



**Eastbourne Town Centre
Area Action Plan
Proposed Submission Version
(Regulation 27)**

**Equality & Fairness Impact
Assessment**

EBC Ref:

PINS Ref:

Date:

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CONTENTS

	<u>Page No</u>
1. INTRODUCTION	1
2. SPATIAL OBJECTIVES AND CONTEXT	3
CONSIDERING THE DATA AND RESEARCH	8
3. CONSULTATION ON THE TOWN CENTRE AREA ACTION PLAN	155
4. ASSESSING THE IMPACT OF THE TOWN CENTRE AREA ACTION PLAN	177
5. RESULTS & CONCLUSIONS	19

APPENDICES:

Appendix 1: Screening and Assessment of Eastbourne Town Centre Area Action Plan (Proposed Submission Version) Policies

1. INTRODUCTION

- 1.1. This report sets out the Equality and Fairness Impact Assessment (EFIA) of the Proposed Submission Eastbourne Town Centre Area Action Plan (AAP). The purpose of the EFIA is to assess the impact of the Town Centre AAP's policies on protected groups, ensuring that equality and fairness is placed at the centre of policy development and review. The EFIA is a management tool that makes sure that policies and working practices do not discriminate against people with protected characteristics. Protected characteristics are defined in the new Equality Act 2010.
- 1.2. The new Equality Act 2010 came into force in October 2010, consolidating and extending previous anti-discrimination legislation into one over-arching policy. The Act contains a public sector equality duty consisting of a general equality duty and specific duties which are imposed by secondary legislation. The new duty covers nine protected characteristics of: age, disability, gender reassignment, pregnancy and maternity, race, religion and belief, sex (formerly referred to as gender), sexual orientation and 'marriage and civil partnership'. However not all aspects of the duty apply to the protected characteristic of marriage and civil partnership and consequently this EFIA has not assessed this area.
- 1.3. Compliance with the general duty is a legal obligation and should lead to better informed decision-making and policy development, and more importantly, better policy outcomes. The main element of the Act is to embed consideration of equality and good relations into the day-to-day business of public authorities. It requires equality and fairness considerations to be reflected in the design of policies and the delivery of services, including internal policies, and for these issues to be kept under review. Although the new Act no longer requires local authorities to undertake equality impact assessments, the Council considers them to be good practice and a means by which it can measure its compliance against the general duty.
- 1.4. It is recognised that policies impact upon people differently and the EFIA enables the potential and actual effects of a policy to be examined, and

improvements or changes introduced, to ensure fairness. In this way the potential consequences of a particular policy or approach can be considered from the outset and before a policy that has the potential to have a detrimental impact on equality can be adopted.

1.5. The EFIA examines the Town Centre AAP in relation to the following seven protected characteristics:

- Age
- Disability
- Gender
- Race
- Religion or belief
- Sexual orientation
- Gender reassignment

2. SPATIAL OBJECTIVES AND CONTEXT

- 2.1 The Eastbourne Town Centre AAP sets out a strategy and proposals for the regeneration of the Town Centre. The AAP is an important policy document that will shape development within the Town Centre to 2027. It is a key component of the Borough wide Local Development Framework. It is being prepared in parallel with the Core Strategy, which will set out the overarching policy direction for the Borough.
- 2.2 The AAP has a clear vision for the regeneration of the Town Centre which is supported by 12 objectives, setting out what sort of place it will be in 2027. Their outcomes will be measured through the lifetime of the AAP by the Sustainability Appraisal and the Local Monitoring Report. The monitoring framework is set out in Table 2 of the AAP.
- 2.3 The objectives for the Town Centre AAP have been developed following consultation with key stakeholders and the community and are listed below:

1. Economic Potential: identify and prepare a series of high quality, ambitious and deliverable proposals and policies for Eastbourne Town Centre that will enable the area to maximise its economic potential in creating a thriving and dynamic Town Centre that will play an important part in helping to build a sustainable and prosperous future for the town;

2. Vitality and Competitiveness: enhance the vitality and viability of the Town Centre as a whole by improving Eastbourne's retail competitiveness, both in its role as a sub-regional centre in East Sussex, and in respect of competing with out of town developments;

3. Quality and Diversity: increase the quality and diversity of the Town Centre retail offer to increase choice for all sectors of the population. To secure a mix of occupiers in the Town Centre with a mutually supporting balance between national multiple retailers through the provision of units of a sufficient size and configuration in suitable locations in order to respond to modern retailer requirements, as well as smaller independent traders;

4. Complementary New Retailers: complement rather than compete with the existing retail offer, promoting a strategy for new mixed use development that aims to bring in new retailers, not simply relocate those already present;

5. Independent Retail Offer: strengthen the towns independent retail offer, improving its integration with the primary shopping area and the seafront and building on its authentic local distinctiveness;

6. A Mixed Use Centre: increase the mix of uses within the Town Centre including leisure uses such as restaurants and cafes and specifically to encourage significant additional residential development including the provision of affordable homes and community facilities ensuring that the Town Centre is well used and safe at all times of the day and evening;

7. Employment Opportunities: develop strategies for increasing the employment opportunities in high quality jobs in a variety of sectors in the Town Centre;

8. Supporting Tourism and Business: ensure the regeneration of the Town Centre contributes to Eastbourne as an important tourist and business destination including opportunities for providing a range of hotel uses through retention and enhancement of existing stock and through new development;

9. Accessibility: improve accessibility to and within the Town Centre and Seafront for all sectors of the population, through the provision of an integrated approach to all transport users particularly pedestrians and public transport customers;

10. Design and Heritage: protect the best areas and important heritage assets while delivering a high quality, contemporary urban design which will integrate and encourage greater activity in the Town Centre;

11. Public Realm: provide enhanced pedestrian links across the Town Centre, particularly between Sussex Gardens, the railway station, the seafront and Arts Quarter through improvements to the public realm ensuring that the qualitative experience for those who shop, work, visit and live in Eastbourne is improved through measures such as pedestrian access and security, improving the quality of public places and securing increased priority for pedestrians within the Town Centre; and

12. Sustainable Development: enhance the sustainable performance of development proposals coming forward within the Town Centre by utilising a balance of resource efficiency measures and improving biodiversity.

- 2.4 The policies and proposals set out within the AAP are consistent with the objectives and policies within the Proposed Core Strategy - The Eastbourne Plan. This recognises the diversity of Eastbourne's population and recognises that its citizens have a variety of needs and interests, some of which may sometimes be considered conflicting (for example night-time activities in the town for the younger generation may be seen as creating noise and disturbance by the elderly population). Paragraph 1.3.8. of the Eastbourne Plan states that:

"It is essential that the Core Strategy ensures that the needs and aspirations of all people are given equal validity, regardless of their age, sex, income, sexual orientation, disability, race, nationality, religion, home tenure or any other personal characteristic".

- 2.5 The Eastbourne Plan establishes fourteen neighbourhoods and these will be linked to sustainable and improved facilities such as shopping, health and education so that people can enjoy the full range of services locally, helping to reduce the need to travel. This will also help to substantially reduce the gaps between the more affluent and the town's less sustainable neighbourhoods.
- 2.6 The Town Centre is identified as one of the fourteen neighbourhoods within the Borough. Policy B2 of the Eastbourne Plan states that

sustainable neighbourhoods will be established through a set of generic criteria. Therefore, the Town Centre neighbourhood will be required to:

- Meet the needs of the local community and address issues specific to that neighbourhood;
- Protect the residential and environmental amenity of existing and future residents;
- Create an attractive, safe and clean built environment with a sense of place that is distinctive and reflects local character;
- Offer a choice of housing and employment opportunities locally;
- Respect the natural environment by adapting to climate change and reducing potential negative environmental impacts;
- Providing services and facilities locally within walking distance of the local residents; and
- Encourage sustainable modes of transport and create good connections between neighbourhoods.

2.7 Neighbourhoods are also the building blocks of localism, and planning at a local level is important as it enables communities to express a vision for the future of the area in which they live. The concept of engaging with local communities and seeking to take account of their views has been at the heart of decision-making in Eastbourne for many years. No two communities are the same and different communities require alternative approaches and varied solutions.

2.8 The Town Centre AAP has been prepared in accordance with the relevant government regulations and guidance. Community engagement has taken place in accordance with the published Statement of Community Involvement (SCI) and at the following key stages in the progression of the Town Centre Area Action Plan:

- Issues and Options (14th June to 6th September, 2010)

- Proposed Submission Version Eastbourne Town Centre Area Action Plan (21st July to 22nd September, 2011).

2.9 The Town Centre AAP will be formally submitted to the Secretary of State for Communities and Local Government in February, 2012. It will then be assessed by a Government-appointed independent inspector at an Examination in Public. This EFIA will be submitted alongside the Town Centre AAP and its accompanying Sustainability Appraisal and other supporting documents.

3. CONSIDERING THE DATA AND RESEARCH

- 3.1. The Equality and Human Rights Commission Guidance promotes the use of statistics and background information to help identify key issues of importance and provide information on the make-up of those using the service or policy that is the subject of the EFIA.
- 3.2. In order to comply with this guidance this EFIA has considered population and demographic data, which in turn, has helped to provide important baseline data about the characteristics of Eastbourne's residents. The Council recognises the importance of understanding the community and its needs, and this data helps inform the EFIA process.
- 3.3. For each of the protected characteristics listed, key statistics and trends showing the situation in Eastbourne have been compiled from a variety of sources including the Office for National Statistics (ONS).

Population

- 3.4. The 2001 Census showed that Eastbourne had a total population of 86,997. The 2010 population estimate suggests that the population has now increased to 96,400. In March 2011, an up-to-date Census was conducted but the results of this are not expected until after the Town Centre AAP is submitted to the Secretary of State in February 2012.
- 3.5. Eastbourne has historically attracted older people to come and live in the town. However in recent years, new housing and employment opportunities, together with enhanced educational facilities such as the University of Brighton campus have attracted a younger age group.
- 3.6. The Council continually monitors its changing population demographics to ensure that it understands the characteristics and needs of its population and is able to deliver the services that meet the requirements of the Borough's residents.

Age

- 3.7. Compared to the United Kingdom as a whole, Eastbourne has a higher percentage of the population of pensionable age, 23.09% aged over 65 years old compared to a national average of 16.6%. However in recent years this has changed and whilst Eastbourne still remains an attractive and popular location for retirement, it has also experienced considerable housing and economic development, which has attracted a younger age group, leading to a more balanced community. Now 34.2% of the population are under the age of 30 years old.
- 3.8. There are, however, considerable differences in the age profiles across different parts of the Borough. These differences are set out in Table 1 (note that the Town Centre AAP boundary mainly comprises Devonshire and Meads, and includes part of Upperton):

Table 1: showing the age profile in Eastbourne as a whole and across individual wards

Age group	All ages	0-14	15-29	30-44	45-64	65-74	75-84	85+
Geography								
Eastbourne	98493	15599	17648	17412	24989	10229	8374	4242
Devonshire	12047	1677	2929	2372	2919	987	791	372
Hampden								
Park	10163	2245	2086	2069	2351	650	483	279
Langney	10729	2683	2031	2218	2370	720	543	164
Meads	11926	842	2288	1147	2645	1757	2097	1150
Old Town	10624	2040	1577	2103	2892	1016	640	356
Ratton	9397	1186	1195	1326	2980	1397	960	353
St								
Anthony's	10773	1994	1557	2025	2746	1169	875	407
Sovereign	12508	1967	1987	2495	3730	1341	714	274
Upperton	10326	965	1998	1657	2356	1192	1271	887

Disability

- 3.9. In the UK it is estimated that approximately 15% of the population could be defined as Disabled under the Equality Act (2010), although the proportion of people claiming Disability Living Allowance is considerably lower than this figure. There are a number of factors that come into play here as many people who are actually covered by the definition would not

consider themselves to be a disabled person, and there are still a number of people who have no awareness of what they may be entitled to claim.

- 3.10. A disabled person is twice as likely as a non-disabled person of the same age to be unemployed and claiming benefits. Although most disabled people are in employment, at any given level of qualification a disabled person is more likely than a non-disabled person to be low paid. Almost a third of working age disabled adults live in income poverty.
- 3.11. The results of the 2001 Census showed that in Eastbourne 21.6% of the population stated that they had a long-term illness, health problem or disability that limited daily activities or work (national average 18.2%). 5.1% described themselves as permanently sick or disabled (national average 5.5%). In 2010, 5.0% of Eastbourne's residents claimed Disability Living Allowance. This equated to 4,970 people.
- 3.12. Due to the number of people assessing themselves as having a long-term illness, health problem or disability, and in support of meeting its obligations under the Disability Equality Duty 2006, the Council established a forum for disabled people to share their views and experiences with the Council and help to influence decision-making by participating in the Council's equality work. This forum became the Disability Involvement Group and since its first meeting in 2007 has grown into a significant engagement and lobbying group for disabled people in the Borough.

Gender

- 3.13. The 2009 estimates indicate that there are more females than males within the Borough. Nationally, at higher age levels, females outnumber males reflecting the higher life expectancy of females.
- 3.14. Personal security concerns, particularly after dark, are important aspects for the safety and well-being of women in the Borough.

Race

- 3.15. It is estimated that of the 96,400 population of Eastbourne, 92.4% (89,200) consider themselves to be White¹. This is slightly higher than the South East average (90.7%) and significantly higher than the England average (87.5%).
- 3.16. Residents from Black, Asian and Minority Ethnic (BAME) groups make up a small but important proportion of the Borough's overall population in the 2009 resident population estimates, at just under 7.5% (7,200). The 2001 Census results showed Eastbourne's BAME population at 3.4%. The largest minority ethnic group in 2009 were Asian or Asian British (3.1%). A breakdown of the different ethnic groups within the Borough is set out in Table 2 below.

	Eastbourne	South East region	England
White	92.4%	90.7%	87.5%
Mixed	1.5%	1.7%	1.9%
Asian or Asian British	3.1%	4.2%	6%
Black or Black British	1.5%	1.8%	2.9%
Chinese	0.5%	0.7%	0.8%
Other	0.9%	0.8%	0.8%

- 3.17. In addition to the above, there is no reliable evidence to provide information about the proportion of Eastbourne's residents who do not speak English as a first language or have a limited knowledge of it. It is

¹ Office for National Statistics (2009 estimate)

recognised that an inability to speak English can be a significant barrier to accessing services and facilities. In recognition of this the Council works in partnership with Eastbourne’s Cultural Communities Network and has introduced an interpretation and translation service across the Council, forming part of a Sussex-wide consortium of local authorities.

3.18. In recent years, migration has seen approximately 4,800 adult overseas nationals registered for national insurance numbers in Eastbourne, with over 1,000 nationals coming from Poland; the largest group. The top ten countries for Eastbourne based on these figures are: Poland; Portugal; Philippines; South Africa; Germany; Italy; Slovak Republic; Republic of Lithuania; Zimbabwe and France.

Religion or Belief

3.19. Religion can often be linked to ethnicity and whilst this is often true, it is important that such links are not automatically assumed. The data pertaining to religious belief is now ten years old (2001 Census) and there have been no subsequent estimates to inform whether or not the situation has changed.

3.20. The 2001 Census information indicates that 75.2 % of Eastbourne’s population identify themselves with a religious group compared with 72.8% across the wider South East region.

Table 3: Religion or Belief			
	Eastbourne	South East region	England
Buddhist	306 (0.3%)	22,005 (0.3%)	139,046 (0.3%)
Christian	65,278 (72.8%)	5,823,025 (72.8%)	35,251,244 (71.7%)
Hindu	213 (0.2%)	44,575 (0.6%)	546,982 (1.1%)
Jewish	259 (0.3%)	19,037 (0.2%)	257,671 (0.5%)
Muslim	880 (1.0%)	108,725 (1.4%)	1,524,887 (3.1%)
Sikh	45 (0.1%)	37,735 (0.5%)	327,343 (0.7%)

Other religion	415 (0.5%)	28,668 (0.4%)	143,811 (0.3%)
No religion	14,971 (17%)	1,319,979 (16.5%)	7,171,332 (14.6%)
Religion not stated	7,300 (8.1%)	596,896 (7.5%)	3,776,515 (7.7%)
TOTAL	89,667	8,000,645	49,138,831

- 3.21. 72.8% of Eastbourne's residents identified themselves as Christians. Muslims (1%) account for the next largest group. 17% of Eastbourne's population are non-religious compared to 16.5% in the South East and 14.6% across England as a whole.
- 3.22. Although 72.8% of residents identified themselves as Christians, a total of 63,334 people, in a recently published 'Churches Together for Eastbourne' report, entitled 'Report on The Christian Community Eastbourne and District 2010' states that the Census figure is probably more of a 'cultural' response. They estimate that there are around 8,750 members of the Christian community who are 'regular church going population' of all ages belonging to 70 congregations.
- 3.23. Eastbourne has its own faiths forum consisting of a diverse range of religions and beliefs from Christian Science to Paganism. There is now a much greater awareness and understanding of how different faith communities in Eastbourne can come together with shared aims and help to bring about change.

Sexual Orientation

- 3.24. There is limited available information regarding sexual orientation. No specific data on sexual orientation exists as this is a social identity factor that is omitted from the Census.
- 3.25. Impact assessments produced by Government estimated that between 5-7% of the UK population is gay, lesbian or bisexual. However, recent work by the Office for National Statistics indicates that the figure may be around 1.5% although there was some criticism of the methodology used.

Measuring the prevalence of different sexual orientations is difficult for a variety of reasons and consequently any figures that do exist need to be taken with a degree of scepticism. The proportion of gay, lesbian and bisexual people can vary considerably across different areas although the extent to which this is the case is uncertain. For the purposes of this EFIA, the 5-7% UK average has been assumed in the absence of any other evidence.

4. CONSULTATION ON THE EASTBOURNE TOWN CENTRE AREA ACTION PLAN

- 4.1. Eastbourne Borough Council is committed to ensuring that the local community and stakeholders are involved in all stages of preparation of planning policy. This is essential to ensure that planning policy reflects the views of the community. A key element of this is ensuring that all sections of society have an opportunity to have their say on proposals for the future of Eastbourne. In order to achieve this, the Council has been proactive in engaging with many local organisations and engagement groups.
- 4.2. The Equality Act 2010 outlines the need for local authorities to consult with their communities, especially those who are made vulnerable by their circumstances. Engagement will help local authorities to identify particular needs, patterns of disadvantage and poor relations between groups and to understand those needs and the reasons why disadvantage occurs. Determining priorities can only result from effective community engagement helping to put trust in public services.
- 4.3. The consultation on the Town Centre AAP has been informed by the Statement of Community Involvement (SCI), a document which sets out the standards and general approach that Eastbourne Borough Council intends to take in the preparation of documents within its Local Development Framework.
- 4.4. The SCI acknowledges that there are many ways by which the Council directly engages with “Hard to Reach” groups either through its own mechanisms or made possible through the Eastbourne Strategic Partnership (ESP), which has 10 Core Partner organisations, including the Eastbourne Association of Voluntary Services (EAVS) (now renamed 3VA).
- 4.5. The Council recognises that there are instances where more specialised methods of consultation are needed to ensure that vulnerable and hard to reach communities have an equal opportunity to have their say. The SCI make reference to the specific efforts required to engage with the following groups:

- People who do not speak English as their first language
- Young people
- People with learning difficulties
- Minority faith groups and other minority groups

4.6. The methods to enable community involvement in planning matters are laid out in the Council's SCI, which was adopted by Full Council in July 2009.

4.7. Paragraph 2.2.1 of the SCI: Technical Update, also acknowledges that *"The Council has a duty to involve people in meaningful consultation on the delivery of Council services as well as an obligation (under the Race Relations (Amendment) Act 2000 and the Disability Discrimination Act 1995 to consult with 'Hard to Reach' groups"*. It states that the *"aim of the planning service is to consult with anyone who has an interest in the future of the town, as a place to live, work or visit"*. This will be eventually updated and aligned to the recently published Equality Act 2010 (Specific Duties) Regulations 2011, covering public authorities.

4.8. Consultation has played a very prominent role in the preparation of the Town Centre AAP. Widespread and extensive consultation exercises have taken place at the each of the key stages in the preparation of the Town Centre AAP:

- Issues and Options Consultation Stage
- Proposed Submission Version Eastbourne Town Centre Area Action Plan Representation Stage.

4.9. During each stage of consultation, considerable effort has been made to engage with all sections of the community. Further, more detailed information about the consultation methods used at each stage is set out in the Consultation Report and Publicity Plan (which was published as part of the evidence base alongside the Town Centre AAP).

5. ASSESSING THE IMPACT OF THE EASTBOURNE TOWN CENTRE AREA ACTION PLAN

5.1. The Proposed Submission Eastbourne Town Centre AAP sets out a Vision of what Eastbourne Town Centre will be like by 2027. It states that:

'By 2027, Eastbourne Town Centre will be a place that attracts more shoppers, workers, residents and visitors to spend more time enjoying a vibrant and varied offer and mix of uses in a well connected series of attractive streets and public spaces. Increasing investment in the town will bring wide-ranging benefits and will allow Eastbourne to respond positively to climate change'.

5.2. The AAP has been prepared to deliver the Vision through meeting the twelve key objectives already detailed above.

5.3. Policies within the Plan aim to reinforce the approach to development providing a robust framework against which proposals can be shaped and assessed.

5.4. The table below sets out the symbols that have been used in Appendix 1, which outlines the key characteristics of each Policy within the Town Centre AAP and summarises whether there is the potential to have any impact on any of the equality groups identified.

Symbol	Likely Impact
+	Positive
0	Neutral
-	Negative
?	Unknown

5.5. Government regulations require the Council to engage with a number of specific consultation bodies. In addition to consulting with these, the

Council is committed to involving the Eastbourne Strategic Partnership in the preparation of the Local Development Framework and consequently the Town Centre AAP.

5.6. In addition, the Council also maintains an up-to-date mailing list of organisations and groups that have expressed an interest in being consulted on planning policy. This list includes:

- Voluntary organisations;
- Organisations which represent the interests of different racial, ethnic or national groups;
- Organisations which represent different faith groups;
- Organisations which represent the interests of disabled people;
- Organisations which represent the interests of businesses operating in Eastbourne; and organisations which represent amenity, conservation, recreational and other interests.

5.7. The policies in the Town Centre AAP have therefore been informed by extensive community involvement which should have reduced the risk of marginalising certain community and social groups. However in assessing how planning policies set out in the Town Centre AAP could affect equality, it is still important to consider how these policies might discriminate, or lead to inequitable treatment or outcomes. In cases where inequitable treatment or outcomes may be perceived to occur, these will need to be addressed.

6. RESULTS & CONCLUSIONS

- 6.1. The EFIA Screening and Assessment Table (Appendix 1) evaluates whether or not the Town Centre AAP will cause an adverse impact or discriminate against different groups in the community. This exercise was undertaken by planning officers and the Council's Communication and Participation Manager.
- 6.2. The EIFA assessment table evaluates that the impact of the Town Centre AAP on protected groups is generally supportive. A significant number of policies in the Town Centre AAP are likely to have an indirect beneficial impact on certain community groups within the Borough. None of the policies contained within the Town Centre AAP are considered likely to have an adverse impact on community groups.
- 6.3. The Town Centre AAP places equality and fairness at its heart and accords with all relevant national legislation and local standards on equality issues. Having assessed the Town Centre AAP, it is not considered that any measures are required to mitigate any adverse impacts that specific policies might have.
- 6.4. The impact of the Town Centre AAP and the implementation and impact of its policies will be monitored regularly through the production of the Local Monitoring Report (LMR) published in December each year. This is an essential component as it enables the Council to assess whether or not a particular policy is working. This can only be achieved with targets that have clear and measureable outcomes. The Town Centre AAP sets out a clear monitoring framework, which provides a robust evidence base for future monitoring and assessments.

Appendix 1: Screening and Assessment of Proposed Submission Eastbourne Town Centre Area Action Plan Policies:

Screening of the Town Centre AAP Policies							
	Age	Disability	Gender	Race	Religion	Sexual Orientation	Commentary
<p>TC1: Character Areas</p> <p>The structure of the Town Centre will be defined through seven interlinked character areas. A complementary mix of uses will improve and strengthen the character areas.</p>	+	+	+	+	+	+	A mix of uses across the Town Centre will provide variety and something for everyone, with improved links allowing better access.
<p>TC2: Town Centre Structure</p> <p>Key approaches, gateways, streets and public spaces will be strengthened, achieved by prioritising investment and public realm</p>	+	+	+	+	+	+	Public realm improvements will result in the Town Centre being more legible and user-friendly, with links between the Retail District, the Arts District

Screening of the Town Centre AAP Policies

	Age	Disability	Gender	Race	Religion	Sexual Orientation	Commentary
enhancements.							and the Seafront offering points of interest for all.
<p>TC3: Mixed Use Development</p> <p>A mix of uses will be supported throughout the Town Centre. Priority will be given to retail uses, leisure and cultural uses, employment generating uses particularly office development, community uses, residential uses, cafes and bars.</p>	+	+	+	+	+	+	The Town Centre is the most accessible neighbourhood in the Borough and the focus on regeneration and enhancement, supporting a wide mix of uses will provide benefits for many people.
<p>TC4: Primary Retail Area</p> <p>The primary retail core will be maintained and enhanced as the principal retail area in</p>	+	+	+	+	+	+	Maintaining the primary retail core will result in a good shopping offer for all, made easily

Screening of the Town Centre AAP Policies

	Age	Disability	Gender	Race	Religion	Sexual Orientation	Commentary
the town centre. Public realm improvements will result in better pedestrian linkages between the primary retail core and secondary retail areas.							accessible by improvements to pedestrian linkages.
TC5: Secondary Retail Areas These areas make an important contribution to the diversity of retailing in the Town Centre and will be maintained and enhanced.	+	+	+	+	+	+	Encouraging and maintaining a diverse retail offer will provide something for all equalities groups.
TC6: Residential Development in the Town Centre New residential development must provide a mix of	+	+	0	0	0	0	This policy will have a positive impact on some groups including families, single person households, older people

Screening of the Town Centre AAP Policies							
	Age	Disability	Gender	Race	Religion	Sexual Orientation	Commentary
different dwellings and contribute towards the provision of affordable housing.							and disabled people as it encourages a mix of housing types and sizes to address the needs of all sections of the community.
TC7: Supporting the evening and night-time economy The evening and night-time economy will be supported to promote Eastbourne as a broad and inclusive destination.	?	0	0	0	0	0	This policy will encourage young people and families into the Town Centre in the evenings, although it is unlikely to do the same with the more elderly population.
TC8: Arts Trail An arts trail will be commissioned across the Town Centre linking together	0	0	0	0	0	0	Although this policy will have a positive impact on those with an interest in Arts, it is difficult to

Screening of the Town Centre AAP Policies							
	Age	Disability	Gender	Race	Religion	Sexual Orientation	Commentary
key arts, heritage and cultural venues, the railway station and the Seafront.							say that this will have a positive effect on any of the equalities groups, although it is unlikely to have a negative effect on any.
TC9: Development Quality All development proposals will have to achieve the highest architectural and design standards.	0	+	0	0	0	0	High quality design should include provision for those with disabilities, making the Town Centre more accessible.
TC10: Building Frontages and Elevations Within the Town Centre key building elevations should add visual interest, with ground floors incorporating	0	0	0	0	0	0	New buildings will improve the attractiveness and visual interest of the Town Centre.

Screening of the Town Centre AAP Policies							
	Age	Disability	Gender	Race	Religion	Sexual Orientation	Commentary
active frontages.							
TC11: Building Heights, Landmarks, and Tall Buildings The height and distribution of development within the Town Centre will be assessed against strict design criteria.	0	0	0	0	0	0	This policy will ensure that the height and distribution of new buildings is appropriate for the Town Centre.
TC12: Servicing, Access and Storage Service yards must be hidden from view, include appropriate facilities and have minimum conflict with key pedestrian routes.	0	0	0	0	0	0	This policy aims to ensure a high quality streetscape, which is not obscured by service yards and storage areas.
TC13: Public Realm Quality and Priorities The public realm will be	+	+	+	+	+	+	Improved public realm and linkages will mean increased and improved

Screening of the Town Centre AAP Policies

	Age	Disability	Gender	Race	Religion	Sexual Orientation	Commentary
locally distinctive, high quality, safe, accessible and a usable environment. Proposals must establish a sense of place, enhance linkages for pedestrians and improve legibility.							accessibility to all, which will especially benefit those with a disability/mobility issues.
TC14: Public Transport Interchange Enhance the Terminus Road Public Transport Interchange, including improving the pedestrian environment, improving crossing facilities and signage and improving cycle facilities and routes.	+	+	+	+	+	+	This policy will benefit all equalities groups, as these improvements will make this area more accessible and legible.
TC15: Parking in the	0	0	0	0	0	0	Improvements to

Screening of the Town Centre AAP Policies

	Age	Disability	Gender	Race	Religion	Sexual Orientation	Commentary
<p>Town Centre</p> <p>The quality of existing parking will be improved. Routes from existing facilities into the Town Centre will be enhanced through improved signage and wayfinding.</p>							existing parking provision and better signage will attract more visitors to the Town Centre.
<p>TC16: Town Centre Streets</p> <p>Streets will be designed as public spaces with a focus on enhancing pedestrian accessibility.</p>	+	+	0	0	0	0	This policy will aim to provide safer streets, with improved crossing facilities and enhanced accessibility. This will help people with disabilities and the elderly community to easily and safely access the Town Centre and surrounding areas.

Screening of the Town Centre AAP Policies

	Age	Disability	Gender	Race	Religion	Sexual Orientation	Commentary
<p>TC17: Master Planned Approach to Town Centre Development Sites To ensure a comprehensive design-led approach to proposed development within the Town Centre.</p>	0	0	0	0	0	0	This policy will ensure high standards of design, sustainable developments and safe, well-connected public realm.
<p>TC18: Development Opportunity Site One (Land at the junction of Terminus Road and Ashford Road). Proposals include active frontages in pedestrian areas, a mix of uses, new pedestrian accesses, improvements to the public realm, parking and cycle</p>	+	+	+	+	+	+	A mix of uses will provide something for everyone, in an easily accessible environment.

Screening of the Town Centre AAP Policies							
	Age	Disability	Gender	Race	Religion	Sexual Orientation	Commentary
facilities							
TC19: Development Opportunity Site Two (Land adjoining the railway station and the Enterprise Centre). Proposals include active frontages, a mix of uses, improved pedestrian access, public realm improvements and parking and cycle facilities.	+	+	+	+	+	+	A mix of uses will provide something for everyone, in an easily accessible environment.
TC20: Development Opportunity Site Three (Land between Upperton Road and Southfields Road).	+	+	+	+	+	+	A mix of uses will provide something for everyone, in an easily accessible environment.

Screening of the Town Centre AAP Policies							
	Age	Disability	Gender	Race	Religion	Sexual Orientation	Commentary
Proposals include active frontages, a mix of uses, pedestrian access points, public realm enhancements and protection of residential amenity of existing occupiers.							
TC21: Development Opportunity Site Four (Land at the south-eastern end of the Arndale Centre). Proposals include active frontages, a mix of uses, improved pedestrian access and public realm improvements.	+	+	+	+	+	+	A mix of uses will provide something for everyone, in an easily accessible environment.
TC22: Development Opportunity Site Five	+	+	+	+	+	+	A mix of uses will provide something for

Screening of the Town Centre AAP Policies							
	Age	Disability	Gender	Race	Religion	Sexual Orientation	Commentary
(Land at the former Co-op on Terminus Road). Proposals include active frontages, a mix of uses, improved public realm and pedestrian access.							everyone, in an easily accessible environment.
TC23: Transition Areas (Station Street and Mark Lane). Proposals include encouraging a mix of uses, public realm and wayfinding improvements and better pedestrian accessibility.	+	+	+	+	+	+	Encouraging a diverse mix of uses will offer something for everyone in an easily accessible environment.
TC24: Potential Areas of Change (The International Lawn Tennis Centre at Devonshire	+	+	+	+	+	+	Safeguarding the tennis and open space at Devonshire Park will ensure the site remains an

Screening of the Town Centre AAP Policies

	Age	Disability	Gender	Race	Religion	Sexual Orient- ation	Commentary
<p>Park (one) and land at Langney Road and Pevensey Road (two)).</p> <p>Proposals include ensuring the International Lawn Tennis Centre at Devonshire Park is safeguarded, and to maximise any opportunities to widen the tourism, cultural and conference facilities associated with the site.</p> <p>Support redevelopment of the area at Langney Road and Pevensey Road for a mix of town centre uses.</p>							<p>attraction for all, whilst widening the opportunities for tourism and culture, across all equalities groups.</p> <p>Focussing on a mix of uses for the Langney Road/Pevensey Road area will offer something for everyone.</p>