



**Equality Impact Assessment: Pre-Submission Version Hastings Local Plan (Regulation 19).**

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To accompany the Hastings Local Plan 2023-2041 – Pre-Submission Version

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**PRE-SUBMISSION VERSION**

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## **1. Executive Summary**

- 1.1. The Pre-Submission Hastings Local Plan 2023-2041 demonstrates a strong and comprehensive commitment to meeting the requirements of the Public Sector Equality Duty (PSED) under Section 149 of the Equality Act 2010.
- 1.2. Equality considerations have informed the preparation of the Plan from its earliest stages, including the development of the evidence base, the assessment of policy options, consultation and engagement activities, and the refinement of policies in response to identified impacts and stakeholder representations.
- 1.3. The assessment concludes that the Plan is likely to make a positive contribution to the three aims of the Public Sector Equality Duty by helping to eliminate discrimination, advance equality of opportunity and foster good relations between people who share protected characteristics and those who do not.
- 1.4. In particular, the Plan seeks to improve access to housing, employment, services, infrastructure, open space, sustainable transport and healthy environments, while recognising the specific needs of those with protected characteristics including, but not limited to, older people, people with a disability, children and young people, and Gypsy and Traveller communities. Consideration is also given to others who may face barriers to inclusion or are seldom heard such as people from a low socio-economic background, people experiencing homelessness or drug and alcohol dependence, vulnerable migrants, people in contact with the justice system and victims of modern slavery.
- 1.5. Where potential adverse impacts have been identified, the Plan incorporates mitigation measures and monitoring arrangements to reduce or eliminate those effects. While the achievement of equality outcomes will ultimately depend on the implementation of policies and the delivery of development over the plan period, the evidence presented in this assessment demonstrates that the Council has had due regard to its statutory equality responsibilities and that the Plan provides a robust framework for promoting a more inclusive, accessible and equitable Hastings up to 2041.

## 2. Background

- 2.1. Hastings Borough Council has a statutory duty to undertake an Equality Impact Assessment (EqIA) on any changes to policies, plans or services and decisions that could have a disproportionate impact on protected groups as defined by the Equality Act 2010.
- 2.2. An Equality Impact Assessment (EqIA) is a tool that helps make sure that the policies within the Local Plan 2023 – 2041 fulfil their intended function without unfairly disadvantaging protected groups. Policies and the implementation and monitoring of policies should, look to promote opportunities for equality that may previously have been missed or could be better supported, and mitigate negative and adverse impacts where possible.
- 2.3. Simply put, this means that policies should not place anyone with a protected characteristic at a disadvantage compared to someone who does not have a protected characteristic – either directly (intentionally) or indirectly (unintentionally).
- 2.4. However, it can be lawful to have specific rules and arrangements in place as long as they are justified. Policy H1 is one such example, which sets out the Council's approach to Specialist Housing for Older People. This is justified through robust evidence and the direction of the National Planning Policy Framework (2024) to consider the specific housing needs certain groups, such as older people and looked after children (LAC).
- 2.5. If any negative impacts are identified as resulting in unlawful discrimination, they must be removed from the draft Plan. It is in this way that we can ensure that commitment to equality and diversity forms a 'golden thread' throughout the plan-making process. Policy approaches that have not been taken forward due to the potential for unlawful discrimination or disproportionate negative impacts are set out in **Appendix 2** of this document.
- 2.6. In addition to the approach set out in the Equality Act 2010, the Council has referred to the approach set out in [Beyond Box Ticking: A short guide to meaningfully assessing Local Plan policy impacts on equality and inclusion](#)<sup>1</sup> published by the Town and County Planning Association and other relevant documents including RTPI Guidance on Gender and Planning, Mental Health and Dementia.

### What is a protected group?

- 2.7. The Equality Act 2010 identifies nine groups known as 'protected characteristics'. These are:
  - Race
  - Religion or Belief
  - Disability
  - Sex

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<sup>1</sup> [EqIA Guide3.qxd](#)

- Gender Reassignment<sup>2</sup>
- Sexual Orientation
- Age
- Marriage or Civil Partnership<sup>3</sup>
- Pregnancy and Maternity<sup>4</sup>

2.8. It is further acknowledged that social exclusion can result in additional disadvantage within Hastings, a Borough with high levels of deprivation currently ranked Has the third most deprived lower-tier local authority in England, after Blackpool and Manchester; it is more deprived than 99% of local authority districts. It is important that groups who may potentially experience social exclusion are given due consideration throughout the impact assessment process. Key groups identified as experiencing social exclusion include:

- People experiencing homelessness
- Lone parents
- Transient or new communities
- Carers
- People with drug and alcohol dependence
- Refugees and Asylum seekers
- People in contact with the justice system
- Low literacy/ numeracy or without qualifications
- Survivors of domestic violence and victims of modern slavery
- Members of sub-cultures
- Unemployed people
- People in receipt of welfare benefits
- Residents of social rented housing
- Low-income households

2.9. Disadvantage due to homelessness is widespread and is considered one of the key drivers of inequality in the Borough. At the end of July 2026, 629 households were living in temporary accommodation, Child homelessness also remains a significant concern, with Shelter reporting that around 1 in 28 children in Hastings were homeless and living in temporary accommodation.

### 3. Area Profile: Hastings<sup>5</sup>

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<sup>2</sup> Considered more broadly in terms of gender identity, including, but not limited to, the trans and non-binary communities. [See Item 17: Motion, Cabinet Wednesday 19 July 2024](#). "This Council celebrates the successes of the transgender community but also recognises that additional support is sometimes needed by them as a section of our society that is too often marginalised, a victim of hate crime, or who may struggle to access the help they need due to other barriers that occur in relation to their status as a trans or non-binary person. The Council resolves... to continue to foster a culture of safety, acceptance, and inclusion for the trans and non-binary community in our actions as a council."

<sup>3</sup> Relevant only to the first aim of the public sector equality duty: eliminating discrimination

<sup>4</sup> <https://www.equalityhumanrights.com/en/equality-act/protected-characteristics>

<sup>5</sup> The assembly of data in this area summary has been supported through the use of Perplexity AI using publicly available data interpreted by East Sussex County Council through the [East Sussex in Figures Data portal](#). This information was last verified on 22 August 2026.

### Location and settlement

- 3.1. Hastings is a coastal borough in south-east England and one of East Sussex's five lower-tier local authorities. Hastings Borough Council sits within the wider area administered by East Sussex County Council. The borough boundary is consistent with the settlement boundary, with the A259 trunk road providing the main east–west coastal route and the A21 running south–north through the town. Its land boundary is surrounded by Rother district<sup>6</sup>.
- 3.2. Hastings is entirely urban: all **53 Lower Super Output Areas (LSOAs)** are classified as **urban city or town**. The most populated parts of the borough are the central areas of Hastings and St Leonards, the eastern areas around Tressell, Baird and Ore, and the northern parts of St Leonards around Silverhill and Hollington<sup>7</sup>.
- 3.3. The borough had approximately **90,600 residents in 2022**. The area profile's population projection indicates growth of around **1,650 people, or 2%, between 2022 and 2026**, although the strongest growth is expected among older residents<sup>8</sup>.

*Table 1: Population projections by age group, ESiF*

| Age group | 2022   | 2026 projection | Change |
|-----------|--------|-----------------|--------|
| 0–17      | 19,022 | 18,668          | –2%    |
| 18–64     | 53,958 | 54,334          | +1%    |
| 65–84     | 17,000 | 18,473          | +9%    |
| 85+       | 2,729  | 2,887           | +6%    |
| All ages  | 92,709 | 94,362          | +2%    |

- 3.4. The age profile varies significantly within the borough. Higher proportions of young children are found particularly in Ore, Tressell, Baird, Hollington, Wishing Tree and parts of West St Leonards, Conquest and Silverhill. Higher concentrations of older residents are found in Silverhill, St Helens and Maze Hill.

### Population and community

- 3.5. Hastings has a population profile broadly similar to England, but with a slightly higher proportion of people aged 50–74 and a slightly lower proportion of people aged 20–44. Around **85% of residents identified as White British or Northern Irish** in the 2021 Census, while “Other White” was the largest ethnic group outside White British or Northern Irish<sup>9</sup>.
- 3.6. The borough has a relatively high birth rate. The area profile reports that Hastings consistently has a higher live-birth rate than East Sussex and England; in 2020, the birth rate for all ages was **59 per 1,000 women aged 15–44**, compared with 53 in

<sup>6</sup> [eastsussexinfigures](#)

<sup>7</sup> [eastsussexinfigures](#)

<sup>8</sup> [eastsussexinfigures](#)

<sup>9</sup> [eastsussexinfigures](#)

East Sussex and 55 in England. Birth rates were particularly high among women under 30<sup>10</sup>. However, this should be viewed in the wider context of a period of objectively low birthrates nationally and internationally.

- 3.7. The population is not evenly distributed across the borough. Central Hastings and St Leonards, Baird, Tressell, Ore, Silverhill and Hollington contain substantial concentrations of residents due to the presence of denser forms of housing, while demographic and socioeconomic conditions differ considerably between neighbourhoods. This local variation is important when interpreting borough-wide averages.

### Housing and living conditions

- 3.8. Hastings has a distinctive housing tenure pattern compared with the rest of East Sussex. It has the county's **lowest proportion of owner-occupied housing, at 57%, and the highest proportion of privately rented housing, at 29%**<sup>11</sup>.
- 3.9. This suggests a relatively high level of exposure to private-rented-sector issues, including rent increases, insecure tenure, property condition, landlord practices and housing affordability. Housing may also be an important factor in population turnover and in the ability of households to remain in the borough or to 'form'<sup>12</sup>.
- 3.10. The area profile reports that overcrowding was lower in Hastings than in England and Wales and East Sussex for both socially rented households, at **14%**, and privately rented households, at **13%**. However, lower overcrowding does not remove wider concerns around affordability, homelessness, housing quality or fuel poverty<sup>13</sup>.

### Deprivation and inequality

- 3.11. Deprivation is a defining feature of Hastings. The 2025 Index of Multiple Deprivation summary ranks Hastings as the **third most deprived lower-tier local authority in England**, after Blackpool and Manchester; it is more deprived than 99% of local authority districts<sup>14</sup>.
- 3.12. At neighbourhood level:
- **18 of Hastings' 53 LSOAs—34%—are in the most deprived 10% nationally.**
  - The most deprived LSOA is **Hastings 005A**<sup>15</sup>, ranked seventh nationally.

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<sup>10</sup> [eastsussexinfigures](#)

<sup>11</sup> [eastsussexinfigures](#)

<sup>12</sup> A 'forming' household is a new household unit created by the movement of part of an existing household to a new residence. For example, working age children leaving the family home to live independently. ONS identifies a range of classifications that could be considered a 'household', including those in shared accommodation. Insufficient housing stock can prevent new households from forming.

<sup>13</sup> [eastsussexinfigures](#)

<sup>14</sup> [eastsussexinfigures.org](#)

<sup>15</sup> In Baird Ward

- The least deprived LSOA is **Hastings 002D**<sup>16</sup>, ranked 24,589 nationally.
- Nearly half—**49%—of Hastings LSOAs are in the most deprived 20% nationally**<sup>17</sup>.

3.13. The most deprived neighbourhoods are concentrated mainly in Hollington, Hastings Town Centre, the seafront and St Leonards, Tressell, Baird and north-west Ore. Earlier local analysis also found that Hastings had no LSOAs in the least deprived national quintile<sup>18</sup>.

3.14. The 2025 deprivation analysis identifies particularly serious income-related pressures. Around **50% of children in Hastings are estimated to live in income-deprived families**, placing Hastings 26th nationally on this measure. Two nearby neighbourhoods, Hastings 005A<sup>19</sup> and 005D<sup>20</sup>, are among the most income-deprived areas in the South East<sup>21</sup>.

3.15. The concentration of deprivation means that borough-wide averages can conceal very substantial differences between neighbourhoods.

### **Economy, employment and education**

3.16. Hastings has weaker labour-market and earnings indicators than the other East Sussex districts and boroughs. The area profile reports that:

- Median full-time earnings are the **lowest in East Sussex** and below the English average.
- The proportion of working-age people in employment was **72.9%**, the lowest among the East Sussex districts and boroughs in the cited comparison.
- Hastings has higher proportions of working-age residents with lower-level qualifications than East Sussex and England.
- Around **31%** of the working-age population held level 4 qualifications or above, the second-lowest proportion among the East Sussex districts and boroughs in the cited comparison<sup>22</sup>.

3.17. These indicators point to overlapping challenges involving household income, employment security, skills, transport, access to childcare and access to higher-paid jobs. They also help explain why changes to public and VCS services, local employment support, housing costs or transport may have different effects in Hastings from more affluent parts of East Sussex.

3.18. The borough nevertheless has important assets, including its coastal location, established hierarchy of town centres, access to primary, secondary and FE education, health and care infrastructure, cultural identity and substantial community

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<sup>16</sup> St Helens Ward

<sup>17</sup> [eastsussexinfofigures.org](https://eastsussexinfofigures.org)

<sup>18</sup> [eastsussexinfofigures](https://eastsussexinfofigures.org)

<sup>19</sup> Baird Ward

<sup>20</sup> Tressell Ward

<sup>21</sup> [eastsussexinfofigures.org](https://eastsussexinfofigures.org)

<sup>22</sup> [eastsussexinfofigures](https://eastsussexinfofigures.org)

and voluntary-sector activity. Economic indicators should therefore be understood as describing inequalities and pressures rather than defining the borough as a whole.

## Health and wellbeing

- 3.19. Hastings has the lowest life expectancy of the East Sussex districts and boroughs in the period reported:

| Group   | Life expectancy at birth, 2018–2020 |
|---------|-------------------------------------|
| Males   | 78.0 years                          |
| Females | 81.8 years                          |

Table 2: Life expectancy at birth, ESiF

- 3.20. Life expectancy is lower in the most disadvantaged parts of the borough. For 2016–2020, male life expectancy ranged from **74.8 years in Central St Leonards to 81.5 years in Ashdown**. For females, the range was **78.5 years in Central St Leonards to 87.3 years in Ashdown**<sup>23</sup>.
- 3.21. Premature mortality—deaths before age 75—was highest in Hastings among the East Sussex districts and boroughs in the cited comparison. Premature mortality was also highest in the most deprived neighbourhoods, demonstrating the close relationship between health outcomes and wider social conditions.
- 3.22. Across all ages, dementia was the leading cause of death in Hastings in 2022, followed by heart failure. For deaths under 75, ischaemic heart disease was the leading cause, followed by chronic lower respiratory disease<sup>24</sup>.
- 3.23. The borough has a substantial population with long-term illness or disability. The area profile records **20,525 people with a limiting long-term illness in the 2021 Census**, projected to increase to **25,048 by 2035**. Projected overall disability is expected to increase from 17,398 in 2020 to 20,698 in 2035<sup>25</sup>.
- 3.24. Health-related behaviours are also important:
- Smoking prevalence is significantly worse than England.
  - Alcohol-related hospital admissions are significantly worse than England.
  - Alcohol-specific mortality is higher, although the difference is not statistically significant.
  - Hastings is significantly worse for the proportion of residents achieving the recommended “five a day”.
  - The proportion of physically active adults is significantly better than England.

<sup>23</sup> [eastsussexinfigures](#)

<sup>24</sup> [eastsussexinfigures](#)

<sup>25</sup> [eastsussexinfigures](#)

- Adult overweight and obesity levels are similar to England<sup>26</sup>.

### Services and infrastructure

3.25. Hastings has a substantial local health and care infrastructure, including:

- One acute hospital: **Conquest Hospital**.
- Nine GP practices and three branch practices.
- Twenty community pharmacies.
- Sixty care homes, recorded in April 2024.
- One independent school and 25 maintained schools, recorded in January 2024<sup>27</sup>.

3.26. The Hastings and St Leonards Primary Care Network is the only PCN with a footprint within Hastings, although its area also extends into Rother. It is the largest PCN in East Sussex, with approximately **101,000 registered patients**<sup>28</sup>, which is a reflection of the dense urban area it serves.

3.27. Hastings' residents rely heavily on East Sussex Healthcare NHS Trust. In 2022/23, the Trust accounted for:

- **94% of emergency admissions** for Hastings residents.
- **84% of elective admissions**.
- **89% of first outpatient attendances**.
- **96% of A&E attendances**<sup>29</sup>.

3.28. Hastings has the highest rate of new contacts with Adult Social Care for both working-age adults and older people. It also has the highest rate of people receiving long-term support among the East Sussex districts and boroughs in the cited data. The borough also has the highest rate of looked-after children and child protection plans, although it has the second-highest rate of referrals to children's social care<sup>30</sup>.

3.29. These figures indicate substantial demand for health, social care and children's services. They also suggest that service accessibility, prevention, early intervention and coordination between statutory and community services are particularly important.

### Environment and connectivity

3.30. Hastings is a densely urban coastal borough with access to seafront, green spaces and blue spaces. Its main road connections are the A259 along the coast and the A21 northwards. The coastal location provides environmental, recreational and cultural assets but can also create issues associated with coastal exposure, seasonal demand, transport connectivity and access between neighbourhoods.

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<sup>26</sup> [eastsussexinfigures](#)

<sup>27</sup> [eastsussexinfigures](#). Year on year actuals may differ, including those reported in the Infrastructure Delivery Plan which uses different forms of measurement.

<sup>28</sup> [eastsussexinfigures](#)

<sup>29</sup> [eastsussexinfigures](#)

<sup>30</sup> [eastsussexinfigures](#)

3.31. Per-capita domestic, industrial and commercial carbon dioxide emissions have fallen substantially. Hastings' emissions declined from **5.0 tonnes per person in 2005 to 2.4 tonnes in 2020**, a reduction of approximately 52%. Transport emissions fell less than domestic and industrial/commercial emissions, declining by 29% over the same period<sup>31</sup>. However, level of emissions from both domestic and commercial properties remains high and the greatest single source of emissions in the borough, in excess of transport which is a departure from national data which identifies transport as the overall highest nationwide source of carbon emissions.

3.32. The borough's urban form means that public access to nearby, good-quality green and blue space may be important for health and wellbeing. Access<sup>32</sup> should be considered alongside mobility, disability, income, age and the safety of public spaces.

### Overall assessment

3.33. Hastings is a coastal, entirely urban borough of approximately 90,600 people with a strong local identity, significant health and care infrastructure and important coastal, cultural and community assets. It also experiences pronounced socioeconomic inequality, low earnings, relatively low employment, high deprivation, poorer health outcomes and substantial demand for health and social care.

3.34. The most important features for policy, service planning or an impact assessment are:

- Large differences between neighbourhoods, with deprivation concentrated in identifiable parts of the borough.
- High levels of child income deprivation and a comparatively high birth rate.
- A relatively large private-rented sector and low home ownership.
- Lower employment, earnings and higher-level qualification rates than local and national comparators.
- The lowest life expectancy in East Sussex and a strong deprivation-related health gap.
- Significant disability and long-term illness, with projected increases.
- High demand for adult social care and children's social care.
- Heavy reliance on Conquest Hospital and East Sussex Healthcare NHS Trust.
- A population projected to grow modestly overall, with the greatest growth among people aged 65–84.

3.35. For robust decision-making, Hastings-wide statistics should be supplemented with additional evidence base to inform the development and implementation of the

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<sup>31</sup> [eastsussexinfigures](#)

<sup>32</sup> Accessible green and blue spaces are defined as those that can be accessed 'by right' (because it is intended that the public should access them). Such spaces include parks, woodland, the beach and bathing waters. Private or restricted green spaces that are not normally accessible are not considered accessible green spaces for the purposes of this assessment. This includes subscription gardens, private fields or paddocks, restricted cliff erosion zones and railway cuttings.

Local Plan by decision makers including Housing and Economic Development Needs Assessment, Strategic Flood Risk Assessment, Net Zero Carbon Technical Evidence, Infrastructure Delivery Plan and a Sustainability Appraisal<sup>33</sup>.

## Section References

- 3.36. East Sussex in Figures, **District and Borough overview – Hastings**, supplied ArcGIS report and overview page. The page describes the report as a summary of population information for each district and borough. [eastsussexinfigures.org](https://eastsussexinfigures.org)
- East Sussex in Figures, **JSNA: Hastings borough area profile 2024**. [eastsussexinfigures.org](https://eastsussexinfigures.org)
  - East Sussex in Figures, **Indices of Deprivation 2025 by district – Hastings**. [eastsussexinfigures.org](https://eastsussexinfigures.org)
  - East Sussex in Figures, **Indices of Deprivation 2025 – Analysis for East Sussex**. [eastsussexinfigures.org](https://eastsussexinfigures.org)
- 3.37. **Data note:** The indicators come from different reporting periods, including the 2021 Census, ONS 2022 population estimates, 2020–2022 health and economic measures, 2022/23 NHS and social-care data, and the 2025 Index of Multiple Deprivation. Figures should therefore not be interpreted as if they all describe the same point in time.
- 3.38. The most up to date area profile can be accessed through the East Sussex in Figures [data portal](https://eastsussexinfigures.org).
4. **Equality and diversity profile: Hastings, East Sussex**
- 4.1. This profile is designed to accompany an **Equality Impact Assessment (EqIA)** for the pre-submission Hastings Local Plan 2023-2041. It summarises available evidence for the protected characteristics under the **Equality Act 2010**, using the East Sussex in Figures equalities profile and its linked summary data. The figures describe the resident population and should be used as a baseline for considering who may be affected by a proposal; they do not, by themselves, demonstrate that a particular policy will have a positive or negative impact.
- 4.2. The latest figures available in the supplied profile are drawn principally from the **2021 Census**, the **2022 ONS mid-year population estimates**, and administrative data available in 2023<sup>34</sup>.

## Population profile<sup>35</sup>

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<sup>33</sup> [eastsussexinfigures.org](https://eastsussexinfigures.org)

<sup>34</sup> [eastsussexinfigures.org](https://eastsussexinfigures.org)

<sup>35</sup> Sources: ONS 2022 mid-year estimates; 2021 Census; DWP Stat-Xplore; ONS births data, as reproduced by East Sussex in Figures. [eastsussexinfigures.org](https://eastsussexinfigures.org)

Table 3: Population profile

| Characteristic                                          | Hastings               | East Sussex comparator    | Relevance for an EqIA                                                                                                                                              |
|---------------------------------------------------------|------------------------|---------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Population aged 0–15                                    | 17.9%                  | 16.5%                     | Hastings has a comparatively larger child and young-person population. Consider impacts on children, young carers, families and education-related access.          |
| Population aged 16–64                                   | 61.4%                  | 57.1%                     | A relatively high working-age share means employment, transport, housing, childcare and access to services may be significant considerations.                      |
| Population aged 65+                                     | 20.7%                  | 26.4%                     | Hastings has a smaller older population than East Sussex overall, but older residents remain a significant group requiring accessible services and communications. |
| Female                                                  | 51.4%                  | 52.0%                     | Consider sex-related differences in safety, caring responsibilities, health, employment and service use.                                                           |
| Male                                                    | 48.6%                  | 48.0%                     | Consider sex-related differences in safety, caring responsibilities, health, employment and service use.                                                           |
| Disabled under the Equality Act definition, 2021 Census | 20,342 people          | 110,553 people countywide | Disability-related barriers should be assessed, including physical, sensory, cognitive and mental-health-related barriers.                                         |
| DLA and PIP claimants, August 2023                      | 9,307                  | 40,140 countywide         | This is an administrative measure and should not be treated as the total disabled population. It indicates potential demand for accessible services and support.   |
| Live births, 2022                                       | 896                    | 4,411 countywide          | Relevant to pregnancy, maternity, parents, infants and family services.                                                                                            |
| Birth rate, 2022                                        | 19.2 per 1,000 females | 15.4                      | Hastings had the highest rate among the East Sussex districts shown.                                                                                               |
| Teenage pregnancy rate, 2021                            | 18.5 per 1,000 females | 11.6                      | Consider impacts on young parents, education, health, childcare, housing and income.                                                                               |

## Protected characteristics

### Age

- 4.3. Hastings has a **younger age profile** than East Sussex overall: **17.9%** of residents were aged 0–15, **61.4%** were aged 16–64 and **20.7%** were aged 65 or over. The comparatively high proportion of children and working-age residents means that an EqlA should consider effects across the life course rather than focusing only on older people.

### Disability

- 4.4. The 2021 Census recorded **20,342 Hastings residents as disabled under the Equality Act definition**. A further indicator shows **9,307 Hastings residents claiming Disability Living Allowance or Personal Independence Payment in August 2023**. These measures are different: Census disability data are self-reported and cover activity limitation, while benefit data reflect eligibility and take-up of specific benefits<sup>36</sup>.
- 4.5. Disability may interact with age, sex, pregnancy and maternity, poverty, ethnicity and housing conditions. The total disabled population should not be inferred solely from benefit claimant numbers.

### Pregnancy and maternity

- 4.6. Hastings recorded **896 live births in 2022**, with a birth rate of **19.2 per 1,000 females**, compared with **15.4 across East Sussex**. The share of births to UK-born mothers was **84.9%**, compared with **85.8% countywide**. The teenage pregnancy rate was **18.5 per 1,000 females in 2021**, compared with **11.6 across East Sussex**<sup>37</sup>.
- 4.7. An EqlA should assess whether a proposal affects those who are currently pregnant, new parents and infants.
- 4.8. Pregnancy and maternity should be considered both as a protected characteristic and in combination with age, disability, race, religion or belief and socioeconomic disadvantage.

### Race and ethnicity

- 4.9. In the 2021 Census, **91.4% of Hastings residents identified with a White ethnic group**, compared with **93.9% across East Sussex**. Therefore, **8.6% identified with Black, Asian or other minority ethnic groups**, compared with **6.1% countywide**. Hastings had the highest proportion of mixed ethnic groups among the districts shown, at **2.9%**, and **1.5% identified with another ethnic group**, including Arab or another ethnic group<sup>38</sup>.
- 4.10. Selected Hastings figures were:

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<sup>36</sup> [eastsussexinfigures.org](https://eastsussexinfigures.org)

<sup>37</sup> [eastsussexinfigures.org](https://eastsussexinfigures.org)

<sup>38</sup> [eastsussexinfigures.org](https://eastsussexinfigures.org)

Table 4: Ethnic groupings by percentage, ESiF

| Ethnic group                     | Hastings |
|----------------------------------|----------|
| All White ethnic groups          | 91.4%    |
| White British and Northern Irish | 85.1%    |
| Other White                      | 6.3%     |
| All Asian or Asian British       | 2.8%     |
| All Black or Black British       | 1.4%     |
| All Mixed ethnic groups          | 2.9%     |
| Other ethnic group               | 1.5%     |
| Arab                             | 0.4%     |

- 4.11. Hastings' ethnic profile is more diverse than East Sussex overall, although the majority of residents identify as White. However, a relatively small population group may still experience a substantial or disproportionate impact including gypsy and traveller communities.

### Religion or belief

- 4.12. Hastings had a notably high proportion of residents reporting **no religion: 51.4%**, compared with **44.7% across East Sussex**. **Christianity was reported by 37.8%**, compared with **45.9% countywide**. A further **6.6% did not state a religion**. Among named minority religions, **1.9% identified as Muslim**, **0.6% Buddhist**, **0.5% Hindu**, **0.2% Jewish** and **0.9% another religion**<sup>39</sup>.

### Sex

- 4.13. The 2022 population estimate comprised **51.4% females and 48.6% males**. Sex should be considered where a proposal affects safety, health, reproductive services, caring responsibilities, employment, income, public facilities or participation<sup>40</sup>.
- 4.14. The EqIA should avoid treating women and men as homogeneous groups. It should consider intersectional impacts, including those affecting:
- Lone parents.
  - Carers.
  - Pregnant women and new mothers.
  - Disabled women and men.

<sup>39</sup> [eastsussexinfigures.org](https://eastsussexinfigures.org)

<sup>40</sup> [eastsussexinfigures.org](https://eastsussexinfigures.org)

- Trans people, where sex-related service arrangements intersect with gender identity.
- People experiencing domestic or sexual abuse.
- People facing occupational or income inequalities.

### **Sexual orientation**

- 4.15. Among Hastings residents aged 16 and over, **4.6% identified as LGB+ in the 2021 Census**, compared with **3.3% across East Sussex**. Hastings had the highest proportion among the districts shown<sup>41</sup>.
- 4.16. The Census measure records people's self-identification and may undercount some groups because of non-response, privacy concerns or limited disclosure.

### **Gender reassignment**

- 4.17. The 2021 Census recorded **0.5% of Hastings residents aged 16 and over as having a gender identity different from their sex registered at birth**, compared with **0.4% across East Sussex**<sup>42</sup>.

### **Marriage and civil partnership**

- 4.18. In Hastings, **36.9%** of residents aged 16 and over were single, **37.5% were married in an opposite-sex marriage**, **0.5% were married in a same-sex marriage**, **0.3% were in a registered same-sex civil partnership**, **12.7% were divorced or formerly in a dissolved same-sex civil partnership**, and **6.3% were widowed or a surviving same-sex civil partner**.
- 4.19. This category applies in practice to unlawful employment discrimination and is not normally a consideration of EqIA of Local Development Plans. However, the relatively high proportion of single residents may also be relevant to housing, social connection, care and affordability, although marital status should not be used as a proxy for household circumstances.

### **Cross-cutting issues**

- 4.20. Several characteristics overlap and may intensify disadvantage. For Hastings, particular combinations requiring attention include:
- Young people and teenage parents.
  - Disabled people who face digital, transport or physical-access barriers.
  - Minority ethnic residents who may also need access to culturally appropriate services.
  - LGB+ and trans people experiencing stigma, poor mental health, housing insecurity or safety concerns.
  - Older people living alone or with disability.
  - Women, particularly those who are pregnant, caring for children or experiencing domestic abuse.

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<sup>41</sup> [eastsussexinfofigures.org](https://eastsussexinfofigures.org)

<sup>42</sup> [eastsussexinfofigures.org](https://eastsussexinfofigures.org)

- People with no religion and people from minority faith communities.
- Residents affected by poverty, insecure housing, unemployment or limited digital access, alongside one or more protected characteristics.

4.21. The East Sussex equalities resource provides additional Census briefings on ethnicity, language and religion; Gypsy, Roma and Traveller communities; sexual orientation and gender identity; veterans; health and unpaid care; and disability. These should be consulted where the proposal has a potentially material impact on any of those groups.

### **Implications for the equality impact assessment**

4.22. The assessment should use this profile as the demographic baseline and then add proposal-specific evidence. In particular, it should:

- Identify which protected-characteristic groups are likely to use, be affected by or be excluded from the proposal.
- Distinguish direct impacts from indirect impacts and consider both positive and negative effects.
- Assess disproportionate impacts rather than relying only on population size.
- Consider intersectionality, especially disability combined with age, pregnancy, ethnicity, sexual orientation or gender identity.
- Test accessibility in practice through consultation with affected residents and representative organisations.
- Record mitigation, including accessible communications, reasonable adjustments, language support, flexible arrangements, alternative non-digital routes and staff training.
- Specify monitoring measures, including uptake, complaints, satisfaction, accessibility failures and outcomes by relevant characteristic where lawful and statistically robust.
- Explain data limitations, including different reference years, Census non-response, small numbers and the distinction between population estimates and administrative claimant data.

4.23. The profile indicates that Hastings differs from East Sussex overall through its younger age structure, higher proportion of residents identifying as LGB+, higher proportion reporting no religion, greater ethnic diversity than the county average, higher birth and teenage pregnancy rates, and a substantial disabled population. These differences should be treated as prompts for focused assessment and engagement, not as evidence that an impact has already occurred.

### **Sources and limitations**

4.24. East Sussex in Figures, **Equalities summary and reports**, which states that the resource provides equalities data by protected characteristic for East Sussex and its districts and boroughs, together with more detailed Census briefings. [eastsussexinfigures.org](https://eastsussexinfigures.org)

- 4.25. East Sussex in Figures, **Equalities summary March 2024**, including the Hastings figures reproduced above. The source notes identify ONS 2022 mid-year estimates, the 2021 Census, DWP Stat-Xplore and ONS births data. [data.eastsussexinfigures.org](https://data.eastsussexinfigures.org)
- 4.26. ArcGIS report: **Equalities – district | Hastings | Report Builder for ArcGIS**, accessed via the East Sussex in Figures specialist-information page. The accessible page directs users to the equalities summary and reports and to area profiles. [eastsussexinfigures.org](https://data.eastsussexinfigures.org)
- 4.27. The figures are not all from the same year. Population, age, sex and births data are from 2022; disability, ethnicity, religion, marital status, sexual orientation and gender identity data are principally from the 2021 Census; and DLA/PIP data are from August 2023. Percentages may not sum exactly to 100 because of rounding. Census categories measure self-identification and may not capture everyone who belongs to a protected group.

## **5. Equality Impact Assessment Framework Questions for the Hastings Local Plan 2023-2041**

### **Purpose of Assessment**

- 5.1. The purpose of this Equality Impact Assessment (EqIA) is to assess whether the Pre-Submission Hastings Local Plan 2023-2041 is likely to have positive, negative, neutral or disproportionate impacts on individuals or communities sharing protected characteristics under the Equality Act 2010, together with people experiencing socio-economic disadvantage, deprivation, homelessness and housing insecurity and/ or other intersectional issues as set out in the introductory section above. The assessment should examine whether the Plan eliminates discrimination, advances equality of opportunity and fosters good relations insofar as a Local Plan is capable of doing so through its remit as local planning policy.
- 5.2. It should be noted that the Local Plan is a policy framework that sets out where, how and in what form development and associated infrastructure should be delivered over the plan period. It is not responsible for the content of individual planning applications, the delivery of development following the successful granting of planning permission nor may it convey specific rights to develop an individual site on any one developer or group. This assessment can therefore only assess the compliance of the framework itself with the relevant legislation.

### **Cross-Cutting Assessment Questions**

- 5.3. The assessment requires that officers consider a number of cross-cutting and specific questions when assessing the policies of the plan both individually and as a cohesive whole. In simple terms these are:
- Who may benefit?
  - Who may be disadvantaged?
  - Could impacts be direct, indirect, cumulative or mitigatable?
  - Is evidence available?
  - Has the Regulation 18 consultation identified any previously unidentified equality impacts to be addressed?

### **Age**

- 5.4. Considerations include impacts on older people, children and young people including housing, accessibility, schools, safety, transport, play and ageing in place.

### **Disability**

- 5.5. Considerations include accessible housing, inclusive design, transport, specialist accommodation, healthcare access, mental health and hidden disabilities.

### **Sex**

- 5.6. Considerations include safety, employment, caring responsibilities, domestic abuse needs and health inequalities.

### **Pregnancy and Maternity**

- 5.7. Considerations include housing, maternity services, childcare access and accessibility for parents and carers.

### **Race and Ethnicity**

- 5.8. Considerations include housing, employment, community cohesion, displacement risks and inclusive consultation.

### **Religion or Belief**

- 5.9. Considerations include places of worship, faith community needs and access to religious facilities.

### **Sexual Orientation**

- 5.10. Considerations include safe and inclusive communities and equal access to services and housing.

### **Gender Reassignment**

- 5.11. Considerations include inclusive environments, facilities and engagement.

### **Marriage and Civil Partnership**

- 5.12. N/A. Assessment proxy potential captured under interactional considerations within other groups.

### **Poverty and Socio-Economic Disadvantage**

- 5.13. Considerations include affordable housing, employment, cost of living, deprivation and geographic inequality.

### **Homelessness and Housing Insecurity**

- 5.14. Considerations include homelessness reduction/ prevention, temporary accommodation, overcrowding, displacement and vulnerable households.

### **Carers**

- 5.15. Considerations include access to housing, transport, healthcare and support services.

### **Multiple Disadvantage and Cumulative Effects**

- 5.16. Considerations include where multiple protected characteristics or other factors may be present and cumulative impacts over the Plan period.

### **Overall Equality Assessment**

- 5.17. The assessment as a whole will identify Positive Impacts, Negative Impacts, Mitigation Measures, Monitoring Arrangements and whether the Public Sector Equality Duty has been met.

## **6. Description of the Pre-Submission (Regulation 19) Hastings Local Plan 2023 – 2041**

6.1. The Pre-Submission Hastings Local Plan (Regulation 19) contains both strategic and non-strategic policies, including a schedule of site-specific policies for employment, traveller and housing sites within Hastings Borough. The plan has a significant focus on climate change as part of the response to the declared Climate Emergency<sup>43</sup>, taking a 'climate in all policies' (CIAP) approach which incorporates mitigation and adaptation throughout. Other cross-cutting themes that form part of the 'golden thread' are those within the Health and Wellbeing suite, referred to as 'health in all policies' (HIAP).

### **Development objectives**

6.2. To improve the health and wellbeing of Hastings' communities and reduce deprivation by:

- Addressing climate change and supporting our carbon neutral ambition through reduced transport emissions, energy efficient buildings and expanded green infrastructure.
- Providing a local plan that keeps our communities connected to all our places of work, leisure and services through affordable, sustainable transport modes.
- Achieving and sustaining a thriving, inclusive and diverse economy, with a strong manufacturing sector including new creative, high tech and green industries with a focus on developing a circular economy creating jobs and skills opportunities for local people, delivering at least 51,297sqm of new employment floorspace.
- Increasing the supply and mix of new homes that people can afford and want in well-designed existing, or new neighbourhoods that make it easier to lead a more active lifestyle.
- Ensuring developers provide or contribute to the infrastructure needs arising from new development, such as open space, sports and play facilities.

6.3. These objectives should be tested for possible equalities impacts and have therefore been assessed within the matrix in **Appendix 1**.

### **Strategic policies**

- Strategic Policy 1 (SP1): Directing Growth
- Strategic Policy 2 (SP2): New and Affordable Housing
- Strategic Policy 3 (SP3): Business Development – Office and Industrial
- Strategic Policy 4 (SP4): Business Development – Town Centres
- Strategic Policy 5 (SP5): Meeting the Challenge of Climate Change
- Strategic Policy 6 (SP6): Renewable and Low Carbon Technologies
- Strategic Policy 7 (SP7): Protecting and Enhancing the Historic Environment
- Strategic Policy 8 (SP8): Conserving and Enhancing the Natural Environment
- Strategic Policy 9 (SP9): Managing Coastal Erosion and Flood Risk
- Strategic Policy 10 (SP10): Transport Infrastructure
- Strategic Policy 11 (SP11): Healthy and Safe Communities
- Strategic Policy 12 (SP12): Infrastructure Delivery Strategy

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<sup>43</sup> Hastings climate emergency declaration

- Strategic Policy 13 (SP13): Development Viability

#### **Development Potential Area Policies:**

- Development Potential Area 1 (D1): Land at Breadsell

#### **Regeneration Area policies:**

- Regeneration Area Policy 1 (R1): Hastings Central
- Regeneration Area Policy 3 (R3): St Johns Road

#### **Non-Strategic Policies**

- Policy H1: Specialist Housing for Older People
- Policy H2: Shared Housing
- Policy H3: Conversion of Existing Dwellings
- Policy H4: Self build and Custom housebuilding
- Policy H5: Accommodation for Traveller Communities
- Policy H6: Housing Renewal
- Policy H7: Temporary Residential Uses
- Policy E1: Protecting and Enhancing Employment sites, areas and allocations
- Policy E2: Skills, Employment and Supply Chain
- Policy E3: Primary Shopping Areas
- Policy E4: Food, Drink, Entertainment and the Night-time Economy
- Policy E5: The Visitor Economy
- Policy E6: Outdoor Visitor Accommodation
- Policy SC1: Key Design Principles
- Policy SC2: Housing mix, Accessibility and Adaptability
- Policy SC3: Sustainable Design and Construction
- Policy SC4: Alteration and Extension of Dwellings
- Policy SC5: Proposals Affecting the Significance and Setting of Heritage Assets
- Policy SC6: Sustainable development and heritage protection
- Policy SC7: Changes to building elevations and roofs in Conservation Areas
- Policy SC8: Shopfronts, Advertisements and Commercial Frontages
- Policy SC9: The High Weald National Landscape and Other Areas of Landscape Value
- Policy SC10: Habitat Protection, Biodiversity and Net Gain
- Policy SC11: Trees, Woodland and Hedgerows
- Policy SC12: Green and Blue Infrastructure
- Policy SC13: Urban Greening Factor
- Policy SC14: Provision, Enhancement and Retention of Sports and Recreation Facilities
- Policy SC15: Ground Behaviour, Geodiversity and Land Stability
- Policy SC16: Flood Risk and Drainage
- Policy SC17: Coastal Change Management
- Policy SC18: Pollution and Hazards
- Policy SC19: Environmental Nuisance
- Policy SC20: Community Facilities
- Policy ID1: Planning Obligations (Section 106)
- Policy ID2: Access, Services and Parking
- Policy ID3: Open space, Sports and Recreation

- Policy ID4: Utilities Infrastructure and New Connections
- Site allocations

### **Publication (Regulation 19)**

- Publication process: Online
- Publication process: Digitally disengaged groups
- Publication process: Use of AI

### **Assessment of consultation: Regulation 18 (2021 and 2026)**

6.4. The council undertook two Regulation 18 Consultations to inform the development of the Regulation 19 pre-submission version plan. The comments received during the consultations influenced the strategies and policies included in the pre-submission version (Regulation 19) new local plan. These consultations took place as follows:

- Regulation 18 Draft Local Plan (2021) – Identified a series of policy options and site allocations.
- Regulation 18 Preferred Options Draft Local Plan (2026) – A developed draft of the proposed Local Plan setting out the preferred position.

### **Regulation 18 Draft Local Plan (2021)**

6.5. Consultation for the Regulation 18 Draft Local Plan (2021) took place for 8 weeks between 27 January 2021 and 24 March 2021. The Regulation 18 draft version of the Local Plan was intended to provide a basis for discussion with the public and stakeholders about what the strategy for the future development of Hastings should be and the policies needed to deliver it. It contained a limited number of high-level policies, indications of potential policies that the council were seeking views on, a number of development focus areas, and a series of site allocations.

6.6. A summary of consultation activity, including how different groups were reached, can be found in the [Interim Consultation Statement](#).

### **Recommendations and Actions**

6.7. Following the 2021 Regulation 18 draft Local Plan consultation, representations were fully reviewed. Additional engagement with key stakeholders took place following to ensure that material considerations were addressed and additional evidence base could be developed to further test policy approaches where necessary. The draft policies of the Regulation 18 Preferred Options draft Local Plan (2026) were then assessed for potential equalities impacts in their early draft form and where the potential for negative impact on protected characteristics or socially excluded groups was identified, proportionate amendments were made. Where a policy position was rejected due to disproportionate equality impact, this has been documented in **Appendix 2**.

### **Regulation 18 Preferred Options Draft Local Plan (2026)**

6.8. Consultation for the Regulation 18 Draft Local Plan (2026) was carried out between 19 February 2026 and 7 April 2026. In total, 539 individuals and organisations responded, 71% using the online portal, 26% used email, and 3% sent in paper submissions. A total of 1,866 submissions were made across the Plan, comprising 2,288 individual representations. Of those, 232 were in support, 1,107 were objections, and 949 were comments.

6.9. The consultation was carried out in accordance with the Council's Statement of Community Involvement 2025. Following an Equalities Impact Screening and resourcing review, the following consultation activities were selected and carried out:

*Table 5: Table of consultation activities.*

| <b>Consultation Method</b>     | <b>Date(s)</b>                  | <b>Details</b>                                                                                                                                                                                                                                                                                              |
|--------------------------------|---------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Notification email / letter    | 19 February 2026                | Consultees on the Council's database were sent an email or letter notifying them of the consultation and explaining how to respond.                                                                                                                                                                         |
| Online consultation portal     | 19 February 2026 – 7 April 2026 | Representations could be submitted via the Opus Consultation website <a href="https://hastings.oc2.uk/">https://hastings.oc2.uk/</a> . The portal allowed respondents to comment on individual chapters and policies.                                                                                       |
| Council website                | 19 February 2026 – 7 April 2026 | All consultation documents were published on the Council's website at <a href="https://www.hastings.gov.uk/planning/policy/new-local-plan/localplanreg18B/">https://www.hastings.gov.uk/planning/policy/new-local-plan/localplanreg18B/</a> . A dedicated Local Plan page set out key information and FAQs. |
| Press notice / local newspaper | 20 February 2026                | A formal notice was published on the <a href="https://www.hastings.gov.uk">hastings.gov.uk</a> website on 20 February in accordance with Regulation 18 requirements.                                                                                                                                        |
| Social media                   | 19 February 2026 - 7 April 2026 | The consultation was publicised via the Council's official social media channels, including Facebook, X, Instagram, LinkedIn.                                                                                                                                                                               |
| Public Consultation events     | 4 March 2026 – 16 March 2026    | Five public drop-in consultation events were organised by Hastings Borough Council.                                                                                                                                                                                                                         |
| Special interest groups        | 4 March 2026 – 27 March 2026    | 6 targeted special interest group workshops were held.                                                                                                                                                                                                                                                      |
| Pre-existing Community events  | 3 March 2026 – 27 March 2026    | Officers attended five existing community events and locations.                                                                                                                                                                                                                                             |

|             |                                 |                                                                                                                                                             |
|-------------|---------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Hard copies | 20 February 2026 - 7 April 2026 | Hard copies of the consultation documents were available to view at three public libraries across Hastings and the Hastings Borough Council contact centre. |
|-------------|---------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|

- 6.10. Alongside this, the council operated a voicemail service and an email service that could be used by members of the community to seek advice on how to access the consultation from dedicated council planning officers. A summary of consultation activity, including how different groups were reached, can be found in the [Consultation Report](#).

## 7. Summary of Impact Assessment

- 7.1. This Equality Impact Assessment highlights the potential for the Pre-Submission (Regulation 19) Local Plan to positively influence equality of opportunity throughout the borough. Through identifying ten different themes for policies, the Local Plan aims to provide a blueprint to create an inclusive borough that fosters good relations and better health outcomes for all residents. Conclusions regarding the assessment of these policies and monitoring recommendations are provided below in summary form.

### Impact Assessment Conclusions

- 7.2. **Spatial Strategy (Policy SP1).** The Spatial Strategy directs development to areas that are sustainably located, resisting out-of-centre services, and directing new or enhanced employment facilities of a type that would result in poor amenity for residential communities away from residential areas to the borough's industrial estates. The Spatial Strategy demonstrates positive effects for all groups.
- 7.3. **Natural Environment Policies (SP8, SC9-14)** promote safe, inclusive, and healthy spaces by protecting existing green and blue assets, enhancing green and blue infrastructure, promoting enhancement to publicly accessible recreational spaces and incentivising design choices for new built development that integrate essential site infrastructure (e.g. SuDS and footpaths) with green and blue infrastructure solutions. These measures could support positive equality outcomes for those more vulnerable to social exclusion and negative health effects, including those associated with mental health and physical wellbeing, where these are linked to their environment. A number of site Policies, including HS1, HS2, HS18, HS25, HS26 and HS27 set out strict requirements for the provision and maintenance of either new or enhanced publicly accessible areas of open space and/ or equipped play. This may result in positive effects for a range of protected groups due to the increased access to public open space including older people, young people, and those with disability or impairment. It also has the potential to foster greater community cohesion by creating well-maintained spaces suitable for activities and social interaction.

- 7.4. **Heritage Protection Policies (SP7, SC5-8)** support cultural inclusion and identity by protecting and enhancing heritage assets with religious significance, which may positively impact religious and ethnic minority groups. They also foster a sense of community cohesion amongst groups with a special interest in the historic identity of their neighbourhood, a particular asset or the Borough as a whole. Site Policy HS25 and Annex 1 of the Plan has the potential to increase community access to a designated heritage asset (Former Convent of the Holy Child Jesus, Magdalen Road) by providing a framework for any future development of the site that incorporates public access from neighbouring communities. This may result in positive effects for a range of protected groups due to the increased access to public open space including older people, young people, and those with disability or impairment and an improvement in access to the historic environment for all groups.
- 7.5. **Environmental Protection and Safe Development policies (SP9, SC15-19)** seek to ensure that development delivers positive benefits for the safety and protection of both new and existing communities by managing land stability, flood risk, drainage, pollution, hazard and nuisance effectively and with clear accountability for maintenance and management of any newly introduced measures. These policies have the potential to benefit all residents, with the greatest effect likely to be for those who have the greatest potential to experience negative health impacts, injury or economic loss should these policies not be incorporated into the Plan. It should be noted that many of the most deprived areas of the Borough are those most vulnerable to the effects of ground movement, flood risk and coastal change.
- 7.6. **Housing Delivery Policies (SP2, SC2)**, including those related to the delivery of **specialist forms of Housing (H1-H7)**, seek to establish the quantum and type of housing that should be delivered during the plan period, including affordable and accessible housing, gypsy and traveller pitches, specialist housing for older people, shared housing, and community-led housing. Policies also set a framework for the provision of temporary residential uses. These policies are designed to reflect the diverse needs of the local population, both now and in the future. There is the potential for positive effects for older people, younger working age people, people with disability or impairment, families, gypsy and traveller communities, communities of identity, such as community house builders, and those in need of temporary residential options. Specialist forms of accommodation can carry the potential to result in negative effects for protected groups or communities of interest. For example, specialist housing for older people may result in poor access to local leisure, cultural and social activities without strong sustainable transport links and accessible design, increasing the potential for isolation. Where policies address specialist forms of housing, they also incorporate mitigations for any potential negative impacts to reduce or eliminate them entirely. For example, the vulnerabilities to crime from outside sources experienced by the van dwelling community may be mitigated through the policy requirement for safe design and site management plans.
- 7.7. **Economy and Town Centre policies (SP3, SP4, E1-6)** recognise the importance of promoting social inclusion, wellbeing and economic opportunity for protected characteristic groups. Policies seek to protect and enhance key industries, ensure that new town centre functions are delivered in existing centres accessible by the community, and set out a clear position on the delivery of new or enhanced visitor attractions and accommodation in the Resort Area and for outdoor visitor

accommodation. They also seek to promote skills development and the use of local labour in construction in order to improve opportunities for local people. There is potential for positive impact across all groups, particularly for young people, and those experiencing economic disadvantage.

- 7.8. **Health, Wellbeing, and Design Policies (SP11, SC1)** recognise the potential for negative health impacts if development is not delivered in accordance with the policies of the plan. They set out clear requirements for the use of Health Impact Assessment Screening on larger major developments and a clear set of principles for the delivery of good design, including where clear regard should be given to protected groups- for example, the emphasis within SC1 to ensure that developments maximise access for all, including but not limited to people with a physical, psychiatric, cognitive or sensory impairment. There is the potential for positive impacts for all protected groups arising from these policies.
- 7.9. **Climate Change policies (SP5, SP6, SP9 and SC3 and SC16-17)** target a reduction in living costs and improvement in environmental quality to deliver positive equality impacts for groups disproportionately affected by energy poverty and the effects of climate change locally including water scarcity, coastal change and flood risk. These benefits should be achieved through energy-efficient design, energy use intensity limits, provision of onsite or strategic scale renewable energy and careful consideration of operational carbon. The policy addresses the capabilities of the premises as built to meet these standards, and does not prohibit or penalise greater occupier energy or water consumption where this is necessary (for example, for medical or religious reasons).
- 7.10. **Infrastructure and Community Facility Policies (SP10, SP12 and SP13, SC20, ID1-4)** provide a framework to improve access to essential services, transport, and community facilities in ways that support the wellbeing, independence, and inclusion of protected characteristic groups. The policies also take into account the lifetime of the plan and express how delivery of necessary infrastructure as a result of these policies will be prioritised and implemented. The policies have specific regard for the need to allow policy exemptions in some limited cases in order to support the needs of protected groups- for example, by exempting the provision of disabled spaces from the Low Car Parking Area requirements.
- 7.11. **Site Allocation Policies and Approach to Applications (HA1, EA1, HS suite, ES suite, TP suite)** set out the overall approach to ensure a policy-compliant proposal is received with each application that addresses all the policy requirements set out above. They also set out any site-specific requirements that may differ from the requirements set out in the general policies of the plan- for example, where onsite play or open space must be secured. Taken together, these policies have the potential to deliver positive effects through their delivery both by delivering housing and employment development and through the wider benefits to biodiversity, green and blue infrastructure, walking and cycling improvements, minimal utilities bills, heritage conservation interests and flood risk.

## 8. Monitoring

- 8.1. It is recommended that the actions identified in Appendix 3 are incorporated into the Local Plan monitoring and development, in order to ensure the Plan as implemented is capable of delivering as anticipated.

## **9. Assessment Outcome**

- 9.1. Equality considerations have informed the preparation of the Plan from its earliest stages, including the development of the evidence base, the assessment of policy options, consultation and engagement activities, and the refinement of policies in response to identified impacts and stakeholder representations. The assessment concludes that the Plan is likely to make a positive contribution to the three aims of the Public Sector Equality Duty by helping to eliminate discrimination, advance equality of opportunity and foster good relations between people who share protected characteristics and those who do not. In particular, the Plan seeks to improve access to housing, employment, services, infrastructure, open space, sustainable transport and healthy environments, while recognising the specific needs of older people, disabled people, children and young people, Gypsy and Traveller communities, people experiencing poverty or homelessness, and other groups who may be at greater risk of disadvantage within Hastings.
- 9.2. Where potential adverse impacts have been identified, the Plan incorporates mitigation measures and monitoring arrangements to reduce or eliminate those effects. While the achievement of equality outcomes will ultimately depend on the implementation of policies and the delivery of development over the plan period, the evidence presented in this assessment demonstrates that the Council has had due regard to its statutory equality responsibilities and that the Plan provides a robust framework for promoting a more inclusive, accessible and equitable Hastings up to 2041.

## Appendix 1

### Assessing Impact by protected characteristic against draft plan policies

This matrix sets out protected groups and the potential for positive, negative and neutral impacts upon each protected group. A 'neutral' impact is chosen where the policy is unlikely to have any negative impact, is likewise unlikely to result in quantifiable positive impacts and is still considered a 'good' outcome. Where there is potential for negative impact, or impact should be measured, recommendations for monitoring or implementation of policies will be made.

It is also identified that a significant percentage of the population are economically disadvantaged and the impacts of policies on economic disadvantaged groups will be additionally assessed, including the additional cumulative impacts upon a protected characteristic experiencing economic inequality.

Key:

Neutral impact (=)

Potential for positive impact for some groups (+)

Potential for negative impact for some groups (-)

| #  | Objective or policy                                                                                                                                                         | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                           |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| O1 | To improve the health and wellbeing of Hastings' communities and reduce deprivation by addressing climate change and supporting our carbon neutral ambition through reduced | +   | =   | +          | =    | =                  | =                  | =                   | +                       | =                             | <p>The objective is written positively and unlikely to result in negative impacts.</p> <p>Addressing the negative effects of climate change will support positive health outcomes for our oldest and youngest</p> |

| #  | Objective or policy                                                                                                                               | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                                                                                                           |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | transport emissions, energy efficient buildings and expanded green infrastructure.                                                                |     |     |            |      |                    |                    |                     |                         |                               | <p>residents, and those experiencing health inequality.</p> <p>Energy efficient buildings can help reduce fuel poverty and cost of living expenditure for the most economically vulnerable communities.</p> <p>Expanded GBI can allow more of our residents to benefit from green and blue spaces close to home or workplace.</p> |
| O2 | ...by providing a local plan that keeps our communities connected to all our places of work, leisure and services through affordable, sustainable | +   | +   | +          | +    | +                  | +                  | +                   | +                       | +                             | <p>The objective is written positively and unlikely to result in negative impacts.</p> <p>Any improvement to the affordability and sustainability of</p>                                                                                                                                                                          |

| #  | Objective or policy                                                                                                                                                                              | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                                                                            |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | transport modes.                                                                                                                                                                                 |     |     |            |      |                    |                    |                     |                         |                               | transport will benefit all groups, by strengthening opportunities to access essential services, places of worship, and opportunities to build cohesion by spending time socially or in the workplace with members of the same or different special interest groups (bonding and bridging capital). |
| O3 | ...by achieving and sustaining a thriving, inclusive and diverse economy, with a strong manufacturing sector including new creative, high tech and green industries with a focus on developing a | +   | +   | +          | +    | +                  | +                  | +                   | +                       | =                             | <p>The objective is written positively and unlikely to result in negative impacts.</p> <p>A diverse economy takes into account the different needs of all groups and, where possible, ensures there</p>                                                                                            |

| #  | Objective or policy                                                                                                | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                                                                                                                                   |
|----|--------------------------------------------------------------------------------------------------------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | circular economy creating jobs and skills opportunities for local people, delivering new employment floorspace.    |     |     |            |      |                    |                    |                     |                         |                               | are adequate opportunities across all sectors to meet specific group needs. Examples include opportunities to start up new businesses or grow existing businesses created by newly available floorspace, increased seasonal/ flexible work to accommodate those who are unable to work in a '9-5' format, and skilled jobs to retain the newly qualified. |
| O4 | ...by increasing the supply and mix of new homes that people can afford and want in well-designed existing, or new | +   | +   | +          | +    | +                  | +                  | +                   | +                       | =                             | <p>The objective is written positively and unlikely to result in negative impacts.</p> <p>New homes will contribute</p>                                                                                                                                                                                                                                   |

| #  | Objective or policy                                                                                                                                                                                                                              | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                             |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | neighbourhoods that make it easier to lead a more active lifestyle.                                                                                                                                                                              |     |     |            |      |                    |                    |                     |                         |                               | <p>towards meeting housing needs in the borough, with new affordable homes supporting those in housing need.</p> <p>Well-designed neighbourhoods take into account the needs of all users.</p>                      |
| O5 | To improve the health and wellbeing of Hastings' communities and create new opportunities by ensuring developers provide or contribute to the infrastructure needs arising from new development, such as open space, sports and play facilities. | +   | +   | +          | +    | +                  | +                  | +                   | +                       | =                             | <p>The objective is written positively and unlikely to result in negative impacts.</p> <p>Addressing the infrastructure needs arising from new development ensures any potential for disadvantage is mitigated.</p> |

| #   | Objective or policy | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-----|---------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SP1 | Directing Growth    | +   | +   | +          | +    | +                  | +                  | +                   | +                       | =                             | <p>The policy is written positively and unlikely to result in negative impacts.</p> <p>By directing growth to sustainable locations, with good natural surveillance, good public transport links and access to amenities including places of worship and community facilities, it is likely to overall result in a positive impact for the majority of protected groups in terms of their safety, wellbeing and access to essential services.</p> <p>Overall, the policy is likely to achieve positive</p> |

| #   | Objective or policy        | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                                                                                                                                            |
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|     |                            |     |     |            |      |                    |                    |                     |                         |                               | outcomes against all strands of the public sector equality duty for the majority of protected groups.                                                                                                                                                                                                                                                              |
| SP2 | New and affordable housing | +   | +   | +          | =    | +                  | +                  | +                   | +                       | +                             | <p>The policy is written positively and unlikely to result in negative impacts.</p> <p>The policy sets out the overall strategic approach towards delivering a supply of new and affordable housing, through allocations, windfall and large-scale regeneration. It is supportive of proposals for specialist accommodation, and the proposed dwelling mix for</p> |

| # | Objective or policy | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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|   |                     |     |     |            |      |                    |                    |                     |                         |                               | <p>affordable housing is reflective of identified needs.</p> <p>The policy includes wording that is supportive of windfall delivery of sufficient gypsy and traveller sites to meet any unmet need that cannot be delivered through potential allocations.</p> <p>Overall, the policy is likely to achieve positive outcomes against all strands of the public sector equality duty for the majority of protected groups as well as those experiencing economic or social disadvantage.</p> |

| #   | Objective or policy                       | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| SP3 | Business development (B/ Eg(ii/iii) uses) | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | <p>The policy is written positively and unlikely to result in negative impacts.</p> <p>Outcomes of activities that promote access to employment, skills and jobs should be monitored to ensure all groups are represented and none are excluded.</p> <p>Overall, the policy is likely to achieve neutral outcomes against all strands of the public sector equality duty for the majority of protected groups, with the potential for positive outcomes for as those</p> |

| #   | Objective or policy                 | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                                                                                                              |
|-----|-------------------------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                                     |     |     |            |      |                    |                    |                     |                         |                               | experiencing economic disadvantage by promoting employment growth and removing barrier to accessing the labour market.                                                                                                                                                                                                               |
| SP4 | Business Development - Town Centres | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | <p>The policy is written positively and unlikely to result in negative impacts.</p> <p>The location and catchment of town centres, including vacancy rates and availability of core services should be regularly monitored and reviewed to maximise equalities outcomes.</p> <p>Overall, the policy is likely to achieve neutral</p> |

| #   | Objective or policy                     | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                                                             |
|-----|-----------------------------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                                         |     |     |            |      |                    |                    |                     |                         |                               | outcomes against all strands of the public sector equality duty for the majority of protected groups, with the potential for positive outcomes for as those experiencing economic disadvantage by promoting employment growth and removing barriers to accessing the labour market. |
| SP5 | Meeting the challenge of climate change | +   | +/- | +/-        | +/-  | =                  | =                  | +/-                 | +/-                     | =                             | <p>The policy is written positively and unlikely to result in negative impacts.</p> <p>The policy may result in minor to significant positives for a number of protected groups</p>                                                                                                 |

| #   | Objective or policy                               | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                   |
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|     |                                                   |     |     |            |      |                    |                    |                     |                         |                               | due to the improved quality of life that an energy efficient building can offer both commercial and residential occupiers in the form of improved maintenance schedules, ambient temperatures, and lower operating costs. |
| SP6 | Renewable and Low Carbon Technologies             | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | The policy is written positively and unlikely to result in negative impacts.                                                                                                                                              |
| SP7 | Protecting and Enhancing the Historic Environment | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | The policy is written positively and unlikely to result in negative impacts.                                                                                                                                              |
| SP8 | Conserving and Enhancing the Natural Environment  | +/- | +/- | +/-        | +/-  | +/-                | +/-                | +/-                 | +/-                     | +/-                           | The policy is written positively. There is the potential for both positive                                                                                                                                                |

| # | Objective or policy | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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|   |                     |     |     |            |      |                    |                    |                     |                         |                               | <p>and negative impacts for a number of groups depending on how effectively this policy is implemented.</p> <p>When designing schemes, improvements to green and blue infrastructure positively enhance the experience of spaces. It is recognised that some members of the community may have limited access to nature, due to physical access constraints and/or feeling vulnerable or uncomfortable.</p> <p>New and enhanced green infrastructure and open</p> |

| #     | Objective or policy                     | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                              |
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|       |                                         |     |     |            |      |                    |                    |                     |                         |                               | spaces should be designed with the needs of all potential users in mind. Further guidance is provided in policy SC1, SC12, SC13 and SC14.                                                                                                            |
| SP9   | Managing Coastal Erosion and Flood Risk | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | <p>The policy is written positively and unlikely to result in negative impacts.</p> <p>Measures to mitigate or adapt to flooding and coastal change should consider the needs of all users. General design principles are set out in policy SC1.</p> |
| SP 10 | Transport Infrastructure                | =   | =   | +          | =    | =                  | =                  | =                   | +                       | =                             | The policy is written positively and unlikely to result in negative impacts.                                                                                                                                                                         |

| #     | Objective or policy  | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                                                                                                                    |
|-------|----------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|       |                      |     |     |            |      |                    |                    |                     |                         |                               | <p>The policy focus on improving the transport network in general and impact are likely to be positive for the majority of groups.</p> <p>The upgrading of Ore station to provide an accessible south platform will have positive impacts for a number of groups including those with mobility issues or with non-ambulatory children.</p> |
| SP 11 | Health and Wellbeing | +   | +   | +          | +    | +                  | +                  | +                   | +                       | =                             | <p>The policy is written positively and unlikely to result in negative impacts.</p> <p>Policy SP11 sets out a strategic approach to health and</p>                                                                                                                                                                                         |

| #    | Objective or policy              | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                     |
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|      |                                  |     |     |            |      |                    |                    |                     |                         |                               | wellbeing, with detailed guidance delivered through the non-strategic policies of the plan. The requirement for Health Impact Assessments for larger major developments is likely to have a positive impact for all groups.                 |
| SP12 | Infrastructure Delivery Strategy | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | <p>The policy is written positively and unlikely to result in negative impacts.</p> <p>Local plans must ensure that the level of growth planned for is accompanied by appropriate essential infrastructure to prevent negative effects.</p> |
| SP13 | Development Viability            | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | The policy is written positively and unlikely to                                                                                                                                                                                            |

| #  | Objective or policy | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                               |
|----|---------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    |                     |     |     |            |      |                    |                    |                     |                         |                               | <p>result in negative impacts.</p> <p>The policy sets out a clear priority order of planning obligations to ensure that those that avoid or mitigate the negative impacts of development on all groups are prioritised.</p>                           |
| D1 | Land at Breadsell   | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | <p>The policy is written positively. There is some potential for negative impact in terms of access to services due to the more peripheral location of this area.</p> <p>The policy incorporates mitigation in the form of clear requirements for</p> |

| #  | Objective or policy                | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                                              |
|----|------------------------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    |                                    |     |     |            |      |                    |                    |                     |                         |                               | transport and access.                                                                                                                                                                                                                                                |
| R1 | Hastings Central Regeneration Area | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | <p>The policy is written positively and unlikely to result in negative impacts.</p> <p>This policy encourages regeneration. The implementation of this policy will require reference to the detailed guidance set out in the non-strategic policies of the plan.</p> |
| R3 | St Johns Road Regeneration Area    | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | <p>The policy is written positively and unlikely to result in negative impacts.</p> <p>This policy encourages regeneration. The implementation of this policy will</p>                                                                                               |

| #                | Objective or policy                              | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                         |
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|                  |                                                  |     |     |            |      |                    |                    |                     |                         |                               | require reference to the detailed guidance set out in the non-strategic policies of the plan.                                                                                                                                   |
| Site allocations | Policies HA1, EA1, all HS, HSS, TP and ES sites. | +   | +   | +          | +    | +                  | +                  | +                   | +                       | =                             | <p>These policies have the potential to deliver positive effects through their delivery.</p> <p>Where there is the potential for negative impact, this potential is considered to be mitigated through policy requirements.</p> |
| H1               | Specialist Housing for Older People              | +   | =   | +/=        | =    | =                  | =                  | =                   | =                       | =                             | <p>The policy is written positively and unlikely to result in negative impacts.</p> <p>This policy sets out detailed guidance on the council's approach to</p>                                                                  |

| #  | Objective or policy | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                                                                                      |
|----|---------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    |                     |     |     |            |      |                    |                    |                     |                         |                               | meeting the needs of an older people who may require specialist accommodation, to ensure this is well designed and of good quality. Where potential for negative impact has been identified, this has been mitigated through requirements for appropriate amenity space and access to sustainable transport. |
| H2 | Shared Housing      | +   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | <p>The policy is written positively and unlikely to result in negative impacts.</p> <p>This policy sets out detailed guidance on the council's approach to</p>                                                                                                                                               |

| #  | Objective or policy                     | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                             |
|----|-----------------------------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    |                                         |     |     |            |      |                    |                    |                     |                         |                               | ensuring shared housing is well designed and of good quality. The potential for negative impact has been mitigated through clear requirements for management plans. |
| H3 | Conversion of Existing Dwellings        | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | The policy is written positively and unlikely to result in negative impacts.                                                                                        |
| H4 | Self build and Custom housebuilding     | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | The policy is written positively and unlikely to result in negative impacts.                                                                                        |
| H5 | Accommodation for Traveller Communities | =   | =   | =          | +    | =                  | =                  | =                   | =                       | =                             | The policy is written positively and unlikely to result in negative impacts.<br><br>The wording of the policy is designed to                                        |

| #  | Objective or policy        | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                                                                                          |
|----|----------------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    |                            |     |     |            |      |                    |                    |                     |                         |                               | streamline the planning process for traveller communities when seeking permission for pitches in appropriate locations.                                                                                                                                                                                          |
| H6 | Housing Renewal            | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | <p>The policy is written positively and unlikely to result in negative impacts.</p> <p>The policy seeks no net reduction in affordable housing where housing renewal is proposed. Potential for negative impacts due to net loss of affordable housing as a result of renewal have been partially mitigated.</p> |
| H7 | Temporary Residential Uses | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | The policy is written positively and unlikely to                                                                                                                                                                                                                                                                 |

| #  | Objective or policy                                   | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                                                                          |
|----|-------------------------------------------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    |                                                       |     |     |            |      |                    |                    |                     |                         |                               | <p>result in negative impacts.</p> <p>The potential for negative impacts of vulnerable groups has been mitigated through policy criteria including a requirement for appropriate servicing and management of sites.</p>                                                                          |
| E1 | Protecting and Enhancing Employment Land and Premises | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | <p>The policy is written positively and unlikely to result in negative impacts.</p> <p>The policy safeguards locations that will support the delivery of local job opportunities, which has the potential to benefit those having difficulty accessing the labour market in the longer term.</p> |

| #  | Objective or policy                 | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                                                                                                                                             |
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|    |                                     |     |     |            |      |                    |                    |                     |                         |                               |                                                                                                                                                                                                                                                                                                                                                                     |
| E2 | Skills, Employment and Supply Chain | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | <p>The policy is written positively and unlikely to result in negative impacts.</p> <p>The policy supports moving those furthest from the labour market closer to the labour market, and encourages the provision of local employment opportunities during construction. This has the potential to benefit those having difficulty accessing the labour market.</p> |
| E3 | Primary Shopping Areas              | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | <p>The policy is written positively and unlikely to result in negative impacts.</p>                                                                                                                                                                                                                                                                                 |

| #  | Objective or policy                                   | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                        |
|----|-------------------------------------------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    |                                                       |     |     |            |      |                    |                    |                     |                         |                               | The location and catchment of town centres, including vacancy rates and availability of core services should be regularly monitored and reviewed to maximise equalities outcomes.                                                              |
| E4 | Food, Drink, Entertainment and the Night-time Economy | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | <p>The policy is written positively and unlikely to result in negative impacts.</p> <p>Ensuring amenity and safety matters are a material consideration when assessing new evening economy premises is beneficial to all protected groups.</p> |

| #  | Objective or policy           | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                                                                                                                                                                          |
|----|-------------------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    |                               |     |     |            |      |                    |                    |                     |                         |                               | For additional information regarding this policy, see Appendix 2.                                                                                                                                                                                                                                                                                                                                |
| E5 | The Visitor Economy           | +/= | =   | =          | =    | =                  | =                  | =                   | +/=                     | =                             | <p>The policy is written positively and unlikely to result in negative impacts.</p> <p>Groups who are more likely to require the flexibility or seasonality of the job opportunities created through the visitor economy may be considered to benefit from this policy, as it is generally supportive of growth in this area as well as resisting loss of existing employment opportunities.</p> |
| E6 | Outdoor Visitor Accommodation | +/= | =   | =          | =    | =                  | =                  | =                   | +/=                     | =                             | The policy is written positively                                                                                                                                                                                                                                                                                                                                                                 |

| #   | Objective or policy   | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                                                                                                                                         |
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|     |                       |     |     |            |      |                    |                    |                     |                         |                               | <p>and unlikely to result in negative impacts.</p> <p>Groups who are more likely to require the flexibility or seasonality of the job opportunities created through the visitor economy may be considered to benefit from this policy, as it is generally supportive of growth in this area as well as resisting loss of existing employment opportunities.</p> |
| SC1 | Key Design Principles | +/= | +/= | +/=        | +/=  | +/=                | +/=                | +/=                 | +/=                     | =                             | <p>The policy is written positively and unlikely to result in negative impacts and has a likelihood to result in beneficial</p>                                                                                                                                                                                                                                 |

| #   | Objective or policy                         | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                                                                                                    |
|-----|---------------------------------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                                             |     |     |            |      |                    |                    |                     |                         |                               | <p>outcomes for all groups.</p> <p>SC1 is a non-strategic policy that sets out key design principles, including those around inclusive design.</p>                                                                                                                                                                         |
| SC2 | Housing mix, Accessibility and Adaptability | +   | =   | +          | =    | =                  | =                  | =                   | +                       | =                             | <p>The policy is written positively and unlikely to result in negative impacts and has a likelihood to result in beneficial outcomes.</p> <p>SC2 is a non-strategic policy that sets out key design principles regarding the accessibility and future adaptability of homes delivered during the lifetime of the plan.</p> |

| #   | Objective or policy                   | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                  |
|-----|---------------------------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SC3 | Sustainable Design and Construction   | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | <p>The policy is written positively and unlikely to result in negative impacts.</p> <p>SC3 is a non-strategic policy that is supportive of development that maximises potential for energy efficiency and climate change mitigation.</p> |
| SC4 | Alteration and Extension of Dwellings | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | <p>The policy is written positively and unlikely to result in negative impacts.</p> <p>SC4 is a non-strategic policy that sets out key principles around amenity and design for alteration or extension of dwellings.</p>                |
| SC5 | Proposals Affecting the               | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | The policy is written positively                                                                                                                                                                                                         |

| #     | Objective or policy                                                  | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                      |
|-------|----------------------------------------------------------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|------------------------------------------------------------------------------|
|       | Significance and Setting of Heritage Assets                          |     |     |            |      |                    |                    |                     |                         |                               | and unlikely to result in negative impacts.                                  |
| SC6   | Sustainable Development and Heritage Protection                      | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | The policy is written positively and unlikely to result in negative impacts. |
| SC7   | Changes to building elevations and roofs in conservation areas       | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | The policy is written positively and unlikely to result in negative impacts. |
| SC8   | Shopfronts, Advertisements and Commercial Frontages                  | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | The policy is written positively and unlikely to result in negative impacts. |
| SC9   | The High Weald National Landscape and Other Areas of Landscape Value | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | The policy is written positively and unlikely to result in negative impacts. |
| SC 10 | Habitat Protection, Biodiversity and Net Gain                        | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | The policy is written positively and unlikely to result in negative impacts. |

| #     | Objective or policy                                                      | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                      |
|-------|--------------------------------------------------------------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|------------------------------------------------------------------------------|
| SC 11 | Trees, Woodland and Hedgerows                                            | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | The policy is written positively and unlikely to result in negative impacts. |
| SC 12 | Green and Blue Infrastructure                                            | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | The policy is written positively and unlikely to result in negative impacts. |
| SC 13 | Urban Greening Factor                                                    | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | The policy is written positively and unlikely to result in negative impacts. |
| SC 14 | Provision, Enhancement and Retention of Sports and Recreation Facilities | =   | +/= | +/=        | =    | =                  | =                  | =                   | =                       | =                             | The policy is written positively and unlikely to result in negative impacts. |
| SC 15 | Ground Behaviour, Geodiversity and Land Stability                        | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | The policy is written positively and unlikely to result in negative impacts. |

| #     | Objective or policy     | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                                                                                                                                                  |
|-------|-------------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|       |                         |     |     |            |      |                    |                    |                     |                         |                               | This policy relates to safeguarding the health and wellbeing of all residents and preventing negative impacts.                                                                                                                                                                                                                                                           |
| SC 16 | Flood Risk and Drainage | +/= | =   | +/=        | =    | =                  | =                  | =                   | +/=                     | =                             | <p>The policy is written positively and unlikely to result in negative impacts.</p> <p>Safe access and exit should consider non-ambulant people (including infants, older people, people with disabilities) and those with potentially restricted movement (including people with disabilities, pregnant individuals and the elderly) when designing the safe access</p> |

| #     | Objective or policy       | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                           |
|-------|---------------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|       |                           |     |     |            |      |                    |                    |                     |                         |                               | and egress of schemes.                                                                                                                                                                                                                            |
| SC 17 | Coastal Change Management | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | The policy is written positively and unlikely to result in negative impacts.                                                                                                                                                                      |
| SC 18 | Pollution and Hazards     | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | <p>The policy is written positively and unlikely to result in negative impacts.</p> <p>Ensures existing pollutants are remediated or mitigated and new pollutants are not introduced to the environment, preventing associated health issues.</p> |
| SC 19 | Environmental Nuisance    | =   | =   | +          | =    | =                  | =                  | =                   | =                       | =                             | The policy is written positively and unlikely to result in negative impacts.                                                                                                                                                                      |

| #     | Objective or policy  | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                    |
|-------|----------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|       |                      |     |     |            |      |                    |                    |                     |                         |                               | <p>There is the potential for minor positive effects due to reduced potential for sensory overload through nuisance intrusion.</p> <p>Generally, safeguards wellbeing through ensuring high standards of amenity.</p>                      |
| SC 20 | Community Facilities | +/- | +/- | +/-        | +/-  | +/-                | +/-                | +/-                 | +/-                     | =                             | <p>The policy is written positively and unlikely to result in negative impacts.</p> <p>Any loss of community facilities has the potential to impact negatively on all protected groups. This policy applies a strong test to proposals</p> |

| #   | Objective or policy               | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                                       |
|-----|-----------------------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                                   |     |     |            |      |                    |                    |                     |                         |                               | involving their loss to ensure negative impacts are avoided or minimised.                                                                                                                                                                                     |
| ID1 | Planning Obligations              | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | The policy is written positively and unlikely to result in negative impacts.                                                                                                                                                                                  |
| ID2 | Access, Services and Parking      | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | <p>The policy is written positively and unlikely to result in negative impacts.</p> <p>Where the potential for a negative impact as identified through the use of a Low Car Parking Area, an exemption for disabled parking was identified as mitigation.</p> |
| ID3 | Open Space, Sports and Recreation | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | The policy is written positively and unlikely to                                                                                                                                                                                                              |

| #   | Objective or policy                          | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                                                                                                                                                                                  |
|-----|----------------------------------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |                                              |     |     |            |      |                    |                    |                     |                         |                               | result in negative impacts.                                                                                                                                                                                                                                                                                                                                                                              |
| ID4 | Utilities infrastructure and new connections | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | The policy is written positively and unlikely to result in negative impacts.                                                                                                                                                                                                                                                                                                                             |
|     | Regulation 19: Participation methods         | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | <p>The Regulation 19 publication will ensure multiple methods of notification including:<br/> Direct mailouts to those that have opted into communications;<br/> Promotion within council newsletter;<br/> Promotion of council social media channels;<br/> Publication on council website;<br/> Placement in libraries and the community contact centre.</p> <p>Representations on the soundness or</p> |

| # | Objective or policy                        | Age | Sex | Disability | Race | Religion or belief | Sexual orientation | Gender reassignment | Pregnancy and maternity | Marriage or civil partnership | Details                                                                                                                                                                                                                                                                                                         |
|---|--------------------------------------------|-----|-----|------------|------|--------------------|--------------------|---------------------|-------------------------|-------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   |                                            |     |     |            |      |                    |                    |                     |                         |                               | legal compliance of the plan may be submitted:<br>Online (through consultation software);<br>Online (by email);<br>In hard copy (hand delivery);<br>In hard copy (by mail).                                                                                                                                     |
|   | Regulation 19:<br>Use of AI in submissions | =   | =   | =          | =    | =                  | =                  | =                   | =                       | =                             | The use of AI can remove barriers to clear communication for a number of protected groups, whether this is through the use of AI as a translator or to assist in the collation of information.<br><br>Submissions supported through the use of AI will be considered acceptable, subject to formal declaration. |

## Appendix 2

### Assessment of potential negative impacts and action taken

| Policy          | Approach                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Assessment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Action                                                                                                                                                                                   |
|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| E4/ E5/<br>SP11 | <p>Exclusion policy for new hot food take aways (Sui Generis use class). This policy would be justified on the basis of health impacts associated with the high in calories/ high in fat/ high in salt food offer generally provided by this type of establishment. The policy approach would aim to reduce or prevent a worsening of these negative health impacts.</p> <p>Paragraph 97 (NPPF 2024):</p> <p>Local planning authorities should refuse applications for hot food takeaways and fast food outlets: a) within walking distance of schools and other places where children and young people congregate, unless the location is within a designated town centre; or b) in locations where there is evidence that a concentration of such uses is having an adverse impact on local health, pollution or anti-social-behaviour.</p> | <p>A policy of this nature relative to the Hastings context is likely to have a disproportionately negative impact on the BAME community, and therefore on the protected characteristic of <b>Race/ Ethnicity</b>. Likewise, there may be economic implications within the resort area in particular, and in terms of potential employment opportunities in the food and beverage sector being unfulfilled should this policy approach be taken forward, impacting on <b>economically disadvantaged groups</b>.</p> <p><b>Assessment Summary</b><br/>National chain and franchise operations/ well-known brands that offer take away food generally operate as Class E restaurants or cafes in terms of their planning use class. The distinction is drawn from them having the option of “eating in”.</p> <p>Sui Generis take away food operators requiring planning permission captures counter service or delivery only models where seating areas are provided as waiting areas only. A high volume of take aways in the Borough operating this model are BAME owned and run, with some operators occupying accommodation tied to the workplace.</p> | <p><b>Approach not taken forward.</b></p> <p><b>Not taken forward.</b></p> <p><b>Potential for negative impacts of adopting this policy approach would outweigh public interest.</b></p> |

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|  |  | <p>Hastings and St Leonards have the highest BAME population in East Sussex<sup>44</sup> along with Eastbourne.</p> <p>The running costs of this model are significantly lower than a Class E restaurant, making it easier to achieve viability. In some cases, these businesses are family run and provide employment opportunities for members of the household or wider cultural community that may not be able to easily access other forms of employment – for example, parents or carers who require more flexible working hours.</p> <p>Due to the compact size of the borough, the existing proliferation of access to take away food options and the borough-wide catchment of all existing take away offers using platform-based delivery services, it is unclear what impact (if any) a prohibition on new hot food take aways would have on health outcomes within the locality. Locally and nationally, it remains undetermined to what extent access to fast food above current levels would impact population health outcomes.</p> <p>Data from a report assessing the outcome of such a policy (restricting new HFT) in Gateshead drew the conclusion that “We find that there is no significant association between the policy intervention and the density of restaurants.”<sup>45</sup> Another evaluation of the intervention reported that the percentage of overweight or obese Year 6 students was reducing prior to the introduction of the policy and increased</p> |  |
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<sup>44</sup> <https://www.sussex.ics.nhs.uk/wp-content/uploads/sites/9/2022/08/Sussex-BAME-Population-Needs-Review.docx.pdf>

<sup>45</sup> [No new fast-food outlets allowed! Evaluating the effect of planning policy on the local food environment in the North East of England - ScienceDirect](#)

|  |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |  |
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|  |  | <p>following its introduction “We observed a decreasing trend in OWOB in Gateshead pre intervention, from 38% in 2011 to 35.5% in 2015, which then reversed to 37.7% in 2020”<sup>46</sup> .</p> <p>Both reports acknowledge obesity is a complex issue and that there are a range of opportunities to improve the weight environment without restricting uses. There are other policies of the plan that work hard to address these areas including protecting sports and recreation spaces, and protecting shops and services providing residents access to healthy food choices. The plan also makes it easier for grassroots community infrastructure to grow and change while protecting spaces for them to operate, like social supermarkets.</p> <p>Removing food choices from the market can also result in homogenization of food culture and a reduction in the ability of customers to experience new cultural offerings or express their preferences and values through food choices. This opportunity to explore cohesion and culture through food is important. Opportunities to increase exposure to different cultures through food are an important part of the foundation that underpins relationship building between different groups. The majority of hot food take aways in the Borough that would correspond to the Sui Generis class are in BME ownership and provide opportunities to experience a diversity of food and culture.</p> |  |
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<sup>46</sup> [Planning policies to restrict fast food and inequalities in child weight in England: a quasi-experimental analysis - Xiang - 2024 - Obesity - Wiley Online Library](#)

|  |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |  |
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|  |  | <p>It is equally challenging to establish a baseline for numbers or concentrations of hot food take aways in the Borough. Hastings is a resort town and the food and beverage offer is a key element of the visitor economy for both the day and evening economy. Due to the volume of visitors, many operators offer a hybridized model where customers can take food away as well as dine in.</p> <p>Another popular model is the food hall model. Food Halls are a multi-operator social dining provision. Operators are usually local independent businesses providing a more “artisanal” with a wide variety of cuisines. Food Halls are a positive option for food operators seeking to grow on from more casual provision (e.g., food truck catering or festival provision) but who cannot yet shoulder the overheads of a single operator location.</p> <p>FEAT is an environmental health database and operates using a different classification system to planning. Any operator that allows food to be taken from the premises under certain circumstances may be recorded as providing a take away service. This would include coffee shops and bakeries, for example. In a Food Hall environment, FEAT would record the gross number of operators as opposed to the net. For towns like Hastings, this can result in the appearance of a high concentration where in reality the number of hot food takeaway premises may be significantly lower. The advice of the council’s Environmental Health Team is that FEAT should not be used locally to determine either gross numerical values nor percentages of takeaways, although it was acknowledged that outside of a</p> |  |
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|  |  | <p>resort or city centre setting it may be a more effective proxy.</p> <p>Data taken from the 2025 retail survey identifies just 4% of the total units within retail areas as hot food takeaways within the Sui Generis classification. There is no set threshold for a “high concentration”, although research by the Health Foundation indicates that a low concentration is zero and highest 32%<sup>47</sup>.</p> <p>None of the retail survey data indicates a concentration exceeding 17%. When quantum of units is observed, outside of the main town centre in Hastings, it is both subjectively and objectively low.</p> <p>Centres that correspond to the resort (Marine Court, Old Town, St Leonards, Hastings Town Centre) have the lowest percentage concentrations (0%, 2%, 3%, 2%) as the food offer there is largely a “dine in” offer which increases dwell time and maximises participation in other resort activities.</p> <p>Therefore, direct interventions restricting locations for Hot food takeaways would likely be inappropriate for denser areas such Hastings given the compact nature of Hastings Borough and the lack of evidence to suggest the meaningful impact that such a restriction would make.</p> <p>Policies E3, E4, SP4 and SP11 all seek to direct casual dining uses such as restaurants to the resort area and town centre via the retail hierarchy</p> |  |
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<sup>47</sup> [Relationship between the concentration of fast food outlets and health | The Health Foundation](#)

|            |                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                               |
|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|
|            |                                                                                                                                                                                                                                                                                                                                                                                                                             | <p>ensuring that uses which are directed to areas where they are most compatible with regards to the councils ambitions for the town centre and resort area. In addition to this, policy E4 seeks to limit the granting of permissions for these uses outside of the town centre hierarchy and resort core which will limit the potential for a proliferation of these uses outside of the compatible areas. The policy also sets a high bar that seeks to limit the use of delivery services, which in turn would limit access to any new casual dining use granted permission regardless of location.</p> <p>Finally, the plan does not include any policies which resist the loss of existing hot food take aways to alternative uses.</p> <p>The potential for negative effects on the BAME business community and the role of the Borough as a resort is therefore considered to be greater than the potential for positive effects on health outcomes.</p> |                                                                                                                               |
| <b>SC2</b> | <p>This policy has the potential to impact negatively on those within the protected characteristic groups that relate to Age and Disability should requirements relating to space standards and adaptable/ full adapted properties not be set. The level of affordable M4(3) dwellings sought at Regulation was 5%, and this may have negative impacts on vulnerable groups due to the comparative demand vs threshold.</p> | <p>There is a more detailed explanation within Topic Paper: Space Standards that sets out the council's approach to ensuring the needs of protected groups are met in terms of adaptation and amenity.</p> <p>The evidence base indicates that policies should require developments to conform to the nationally prescribed space standards which ensures housing is fit for use by occupiers at every stage of life and of differing physical needs.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <p><b>Adjustments made.</b></p> <p>Affordable housing element seeks M4(3) on 10% of all dwellings, up from Regulation 18.</p> |

|            |                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                              |
|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|            |                                                                                                                                                                | <p>Evidence also recommends that we should likewise target all properties to meet M4(2) (adaptable) and require that 10% of affordable housing meets M4(3) to ensure that they have the best opportunity to be allocated based on need. This would represent an increase on the quantum set out in the Regulation 18 2021 plan.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                         | <p>Require developments to conform to the nationally prescribed space standards which ensures housing is fit for use by occupiers at every stage of life and of differing physical needs.</p>                                                |
| <b>SP2</b> | <p>This policy should be improved to include wording to reference the needs of gypsy and traveller communities in a strategic context prior to submission.</p> | <p>Plans should include both strategic and non-strategic policies. Strategic policies should set out an overall strategy for the pattern, scale and design quality of places and including making sufficient provision for housing.</p> <p>More in depth non-strategic policies extend to detailed matters, e.g., how delivery of a strategic policy objective can be evidenced through and application.</p> <p>The NPPF asks local planning authorities to identify a local housing need and then within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.</p> <p>Gypsy and Traveller accommodation needs must be assessed and planned for in the context of</p> | <p><b>Adjustments made.</b></p> <p>Policy SP2 strengthens the council's approach towards traveller accommodation needs, and asks that eligible windfall proposals demonstrate how they can contribute to meeting the borough's traveller</p> |

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|-----------------|--------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                 |                                                                                            | planning for the needs of different groups. A strategic reference to traveller accommodation as a typology within SP2 or another appropriate policy may therefore be appropriate. | accommodation needs.                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>SP10/ID2</b> | Reduction in private car use and in increase in active travel for both people and freight. | Proposals to reduce car use should consider the safety and accessibility needs of protected groups.                                                                               | <p><b>Adjustments made.</b></p> <p>Greater clarity has been added to policy SP10 and ID2 to reflect the need for some protected groups to access private vehicles on a daily basis, for example through the exemption of disabled parking from the Low Car Parking Area.</p> <p>SC1 has been amended to greater reflect the need to ensure neighbourhoods are designed to address a mix of mobility needs,</p> |

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|  |  |  | e.g. frailty or cognitive. |
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## Appendix 3

### Actions

| Issue                                                                                   | Action                                                                                                                                                                                                                                                     | Responsible                                   | When            | Progress |
|-----------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|-----------------|----------|
| Ensure that the Local Plan remains legally compliant with respect to equalities matters | Monitoring emerging equalities related case law and any future legislative amendments.                                                                                                                                                                     | Legal Services                                | Ongoing         |          |
| Plan monitoring                                                                         | <p>Improve plan monitoring process to ensure equalities impacts are better captured, particularly relating to:</p> <p>Employment and skills;<br/>Access to essential infrastructure and services;<br/>Lifetime homes;<br/>Infrastructure enhancements.</p> | Planning Policy/<br>Development<br>Management | Regulation 19   |          |
| Plan modifications                                                                      | Ensure that any proposed modifications are screened for Equalities Impacts prior to their integration with the local plan.                                                                                                                                 | Planning Policy.                              | Post-Submission |          |

