

# Equality Analysis Form

Delivering for Croydon

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## 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

<b>Directorate</b>	<b>Planning &amp; Sustainable Regeneration - Spatial Planning, Place</b>
<b>Title of proposed change</b>	<b>Local Plan Supplementary Planning Document - Revocation</b>
<b>Name of Officer carrying out Equality Analysis</b>	<b>Julia Dawe</b>

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

Briefly summarise the proposed change and why it is being considered/anticipated outcomes. What is meant to achieve and how is it seeking to achieve this? Please also state if it is an amendment to an existing arrangement or a new proposal.

This Equality Analysis has become necessary following Mayor Perry's manifesto pledge in 2022 to revoke one of the Council's adopted Supplementary Planning Documents "The Croydon Suburban Design Guide" (SPD2). SPD2 is not a policy document but provides guidance, information, clarification and amplifies how the Council's Local Plan policies should be applied to planning applications. Whilst SPD2 is not a policy document it will result in a change as it may place more reliance on the interpretation of the adopted Local Plan policies, which are clearly subject to Equality Analysis.

This EQIA does **NOT** apply to the Council's adopted Local Plan. The Local Plan EQIA is a separate approved document.

This EQIA has been undertaken to assess the impact of the revocation of SPD2 on equality issues and takes account of the publication of the new Equality Strategy 2020-2024.

## 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**

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 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
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Age	<p>The adopted Local Plan policies support additional growth in housing and greater choice. Policies seek to enable more genuinely affordable housing for people in older age groups (75 plus) who are forecast to increase by 77%, families with children and young households on low incomes. Housing development will contribute to outcomes 3 and 4 of the Equality Strategy by addressing individual needs as they arise, providing greater choice and more affordable options and supporting good health outcomes for older people, enabling them greater opportunities to remain living in their homes.<sup>1</sup>The SPD2: Suburban Design Guide provides key design principles for housing development in accordance with the policies in the Croydon Local Plan to help to ensure suburban growth is suitable and sustainable</p>	<p>No significant negative impact has been identified.</p> <p>The revocation of SDP2, whilst not impacting on the adopted policies in the Local Plan will place more emphasis on the interpretation of policy leading to less certainty in outcomes.</p> <p>The time taken for the Council to process planning applications may slow down as a result and with less guidance for applications it may be difficult to determine whether an application is acceptable and for the applicant to know what would be acceptable. It needs to be considered whether there are sufficient resources to deal with this additional work in a timely manner. This may result in more applications going to appeal which will</p>	<p>Evidence to test the impact of policies has been collected from a range of sources: Croydon Observatory; 2011 Census; Croydon strategic policy documents; ONS, Housing Need data; Health data, Adult and Children services data. This has been collated into a borough profile and key facts and issues document.</p>
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<sup>1</sup> <https://www.croydon.gov.uk/sites/default/files/articles/downloads/Croydon%20SHMA%20Update%20-%20V6.pdf?src=redirection-fix>

		<p>further delay outcomes.</p> <p>Overall delays in processing planning applications effectively may adversely affect housing delivery and particularly affordable and specialist housing for which there is a recognised need.</p>	
Disability	<p>There are policies in the adopted Croydon Local Plan which seek to increase the provision of low cost rented housing and to ensure it is genuinely affordable that will benefit disabled households who are more likely to be on low incomes and dependent on affordable housing. The data suggests that across Croydon, some 28% of households contain someone with a Long term health problem or disability (LTHPD). The policy also supports the provision of accessible housing (M4(2)) and homes for wheelchair users (M4(3)). Policies seeking an increased in supported bedspaces for people with disabilities will benefit people with mental health issues, physical disability and learning disability kitchens and improvements to parks and</p>	<p>No significant negative impact has been identified.</p> <p>The revocation of SDP2, whilst not impacting on the adopted policies in the Local Plan will place more emphasis on the interpretation of policy leading to less certainty in outcomes.</p> <p>The process of determining planning applications may slow down as a result and with less guidance it may be difficult to determine whether an application is acceptable and for the applicant to know what would be acceptable. It needs to be considered</p>	<p>Evidence to test the impact of policies has been collected from a range of sources: Croydon Observatory; 2011 Census; Croydon strategic policy documents; ONS, Housing Need data; Health data, Adult and Children services data. This has been collated into a borough profile and key facts and issues document.</p> <p>Section 6 - <a href="#">Strategic Housing Market Assessment Update</a></p>

	<p>open spaces to accommodate accessible community events and activities and co-located services that are inclusive will increase the participation of disabled people. The housing proposals will contribute to outcomes 3 and 4 of the Equality Strategy by seeking to increase the provision of accessible housing for people with disabilities (including those with invisible disabilities) and of specialist supported housing for vulnerable and disabled people, which will help meet arising needs and support improved health outcomes.</p> <p>The SPD2: Suburban Design Guide provides key design principles that expand upon how the policies will be delivered.</p>	<p>whether there are sufficient resources to deal with this additional work in a timely manner. This may result in more applications going to appeal which will further delay outcomes.</p> <p>Overall delays in processing planning applications effectively may potentially affect the delivery of affordable housing for vulnerable people and those with disabilities.</p>	
Sex	<p>There are Policies in the adopted Croydon Local Plan which seek support the provision of genuinely affordable low cost rented housing, which will help meet the housing needs of low-income households and positively impact on female headed low parent households who are more likely to experience low</p>	<p>No significant negative impact has been identified.</p> <p>The revocation of SDP2, whilst not impacting on the adopted policies in the Local Plan will place more emphasis on the interpretation of policy leading to</p>	<p>Evidence to test the impact of policies has been collected from a range of sources: Croydon Observatory; 2011 Census; Croydon strategic policy documents; ONS, Housing Need data; Health data, Adult and Children services data. This has been collated into a borough profile and key facts and issues document.</p> <p>Section 6 - <a href="#">Strategic Housing Market Assessment Update</a></p>

	<p>income, poverty and homelessness and are disproportionately represented among those in housing need. 4, by addressing social isolation.</p> <p>The SPD2: Suburban Design Guide provides key design principles for housing development in accordance with the policies in the Croydon Local Plan to help to ensure suburban growth is suitable and sustainable</p>	<p>less certainty in outcomes.</p> <p>The process of determining planning applications may slow down as a result and with less guidance it may be difficult to determine whether an application is acceptable and for the applicant to know what would be acceptable. It needs to be considered whether there are sufficient resources to deal with this additional work in a timely manner. This may result in more applications going to appeal which will further delay outcomes.</p> <p>Overall delays in processing planning applications effectively may potentially affect the delivery of affordable housing for specific low income single/lone parent groups.</p>	
Gender Identity	No specific positive impacts have been identified.	No significant negative impact has been identified.	

Marriage or Civil Partnership	No specific positive impacts have been identified.	No significant negative impact has been identified.	
Religion or belief	No specific positive impacts have been identified.	No significant negative impact has been identified.	
Race	<p>Policies supporting the provision of genuinely affordable housing to meet the housing needs of low-income households will positively impact on our African, African Caribbean and other global ethnic households who are more likely to experience poverty, overcrowding and homelessness and are disproportionately represented among those in housing need.</p> <p>Housing proposals seeking to increase the provision of affordable housing will support the achievement of outcome 3 of the Equality Strategy by improving access to housing for African, African Caribbean and other global ethnic households who are more likely to experience low incomes, homelessness and housing need.</p> <p>The SPD2: Suburban Design Guide provides key design principles that support the objectives of the Croydon Local Plan to help to ensure</p>	<p>No significant negative impact has been identified.</p> <p>The revocation of SDP2, whilst not impacting on the adopted policies in the Local Plan will place more emphasis on the interpretation of policy leading to less certainty in outcomes.</p> <p>The process of determining planning applications may slow down as a result and with less guidance it may be difficult to determine whether an application is acceptable and for the applicant to know what would be acceptable. It needs to be considered whether there are sufficient resources to deal with this additional work in a timely manner. This may result in more applications going to</p>	<p>Evidence to test the impact of policies has been collected from a range of sources: Croydon Observatory; 2011 Census; Croydon strategic policy documents; ONS, Housing Need data; Health data, Adult and Children services data. This has been collated into a borough profile and key facts and issues document.</p> <p>Section 6 - <a href="#">Strategic Housing Market Assessment Update</a></p>



	<p>suburban growth is suitable and sustainable including:</p> <ul style="list-style-type: none"> <li>• Providing homes for people of all ages and needs to live in one neighbourhood, with the services to support them;</li> <li>• Contributing to the community's health and well-being;</li> <li>• Contributing to economic activity and prosperity; and •</li> <li>• Supporting and encouraging social cohesion.</li> </ul>	<p>appeal which will further delay outcomes.</p> <p>Overall delays in processing planning applications effectively may potentially affect the delivery of affordable housing for low income African, African Caribbean and other global ethnic households and weaken the support for achieving outcome 3 of the Equality Strategy by improving access to African, African Caribbean and other global ethnic households.</p>	
Sexual Orientation	No specific positive impacts have been identified.	No significant negative impact has been identified.	<p>Evidence to test the impact of policies has been collected from a range of sources: Croydon Observatory; 2011 Census; Croydon strategic policy documents; ONS, Housing Need data; Health data, Adult and Children services data. This has been collated into a borough profile and key facts and issues document.</p> <p>Section 6 - <a href="#">Strategic Housing Market Assessment Update</a></p>
Pregnancy or Maternity	Policies supporting the provision of genuinely affordable housing to meet the housing needs of low-income households will positively impact on pregnant women in housing need who have a recognised priority	<p>No significant negative impact has been identified.</p> <p>The revocation of SDP2, whilst not impacting on the adopted policies in the Local Plan will</p>	<p>Evidence to test the impact of policies has been collected from a range of sources: Croydon Observatory; 2011 Census; Croydon strategic policy documents; ONS, Housing Need data; Health data, Adult and Children services data. This has been collated into a borough profile and key facts and issues document.</p> <p>Section 6 - <a href="#">Strategic Housing Market Assessment Update</a></p>

	<p>need for low cost rented housing. Policies seeking to increase the provision of affordable housing will support the achievement of outcome 3 of the Equality Strategy by improving access to housing for pregnant women who are homeless or in housing need.</p> <p>The SPD2: Suburban Design Guide provides key design principles that support the objectives of the Croydon Local Plan to help to ensure suburban growth is suitable and sustainable including:</p> <ul style="list-style-type: none"> <li>• Providing homes for people of all ages and needs to live in one neighbourhood, with the services to support them;</li> <li>• Contributing to the community's health and well-being;</li> <li>• Contributing to economic activity and prosperity; and •</li> <li>• Supporting and encouraging social cohesion.</li> </ul>	<p>place more emphasis on the interpretation of policy leading to less certainty in outcomes.</p> <p>The process of determining planning applications may slow down as a result and with less guidance it may be difficult to determine whether an application is acceptable and for the applicant to know what would be acceptable. It needs to be considered whether there are sufficient resources to deal with this additional work in a timely manner. This may result in more applications going to appeal which will further delay outcomes.</p> <p>Overall delays in processing planning applications effectively may potentially affect the delivery of affordable housing for specific low income single/lone parent groups.</p>	
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**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.

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
None identified		

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**

<b>Severity of Impact</b>	3	3	6	9
	2	2	4	6
	1	1	2	3

		1	2	3
<b>Likelihood of Impact</b>				

**Key**

<b>Risk Index</b>	<b>Risk Magnitude</b>
6 – 9	High
3 – 5	Medium
1 – 3	Low

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**Table 3 – Impact scores**

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

## 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.

The proposed policies will assist in advancing equality of opportunity and good relations between people who belong to protected groups and in other areas will have no specific impact on people who belong to protected groups.

## 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:

The proposed policies are generally assessed to have positive or neutral impacts on people from protected groups and any potential negative impacts have been assessed to have a low equality impact score. No specific actions have been identified as necessary.

**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

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Disability	<b>The slowing down and or reduction in supply of homes for those with disabilities. x</b>	<b>Use existing adopted Local Plan policies; Monitor whether determining planning applications start taking longer to be determined; Monitor the number of planning applications determined at appeal.</b>	<b>Heather Cheesbrough</b>	<b>N/A</b>
Race	<b>The reduction in the delivery of housing may impact those</b> by reducing access to housing for BAME households who are more likely to experience low incomes, homelessness and housing need.	<b>Use existing adopted Local Plan policies; Monitor timelines for determining planning applications; and Monitor the number of planning applications determined at appeal</b>	<b>Heather Cheesbrough</b>	<b>N/A</b>
Sex	<b>There may be a reduction in the supply of housing resulting in</b> overcrowding and homelessness and are disproportionately represented by single female households in housing need.	<b>Use existing adopted Local Plan policies; Monitor timelines for determining planning applications; and Monitor the number of planning applications determined at appeal</b>	<b>Heather Cheesbrough</b>	<b>N/A</b>
Gender identity				
Sexual orientation				
Age	There may be a reduction in the supply of housing resulting in less choice and the lack of affordable options which would support good health outcomes for older people whilst living in their own homes.	<b>Use existing adopted Local Plan policies; Monitor timelines for determining planning applications; and Monitor the number of planning applications determined at appeal</b>	<b>Heather Cheesbrough</b>	<b>N/A</b>
Religion or belief				

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Pregnancy or maternity	x	<b>Use existing adopted Local Plan policies Monitor timelines for determining planning applications; and Monitor the number of planning applications determined at appeal</b>	<b>Heather Cheesbrough</b>	<b>N/A</b>
Marriage/civil partnership				

### 6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter <b>X</b> in column 3 ( <b>Conclusion</b> ) alongside the relevant statement to show your conclusion.		
<b>Decision</b>	<b>Definition</b>	<b>Conclusion - Mark 'X' below</b>
No major change	<p>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. <b>If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.</b></p> <p>We have undertaken detailed analysis of the impact of the revocation of the <b>SPD2 Suburban Design Guide</b> in relation to all groups with protected characteristics and identified the impacts to be positive or neutral.</p>	<b>X</b>
Adjust the proposed change	<p>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. <b>If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</b></p>	
Continue the proposed change	<p>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. <b>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.</b></p>	



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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.	
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet	Meeting title: Cabinet Date: June 2022	

### 7. Sign-Off

<b>Officers that must approve this decision</b>	
<b>Equalities Lead</b>	<b>Name: Denise McCausland Date: 9 June 2022 Position: Equalities Manager</b>
<b>Director</b>	<b>Name: Heather Cheesbrough Date: 6 June 2022 Position: Director of Planning &amp; Sustainable Regeneration</b>