

Equality Impact Assessment

Full Assessment

Core Strategy - Issue and Options Reports

- **Towards a Preferred Core Strategy for Croydon**
- **Towards a Preferred Core Strategy for Croydon - Supplement**

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Core Strategy Issue and Options Reports

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I agree with the outcome of this EqIA and actions arising.	
Lead Officer	
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Date	
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Date	

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Introduction

Equality Impact Assessment

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

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

The subject of this EqIA is the two Core Strategy Issues and Options Reports: “Towards a Preferred Core Strategy” report and the Supplement report, published respectively in February and September 2010.

Equality Acts

The Race Relations Amendment Act 2000, Disability Discrimination Act 2005 and the Equality Act 2006 require an Equality Impact Assessment (EqIA) to be carried out for all services and policies delivered by Local Authorities. The Equality Act 2010 brings together, harmonises and in some respects extends the previous anti-discrimination laws. It comes into force on 1 October 2010.

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

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

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

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

The Core Strategy

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

The Core Strategy sets out the long term spatial framework for the borough. It gives physical and geographic expression to the economic, social, cultural and ecological policies and priorities of the borough. It will guide development and shape the places that make up the borough over the next 15-20 years.

The Core Strategy is not a standalone document but one piece of a wider spatial policy framework for the borough. In the light of its strategic nature, it is not the role of the Core Strategy to set out the detailed policies in relation to planning applications, set out site specific policies and allocations, nor to set out defined boundaries for a specific designation. These are the subject of the lower level plans and policies and would be subject to equality impact assessment separately if appropriate.

The Core Strategy being the key spatial planning document will have significant impact on all residents, businesses and visitors of the borough.

The “Imagine Croydon” Long Term Vision

Following the “Imagine Croydon” consultation in 2009, a long term vision for the borough is articulated as below. A series of spatial objectives for the Local Development Framework have been devised from this vision and they are subject of the EqlA.

We are Croydon

We will be London’s most enterprising borough – a city that fosters ideas, innovation and learning and provides skills, opportunity and a sense of belonging for all.

- **An Enterprising City** – a place renowned for its enterprise and innovation with a highly adaptable and skilled workforce and diverse and responsive economy
- **A Learning City** – a place that unleashes and nurtures local talent, is recognized for its culture of lifelong learning and ambitions for children and young people
- **A Creative City** – a place noted for its health, culture and creativity – one of the best incubators of new artistic and sporting talent in the country
- **A Connected City** – a place defined by its connectivity and permeability, with one of the best digital, communications and transport networks in the country
- **A Sustainable City** – a place that sets the pace amongst London boroughs on promoting environmental sustainability and where the natural environment forms the arteries and veins of the city
- **A Caring City** – a place noted for its safety, openness and community spirit where all people are welcome to live and work and where individuals and communities feel empowered to deliver solutions for themselves.

Consultation

In accordance of the Statement of Community Involvement, both the “Towards a Preferred Core Strategy” report and the Supplement report have gone through a 6 weeks public consultation respectively. Exhibitions and workshops were held in four Spatial Management Areas for the general public. More than 2000 representations have been received as part of the “Towards a Preferred Core Strategy” consultation and more than 400 representations as part of the Supplement consultation.

The representations received which are made by equality groups (if identified) or in regards to equality issues are taken on board in the evidence base to inform the EqIA.

In accordance with the Council’s guidance to all departments on carrying out equality impact assessments, we have considered the effect of the Core Strategy on a range of groups – equality groups with the aim of ensuring fairness and equality of opportunity in relation to race, disability, gender, age, faith and religions, and sexual orientation.

Officers have discussed the Core Strategy documents with the equality groups, often consisting existing forums and networks, and voluntary community organisations in the initial evidence base assembly stage. The initial draft of this EqIA report is also circulated¹ to these equality groups for their comments prior to publication.

A list of the equality groups who have supplied information and have been consulted on this EqIA can be found in Appendix 1.

Profile of the Equality Groups - Key facts and Spatial Issues

Information collected from secondary data sources² such as the Census or health service have provided the profile of residents with protected characteristics in the borough. This forms part of the evidence base to inform the EqIA.

It should be acknowledged that these protected characteristics are not mutually exclusive and some people can have more than more than one protected characteristics. For instance, an older person can also be disadvantaged as a female and disabled at the same time.

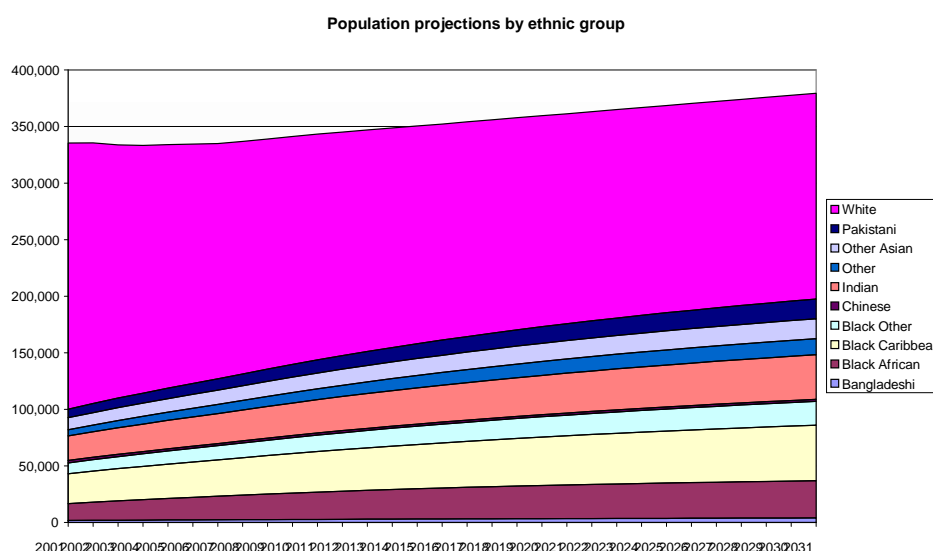
People from ethnic minorities and migrants

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

¹ [delete after publication] Draft of the EqIA will be circulated to the equality groups – forums and networks.

² The sources of data are listed in Appendix 2.

- Croydon's changing BME population is one of the fastest growing in London. In the population projections produced by the Greater London Authority indicated that the BME population is rising, at 40% in 2009 and projected to be more than 50% by 2023.
- The Black and Minority Ethnic communities are younger overall than the white community: 29% of all BME residents are under 16 and 64% are young adults or adults (16-Pensionable age). Only 7% are at pensionable age or above. Services targeted at younger adults are therefore likely to be used by proportionately more



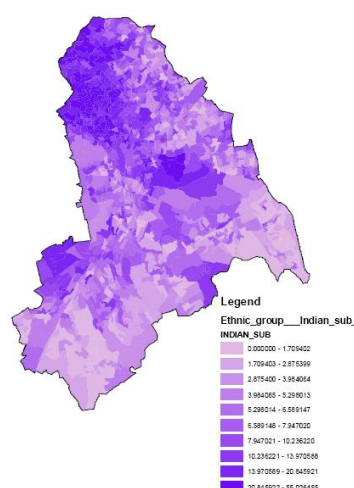
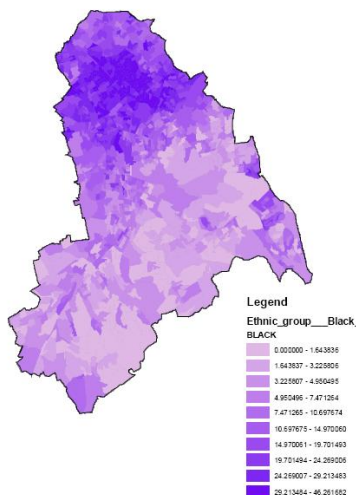
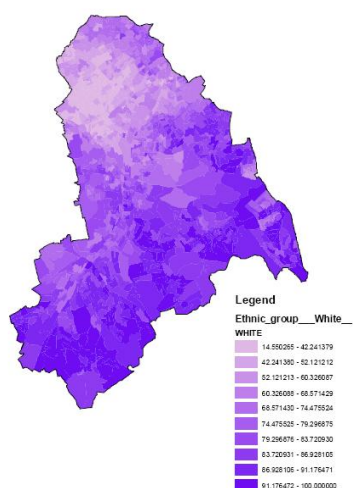
BME people than services targeted at older adults.

- At least 40% of all school children (5-16) and 33% of working age residents (16-pensionable age) are from a Black and Minority Ethnic communities.
- People from BME communities tend to live predominantly in certain parts of the borough. Amongst the 16 Places of Croydon, Broad Green (51%), Norbury (50%) and Thornton Health (59%) have more than half of their residents from a Black or Ethnic minority origins. Central Croydon (33%), South Norwood (39%) and Upper Norwood (29%) also have a significant proportion of population of BME background.
- The following diagrams describe the distribution of people of different ethnic background in the borough. There is a concentration of the Black Ethnic population in the central part of North Croydon, around Thornton Health, whilst the Indian sub-continent ethnic population are a greater proportion of the population in western part of North Croydon, along London Road and Norbury, and some pocket of areas in the south east and west of the borough. The people of mixed and far eastern origins are distributed more evenly in the borough. The areas in the south of the borough are predominantly white.

Census 2001 Ethnic White proportion

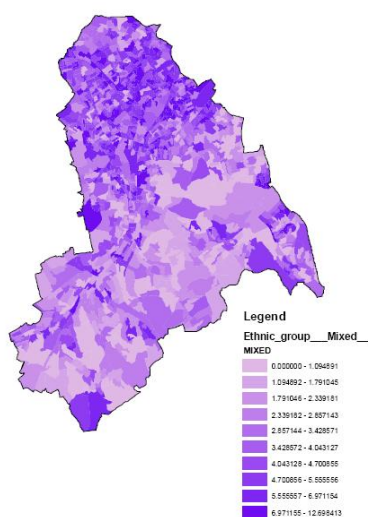
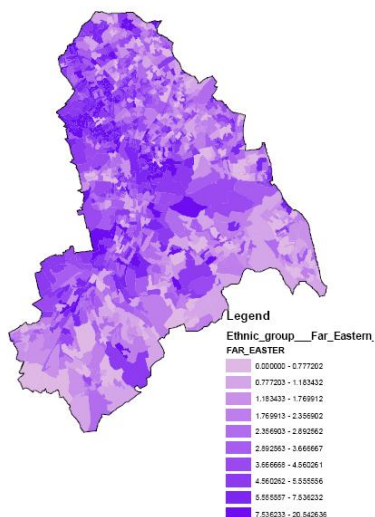
Census 2001 Ethnic Black proportion

Croydon Census 2001 Ethnic Indian Sub



Census 2001 Ethnic Far Eastern proportion

Census 2001 Ethnic Mixed proportion



- In 2004 people in employment³ from Pakistani, Chinese and White Irish groups were more likely to be self-employed than those in other ethnic groups in Great Britain. One in five Pakistanis in employment were self-employed (21 per cent), as were just under one in six Chinese (16 per cent) and White Irish (15 per cent) people. This compared with around one in eight (12 per cent) White British people and fewer than one in ten people from a Mixed or Black ethnic group.
- In 2001 63% of BME households live in owner-occupied housing, 10% in council housing, 9% in other social rented housing and 16% in privately rented accommodation. The remainder live rent free or in communal establishments.
- In 2007/8 approximately 6,000 international migrants registered with a doctor in Croydon. Internal migration outflow exceeds inflow, while international inflow exceeds outflow.
- More than 100 different languages are spoken and the borough's interpretation and translation service dealt with 10,659 (April-Nov 2009) requests where the greatest need came from people speaking Pashto (21.2%) and Dari (7.2%)

³ Nomis

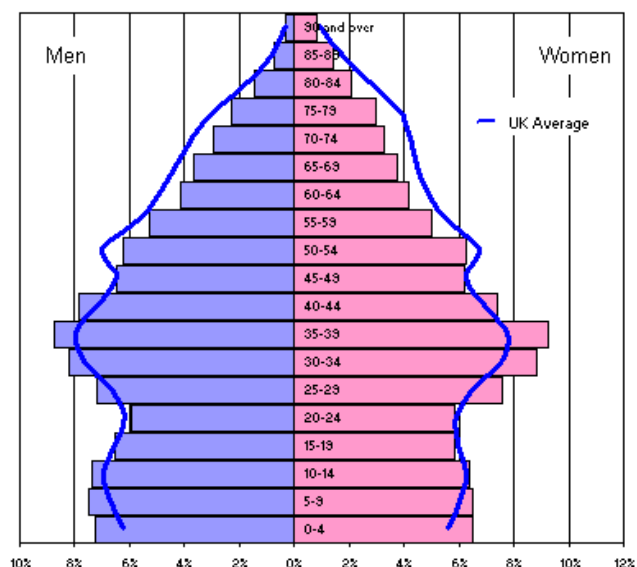
- In 2007 a quarter of all primary school children and a fifth of secondary school children had English as an additional second language.
- In 2008 Croydon had a higher number of unaccompanied asylum seeking children and more young people than elsewhere in London. In 2009, of the 1068 children who were looked after by the local authority, 681 were unaccompanied asylum seeking children. With the UK Border Agency located in the borough, Croydon is a gateway site and the only asylum screening centre in the country.
- Gypsy and Travellers are people living a nomadic habit of life following a traditional or out of voluntarily decision, whatever their race or origin. They experience wide-ranging inequalities, including accommodation, employment, health, education, criminal justice system and are often subject to racism and discrimination. In 2008 it is estimated⁴ that there are a total of 88 families of Gypsy and Travellers in Croydon.

Key Spatial Issues

- Discrimination in the labour market is a recurrent problem for many black and ethnic minority groups, particularly for young black men or those with low educational qualifications which limit access to employment opportunities.
- In London, the spatial location of workless households relates closely to deprived areas, which may restrict the access to essential local facilities and services.
- Some ethnic groups (such as those Indian sub-continent) are included to run their own business or self-employed and would benefit from initiatives to promote small businesses start up.
- The cost of housing and larger family size of some BME communities can mean that overcrowding and poor housing conditions can be a problem.
- Fear of crime, racial abuse and discrimination can prevent their enjoyment of the public realm and accessing open space.
- In respect of gypsies and travellers there is a lack of permanent sites in London and they are often located poorly and so barriers to education, employment and access to social and health facilities are experienced.

Sex/Gender

- Gender differences create inequalities throughout life. Women live longer than men but spend more years in poor health. Women are also more likely than men to be poor when they are older.
- In Census 2001, 52% of Croydon residents are women and 48% men. 62% of those aged over 75 are women.
- The overall gender pay gap, measuring the difference between all working men and all working women's hourly



Source: ONS Census 2001

⁴ London Boroughs Gypsy and Travellers Accommodation Study

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

- 10% of the overall pay gap can be attributed to occupational sex segregation. Having 10% greater share of men in an occupation is associated with 2 per cent higher average hourly wages. 12% of the gap is due to the industries in which men and women work. 21% is due to differences in years of experience of full-time work. 16% is due to the negative effect on wages of having previously worked part-time or having taken time out of the labour market to look after family. 36% of the pay gap cannot be explained by any of the characteristics that have been controlled for in the study⁵.
- 9% of households in the borough are lone parent families and over 90% of these parents are women. The proportion of such households in the population has doubled since the 1991 census. Single parents make up a high proportion of households living in social housing - 23% of council tenants and 32% of housing association tenants. They are also highly represented among housing applicants: 18% of waiting list applicants and 55% of homeless households on the housing register are headed by a woman.
- Lone parents experience some of the greatest levels of economic and housing need: their household incomes are only about a third of the average income and they are far poorer than couples with children; they are more than three times as likely to be dependent on benefits than the average household; they are twice as likely to be in unsuitable housing than others (unsuitability is caused by a range of factors such as unfitness and disrepair, overcrowding, and sharing or lacking amenities).
- Women are much more likely to suffer from gender specific violence than men, including rape and sexual violence, trafficking and prostitution, domestic violence etc. In the 12 months prior to July 2010, there are 17 reported incidents of rape and 24 of other sexual crime (of both men and women) in Croydon.
- 1 in 3 women experience domestic violence in their lifetime. There are a total of 215 reported incidents of domestic crime in the 12 months prior to July 2010. According to latest hate crime recorded in incident data (April 2009 – January 2010) in Croydon, less affluent wards in the north and to a lesser design in the south-east tend to have a higher number of domestic violence incidents than more affluent wards in the south.
- There are some issues and barriers to access for men as well. For example, there are more rough sleeping men than women and it can be harder to place men in hostel accommodation. Men are more likely to suffer from psychotic illness or have a learning disability. They can be affected by domestic violence too and can be lone parents and are, therefore, likely to suffer the same type of disadvantage as women in these circumstances.

Key Spatial Issues

- Many women have to balance work and domestic responsibilities. To do this they ideally need to be able to access suitable employment and training opportunities close to home. The provision of part-time work opportunities, business start up units and community and voluntary sector facilities can be used to promote women's employment and reduce poverty and social exclusion.

⁵ The Gender Pay Gap in the UK: 1995 to 2007, Government Equalities Office no. 2010/2

- Access to affordable childcare is a key factor to women engaging fully in the labour market.
- Because of the lower wages and higher level of part time working, women have a more restricted choice and quality of housing accessible to them and are more likely to rely on social housing.
- Women tends to have less access to cars and are more likely to be dependent on public transport for making local journeys for shopping, childcare and work. They need ramps and level access in the public realm and public transport for push chairs.
- Women are also more susceptible to gender specific crime and security after dark in the public realm and public transport is a particular concern. Facilities such as public toilets, local parks and children's play areas are also needed for mothers with children.

Disability

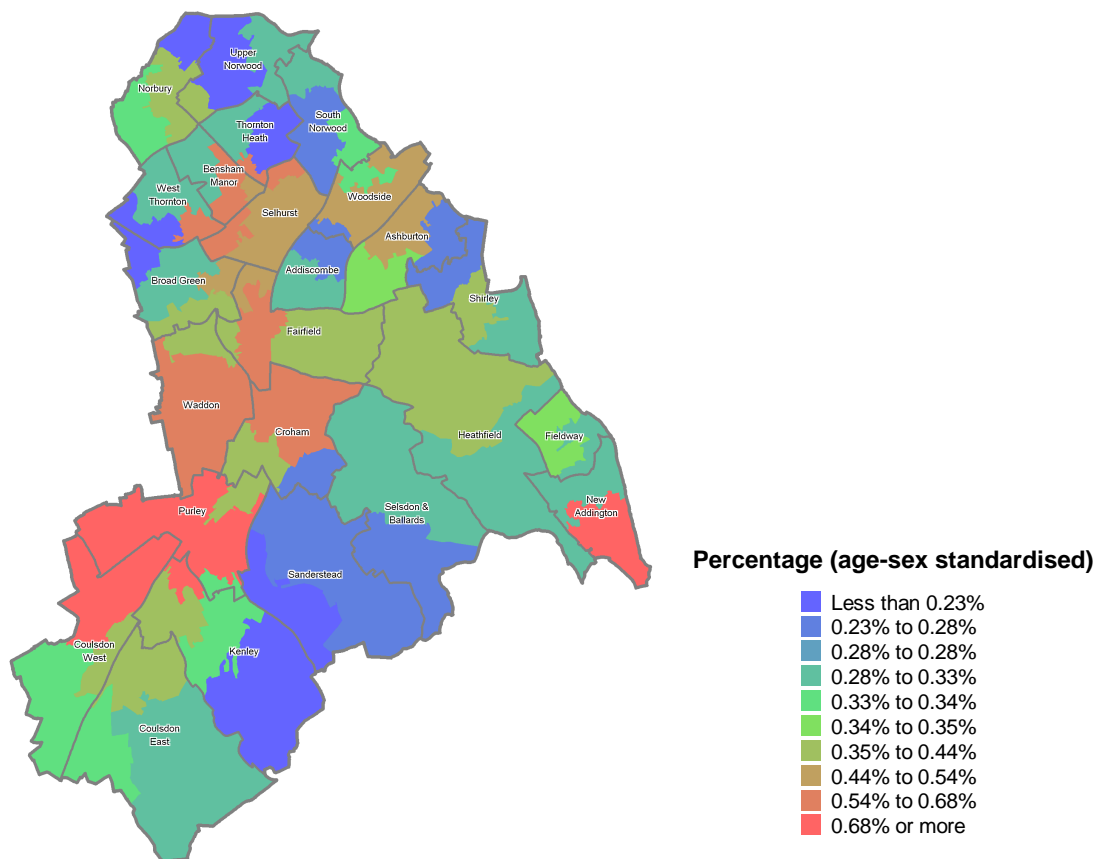
- The proportion of population with a disability is at 15%, slightly below the average of London and England.
- In 2001 census 48,660 people described themselves as having a limiting long-term illness, health problem or disability that limits their daily activity or work. Given that the population of Croydon has increased and become older since the national census, it is likely that this figure now exceeds 50,000 and it is estimated that this will exceed 53,000 by 2018.
- In 2009, there are a total of 9,490 people claiming Incapacity Benefits⁶ and 1,160 for Severe Disablement Allowance⁷. The claimants are predominantly male (56%) and have claimed for 5 years or over. The main medical reasons for claiming are mental disorders (46%), Musculoskeletal diseases (14%) and other (24%).
- In 2009, there are a total of 14,065 people claiming disability living allowance⁸ and 2,035 benefit claimants in Croydon who are disabled. The geographical distribution of these claimants in proportion to all working age population is fairly even (0.9%) in the borough with a slightly higher rate in the East spatial management area (1.1%).
- Croydon's Joint Strategic Needs Assessments (JSNA) estimated that in 2007⁹ there were 42,796 adults with a moderate or serious disability in Croydon, 1695 people with registered as blind or partially sighted, 2400 are registered as hearing impaired and 6846 people have a learning disability.
- The following diagram shows the GP recorded prevalence of learning disability (of all age) by Croydon middle super output areas as at 31 Dec 2009. There are a total of 1,484 persons with learning disability. Purley, Coulsdon West and New Addington have the highest percentage in the Borough.

⁶ Incapacity Benefit is a weekly payment for people under State Pension age - currently 60 for women and 65 for men if they can't work because of illness or disability.

⁷ Severe Disablement allowance is for people who are assessed to be 80 per cent disabled and are incapable of work because of illness or disability.

⁸ Disability Living Allowance is a tax-free benefit for disabled children and adults who need someone to help look after them, or have walking difficulties.

⁹ The data in 2009 is not published.



Source: Data from Crofton NHS/general practices

- The most common reason for registering children and young people as disabled was communication disorders (including autistic spectrum disorders) (57%), followed by moderate (36%) and severe (28%) learning difficulties.

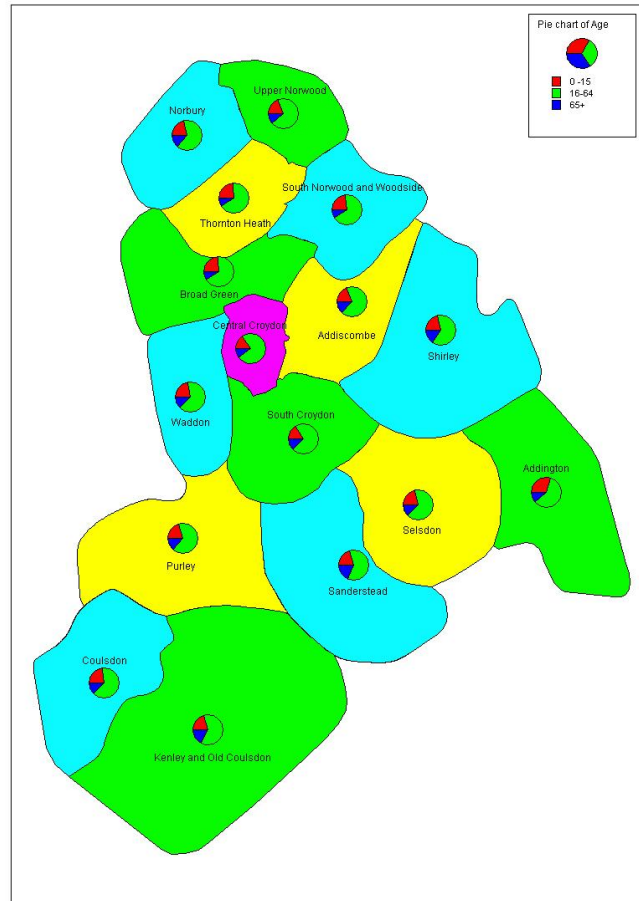
Key Spatial Issues

- There are a variety of disabilities, whether it is physical or mental, which means that disabled people can have a wide range of different issues and difficulties in daily life depending on their type and level of disability. The needs of people who have mobility difficulties, for example, are different from those of someone who have learning difficulties.
- Disabled people are more likely to experience worklessness than non-disabled people.
- There is a shortage of accessible housing for disabled people, leading to lack of choice and inappropriate housing.
- Convenient, safe and reliable public transport (including specialist transport services such as dial-a-ride) is important for disabled people to continue participating in society. Disabled parking is also important especially in areas where access to public transport is limited.
- Surrounding environments such as schools, shops, public realm and public transport are not often fully accessible and restrict the access to employment, training and leisure for disabled people.
- Access to social facilities and services for disabled people, including easily accessible, comprehensive, accurate and timely information and support are crucial for the well-being of disabled people.

- Disabled people continue to experience high levels of discrimination, harassment and lack of awareness. Their disability, particularly if physically visible, might make them feel vulnerable to abuse and harassment in public. This can limit their ability to enjoy the public realm and participate fully in society.

Age

- Amongst the 16 Places of Croydon, Addington has a highest proportion of youngsters (0-15 years old) at 30% and the lowest proportion of working age (16-65 years old) at 57%. Central Croydon and South Croydon have the highest level of working age population (70%-74%) and the lowest proportion of youngsters (15%-16%). Kenley and Old Coulsdon and Sanderstead have the highest proportion of pensionable population (65+) at 18%-19%.



Older people

- In 2010 it is estimated that there are 60,523 people aged 60 or over in Croydon, approximately 18% of all residents in Croydon. 55% of people aged 60 or over are women and the female proportion increases as the age rises.
- In 2001, 16,626 households in Croydon (i.e. 12% of all households) are single pensioners and a further 9,181 households (7%) are pensioner-only households.
- Single pensioner households make up a much higher proportion of social housing tenants (21% council and 16% housing association tenants) than of the borough average although the proportion of other pensioner-only households is slightly lower than average.
- In 2001, 17% of 50 - 74 year olds were from a BME background, but this fell to only a little over 10% of 70-80 year olds and under 5% of people aged 80 and over. Most older BME people are from an Asian Indian or Black Caribbean ethnic background.

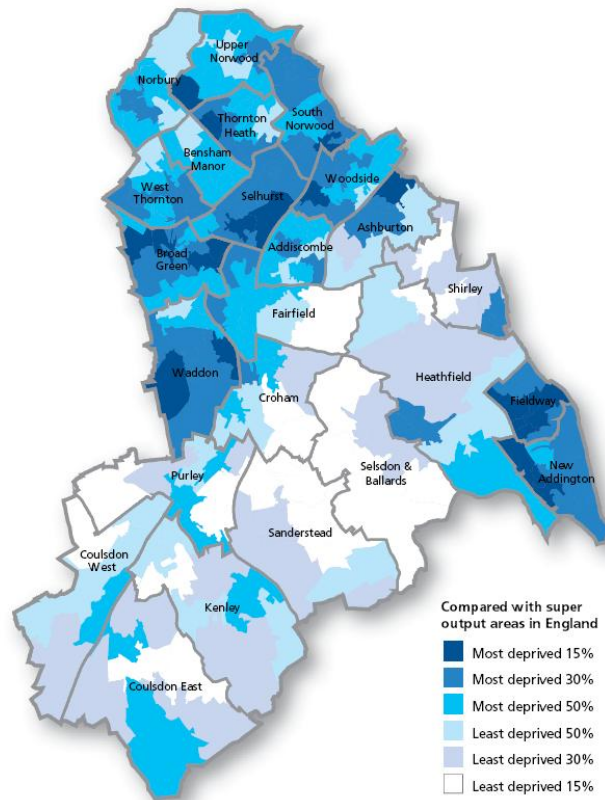
Key Spatial Issues

- Older people are more likely to suffer from poor health and disability. They make up about half the total population with a limiting long-term illness.
- Older people are more likely to be living in poverty and suffering the associated effects of low quality and inappropriate housing. There is a shortage of sheltered and specialised accommodation for older people.

- Many older people live alone and experience isolation. Their safety and security both at home and in public spaces can be a concern.
- While many older people remain in work, many experience discrimination when it comes to gaining access to employment and training.
- Health facilities and social care in accessible location is a priority for older people.
- Convenient, safe and reliable public transport (including specialist transport services such as dial-a-ride) is important for older people to continue participating in society.
- The environmental quality and accessibility of the public realm is important for older people. Provision of accessible places to meet, to rest, public toilets and street furniture is essential to encourage older people to enjoy public realm.

Younger People

- In 2010 there were 89,671 children and young people aged 0 to 19 years living in Croydon. This is 26% of the total population and the largest population of children and young people in London. This makes Croydon the “youngest” borough in south London.
- Croydon has a very ethnically diverse school age population, with 54% of pupils in primary schools and 51% of pupils in secondary schools coming from black and minority ethnic groups.
- In the previous years, Croydon had a high incidence of teenage pregnancy – it is 13% higher than the London average. However, teenage pregnancy rate in Croydon has dropped in 2009. The under-18 conception rates for quarter 2 (March to June) in 2009 were 41.5 per 1,000 conceptions amongst women aged between 15 to 17 years-old. This is a 33% decrease from the same period in 2008, where the figure was 62 per 1,000. These figures put Croydon below the London average for under-18 conception rates of 42.5 per 1,000 and just above the overall average for England of 39.5 per 1,000. It is not clear whether the downward trend will continue in the future.
- With over 58,000 pupils Croydon has the highest school population of the London boroughs, and 22.6% of primary school pupils and 18.5% of secondary school pupils are known to be eligible for free school meals. Entitlement for free school meals is used as a proxy indicator for deprivation.
- In September 2009, young people aged 16-18 not in education, employment and training accounted for 9% of the population in Croydon, an increase of 1.4% from 2007/08.
- The following figure shows the distribution of child wellbeing across Croydon. The index is comprised of seven domains with equal weightings: material wellbeing, health, education, crime, housing, environment, and children at need. The most deprived 15% of super output areas in terms of the index of child wellbeing are in the north and south east of the borough, covering areas in Selhurst, Broad Green, Waddon, Fieldway and New Addington. This link between deprivation and special educational needs and disability, has implications for service delivery. There is a need to focus resources to help counteract social and economic disadvantage in the more deprived areas of the borough.



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

Figure 0.1 Index of child wellbeing 2009, Croydon super output areas

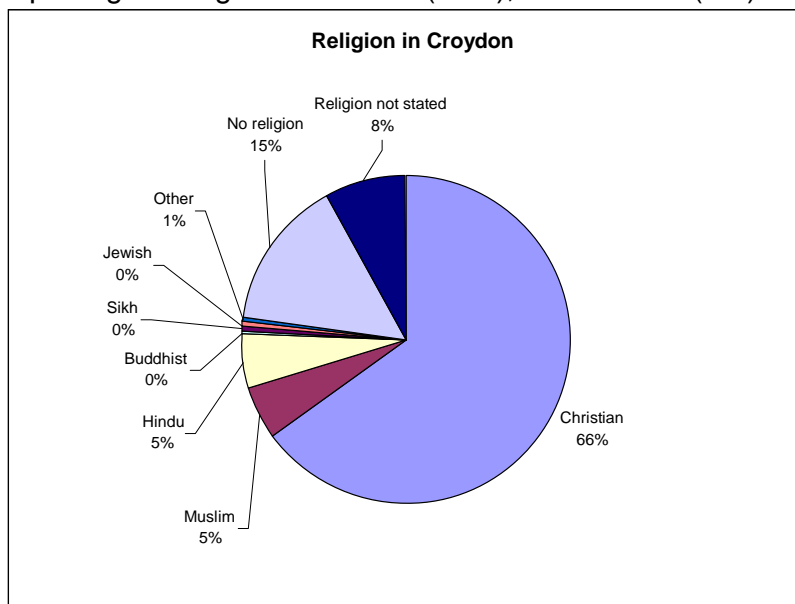
Key Spatial Issues

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

Religion and Faith

- More people in Croydon stated they had a religious belief than any other London boroughs but there is a significant proportion that either had no religion or it was not stated. The most common religion is Christianity (66%), followed by those

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



- Croydon is one of the most religiously diverse boroughs in the country, although this diversity tends to be in the north west of the borough. Since 2000 there have been 15 applications related to places of worship in Croydon (source: GLA London Development Database).
- Faith Communities in Croydon (2006 mapping exercise) found that there are two hundred and sixty worshipping groups in the whole of Croydon, just over half of these are to be found in North west Croydon, seventy eight of those groups did not have a place of worship of their own and were either sharing premises with another group or meeting in school halls or community halls.
- The black majority churches are some of the fastest growing in the borough in terms of congregations. Fifty of the groups without premises were in North west Croydon and were mainly the Black led, Pentecostal or Evangelical groups who wanted to worship in their own way. Some groups were worshipping in their own language, such as in Tamil, Ghanaian, Nigerian and Ugandan. A few were groups that had been 'planted' by other churches outside Croydon and had grown to sizeable communities.
- Recent studies show a London-wide problem for finding space for worship, especially for Pentecostal and Evangelical churches and Muslim communities which tend to have a large and growing number of worshippers but fewer resources than the more established faith communities.
- The Croydon study from 2006 would seem to show a need for more places of worship particularly within the north of the Borough. It would appear that the groups that will see the greatest levels of growth will be Muslim and the Christian black majority churches. The nature of the black majority churches require larger facilities as the membership tends to be drawn from a wider area than a local parish.

Key Spatial Issues

- Discrimination, harassment and hate crime are concerns of some religious groups
- Access to appropriate housing especially in relation to overcrowding among populations with high fertility due to religious and cultural restrictions on contraceptive use.

- People from faith groups are likely to require specialized service provision, including places for cultural practices, community activities and provision for places of worship that are accessible by the communities which need them.
- The newly established faith groups have different needs and patterns of worships from the more established faith group such as the Church of England.

Lesbians, gay men, bisexuals and transgender people

- Nationally there is insufficient data for the Lesbian, Gay, Bisexual and Transgender (LGBT) community. It has been estimated between 5-10% of the population could potentially classify themselves as lesbians, gay men, bisexual or transgender people - equating to about 15-30,000 residents in Croydon.
- In 2001 census there were 672 people living as same sex couples in Croydon.
- The second National Survey of Sexual Attitudes and Lifestyles (Mercer et al. 2004) found that 3.9% of women and 5.5% of men aged 16 to 44 and living in London had a same gender sex partner in the last five years. The figures were lower in the rest of the UK for both women (2.4%) and men (2.1%), confirming that sexual minorities migrate to large cities, especially London. Within London, sexual minorities are concentrated in inner rather than outer London.
- LGMT Studies in Lambeth (2006) found that the greatest social need amongst LGBT people resides with those who are members of groups which are already disadvantaged, such as women and ethnic minority groups.
- In the 2008 Croydon's strategic crime assessment indicated there had been an increase in homophobic hate crimes recorded by the police.
- Recent Study in the LGBT community in Croydon conducted by Crocus show that there is a need for more LGBT or LGBT-friendly venue in Croydon.
- Recent studies estimate prevalence of transgender¹⁰ people to be about 20 per 100,000 people, i.e. 10,000 people, of whom 6,000 have undergone transition in the UK. There is no figure for local number but the group is likely to be relatively small and the majority are likely to be in concealment for family or employment reason.

Key Spatial Issue

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

Hate Crime

¹⁰ Transgender is the state of one's "gender identity" (self-identification as woman, man, neither or both) not matching one's "assigned sex" (identification by others as male, female or intersex based on physical/genetic sex). "Transgender" does not imply any specific form of sexual orientation.

- According to latest hate crime recorded in incident data (April 2009 – January 2010), recent concentrations of racial and religious hate crime tend to arise in the west central area of the borough with slightly lower numbers of offences recorded in the wards in north west. It is not possible to compare recorded incidents of homophobic hate crime or disability hate crime on this basis, due to the small number of recorded incidents (12 and 1 respectively) during this period.

Social Cohesion and Deprivation

- Croydon is one of the more affluent boroughs in London, being ranked 14th out of the 33 London authorities (but 230th out of 354 authorities in England)¹¹, but there is a north south divide in the borough.
- Borough-wide figures mask real pockets of deprivation with five wards ranked as being in the top 10% most deprived in the UK. Croydon also has the 18th highest level of child poverty in London (out of the 32 boroughs in the capital) with 1 in 4 children living in poverty.
- The Index of Multiple Deprivation map below demonstrates the level of deprivation in specific areas in the borough. Croydon has the six most deprived super output areas (small areas in a ward) in South West London, including parts of Fieldway and New Addington, Broad Green and South Norwood. Fieldway is the most deprived ward in South West London. At a London-wide level, Fieldway and New Addington are amongst the 30% most deprived wards while Sanderstead and Selsdon are amongst the 10% least deprived.

¹¹ Indices of Multiple Deprivation, Department of Communities and Local Government, 2007

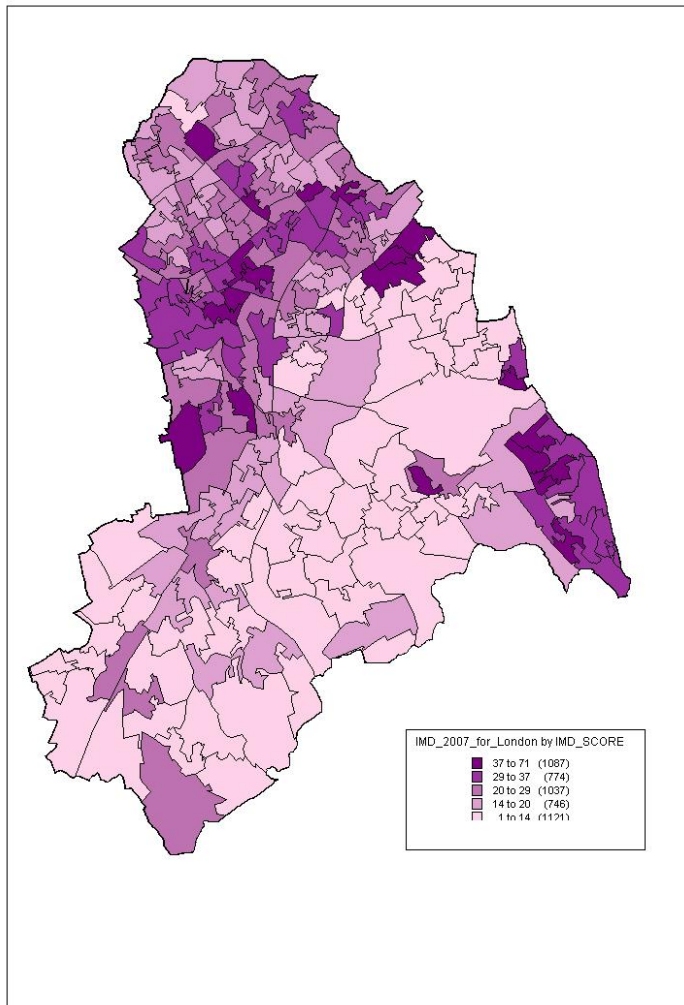


Figure 0.2 Indices of Multiple Deprivation 2007

- On health, education and crime, Croydon performs well; and life expectancy is in line with London and national average at 78 for men and 82 for women. Crime and the fear of crime remain a major concern for many residents.
- The national recession is putting significant additional pressures on local communities in Croydon, reducing the opportunities for those leaving education, and putting downward pressure on the numbers of people able to access paid employment. Those in the most vulnerable groups such as the long-term unemployed, disabled people and those with low levels of literacy are likely to feel most squeezed as people with established work skills and experience re-enter the employment market.

The Equality Impact Assessment

Towards a preferred Core Strategy for Croydon

Topic	Spatial proposals	Are Groups affected because of: (Key: Yes or No and +/- impact)						Equality Impacts	Likely Positive Equality Impacts	Likely Negative Equality Impacts	Mitigation Activity
		Disability	Race	Gender	Sexual Orientation	Faith / Belief	Age				
CS1 Modified Spatial Strategy	Develop the Borough with a combination of approaches: Renewal and Growth, Managed Change, Conservation and Enhancement; Proposed town centre hierarchy; Croydon Metropolitan Centre	Y+	Y+	Y+	Y+	Y+	Y+	<p>Potentially they are significant implications for equality and diversity in this strategic strategy. The specificity of strategy and programme details are vague at this stage. Measures should be put in place to ensure that this strategy would contribute to the equality and diversity benefits in the Borough.</p>	<ul style="list-style-type: none"> Communities will benefit from the increase of homes and jobs. Growth in CMC and town centres where there are good public transport and concentration of services will improve access to jobs and homes and services for those disabled people, women, older and young people who have no access to cars. The proposed high proportion of family sized homes would meet the needs of ethnic groups with large family size. 	<ul style="list-style-type: none"> Measures need to be taken to deal with equality and diversity issues, particularly in areas suffering from multiple deprivations, such as Broad Green and New Addington. Some communities may feel threatened and displaced by the new development Specific businesses may be affected. They may be a negative impact on ethnic minority owned / small businesses. 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> Extensive community consultation on Core Strategy targeted for equality groups, including disability forum, BME forum, interfaith forum and public workshops in deprived locations and for disadvantaged communities. Core strategy policies should be revised to address equality and diversity issues. <p><u>Further Action</u></p> <ul style="list-style-type: none"> EqIA of OAPF and town centre master plans where applicable Specific equality and diversity targets for development schemes which seek to reflect the local community in each place.
CS2 Homes	To provide 19,000 new homes by 2031 including 3,500 homes in CMC	Y+	Y+	Y+	Y+	Y+	Y+	<p>The supply of suitable new homes is important issue for equality groups as well as the rest of the population. The strategy provides a broad brush indication on potential location for</p>	<ul style="list-style-type: none"> Placing most new housing in areas of high transport accessibility would be beneficial for the disabled people, women, 	<ul style="list-style-type: none"> There is no specific detail on housing choice, housing standards, accessibility, lifetime homes, sheltered housing and affordable 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> Extensive community consultation on Core Strategy targeted for

Topic	Spatial proposals	Are Groups affected because of: (Key: Yes or No and +/- impact)						Equality Impacts	Likely Positive Equality Impacts	Likely Negative Equality Impacts	Mitigation Activity
		Disability	Race	Gender	Sexual Orientation	Faith / Belief	Age				
							new homes.	<p>older and young people who have no access to cars.</p> <ul style="list-style-type: none"> The indicative proportions of family housing need to meet the needs of BME and faith groups with larger family size. 	<p>housing, all of which are major concerns for equality groups.</p> <ul style="list-style-type: none"> Range of provisions fails to meet specific needs and varying family sizes of equality groups. 	<p>equality groups, including disability forum, BME forum, interfaith forum and public workshops in deprived locations and for disadvantaged communities.</p> <ul style="list-style-type: none"> Core strategy policies should be revised to ensure equal access to housing by equality groups to suit their needs. <p><u>Further Action</u></p> <ul style="list-style-type: none"> Review of supply and demand for local housing working with housing providers to ensure a relevant mix of provision to meet the needs of local communities EqIA of Housing Strategy 	
CS3 Industrial Locations	To set out a "5 tier" sequential approach for the protection of industrial capacity especially those within the Employment Areas	Y+	Y+	Y+	Y+	Y+	It is critical that all communities have access to employment in appropriate and convenient locations.	<ul style="list-style-type: none"> The promotion of workshop / studio in town centres could offer opportunities for small businesses and full and part time employment opportunities for women, disabled people and those who are dependent on public transport. The potential alternative use of non-employment area premises that are well served by public transport for D1 and D2 uses could provide much needed social facilities such as nursery, clinic and places of worship. 	<ul style="list-style-type: none"> The strategy does not attempt to boost job creation which match the skills level of the local communities and to remove barriers for specific equality groups, such as accessibility at work place. It needs to improve training and education to boost employability for those who are disadvantaged. Need to have recognition that some communities are disproportionately represented in the borough's unemployment figures, such as young adults and disabled people. There is a need for part time work 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> Extensive community consultation on Core Strategy targeted for equality groups, including disability forum, BME forum, interfaith forum and public workshops in deprived locations and for disadvantaged communities. Core strategy policies should address job creation and access to employment by equality groups, such as training and education, access at workplace and to remove obstacles to equality groups, particularly those highly represented in unemployment 	

Topic	Spatial proposals	Are Groups affected because of: (Key: Yes or No and +/- impact)						Equality Impacts	Likely Positive Equality Impacts	Likely Negative Equality Impacts	Mitigation Activity
		Disability	Race	Gender	Sexual Orientation	Faith / Belief	Age				
									for women in accessible locations.	figure.	
									<ul style="list-style-type: none"> Business growth does not provide employment for local people but for workers moving to the area 	<p><u>Further Action</u></p> <ul style="list-style-type: none"> Communities of interest must become engaged in business representation 	
CS4 Enterprise Locations	To promote greater entrepreneurial activity through the provision of enterprise and opportunity centres	Y+	Y+	Y+	Y+	Y+	Y+	<p>Business start up and self employment are a major source of jobs. It offers flexibility and accessibility to those who find barriers to conventional labour market, particularly those who are discriminated in work place, women who need more flexible work pattern, and disabled people who can work from home.</p>	<ul style="list-style-type: none"> The promotion of entrepreneurship would be beneficial for small businesses and self employed people in ethnic minority groups in the north of the borough. It would also provide full and part time job or home working opportunities for the equalities groups, especially women and disabled people. 	<ul style="list-style-type: none"> Under representation of women, BME and disability people owned business in securing business support and benefit 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> Core strategy policies should ensure the enterprise centres would provide equal access to equality groups. <p><u>Further Action</u></p> <ul style="list-style-type: none"> Monitor diversity ownership of business, workforces and participants in business and innovation initiatives Communities of interest must become engaged in business representation
CS5 Education and Skills	To guide new educational development into the areas of greatest demand and high public transport accessibility	Y+	Y+	Y+	Y+	Y+	Y+	<p>Education and training are critical to employability and upward mobility. Lifelong learning opportunities need to be afforded to all communities.</p>	<ul style="list-style-type: none"> The expansion of new schools in areas of highest demand and of high public transport accessibility will improve access to education for children and young adults. The proposal of a multiversity gearing towards key employment sectors in Croydon would improve employability of local people in local areas and improve access to job opportunities to women, 	<ul style="list-style-type: none"> Skills and education programmes fail to meet the market needs or the specific needs of those seeking employment and advancement Courses are not flexible and accessible for those who are disabled or with family commitment Increasing student population may have negative impact on housing provision and cohesion in local 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> Core strategy policies should ensure there would be equal access to education and training facilities by equality groups. <p><u>Further Action</u></p> <ul style="list-style-type: none"> Evaluation of skills and education provision by Education Authority to assess coverage and reflection of the borough's population

Topic	Spatial proposals	Are Groups affected because of: (Key: Yes or No and +/- impact)						Equality Impacts	Likely Positive Equality Impacts	Likely Negative Equality Impacts	Mitigation Activity
		Disability	Race	Gender	Sexual Orientation	Faith / Belief	Age				
								disabled people and young adults.	community. <ul style="list-style-type: none"> Access to schools may be inaccessible to some with disability if design standards haven't been applied for school building and improvement. 	<ul style="list-style-type: none"> EqIA of key educational programme where appropriate 	
CS6 Culture	To promote cultural activities, support creative industries and night time economy in central Croydon and other town centres	Y+	Y+	Y+	Y+	Y+	Y+	<p>This strategy is crucial to celebrate the cultural diversity of the communities within the borough. It is important to promote cohesion in local communities and to discourage social exclusion.</p> <ul style="list-style-type: none"> Promotion of cultural activities would recognise the cultural diversity in the borough. Local leisure and cultural facilities enable social interaction and can be focal points for local communities. Local culturally specific facilities can play an important part in preserving some of the unique characteristics of areas. Creative industries can be a potential source of employment for local communities Night time and leisure economy would facilitate participation of local communities, especially important for young adults and LGBT groups. 	<ul style="list-style-type: none"> The Cultural planning strategy fails to recognise the cultural diversity of different communities in the borough, including those of ethnic minorities and of different age. Creative talents leak to outside of the borough Anti-social behaviours and crime increases as a result of the strategy. 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> Core strategy policies should ensure promotion of cultural diversity of different communities, including those of ethnic minorities, faiths and religion, and of different age. Core Strategy policies should promote diversity of leisure and night time economy to avoid concentration of drinking premises and to address the potential impacts on crime and anti-social behaviours in town centre. <p><u>Further Action</u></p> <ul style="list-style-type: none"> EqIA of Cultural Strategy, monitoring of provision and impact on cultural diversity 	
CS7 Community Facilities	To provide community facilities to meet the needs of the population	Y+	Y+	Y+	Y+	Y+	Y+	<p>The supply of social and community facilities are crucial for all but particularly for those who are disadvantaged.</p> <ul style="list-style-type: none"> Locating public facilities in accessible locations and in close proximity to each other would be beneficial for women, the older and disabled people who tends to depend on public transport and 	<ul style="list-style-type: none"> There is no specific details on where and what these community facilities are needed and those would be provided. The risk is that the strategy fails to cater for the specific needs of the local 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> Core strategy policies should ensure there would be equal access to community facilities by 	

Topic	Spatial proposals	Are Groups affected because of: (Key: Yes or No and +/- impact)						Equality Impacts	Likely Positive Equality Impacts	Likely Negative Equality Impacts	Mitigation Activity
		Disability	Race	Gender	Sexual Orientation	Faith / Belief	Age				
								<p>make multiple local journeys.</p> <ul style="list-style-type: none"> The provision of health facilities with better local access would be useful for the older and disabled people and the LGBT group. The provision of housing types in town centres designed to promote inter-generational activity would promote housing choice for families with children, older and disabled people. 	<p>communities, especially if private development is expected to deliver the community facilities.</p> <ul style="list-style-type: none"> Some places of worships have their own requirement of layout and facilities and may not easily co-locate with other faith groups. Investment and new facilities would go in the town centres and that requires equality groups to travel further into town centres. There should be a better balance with the local and district centres. 	<p>equality groups.</p> <p><u>Further Action</u></p> <ul style="list-style-type: none"> EqIA of the Infrastructure Delivery Plan 	
CS8 Heritage and the Built Environment	To conserve historic buildings and to preserve local distinctiveness	Y+	Y+	Y+	Y+	Y+	Y+	<p>Promoting the borough's heritage should also address multiculturalism and Croydon's distinctive history of diversity</p> <p>Ensure that placemaking linked to heritage is open and accessible and inclusive of the Borough's equality groups.</p>	<ul style="list-style-type: none"> Historic buildings are made accessible so that all can celebrate and visit them. Places which are high quality, accessible, sustainable, durable, attractive and integrated in to surroundings for the whole community 	<ul style="list-style-type: none"> Communities don't feel historic buildings serve them and their communities Distinctiveness is at the expense of equality and diversity commitments. Accessibility is not addressed. 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> Core strategy policies should ensure there would be equal access to heritage and the built environment by equality groups. <p><u>Further Action</u></p> <ul style="list-style-type: none"> Improved Accessibility built into key sites and pedestrian links
CS9 The Public Realm	To develop a public realm framework to create sustainable places and community valued public realm	Y+	Y+	Y+	Y+	Y+	Y+	<p>Ensure that public realm is open, safe and accessible and inclusive of the Borough's equality groups.</p> <p>Provision of accessible public toilets in public realm is main concern for women and disabled people.</p>	<ul style="list-style-type: none"> Improved accessibility with clear footways in public realm is a major benefit for older people, disabled people and mothers pushing buggies. Community valued space and multicultural events for all ages in public realm encourage interaction 	<ul style="list-style-type: none"> Lack of resources for maintaining public realm lead to poor upkeep and low usage, Sense of place is lost or devalued if there is a lack of ownership by the local communities Crime and anti-social behaviour 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> Core strategy policies should ensure that public realm is open, safe and accessible and inclusive of the Borough's equality groups. <p><u>Further Action</u></p>

Topic	Spatial proposals	Are Groups affected because of: (Key: Yes or No and +/- impact)						Equality Impacts	Likely Positive Equality Impacts	Likely Negative Equality Impacts	Mitigation Activity
		Disability	Race	Gender	Sexual Orientation	Faith / Belief	Age				
								<p>and ownership of local communities and promote social cohesion.</p> <ul style="list-style-type: none"> Safe and inclusive public realm would prevent crime and anti-social behaviour against all equalities group, for women and LGBT group in particular. 	<p>may arise especially in town centres and discourage people using the public realm</p> <ul style="list-style-type: none"> Accessibility is not fully integrated in the design of public realm or improvement of existing public spaces. 	<ul style="list-style-type: none"> EqIA of the major development scheme which involve provision of public space Extensive community participation on new development involving public realm to ensure buy-in by the communities. Integration of disability access in the design of public realm and ensure that they are Disability Act Compliant. 	
CS10 Community Safety	To promote community safety by a social design approach - through engagement with young people; undertaking a series of community events that involve people from different cultures and religions; supplement enforcement measures with safe and inclusive design of new buildings, spaces	Y+	Y+	Y+	Y+	Y+	Y+	<p>Hate crime, anti-social behaviour and harassment are one of the key concerns for all equality groups.</p> <ul style="list-style-type: none"> Promotion of social design approaches in new buildings and public realm would improve the perception of safety, which is key concern for women. Combat hate crime and anti-social behaviour would have positive impact for all equalities groups. The engagement of young people and the multicultural events would encourage interaction of people of different culture and age and promote social cohesion Measures to tackle youth crime would have a direct impact on younger population 	<ul style="list-style-type: none"> Social design approach might not have immediate and direct impact on crime prevention the proposal fails to directly tackle with youth crime and anti-social behaviour especially in town centres. 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> Core strategy policies should promote community safety and crime prevention, especially in town centres and public transport. <p><u>Further Action</u></p> <ul style="list-style-type: none"> EqIA of the Infrastructure Delivery Plan Crime Reduction Strategy Effective consultation and participation of the local communities 	
CS11 Transport and Movement	To create a transport network to meet the demands by (1) Smarter travel in short to medium term and (2) New infrastructure provision and network improvement in medium	Y+	Y+	Y+	Y+	Y+	Y+	<p>Convenient and efficiency transport network is crucial to provide access to jobs, homes, leisure and services of all equality groups. An accessible public transport system is particular</p> <ul style="list-style-type: none"> Short term improvement to the network in the central and north of the borough will be beneficial to the ethnic minority groups in the 	<ul style="list-style-type: none"> The proposal does not specific measures to improve walking and cycling, 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> Core strategy policies should have specific measures to improve 	

Topic	Spatial proposals	Are Groups affected because of: (Key: Yes or No and +/- impact)						Equality Impacts	Likely Positive Equality Impacts	Likely Negative Equality Impacts	Mitigation Activity
		Disability	Race	Gender	Sexual Orientation	Faith / Belief	Age				
	and long term							important to those who have less access to private cars, such as women, older and younger generation, and disabled people.	<p>areas who are dependent on public transport.</p> <ul style="list-style-type: none"> Tramlink enhancement and line extension would be beneficial for those uses wheelchairs and mobility scooters as well as for mothers pushing buggies. 	<ul style="list-style-type: none"> The proposal does not recognise the need of disabled and older people by including improvement of accessibility at public transport hubs and provision of disabled parking in town centres. The proposal does not promote public safety and inclusive design in public transport 	<p>walking and cycling. It needs to promote public safety and inclusive design in public transport and to improve accessibility at public transport and stations for disabled and older people. It needs to review disabled parking in town centres.</p> <p><u>Further Action</u></p> <ul style="list-style-type: none"> EqIA of the Transport Strategy and Local Implementation Plan Integrating the design for accessibility in all public transport stations and interchange
CS12 Climate Change, CO2 and Water Management	To promote district heat and power networks in the CMC and district centres; requirements for new buildings and retrofitting of existing buildings; sustainable urban drainage system	Y+	Y+	Y+	Y+	Y+	Y+	Impacts of this strategy focuses on generic impacts for the borough as a whole to respond to the global need to adapt to climate change. It is vital that any adaptations are equally available and the benefits of which are accessible by all equality groups.	<ul style="list-style-type: none"> All equality groups have access to adaptations to the effect of climate change 	<ul style="list-style-type: none"> Specific barriers for individual communities and equality groups in getting access to the adaptations Adaptations to climate change may be restricted to those living in new development, especially if these new development are not reflective of the borough's equality profile. Equality groups who are workless, have lower income or have larger family might not able to afford retrofitting their existing homes and benefit from the adaptations to climate change. 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> Core strategy policies should promote sustainable building design to older and existing building stock. <p><u>Further Action</u></p> <ul style="list-style-type: none"> Ensure developments have strong cross representation of the borough's equality groups Review adaptations and ensure the benefits are distributed locally Targeted programmes and development to support communities in greatest need

Topic	Spatial proposals	Are Groups affected because of: (Key: Yes or No and +/- impact)						Equality Impacts	Likely Positive Equality Impacts	Likely Negative Equality Impacts	Mitigation Activity
		Disability	Race	Gender	Sexual Orientation	Faith / Belief	Age				
CS13 Green Grid and Rivers	To provide or enhance public open spaces; provide public access along watercourse and green areas; provide a range of formal and informal recreational uses; enhance wildlife sites; water and flood risk management; mitigate climate change	Y+	Y+	Y+	Y+	Y+	Y+	Access to recreational and open space is crucial for the health and well being of all communities. It is vital to ensure that these public open spaces and waterway paths would be accessible, convenient and safe for all equalities groups to use.	<ul style="list-style-type: none"> Provision and enhancement of public open spaces, green areas, recreational areas and wildlife sites would promote healthy living for all equality groups. The availability of small local park and informal play area are beneficial for mothers with children, young and older people. 	<ul style="list-style-type: none"> It fails to tackle the existing deficiency of access to open space and nature in the central and the north of the borough where there is a concentration of ethnic minority groups. This is a lack of measures and resources to improve the accessibility of open space and waterway paths for wheelchair users. 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> Core strategy policies should address the existing deficiency of access to open space and to nature in the central and the north of the borough. It should also promote the accessibility of open space and waterway paths for disabled people. <p><u>Further Action</u></p> <ul style="list-style-type: none"> EqIA of the Green Infrastructure Delivery Plan Effective consultation and engagement with the local communities
CS14 Waste Reduction and Management	To prepare the Joint South London Waste Plan							Waste reduction and management is a generic issue impacting on all sectors in the borough. It is vital that the promotion of waste minimization and reuse as well as the waste recycling and disposal facilities are made available to all equality groups.	<ul style="list-style-type: none"> Recycling facilities in new developments will improve access to all. 	<ul style="list-style-type: none"> Specific barriers to local communities to have access to recycling facilities particularly for those living in older housing without in situ facilities and without access to cars. 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> Core strategy policies should improve access to recycling facilities for residents living in the older and existing housing stock. <p><u>Further Action</u></p> <ul style="list-style-type: none"> EqIA of the joint South London Waste Plan EqIA of the Council's waste management services

Towards a Preferred Core Strategy for Croydon - Supplement

Topic	Spatial proposals	Are Groups affected because of: (Key: Yes or No and +/- impact)						Equality Impacts	Likely Positive Equality Impacts	Likely Negative Equality Impacts	Mitigation Activity
		Disability	Race	Gender	Sexual Orientation	Faith / Belief	Age				
Borough-wide Thematic Policy											
Housing and population growth	To build 21,500 homes up to 2031; to ensure supply of 3+ bedroom homes; to provide for affordable housing; To provide 10 additional Gypsy and Travellers pitches by 2021	Y+	Y+	Y+	Y+	Y+	Y+	The supply of suitable new homes is important issue for equality groups as well as the rest of the population.	<ul style="list-style-type: none"> Communities will benefit from the additional supply of homes. The proposed high proportion of family sized homes in central and north of the borough would meet the needs of ethnic groups with large family size. The supply of affordable housing would be beneficial for those with limited means, including single mothers with children, disabled people and older people. Supply of new homes in CMC & Environs with high proportion of family size homes and where there are good public transport and concentration of services will improve access to homes and services for the disabled people, single mothers with children, older and young people who have no access to cars. The supply of Gypsy and Traveller pitches would contribute to meeting the accommodation needs of this ethnic minority 	<ul style="list-style-type: none"> New communities moving into CMC would face deficient access to parks and open space, recreational and play area, high crime rate in the town centre. Range of provisions fails to meet diversity of the local communities and the specific needs of equality groups. There is no specific detail on supported and sheltered housing. 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> Core strategy policies should ensure the new housing would recognise the diversity of local communities and their specific needs, including supported/sheltered housing. The policies should ensure the well-being of the new communities in the CMC by promoting good standard of design in housing, provision of public realm and open space, and community safety measures. Extensive community consultation to the hard to reach and equality groups, and in major growth areas and town centres. <p><u>Further Action</u></p> <ul style="list-style-type: none"> EqIA of OAPF and town centre master plans where applicable Specific equality and diversity targets for development

Topic	Spatial proposals	Are Groups affected because of: (Key: Yes or No and +/- impact)						Equality Impacts	Likely Positive Equality Impacts	Likely Negative Equality Impacts	Mitigation Activity
		Disability	Race	Gender	Sexual Orientation	Faith / Belief	Age				
								group.		<ul style="list-style-type: none"> Review of supply and demand for local housing working with housing providers to ensure a relevant mix of provision to meet the needs of local communities EqlA of Housing Strategy 	
CMC and Environs											
Homes Strategy	To provide 14,400 new homes up to 2031; Proportion of 1/2 vs 3/4 bedroom homes	Y+	Y+	Y+	Y+	Y+	Y+	The supply of suitable new homes is important issue for equality groups as well as the rest of the population.	<ul style="list-style-type: none"> The new development will provide access to new homes for the local communities. In particular, the high proportion of family size homes would meet the needs of BME communities with larger family size. As the areas are well serviced by public transport and concentration of services, it will improve access to homes and services for the disabled people, single mothers with children, older and young people who have no access to cars. 	<ul style="list-style-type: none"> Substantial supply of new homes in CMC & Environs would have significant impact on the composition of the local communities. New homes in CMC would be occupied by commuters from Central London who can afford higher rent/price and would not meet the needs of local communities in terms of price and standards. New communities moving into CMC would face deficient access to parks and open space, recreational and play area, high crime rate in the town centre. Measures need to be taken to 	<u>Action for Core Strategy</u> <ul style="list-style-type: none"> Core strategy policies should promote social cohesion in the new communities and the existing communities in the major growth areas in CMC & Environs. It should also recognise the equality and diversity impact on the deprived areas, such as Broad Green. Core Strategy policies should provide adequate affordable housing for the equality groups and people with limited means who have connections with the borough. The policies should ensure the well-being of the new communities in the CMC by

Topic	Spatial proposals	Are Groups affected because of: (Key: Yes or No and +/- impact)						Equality Impacts	Likely Positive Equality Impacts	Likely Negative Equality Impacts	Mitigation Activity
		Disability	Race	Gender	Sexual Orientation	Faith / Belief	Age				
									<p>deal with equality and diversity issues, particularly in areas suffering from multiple deprivations such as Broad Green.</p> <ul style="list-style-type: none"> Some communities may feel threatened and displaced by the new development 	<p>promoting good standard of design in housing, provision of public realm and open space, and community safety measures.</p> <ul style="list-style-type: none"> Extensive community consultation to the hard to reach and equality groups, and in major growth areas and town centres. <p><u>Further Action</u></p> <ul style="list-style-type: none"> EqlA of OAPF and town centre master plans where applicable Extensive community consultation on development in major growth area and town centres. 	
Jobs Strategy	<p>To safeguard industrial/warehousing premises which fall outside the Separated and Integrated Industrial Locations; change to D1 uses allowed in those sites with better transport accessibility; mixed use development with residential allowed in CMC and district centres; additional workshop/studio capacity in CMC and district centres; promote temporary use of vacant premises by creative industries and cultural activity.</p> <ul style="list-style-type: none"> B1a office & hotel development in CMC; Designate Addiscombe as District Centre; Regenerate long term vacancy sites in Integrated Industrial Locations in Broad 	Y+	Y+	Y+	Y+	Y+	Y+	<p>Croydon Metropolitan Centre & its surrounding areas is an important locations for jobs in retail, office and industrial/warehousing. It is vital to ensure equal access to jobs for the equality groups.</p> <ul style="list-style-type: none"> Potential benefit for all communities, especially those depend on public transport for access to jobs and services. Promotion of start up units would potentially be a source of flexible/ part time job opportunities for women and an opportunity of BME small businesses. Use of vacant premises by creative industries and cultural activity can be a source of job / self-employment for artists, 	<ul style="list-style-type: none"> Jobs created might not match the skill level of the local communities and would attract people from outside the borough. Many Industrial/warehousing locations are not well-served by public transport nor easily accessible for disabled people. Lack of community engagement may damage potential benefits 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> Core strategy policies should provide education and training which would improve skills level and remove job barriers for equalities groups. Core Strategy should promote job creation in town centres and public transport accessible areas. Extensive community consultation to the hard to reach and equality groups, and 	

Topic	Spatial proposals	Are Groups affected because of: (Key: Yes or No and +/- impact)						Equality Impacts	Likely Positive Equality Impacts	Likely Negative Equality Impacts	Mitigation Activity
		Disability	Race	Gender	Sexual Orientation	Faith / Belief	Age				
	<p>Green & Selhurst;</p> <ul style="list-style-type: none"> • Strong protection on Separated Industrial Location in South Croydon; • Strong protection on Strategic Industrial Location in Waddon; • Promote start up units in Purley Way North; • Seek mixed-use development on retail sites along Purley Way; • Potential 2 new Local Centres at Fiveways and Valley Park 							<p>musicians, craftsman of different age and cultural background. This could potentially benefit young people of underground/street culture by providing an alternative choice of employment.</p>		<p>in major growth areas and town centres.</p> <p><u>Further Action</u></p> <ul style="list-style-type: none"> • EqlA of OAPF and CMC master plans • EqlA of Economic Development Strategy • Effective public engagement and consultation with local communities 	
Cultural Planning Strategy	<p>To support the temporary occupation of empty buildings by creative industries and cultural organizations.</p> <ul style="list-style-type: none"> • A creative industries specific Enterprise Centre in the CMC • Refurbishment of the Fairfield Halls • Propose Croydon Airport site as a "Site with Potential for Heritage Development" 	Y+	Y+	Y+	Y+	Y+	Y+	<p>The promotion of cultural activities can be used for celebration of the diversity and multiculturalism of the borough.</p> <ul style="list-style-type: none"> • Use of vacant premises by creative industries and cultural activity can be used to celebrate the diversity and multiculturalism of the borough. • The promotion of creative industries and Enterprise Centre can be a source of job / self-employment for people of different age and from cultural background. • The use of vacant premises also might improve the occupancy rate of shops/premises, promote activities outside bars and clubs, and may improve the perception of safety in streets and the negative image of Croydon. 	<ul style="list-style-type: none"> • There may be barriers to equality groups to participate in creative industries, such as skills level. 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> • Extensive community consultation to the hard to reach and equality groups, and in major growth areas and town centres. <p><u>Further Action</u></p> <ul style="list-style-type: none"> • EqlA of enterprise centre scheme 	
Transport Strategy	<p><u>Short Term:</u></p> <ul style="list-style-type: none"> • SCOOT along A23 • Improve bus network interchange in CMC 	Y+	Y+	Y+	Y+	Y+	Y+	<p>Convenient and efficiency transport network is crucial to provide access to jobs, homes, leisure and services of all</p> <ul style="list-style-type: none"> • Improvement to the transport network in the central of the 	<ul style="list-style-type: none"> • The review of parking standards does not refer to 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> • Core strategy policies needs to 	

Topic	Spatial proposals	Are Groups affected because of: (Key: Yes or No and +/- impact)						Equality Impacts	Likely Positive Equality Impacts	Likely Negative Equality Impacts	Mitigation Activity
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	<ul style="list-style-type: none"> New interchange facilities on Wellesley Road and Dingwall Road Seek funding for Central Croydon Links project: improvement to pedestrian crossings/cycle links/accessibility Review parking standards Car free development in High Ptal area Review road junction capacities Investigate cycle hubs at stations Review strategic walking routes <p><u>Medium Term</u></p> <ul style="list-style-type: none"> Seek funding for Central Croydon Links Car free development in High Ptal area Provide Electric vehicle charging points Improvement to junctions at various points. Bus facilities Create a strategic cycle network of dedicated routes Bids under LIP to improve access through Broad Green and Waddon Replacement of Croydon gyratory through the Wellesley Road Scheme <p><u>Long Term</u></p> <ul style="list-style-type: none"> Possible north-south tram route between CMC and the North Tram extension to Crystal Palace, Bromley, Sutton and Tooting Car free development in High Ptal area Safeguard land for strategic transport infrastructure improvements 							<p>equality groups. An accessible public transport system is particular important to those who have less access to private cars, such as women, older and younger generation, and disabled people.</p>	<p>borough will be beneficial to the ethnic minority groups and other equality groups living in or visiting the areas.</p> <ul style="list-style-type: none"> Improvement to the pedestrian crossings / cycle links and accessibility in the CMC would be beneficial in particular for those who have mobility impairment, older people and women with shopping trolley bags and push chairs. Tramlink enhancement and line extension would be beneficial for those use wheelchairs and mobility scooters as well as for mothers pushing buggies. 	<p>disabled parking. It may lead to insufficient and sub-standard parking spaces for wheelchair users in CMC</p> <ul style="list-style-type: none"> Tramlink line extension might not materialise due to budget cut and lack of cooperation from neighbouring boroughs. The strategy does not promote public safety and inclusive design in public transport 	<p>promote public safety and inclusive design in public transport and to improve accessibility at public transport and stations for disabled and older people. It needs to review disabled parking in town centres.</p> <p><u>Further Action</u></p> <ul style="list-style-type: none"> EqIAs of Borough Wide and CMC Transport Strategies, and Local Implementation Plan Integration of inclusive design and accessibility standards in the improvement schemes for bus interchange, train stations and Central Croydon Links
North Spatial Management Area											
Homes Strategy	To provide 3,600 new dwellings up to 2031; Proposed proportion of family and non-family	Y+	Y+	Y+	Y+	Y+	Y+	The supply of suitable new homes is important issue for equality groups as	<ul style="list-style-type: none"> The supply of new dwellings 	<ul style="list-style-type: none"> Measures need to be taken to 	<u>Action for Core Strategy</u>

Topic	Spatial proposals	Are Groups affected because of: (Key: Yes or No and +/- impact)						Equality Impacts	Likely Positive Equality Impacts	Likely Negative Equality Impacts	Mitigation Activity
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	housing by place.							well as the rest of the population.	<ul style="list-style-type: none"> would have significant impact on the local communities in the North of the borough, especially the Black minorities in Thornton Heath and Indian minorities in Norbury. The new development would help to renew and regenerate the more deprived area such as South Norwood. 	<ul style="list-style-type: none"> deal with equality and diversity issues, particularly in areas suffering from multiple deprivations such as South Norwood. Some communities may feel threatened and displaced by the new development 	<ul style="list-style-type: none"> Extensive community consultation on hard to reach and equality groups, and in deprived areas.
Jobs Strategy	<p>To safeguard industrial/warehousing premises which fall outside the Separated and Integrated Industrial Locations; change to D1 uses allowed in those sites with better transport accessibility; within District Centre, protect industrial/warehousing premises, promote mixed use development with residential use and provide additional workshop/studio capacity in district centres.</p> <ul style="list-style-type: none"> Protect A1-A4 uses & B1c use in premises fronting Church Road, Crystal Palace. Redesignate Crystal Palace as a District Centre and support new hotel development. Redesignate Norbury and Thornton Heath as District Centres. 	Y+	Y+	Y+	Y+	Y+	Y+	<p>It is important to ensure that there is equal access to job opportunities for all equality groups.</p> <ul style="list-style-type: none"> Potential benefit for all communities for job opportunities Promotion of workshop/studio units in district centres would potentially be a source of flexible/part time job opportunities in an accessible location for women and an opportunity of BME small businesses. Change of use of vacant employment site to D1 community facilities would potentially provide more premises for clinics, nursery, places of worships etc for the benefit of all equality groups. 	<ul style="list-style-type: none"> Jobs created might not match the skill level of the local communities and would attract people from outside the borough. Many Industrial/warehousing locations are not well-served by public transport nor easily accessible for disabled people. Lack of community engagement may damage potential benefits 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> Core strategy policies should provide education and training which would improve skills level and remove job barriers for equalities groups. Core Strategy should promote job creation in town centres and public transport accessible areas. Extensive community consultation to the hard to reach and equality groups, and in major growth areas and town centres. <p><u>Further Action</u></p> <ul style="list-style-type: none"> EqIA of Economic Development Strategy Effective public engagement and consultation with local communities 	

Topic	Spatial proposals	Are Groups affected because of: (Key: Yes or No and +/- impact)						Equality Impacts	Likely Positive Equality Impacts	Likely Negative Equality Impacts	Mitigation Activity
		Disability	Race	Gender	Sexual Orientation	Faith / Belief	Age				
Cultural Planning Strategy	<p>To support temporary occupation of empty buildings by creative industries and cultural organizations.</p> <ul style="list-style-type: none"> • Provide creative industries specific enterprise centres at Crystal Palace Triangle and Portland Road, South Norwood. • Provide of a sports related enterprise centre at Selhurst Park, South Norwood; 	Y+	Y+	Y+	Y+	Y+	Y+	<p>The promotion of cultural activities can be used for celebration of the diversity and multiculturalism of the borough.</p>	<ul style="list-style-type: none"> • Use of vacant premises by creative industries and cultural activity can be used to celebrate the diversity and multiculturalism of the borough. • The promotion of creative industries and Enterprise Centre can be a source of job / self-employment for people of different age and from cultural background. • The use of vacant premises also might improve the occupancy rate of shops/premises and may improve the perception of safety in streets. 	<ul style="list-style-type: none"> • There may be barriers to equality groups to participate in creative industries. For example, the disabled people is unlikely to part take in a sports related enterprise. 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> • Extensive community consultation to the hard to reach and equality groups, and in major growth areas and town centres. <p><u>Further Action</u></p> <ul style="list-style-type: none"> • EqlA of Enterprise centre scheme
Transport Strategy	<p><u>Short Term</u></p> <ul style="list-style-type: none"> • Review of car parking provision within Local Centres • Improvements to traffic flows through the High Street, Thornton Heath • Works on the main bus route to London Road to the north of CMC • Additional trams on the central sections of the Tramlink network • Works on the cycle link between Thornton Heath, the BRIT school and East Croydon Station; Connect2 extension to the cycle network; greenway links in Norbury, Thornton Heath, South Norwood and Woodside; rights of Way Improvement Plan; <p><u>Medium Term</u></p> <ul style="list-style-type: none"> • Improvements to orbital bus routes along 	Y+	Y+	Y+	Y+	Y+	Y+	<p>Convenient and efficiency transport network is crucial to provide access to jobs, homes, leisure and services of all equality groups. An accessible public transport system is particular important to those who have less access to private cars, such as women, older and younger generation, and disabled people.</p>	<ul style="list-style-type: none"> • Improvement to the public transport network in the north of the borough will be beneficial to the young school children, ethnic minority groups and other equality groups living in or visiting the areas. • Improvement to the pedestrian crossings / cycle links and accessibility in the North would be beneficial in particular for those who have mobility impairment, older people and women with children in push chairs. • Tramlink enhancement and line extension would be beneficial for 	<ul style="list-style-type: none"> • The review of parking standards does not refer to disabled parking. It may lead to insufficient and sub-standard parking spaces for wheelchair users in District Centres • Tramlink line extension might not materialise due to budget cut and lack of cooperation from neighbouring boroughs. • The strategy does not promote public safety and inclusive design in public transport 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> • Core strategy policies needs to promote public safety and inclusive design in public transport and to improve accessibility at public transport and stations for disabled and older people. It needs to review disabled parking in town centres. <p><u>Further Action</u></p> <ul style="list-style-type: none"> • EqlAs of Borough Wide Transport Strategies, and Local Implementation Plan • Integration of inclusive design

Topic	Spatial proposals	Are Groups affected because of: (Key: Yes or No and +/- impact)						Equality Impacts	Likely Positive Equality Impacts	Likely Negative Equality Impacts	Mitigation Activity
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	<p>key bus corridors to the east and west of CMC; investigate Bus Rapid Transit Scheme;</p> <ul style="list-style-type: none"> Extending tram extension to Bromley; Increase the number of taxi ranks at busier outlying Railway Stations Complete the Greenways network for walking and cycling linking green grid/spaces; Rights of Way improvement plan; <p><u>Long Term</u></p> <ul style="list-style-type: none"> Improve South Norwood Hill corridor and junctions Convert rail section for tram operation and improve tram capacity between Arena and West Croydon North-south tram route along London Road between CMC and the North Improve access and movement through Norbury Safeguard land for strategic transport infrastructure improvement 							those use wheelchairs and mobility scooters as well as for mothers pushing buggies.		and accessibility standards in the improvement schemes for bus interchange, train stations and road junctions.	
East Spatial Management Area											
Homes Strategy	To provide 900 new dwellings up to 2031; proposed large proportion of larger homes	Y+	Y+	Y+	Y+	Y+	Y+	The supply of suitable new homes is important issue for equality groups as well as the rest of the population.	<ul style="list-style-type: none"> The supply of new dwellings with high proportion of family size dwellings would have impact on the local communities. 	<ul style="list-style-type: none"> Measures need to be taken to deal with equality and diversity issues, especially in deprived areas such as Fieldway. 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> Extensive community consultation on hard to reach and equality groups, and in deprived areas.
Jobs Strategy	To safeguard industrial/warehousing premises which fall outside the Separated and	Y+	Y+	Y+	Y+	Y+	Y+	It is important to ensure that there is equal access to job opportunities for all	<ul style="list-style-type: none"> Potential benefit for all 	<ul style="list-style-type: none"> Jobs created might not match 	<p><u>Action for Core Strategy</u></p>

Topic	Spatial proposals	Are Groups affected because of: (Key: Yes or No and +/- impact)						Equality Impacts	Likely Positive Equality Impacts	Likely Negative Equality Impacts	Mitigation Activity
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	<p>Integrated Industrial Locations; change to D1 uses allowed in those sites with better transport accessibility; within District Centre, protect industrial/warehousing premises, promote mixed use development with residential use and provide additional workshop/studio capacity in district centres.</p> <ul style="list-style-type: none"> • Redesignate New Addington as a District Centre. • Strong protection for industrial and warehousing activities in Vulcan Way; • Redesignate Selsdon as a District Centre. 							<p>equality groups.</p>	<p>communities for job opportunities</p> <ul style="list-style-type: none"> • Promotion of workshop/studio units in district centres would potentially be a source of flexible/ part time job opportunities in an accessible location for women. • Change of use of vacant employment site to D1 community facilities would potentially provide more premises for clinics, nursery, places of worships etc for the benefit of all equality groups. 	<p>the skill level of the local communities and would attract people from outside the borough.</p> <ul style="list-style-type: none"> • Many Industrial/warehousing locations are not well-served by public transport nor easily accessible for disabled people. • Lack of community engagement may damage potential benefits 	<ul style="list-style-type: none"> • Core strategy policies should provide education and training which would improve skills level and remove job barriers for equalities groups. • Core Strategy should promote job creation in town centres and public transport accessible areas. • Extensive community consultation to the hard to reach and equality groups, and in major growth areas and town centres. <p><u>Further Action</u></p> <ul style="list-style-type: none"> • EqlA of Economic Development Strategy • Effective public engagement and consultation with local communities
Cultural Planning Strategy	To support temporary occupation of empty buildings by creative industries and cultural organizations.	Y+	Y+	Y+	Y+	Y+	Y+	The promotion of cultural activities can be used for celebration of the diversity and multiculturalism of the borough.	<ul style="list-style-type: none"> • Use of vacant premises by creative industries and cultural activity can be used to celebrate the diversity and multiculturalism of the borough. • The promotion of creative industries can be a source of job / self-employment for people of different age and from cultural background. . • The use of vacant premises also 	<ul style="list-style-type: none"> • There may be barriers to equality groups to participate in creative industries. For example, the disabled people is unlikely to part take in a sports related enterprise. 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> • Extensive community consultation to the hard to reach and equality groups, and in major growth areas and town centres.

Topic	Spatial proposals	Are Groups affected because of: (Key: Yes or No and +/- impact)						Equality Impacts	Likely Positive Equality Impacts	Likely Negative Equality Impacts	Mitigation Activity
		Disability	Race	Gender	Sexual Orientation	Faith / Belief	Age				
Transport Strategy	<p><u>Short Term</u></p> <ul style="list-style-type: none"> Works on the cycle network as part of greenway links and Rights of Way Improvement plan <p><u>Medium Term</u></p> <ul style="list-style-type: none"> Improvements to the Addington Village stop Complete the Greenways network for walking and cycling linking green grid/spaces; Rights of Way improvement plan; <p><u>Long Term</u></p> <ul style="list-style-type: none"> Explore options for extending the Tram to areas in demand Maintain a programme of tram stop maintenance, refurbishment, accessibility and personal security improvements. Improve access and movement within New Addington Safeguard land for strategic transport 	Y+	Y+	Y+	Y+	Y+	Y+	<p>Convenient and efficiency transport network is crucial to provide access to jobs, homes, leisure and services of all equality groups. An accessible public transport system is particular important to those who have less access to private cars, such as women, older and younger generation, and disabled people.</p>	<ul style="list-style-type: none"> Improvement to the public transport network in the south east of the borough will be beneficial to the young school children, and other equality groups living in or visiting the areas. Improvement to the pedestrian crossings / cycle links and accessibility would be beneficial in particular for those who have mobility impairment, older people and women with children in push chairs. Tramlink enhancement and line extension would be beneficial for those use wheelchairs and mobility scooters as well as for mothers pushing buggies. 	<ul style="list-style-type: none"> There is no review of disabled parking. It may lead to insufficient and sub-standard parking spaces for wheelchair users in District Centres Tramlink line extension might not materialise due to budget cut and lack of cooperation from neighbouring boroughs. The strategy does not promote public safety and inclusive design in public transport 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> Core strategy policies needs to promote public safety and inclusive design in public transport and to improve accessibility at public transport and stations for disabled and older people. It needs to review disabled parking in town centres. <p><u>Further Action</u></p> <ul style="list-style-type: none"> EqlAs of Borough Wide Transport Strategies, and Local Implementation Plan Integration of inclusive design and accessibility standards in the improvement schemes for bus interchange, train stations and road junctions.
South Spatial Management Area											
Homes Strategy	To provide 2,600 new dwellings up to 2031; significant proportion of family size homes.	Y+	Y+	Y+	Y+	Y+	Y+	The supply of suitable new homes is important issue for equality groups as well as the rest of the population.	<ul style="list-style-type: none"> The supply of new dwellings would have significant impact on the local communities 	<ul style="list-style-type: none"> Measures need to be taken to deal with equality and diversity issues Some communities may feel 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> Extensive community consultation on hard to reach and equality groups, and in

Topic	Spatial proposals	Are Groups affected because of: (Key: Yes or No and +/- impact)						Equality Impacts	Likely Positive Equality Impacts	Likely Negative Equality Impacts	Mitigation Activity
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									threatened and displaced by the new development	major growth area and town centres.	
Jobs Strategy	To safeguard industrial/warehousing premises which fall outside the Separated and Integrated Industrial Locations; change to D1 uses allowed in those sites with better transport accessibility; within District Centre, protect industrial/warehousing premises, promote mixed use development with residential use and provide additional workshop/studio capacity in district centres. <ul style="list-style-type: none"> Redesignate Coulsdon as a District Centre. Strong protection for industrial and warehousing activities in Marlipit Lane Industrial Area; Promote the provision of start-up and grow-on units for light industry/storage and distribution use classes within Malpit Lane Industrial Area. Establish an Innovation Complex within Cane Hill / Coulsdon masterplan area. Investigate opportunities for campus facilities as part of the "multiversity" concept; Redesignate Purley as a District Centre. 	Y+	Y+	Y+	Y+	Y+	Y+	It is important to ensure that there is equal access to job opportunities for all equality groups. <ul style="list-style-type: none"> Potential benefit for all communities for job opportunities. The promotion of "Knowledge Economy" (Innovation Complex and Multiversity campus) would probably improve access to jobs for younger people. Promotion of workshop/studio units in district centres would potentially be a source of flexible/part time job opportunities in an accessible location for women and disabled people. Change of use of vacant employment site to D1 community facilities would potentially provide more premises for clinics, nursery, places of worships etc for the benefit of all equality groups. 	<ul style="list-style-type: none"> Jobs created might not match the skill level of the local communities and would attract people from outside the borough. Many Industrial/warehousing locations are not well-served by public transport nor easily accessible for disabled people. Lack of community engagement may damage potential benefits 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> Core strategy policies should provide education and training which would improve skills level and remove job barriers for equalities groups. Core Strategy should promote job creation in town centres and public transport accessible areas. Extensive community consultation to the hard to reach and equality groups, and in major growth areas and town centres. <p><u>Further Action</u></p> <ul style="list-style-type: none"> EqlA of Economic Development Strategy Effective public engagement and consultation with local communities 	
Cultural Planning Strategy	To support temporary occupation of empty buildings by creative industries and cultural organizations. To provide a creative industries specific Enterprise Centre within Purley District Centre.	Y+	Y+	Y+	Y+	Y+	Y+	The promotion of cultural activities can be used for celebration of the diversity and multiculturalism of the borough. <ul style="list-style-type: none"> Use of vacant premises by creative industries and cultural activity can be used to celebrate the diversity and multiculturalism of the borough. 	<ul style="list-style-type: none"> There may be barriers to equality groups to participate in creative industries, such as skills level. 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> Extensive community consultation to the hard to reach and equality groups, and in major growth areas and town 	

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		Disability	Race	Gender	Sexual Orientation	Faith / Belief	Age				
								<ul style="list-style-type: none"> The promotion of creative industries and Enterprise Centre can be a source of job / self-employment for people of different age and from cultural background. The use of vacant premises also might improve the occupancy rate of shops/premises and may improve the perception of safety in streets. 		<p>centres.</p> <p><u>Further Action</u></p> <ul style="list-style-type: none"> EqlA of Enterprise centre scheme 	
Transport Strategy	<p><u>Short Term</u></p> <ul style="list-style-type: none"> Investigate the feasibility of a cycle hub with cycle parking within Purley District Centre Works on the cycle network as part of greenway links and Rights of Way Improvement plan Public realm improvement Promote delivery and collections scheme and a potential consolidation centre for construction materials Review of car parking provision within District Centres; ways to limit the number of parking spaces accessed off the A23 corridor Potential increase rail service destinations from East Croydon; access improvement to Purley, South Coudson and Woodmansterne Stations; Priority to improve the A23 with enhancements made to the Purley Cross gyratory <p><u>Medium Term</u></p> <ul style="list-style-type: none"> Priority to improve the A23 with 	Y+	Y+	Y+	Y+	Y+	Y+	<p>Convenient and efficiency transport network is crucial to provide access to jobs, homes, leisure and services of all equality groups. An accessible public transport system is particular important to those who have less access to private cars, such as women, older and younger generation, and disabled people.</p> <ul style="list-style-type: none"> Improvement to the public transport network in the south of the borough will be beneficial to the young school children, ethnic minority groups and other equality groups living in or visiting the areas. Improvement to the pedestrian crossings / cycle links and accessibility would be beneficial in particular for those who have mobility impairment, older people and women with children in push chairs. Tramlink enhancement and line extension would be beneficial for those use wheelchairs and mobility scooters as well as for mothers pushing buggies. 	<ul style="list-style-type: none"> The review of parking standards does not refer to disabled parking. It may lead to insufficient and sub-standard parking spaces for wheelchair users in CMC Tramlink line extension might not materialise due to budget cut and lack of political commitment. The strategy does not promote public safety and inclusive design in public transport 	<p><u>Action for Core Strategy</u></p> <ul style="list-style-type: none"> Core strategy policies needs to promote public safety and inclusive design in public transport and to improve accessibility at public transport and stations for disabled and older people. It needs to review disabled parking in town centres. <p><u>Further Action</u></p> <ul style="list-style-type: none"> EqlAs of Borough Wide Transport Strategies, and Local Implementation Plan Integration of inclusive design and accessibility standards in the improvement schemes for bus interchange, train stations and road junctions. 	

Topic	Spatial proposals	Are Groups affected because of: (Key: Yes or No and +/- impact)						Equality Impacts	Likely Positive Equality Impacts	Likely Negative Equality Impacts	Mitigation Activity
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	<p>enhancements made to the Purley Cross gyratory</p> <ul style="list-style-type: none"> • Works on the A235 Brighton Road between Purley Cross and High Street; potential bus lane on Brighton Road (southboard approach to Purley Cross) • Introduce more covered, well lit and secure cycle parking facilities within retail centres and at local Railway Stations; Introduce a cycle hub in Purley District Centre; • Complete the Greenways network for walking and cycling linking green grid/spaces; Rights of Way improvement plan; <p><u>Long Term</u></p> <ul style="list-style-type: none"> • Improving the A23 focusing on congestion reduction and solution to the severance to east-west movement; junction improvements and signal works at Purley Cross; enhancement to the public transport offer between Purley/Coulsdon and CMC; • Progress local improvement to access and movement towards the two Coulsdon railway stations; • Options to extend Tramlink service towards Purley and Coulsdon • Safeguard land for strategic transport 										

Impacts on Community Cohesion and Discrimination

The policies proposed in the Towards a Preferred Core Strategy for Croydon and Supplement reports address a wide range of spatial issues which will have a far reaching impact on the whole population of the borough. By providing better opportunities for jobs, homes, community facilities and transport network and promoting cultural activities and community safety, the Core Strategy would have an indirect but positive impact on community cohesion and equality issues.

Eliminate unlawful discrimination and harassment

Although the policies in Core Strategy reports do not deal with unlawful discrimination and harassment directly, it does promote a well-designed and safe public realm and provide for a long term community safety strategy to tackle crime and promote safer neighbourhoods. These strategies are likely to have some positive impact on elimination of unlawful discrimination and harassment.

Promote equality of opportunity and eliminate inequalities

Although the policies in Core Strategy reports does not deal with equality of opportunity and eliminate inequalities directly, it seeks to provide more opportunities for employment and new housing of different size and affordability to suit the needs of the residents. It also seeks to provide community facilities in accessible locations. Therefore it is likely to have some positive impact on equality of opportunity.

To promote good relations between people of different racial or other minority/community/social or economic groups

The Public Realm Strategy seeks the creation of public spaces which are valued by local communities, easily accessible to all with spaces for multicultural events for all ages. The Cultural Planning Strategy promotes diversified night time economy, non-traditional sports, and other cultural offers in the local areas. It is therefore likely to contribute positively towards good relations between people of different racial or other minority/community/social or economic groups.

Promote positive attitudes towards disabled people

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

Promote equality of opportunity between men and women

The Core Strategy addresses some concerns of women: the promotion of business start up and creative industries might provide more flexible time/part time working opportunities for women. The proposal to have more homes, community facilities, and studio/workshops/creative industries (i.e. jobs) in accessible locations by public transport would be useful for women who are more likely to depend on public transport. The improvement of access and movement in town centres and public transport is particularly useful for mothers with push chairs and older women using shopping trolley bags. The Public Realm Strategy and Community Safety

Strategy also addresses the perception of safety for women in public places. It is therefore very likely to have a positive impact on promotion equality of opportunity between men and women.

Promote equal participation in public life

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

Community Cohesion and Economic exclusion

The Core Strategy seeks to provide more opportunities for employment and new housing of different size and affordability to suit the needs of the residents. It also seeks to provide community facilities in accessible locations. It promotes the creation of public spaces which are valued by local communities, easily accessible to all with spaces for multicultural events for all ages. It also promotes diversified night time economy, non-traditional sports, and other cultural offers in the local areas. Overall it is likely to have positive impact on promoting community cohesion and eliminating economic exclusion.

Conclusion

The assessment has found that the Core Strategy is overall very supportive of equality groups because it:

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

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

- The major growth in CMC & Environs would provide the majority of new homes, and opportunities for studio/workshops and for creative industries, not to mention the existing cluster of shops and night life economy. It is vital to ensure that equality groups would have equal access to these new homes, jobs and facilities in the major growth area. The Core Strategy and any delivery mechanism, such as the OAPF and master plans, should take on board the ways which the future growth would affect the equality and diversity of the existing communities in these areas, try to remove barriers for the equality groups, and to promote social cohesion in the new communities created in these major growth areas.
- The Core Strategy needs to address the impact of the proposed growth on the ethnic minority communities in Central and the North of the Borough, especially in disadvantaged areas such as Broad Green and South Norwood (and also Fieldway in the South). There

are opportunities for urban renewal and regeneration in these deprived area and risks that these communities might feel threatened or displaced by new development. Effective engagement with the local BME communities for the new development are particular important.

- The Core Strategy also needs to ensure that equality groups would have equal access to new enterprise and employment opportunities in the borough, especially in the envisaged growth sector in creative industries.

In view of the strategic nature and the lack of implementation details of the Core Strategy policies, their impacts on equality and diversity should be treated as *potential*. Whether these impacts would materialise depends on the details of the scheme during the implementation stage and the mitigation actions. The implementation of Core Strategy will rely on lower level Development Plan Documents and other delivery mechanisms, such as the Infrastructure Development Plans and Masterplans, which will be scrutinised in future EqIAs if appropriate.

The Core Strategy policies are in general found to be sound in equality issues. Mitigation measures are identified on individual policies to be taken on board in the future revision of the Core Strategy and in other Local Authority activities.

Next Step

The findings of this EqIA will inform the plan-making process of the Core Strategy. Further equality impact assessment will be carried out on the Pre-submission draft of the Core Strategy coming out in spring 2011.

Monitoring of the impact of the Core Strategy will be managed through the Annual Monitoring Report, which is scrutinized by the Cabinet and approved by the Secretary of State.

Appendix 1

List of Equality groups

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

(to be updated)

Joan Zusich	Physical Disabilities Team, OP/PD division, Croydon Council	
Carole Webster	Welfare Rights Advisor, Adult Services and Housing, Croydon Council Wheelchair user	
Anonymous	Croydon Council Unison LGBT Group	
David Osborne	Croydon PCT	GP Register data
	Gender Identity Research and Education Society	
Dr. Jagdish Sharma	Hindu community	
Shuaib Yusuf	Muslim community	
Pastor Damian Luke	Black Majority Church groups	
Yvonne Traynor	Rape Crisis- South London	
Richard Pacitti	Mind in Croydon	
John Osbourne	Access Officer, Croydon Council	

Sarah Taylor
Community Involvement Worker, Croydon Voluntary Action
020 8683 5917
audrey.beckford@cvalive.org.uk

Croydon BME Forum

Nero Ughwujabo
020 8684 3719
nero@bmeforum.org

Crocus (Lesbian, Gay, Bi-sexual and Transgender Network)

020 8404 3454

Croydon Disability Forum

Mike McConnell
0208 680 5450
mikejmcconnell@aol.com

Children, Young People and Families Network

Mary Lawrence
020 8683 5909

mary.lawrence@cvalive.org.uk

Croydon Xpress Project (young people)

Nicole Beckford

020 8684 3862

Nicole.beckford@cvalive.org.uk

Croydon Youth Parliament

(Contact via Helen Clarke: helen.clark@croydon.gov.uk)

Faiths Together in Croydon (Croydon's Interfaith Network)

Rev Barry Goodwin

020 8256 9637 / 0796 791 7151

barry.goodwin@southwark.anglican.org

or,

Denise Wright

020 8683 5904

denise.wright@cvalive.org.uk

Older People's Network

Pauline Dawkins

020 8683 7002

pauline.dawkins@cvalive.org.uk

Mental Health Forum

Ikenna Obianwa

020 8683 5909

ikenna.obianwa@cvalive.org.uk

Mind in Croydon

Richard Pacitti

020 8668 2210

020 8763 2084

richard@mindincroydon.org.uk

Croydon Women's Network

Denise Wright

020 8683 5909

denise.wright@cvalive.org.uk

Appendix 2

Sources of Data

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

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

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

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

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

Census 2001, SASPAC

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

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

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

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

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

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

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

The London Borough of Croydon Place Survey 2008

Equality Strategy 2010-2013, LB Croydon [London Borough of Croydon: Equality and diversity - Equality strategy 2010 - 2013.](http://www.london.gov.uk/inequality/equality-strategy-2010-2013)

Equalities and Human Rights Commission website [EHRC - Home](http://www.equalities.gov.uk)

the Government Equalities Office [Home Page](http://www.equalities.gov.uk)

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

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

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

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

Metropolitan Police Crime Figures

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

