm.</p> <p>Reduction in traffic speeds and congestion increases road safety and improves pedestrian environment and perceived accessibility.</p> <p>Croydon has one of the highest levels of childhood obesity in London where the level is also generally higher than the rest of the country. Making walking and cycling to schools safer and more pleasant reduces childhood obesity.</p>	
Religion /Belief	N/A	N/A
Sexual Orientation	N/A	N/A
Pregnancy and Maternity	<p>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. The improvements will deliver ramps and level access in the public realm and on public transport for pushchairs. The schemes will attempt to design out as many barriers to movement as possible, including limitations to step free access, kerbs and steep ramp gradients.</p> <p>The increased accessibility of bus stops and quicker journey times, should benefit people pushing buggies, as should improvements to tram and train services.</p> <p>Croydon Works delivers opportunities for women who have to balance work and domestic responsibilities helping them access suitable employment and training opportunities close to home.</p>	N/A
Social inclusion issues	<p>Social infrastructure, projects yet to be scoped out, will address community cohesion issues. Culture programme will look to engage young people in cultural activities.</p>	N/A
Community Cohesion Issues	<p>Social infrastructure, projects yet to be scoped out, will address community cohesion issues.</p>	N/A

Delivering Social Value	Successful delivery of the Growth Zone programme will create more opportunities for Croydon residents and contribute towards greater equality, fairness and better outcomes for all.	N/A

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

All improvements have positive outcomes for everyone, however weaknesses in partnership working may result in schemes that don't maximise positive outcomes for groups sharing protected characteristics, in particular schemes undertaken by developers under their planning obligations, schemes in geographical areas that don't have strong representation from relevant age/disability groups, etc.

In developing the Growth Zone programme significant engagement has already taken place and continues with major developers and utility companies to identify infrastructure requirements. With regard to resident groups, including people from protected characteristics, a roadshow is planned to provide information on the various projects and for residents to have their say. The roadshow will support informal and statutory consultation associated with any of the projects. The first phase of engagement will commence in October through to December 2018 and will be delivered in and around the Town Centre, actively engaging with mobility and disability forums, schools and residence associations. All engagement and consultation will be inclusive and cover all protected groups.

1.2.7	Would your proposed change affect any protected groups more significantly than non-protected groups?
	Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix.....

The programme has the potential to affect certain protected groups more significantly than non-protected groups. The analysis has revealed that, generally, the programme will have a positive or neutral impact on all groups that share protected characteristics and will improve the overall quality of life among people in these groups. The protected characteristics of Age, Disability, Pregnancy and Maternity and Race will be positively impacted upon most by the implementation of the Growth Zone programme. More generally, it will have a positive impact on those groups with lower levels of car ownership. Improved accessibility and connectivity to the Town Centre via better transport, cycling and walking links will benefit mobility across the board and social cohesion.

1.2.8	<p>As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who do?</p> <p>In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes <i>etc.</i></p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.</p>
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The programme will help the Council in advancing equality of opportunity between people who belong to any protected groups and those who do not as identified. The components of the programme will enable the Council to continue to make adjustments and improve access for people with limited mobility (particularly people with disabilities). It also seeks to aid the active participation via cultural activities and social infrastructure.

1.2.9	<p>As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic?</p> <p>In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act</p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.</p>
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The programme is considered neutral in terms of effect on the elimination of unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act in relation to protected groups.

1.2.10	<p>As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?</p> <p>In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation <i>etc.</i></p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response</p>
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The programme will help by improving access to the street environment and increasing independent travel for disabled people and children. These two groups will have increased opportunity to engage with others not from protected groups.

This will continue to help the Council in fostering good relations between people who belong to any protected groups and those who do not.

1.3 Decision on the equality analysis

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

Decision	Guidance	Response
No, further equality analysis is not required	<p>Please state why not and outline the information that you used to make this decision. Statements such as 'no relevance to equality' (without any supporting information) or 'no information is available' could leave the council vulnerable to legal challenge.</p> <p>You must include this statement in any report used in decision making, such as a Cabinet report</p>	
Yes, further equality analysis is required	<p>Please state why and outline the information that you used to make this decision. Also indicate</p> <ul style="list-style-type: none"> • When you expect to start your full equality analysis • The deadline by which it needs to be completed (for example, the date of submission to Cabinet) • Where and when you expect to publish this analysis (for example, on the council website). <p>You must include this statement in any report used in decision making, such as a Cabinet report.</p>	<p>The programme benefits all but has particular relevance to certain groups of protected characteristics. Scheme specific audits and consultations will be carried out with these groups.</p> <p>The Equalities Analysis has been initiated for the Growth Zone programme as a whole and further analysis will be undertaken as individual projects are progressed through the design stages. The sub-groups will ensure this occurs and where necessary action will be taken to mitigate any negative</p>

Decision	Guidance	Response
		<p>impacts on groups that share a protected characteristic.</p> <p>In addition, in exercising any delegated decision making, the officer in question will ensure that Equalities Analysis are appropriately explored and considered by the Decision maker prior to such decisions being taken.</p> <p>The Growth Zone Equality Analysis is published as a background document to October 2018 cabinet report. The analysis will be reviewed and updated annually when embarking on the preparation of the next year's delivery programme.</p>
Officers that must approve this decision	Name and position	Date
Report author	Maris Puks, Growth Zone	21.09.18
Director	Lee Parker, Growth Zone	21.09.18

1.4 Feedback on Equality Analysis (Stage 1)

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

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Name of Officer	Yvonne Okiyo	
Date received by Officer	21.09.18	Please send an acknowledgement
Should a full equality analysis be carried out?	The Initial Equality Analysis identified the	Note the reasons for your decision

	<p>proposed change will have a range of positive impacts for protected groups. Further analysis will need to be undertaken as individual projects are progressed through the design stages to ensure consideration for equality and inclusion issues and undertake actions to mitigate any negative impacts on groups that share a protected characteristic</p>	
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