

Equalities Impact Assessment Part 1: Quick Screening Tool

This tool is designed to offer a quick screening (20-40 mins) approach to your project, service or strategy (project). This will help to identify Relevance, Scope, Focus and consultation requirements. Please see guidance for further information.

Directorate: Operational Services

Service: Planning Policy

Lead Impact Assessor: Thomas Jackson, Assistant Planner

Name of strategy, policy, project, service or “other”: Hastings Town Centre & Bohemia Area Action Plan

Person(s) or team(s) responsible for delivery of above: Planning Policy

1. What is the purpose of the project? Please describe:

The Hastings Town Centre & Bohemia Area Action Plan's purpose is to provide for the continued social, economic and cultural regeneration of the Borough with a specific focus on the town centre and Bohemia areas.

The Area Action Plan (AAP) seeks to enhance the area's character and environment and to promote sustainable development and improve the quality and range of facilities and services available to residents, businesses and visitors while addressing issues relating to homes, jobs, services and future economic growth by unlocking the significant untapped potential of the area. It sets out a vision for the area and will provide the policy and spatial framework for future development and change.

The AAP builds on both the Hastings Planning Strategy (February 2014) and the Hastings Development Management Plan (September 2015) and will form part of the Local Plan Documents once adopted.

2. Who will be affected and how? Please describe:

The AAP's largest effect will be upon residents and businesses within the AAP's boundary in the town centre and Bohemia area. Members of these communities will be directly affected by the policies and spatial framework within the AAP once adopted.

The AAP will also affect all wider communities within the Borough. The scope of the AAP focuses on Hastings Town Centre, which is the principle centre within the town. This has a wider effect on the surrounding communities as Hastings Town centre is the primary shopping area within the Borough, as well as an important economic hub for the town.

3. Does the item fit with the Council's priorities? Please describe:

The Corporate Plan 2018/19-2020/21 sets out seven priorities for the town on page 3.

Priority 1: Economic and Physical Regeneration

A key objective of the AAP is to unlock the economic potential of the area through a co-ordinated strategy for regeneration, growth and change to encourage investment and maximise local economic benefits.

To support this, the AAP promotes economic growth and local employment opportunities and supports the increase in the quality of commercial floor space and economic opportunities in the town centre for the benefit of the Borough as a whole.

There are also inclusions of provisions work spaces which will attract start-up businesses and people looking for an alternative workspace, including affordable artisan “maker” and co-working/shared working spaces.

The AAP also identifies opportunity areas within the town centre and Bohemia areas for potential physical regeneration as well as new developments. There are also policies which seek to maintain and enhance the built environment and support regeneration opportunities within the AAP boundary area.

Priority 2: Cultural Regeneration

The policies within the AAP actively support the provision and new development of cultural and creative industries within the AAP boundary area. The AAP identifies three cultural quarters in which new creative workshop spaces and cultural developments will be supported. This will enable a broader cultural offer and promote the cultural programme within the borough and further help to establish Hastings as a place recognised nationally and internationally as a centre for arts and culture.

Priority 3: Intervention when it's needed

Not applicable.

Priority 4: Creating decent homes

The AAP seeks to maximise the opportunities for new residential development and associated infrastructure which creates attractive and healthy living environments with access to a range of facilities and services and a mix of housing and community facilities including affordable housing.

The AAP identifies 11 opportunity sites within the AAP's boundary areas for about 820 new homes to help facilitate a boost to the supply of good quality homes within easy access to the town centre. The increased supply of homes within the Borough will help to meet the identified demand within the Borough.

Furthermore, AAP Policies also seeks to support the efficient use of land for residential development through optimising densities of residential development taking into account the site context and capacity of surrounding infrastructure. Therefore, by optimising the density of land we therefore are supporting an increased housing supply within the Borough.

The mix of housing types, including family and affordable housing, are promoted in the AAP policies, which will help to increase the supply and type of housing meeting the variety of needs for people within the Borough.

The AAP provides policies supporting the use of attractive, durable, high quality materials and high standards of craftsmanship as well as the use of masterplans and design codes for bringing forward development of opportunity sites. The AAP also sets provisions for design and access statements to support how development

proposals meet the requirements of the AAP for developments within the boundary area.

Priority 5: An attractive town

The AAP seeks to take an environmentally sensitive approach to change which respects the town's heritage, reinforces the landscape and seafront setting and ensure new development is of the highest design and environmental quality.

This is proposed to be implemented through policies on good design focusing on improving the accessibility, connection and linkages, quality of the public realm, urban green spaces and quality of the townscape.

The AAP also seeks to retain and enhance strategic townscape views from all new developments within the AAP area.

Priority 6: A greener town

The AAP provides specific policies for reducing the carbon footprint of new developments within the AAP area through sustainable design to support sustainable use of natural resources, including reducing energy and water use.

The AAP also designates policies on Green Infrastructure for new developments in the AAP boundary including the provision of new green spaces as well as connecting existing and new spaces, the incorporation of green roofs and the use of sustainable drainage systems (SUDs).

There are also provisions to support the development of combined heat and power (CHP) and district heating networks within the Bohemia area and also support for community-led renewable energy projects within the AAP area.

Priority 7: Transforming the way we work

Not applicable.

The AAP is also specified as a priority within the Corporate Plan 2018/19-2020/21 within the section 'What to look out for next year?' on page 10.

4. Does it help to achieve the aims of the Council's Equalities Objectives (as outlined in the Council's Corporate Plan)? Please describe:

The AAP actively promotes the values set out in the Corporate Plan for the development through the physical, economic and cultural regeneration of the town centre and Bohemia area. This is set out in both the strategic objectives outlined within the AAP and drawn down from the Hastings Planning Strategy (2011) objectives which remain of relevance to the AAP area.

5. Does the project impact on community cohesion issues?

The AAP aims to support community cohesion through the social, economic and cultural regeneration of the town centre and Bohemia area. The policies within the document have focused on providing inclusive growth and benefits from regeneration opportunities for all individuals within the Borough.

Equalities Impact (Risk Assessment) Testing Tool

This tool determines the degree of consultation required.

When considering whether there would be a negative impact, you should consider the following:

- If the item could potentially discriminate unlawfully against any group (High)
- If any group could be denied fair and equal treatment (High)
- If there have been any concerns or complaints expressed about the item (or similar items elsewhere) having a negative impact

There may also be a positive impact; this would give a 'Low' in the ratings.

- If it could actively promote good relations between different groups
- If it could promote equality of opportunity

| Group | Likelihood of negative effect | Impact of one negative effect | Overall assessment rating | Describe potential and actual impacts (show your thought process). Especially if you have given a High rating. |
|----------------------------|-------------------------------|-------------------------------|------------------------------|--|
| Age | High Medium Low | High Medium Low | High Medium Low | <p>The AAP itself does not contain any policies that could be considered to discriminate on the grounds of age.</p> <p>There is however, the consideration of ensuring the consultation process is taken out in a non-discriminatory way. This includes issues such as ensuring that access to consultation venues and documents is non-discriminatory. These issues are being taken into consideration in the planning of the consultation and appropriate measures will be undertaken to ensure that all measures meet the standards set out in the Statement of community involvement and will also be monitored during the consultation process.</p> |
| Disability | High Medium Low | High Medium Low | High Medium Low | <p>The AAP does not have any policies that would be considered to discriminate on the grounds of disability.</p> <p>As part of plan preparation there is a requirement of consultation which includes issues of access to venues and documents. This is being considered in the choice of venues and consultation processes and will be monitored during the consultation phase to ensure appropriate measures are undertaken to ensure that all venues and documents meet the standards set out in the Statement of community involvement.</p> |
| Gender Reassignment | High Medium Low | High Medium Low | High Medium Low | <p>The AAP does not have any policies that would be considered to discriminate on the grounds of gender reassignment.</p> |

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| Marriage and civil partnership | High Medium Low | High Medium Low | High Medium Low | The AAP does not have any policies that would be considered to discriminate on the grounds of marriage or civil partnership. |
| Pregnancy and maternity | High Medium Low | High Medium Low | High Medium Low | The AAP does not have any policies that would be considered to discriminate on the grounds of pregnancy and maternity. |
| Race | High Medium Low | High Medium Low | High Medium Low | <p>There are potential issues relating to the language barrier in understanding the document and the relevant national legislation surrounding this, as well as potential issues with material at exhibition events. To combat this, the Statement of Community Involvement specifies the measures we undertake to prevent this including translation of the document in languages other than English on request.</p> <p>The AAP has not allocated any sites for Gypsy and travelling people within the AAP area. However, this has been suitably assessed in the parent document of the Hastings Planning Strategy (2011) and Hastings Development Management Plan (2015), which has made adequate provisions for sites within the Borough.</p> |
| Religion and belief | High Medium Low | High Medium Low | High Medium Low | <p>The AAP does not have any policies that would be considered to discriminate on the grounds of religion and belief.</p> <p>As part of plan preparation there is a requirement for consultation. The consideration of venues will need to take into account religious requirements to make sure that any potential venue does not provide environments that discriminate or make individuals of particular beliefs uncomfortable and unable to attend.</p> |
| Gender | High Medium Low | High Medium Low | High Medium Low | The AAP does not have any policies that would be considered to discriminate on the grounds of gender. |
| Sexual Orientation | High Medium Low | High Medium Low | High Medium Low | The AAP does not have any policies that would be considered to discriminate on the grounds of sexual orientation. |
| Social and economic exclusion | High Medium Low | High Medium Low | High Medium Low | <p>The AAP does not have any policies that would be considered to discriminate on the grounds of social and economic exclusion.</p> <p>The AAP aims to increase the economic, physical and cultural regeneration of the town centre and will support the creation</p> |

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| | | | | <p>of new jobs and housing opportunities within the area.</p> <p>To ensure the views of business are heard we will be consulting the local business community through the Hastings Business Improvement District.</p> |
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To calculate the overall assessment in the third column, use the following:

Low = Likelihood Low and Impact Low

High = Likelihood High and Impact Medium or High. Likelihood Medium and Impact High

Medium = All other possibilities

The table on page 8 of the guidance may be able to help further.

Generally:

Low Relevance = Short internal consultation

Medium Relevance = Limited consultation

High Relevance = Full consultation

Equalities Impact Assessment Part 2:

This is a 2-step process of gathering information and identifying equalities issues

Lead Impact Assessor (eg senior manager): Thomas Jackson, Assistant Planner

Other Impact assessors (eg front line staff): Kerry Culbert, Planning Policy Manager and Katy Wiseman, Senior Planner

Name of strategy, policy, project, service or “other”: Hastings Town Centre & Bohemia Area Action Plan

Evidence List

Please list the information you have looked at during this process (i.e Census www.eastsussexinfo.org.uk , Community Profile, Trent, PCT, Surveys):

- East Sussex in Figures (www.eastsussexinfo.org.uk)
- Council’s Corporate Plan (https://www.hastings.gov.uk/content/my_council/decisions_how/pdfs/Corporate_Plan_201819_-_202021.pdf)
- Equalities Act 2010
- Statement of Community Involvement (SCI)
- Lesbian, Gay, Bisexual and Trans Equalities in Hastings, Rother & East Sussex: LGBT Online Questionnaire - Initial Findings Report – Hastings and Rother Rainbow Alliance (HRRA) (http://www.hrra.org.uk/LGBT_Equalities_Questionnaire_Report.pdf)

Were there any evidence gaps?

There are no particular evidence gaps within the data for the Borough. Some of the data obtained for the Equalities Impact Assessment is based on the last census, which was undertaken seven years ago.

How were these resolved?

Where possible, steps have been taken to find the most recent evidence from a reliable and verified source. Where it is not possible to find information more recent than the 2011 data then the information is considered to be the best available to make assess against the policies.

Barriers and Solutions

To be completed following the barriers and solutions exercise. If you need more boxes, place the cursor in the bottom solutions box and go to Table and "Insert Row".

Existing Barriers

List existing barriers and their solutions here:

| Group | Barrier | Solution |
|---------------------------|---|--|
| Disability | There are difficulties in access for less mobile individuals particularly within the White Rock area of the AAP. | The AAP focuses on improving the pedestrian access and linkages through to the town centre and towards to seafront. |
| Gender | No known barrier identified | Not applicable. |
| Sexual Orientation | HRRA report suggests that there is a large number of LGBT individuals do not consider Hastings Town Centre to be a safe and inclusive space. | There needs to be a creation of welcoming and inclusive range of events and spaces that individuals can socialise in within the town centre. This can be met through the economic, physical and cultural regeneration of the town centre to provide opportunities for these events and spaces. |
| Race | As of 2011 there were 1,191 households that had no people with English as a main language and a further 159 with at least one person between the ages of 3-15 with English as a main language. This means there are a significant population that do not have access to current planning documents. | There is a translation service available on request. |
| Religion/ belief | No known barrier identified. | Not Applicable. |
| Age | There are difficulties in access for less mobile individuals particularly within the White Rock area of the AAP. | The AAP focuses on improving the pedestrian access and linkages through to the town centre and towards to seafront. |

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| Social and economic exclusion | <p>Hastings has a disproportionate percentage of people affected by income deprivation comparative to the rest of East Sussex, which many individuals excluded from opportunities within the AAP area.</p> <p>There is a lack of affordable housing within the Borough which means that economically disadvantaged individuals lack access to decent quality homes.</p> | <p>The AAP is focused on helping the economic regeneration of the town which will help to bring in new jobs and economic prosperity.</p> <p>The AAP looks to provide 820 homes within the AAP area with policy provisions to provide affordable housing across development sites.</p> |
| Transgender | <p>HRRA report suggests that there is a large number of LGBT individuals do not consider Hastings Town Centre to be a safe and inclusive space.</p> | <p>There needs to be a creation of a welcoming and inclusive range of events and spaces that individuals can socialise in. This can be met through the economic, physical and cultural regeneration of the town centre to provide opportunities for these events and spaces.</p> |
| Other | <p>Not applicable.</p> | <p>Not applicable.</p> |

Possible Barriers

List possible barriers, their likelihood and solutions here:

| Group | Barrier | Likelihood | Solution |
|-------------------|---|---------------------------------------|---|
| Disability | <p>The AAP document is long and may be complex to understand. There are also issues surrounding reading the document for visually impaired individuals.</p> | <p>High Medium Low</p> | <p>The use of a scoping section enables a quick summary and purpose of the document. The use of defined policy boxes in the document allows individuals to easily access the required policy that they may need. The Council will provide officer time on request for any individual requiring help with the document who is visually impaired. There will also be the provision of PDF and word formats on request with both programs having an audio "Read aloud" option.</p> |

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| Gender | There are not any possible barriers considered to affect gender as part of the AAP document. | High Medium Low | Not applicable. |
| Sexual Orientation | There are not any possible barriers considered to affect sexual orientation as part of the AAP document. | High Medium Low | Not applicable. |
| Race | If the AAP is adopted then there needs to be a full understanding of the policies that will be in the AAP area and how these policies will affect individuals. | High Medium Low | Ensure that it is advised that there are translation services for the planning documents if required. |
| Religion/ belief | There are not any possible barriers considered to affect religion or belief as part of the AAP document. | High Medium Low | Not applicable. |
| Age | Hastings has a projected ageing population. This will likely mean future issues with mobility and access both to and within the town centre and Bohemia area. | High Medium Low | The AAP has provisions to improve the pedestrian access through the AAP area to enable easier mobility through the town centre, White Rock and Bohemia area. |
| Social and economic exclusion | There could be higher build costs arising from the design policies proposed for inclusion within AAP | High Medium Low | Government guidance requires us to test the impact of our policies in order to demonstrate that the adoption of such policies will not negatively impact on future development. This is subject to scrutiny and forms part of the examination process. Plans have to found sound before that can be adopted. As part of this process we will actively promote awareness of the AAP through publication on both the Council's own website as well as through numerous external avenues including the press, social media and consultation events. This will ensure |

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| | | | that developers, property owners and other stakeholders will be aware of the requirements for development within the area and will be able to effectively factor in the costs required to make financial decisions. |
| Transgender | There are not any possible barriers considered to affect transgender individuals as part of the AAP document. | High Medium Low | Not applicable. |
| Other | Not applicable. | High Medium Low | Not applicable. |

Equalities Impact Assessment Part 3: Consultation

Consultation on Equalities Impact Assessments should be proportional to the relevance and scale of the assessment.

Currently the AAP is not available for the public until there is political sign-off for full consultation, which is expected to take place through the summer of 2018 if approved. Therefore there is not currently any consultation process that could be undertaken regarding the EIA for the AAP.

Once consultation has taken place for the AAP, the information obtained through this process will be fed back into the AAP and this EIA through a consultation statement which will be appended to this assessment and further amendments to the AAP and EIA will be made, subject to the feedback provided.

Please attach a summary of consultation feedback here:

Feedback on the proposed AAP will be submitted once consultation has taken place.

Equalities Impact Assessment Part 4: Further questions

Based on the findings of the Equalities Impact Assessment:

Were any changes made as a result of the consultation? Please describe:

Not applicable at this stage as consultation of the proposed document has not yet taken place.

Does the project now promote equality of opportunity?

Not applicable at this stage as consultation of the proposed document has not yet taken place.

Does it eliminate unlawful discrimination?

Not applicable at this stage as consultation of the proposed document has not yet taken place.

Are there any groups which would now be adversely affected by the project or experience barriers to full benefit?

Not applicable at this stage as consultation of the proposed document has not yet taken place.

Does it promote positive relations between different groups of people?