

Fairness and Equalities Impact Assessment (FEIA)

Version 3.6 May 2017

The purpose of this assessment is to provide balanced information to support decision making and to promote better ways of working in line with equalities (Equalities Act 2010), Welsh language promotion (The Welsh Language (Wales) Measure 2011), sustainable development (Wellbeing of Future Generations (Wales) Act 2015), and the four parameters of debate about fairness identified by the Newport Fairness Commission (NFC Full Report to Council 2013).

Completed by: Kate Wood **Role:** Project Manager

Head of Service: Tracey Brooks **Date:** 01/02/2021

I confirm that the above Head of Service has agreed the content of this assessment

Yes / No

When you complete this FEIA, it is your responsibility to submit it to
impact.assessments@newport.gov.uk

1. Name and description of the policy / proposal being assessed. Outline the policy's purpose.

At the start of the COVID-19 pandemic, Welsh Government introduced additional regulations, which extended local authorities' homelessness duties in order to ensure the most vulnerable citizens were provided with accommodation that allowed them to remain safe, housed, and minimised the spread of the virus.

This extension made provision for people who, under normal circumstances, would not necessarily be considered for council accommodation, including for example those with no recourse to public funds, and rough sleepers.

Changes to legislation also meant that local authorities were granted emergency powers, which extended permitted development rights, enabling them to undertake certain developments outside of standard processes for fixed periods of time. For longer term developments, this provided an opportunity to meet challenging delivery times, having up to 12 months to obtain full planning approval.

Both changes to legislation remain in place as part of the ongoing response to COVID-19.

The significant health crisis, and changes in regulations, meant that work to support the city's homeless population was taken forward at pace, and a range of emergency housing measures implemented across the city. Following on from this, and to provide the necessary facilities to support the growing numbers of homeless people needing access to move on accommodation, Welsh Government developed its Phase 2 Homelessness Scheme providing opportunities for grant funding.

Proposals have been developed for a two storey terraced row of 12 individually contained housing units designed for single tenant occupation. The mass of the building is located towards the eastern side of the site, retaining 30 of the existing car park spaces to the west.

This would provide a long-term development that aims to prevent people from experiencing sustained or repeated homelessness. It is well integrated with the wider objectives of the local authority as it meets a clearly identified need

The units at Hill Street will provide one of two options for occupation (yet to be determined):

1. General needs affordable housing with floating support to facilitate move on accommodation. Temporary accommodation usage has increased substantially during the pandemic with a higher proportion of single people requiring homelessness assistance. Hill Street will provide permanent, affordable housing for those in need. The site will be managed by Linc Housing Association and added to their social housing stock in Newport. Allocations will be managed via the common housing register. Floating support will be provided based on individual assessed need. The hours of support required can be incorporated into existing contracts commissioned via Housing Support Grant.
2. Supported housing for those with higher support needs, utilising 11 of the 12 units for residents and 1 unit for office/ staff sleep ins. A tender process will be required to source a provider to manage the scheme and support residents and would be funded via Housing Support Grant.

This scheme will provide affordable housing for those in need which meets many of the 7 Wellbeing goals, including cohesive communities, a more equal Wales, a healthier Wales, a more resilient Wales and a more prosperous Wales. This proposal will enable people who can live at the scheme to become independent, resilient and healthier.

This FEIA considers the fairness and equality impacts associated with the Hill Street scheme.

2. 2. Outline how you have/will consult with stakeholders who will be affected by the policy/proposal.

RSL partners were consulted with to develop a programme of schemes designed to assist NCC in responding to homelessness demand across the City. A number of meetings were held with the RSLs (including NCH, Pobl, Linc and Melin) and Charitable organisations (Including Mind and Cyfannol) to discuss and develop projects that could be included in the grant application and the impact they would have on meeting current demands.

Officers and Partners from Linc formed a multi-disciplined project team to review a range of options in terms of site location and design, including the proximity of the development to key support services.

There will also be a targeted programme of communications with local residents, local places of worship and the Business Improvement District (BID), as well as more detailed pre-application consultation (PAC) as part of the full planning process.

3. What information/evidence do you have on stakeholders? e.g. views, needs, service usage etc. Please include all the evidence you consider relevant.

The current Local Housing Market Assessment shows an annual unmet need of 503 units of affordable one bedroom accommodation and 135 units of affordable two-bedroom accommodation. This assessment was carried out prior to the outbreak of COVID-19 and the figures at present are significantly higher.

It is anticipated that there may be some concerns raised regarding the location of the development, and the impact that this may have on residents of the Stow Hill ward. The council will monitor feedback received through a variety of routes, including local ward members, and the formal planning consultation.

Detailed information on the population of Stow Hill ward can be found in the council's [wellbeing profile](#) which highlights key demographic information, including:

- In Stow Hill the percentage of males is 6.48% higher than females. This is mainly due to a much higher percentage of 25 to 44 year old males in the Stow Hill area.
- Stow Hill has a slightly higher population of 16-24 year olds compared to the rest of Newport
- Stow Hill has the second lowest percentage of 4 to 15 year olds of all the wards in Newport after Langstone.
- Stow Hill has the third lowest percentage of over 65 year olds (12.40%) below the Newport and Wales average of 17.27% and 20.58% respectively.
- A significantly higher percentage of people in Stow Hill stated their religion as Muslim than the Wales and Newport averages.
- There is an ethnic minority population of 31.6% in Stow Hill, which is above both the Wales and Newport averages. Stow Hill has the third highest ethnic populations of all the wards in Newport after Pillgwenlly and Victoria.
- 40.4% of people living in Stow Hill were born outside of Wales, this is well above the Newport average of 22.2% and the Wales average of 27.3%. This is the highest of all the wards in Newport.
- 23.3% of people were born outside the UK, which is above the Newport average of 8.5% and the Wales average of 5.5%. This is the second highest of all the wards in Newport after Pillgwenlly

This assessment will be reviewed taking into account monitoring information and feedback once the scheme has been established.

4. Equalities and Welsh language impact





Protected characteristic	Impact:			Provide further details about the nature of the impact in the section below. Does it: 1. Promote equal opportunity 2. Promote community cohesion 3. Help eliminate unlawful discrimination/ harassment/ victimisation?																		
	Positive	Negative	Neither																			
Age	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The Hill Street development will provide up to 12 single bed accommodation units, which will help address the need for good quality, supported accommodation for people who are moving on from supported or temporary accommodation. The scheme will be targeted towards people of all age groups and is likely to increase the percentage of 18 – 54 olds accessing support due to those needing move on accommodation.</p> <p>The age profile of people currently accessing homelessness provision is:</p> <table border="1"> <thead> <tr> <th>Age</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>18 - 24</td> <td>21.8</td> </tr> <tr> <td>25 - 34</td> <td>30.3</td> </tr> <tr> <td>35 - 44</td> <td>26.3</td> </tr> <tr> <td>45 - 54</td> <td>12.9</td> </tr> <tr> <td>55 - 64</td> <td>4.6</td> </tr> <tr> <td>65 - 74</td> <td>1.8</td> </tr> <tr> <td>75+</td> <td>1.4</td> </tr> <tr> <td>under 18</td> <td>0.8</td> </tr> </tbody> </table> <p>Stow Hill has a slightly higher population of 16-24 year olds compared to the rest of Newport. It also has the second lowest percentage of 4 to 15 year olds of all the wards in Newport after Langstone. Stow Hill has the third lowest percentage of over 65 year olds (12.40%) below the Newport and Wales average of 17.27% and 20.58% respectively.</p> <p>It is recognised that local communities may have concerns about the potential social and environmental impacts of a temporary accommodation scheme on younger people in the area, particularly a scheme which supports people with complex needs. Option 2 of the proposed models of use is more likely to have a negative impact on younger people in the area.</p>	Age	%	18 - 24	21.8	25 - 34	30.3	35 - 44	26.3	45 - 54	12.9	55 - 64	4.6	65 - 74	1.8	75+	1.4	under 18	0.8
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65 - 74	1.8																					
75+	1.4																					
under 18	0.8																					
Disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All developments that receive Phase 2 Homelessness funding are built to Welsh Government development standards. These ensure that properties are suitable for a range of needs and can																		

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	Positive	Negative	Neither	
				<p>be adapted easily if these change. In addition to this, the development at Hill Street will also contain ground floor apartments that are wheelchair accessible</p> <p>19.28% of homeless households that may access Hill Street have declared a disability. A small minority of this cohort have declared a physical disability. Those with poor mental health will be positively affected by resolving homelessness and providing permanent accommodation.</p> <p>Hill Street will be located near several support services that provide drug and alcohol support services and treatment, mental health support and outreach services.</p>
Gender reassignment/transgender	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Research has shown higher rates of homelessness and housing instability amongst people that share this characteristic. Having an adequate supply of supported accommodation units/housing will ensure that there are options for people seeking to move to new accommodation and that people are able to move on from temporary accommodation.</p>
Marriage or civil partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>87% of people identified in need of support are currently single, with 2.4% living as a couple.</p> <p>Whilst none of the Phase 2 homelessness schemes are specifically targeted at people based on their marital status a sufficient supply of supported accommodation units will be beneficial to anyone in housing need.</p> <p>Given the current shortage of accommodation across the City, it is anticipated the scheme will have a positive impact on single people, as this is a group who are not usually given priority as a homeless group.</p>
Pregnancy or maternity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Whilst none of the developments in the P2H programme are specifically targeted at pregnant women the provision of more supported accommodation/ housing units will allow them to access ante natal services and necessary medical care more easily.</p>

Protected characteristic	Impact:			Provide further details about the nature of the impact in the section below. Does it: 1. Promote equal opportunity 2. Promote community cohesion 3. Help eliminate unlawful discrimination/ harassment/ victimisation?
	Positive	Negative	Neither	
Race	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>16% of homeless households in need of accommodation identify as being from a Black, Asian or other Minority Ethnic (BAME) background, suggesting that BAME people are over-represented in the homeless population.</p> <p>More recently, COVID-19 has had a disproportionate impact on the financial security of BAME people living in Newport, particularly migrant populations. Other tenancy support schemes, for example, report an increase in the number of EU migrants accessing services. The provision of additional temporary accommodation to support move on to sustainable housing will assist in addressing some of this need.</p> <p>Stow Hill has an ethnic minority population of 31.6%, well above the Newport and Wales average, and the third highest across Newport. Whilst this means the area may be well suited to ethnically and culturally diverse residents, there is also potential for any negative impacts of the scheme to disproportionately affect BAME people due to the demography of the area.</p>
Religion or Belief or non-belief	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Of people currently in need of accommodation, 19% have stated their religious belief as Christianity, 5.9% Islam, and 75% as having another/no religion or have not stated their belief.</p> <p>The most commonly practised religions in Newport are Christianity and Islam, and there is a higher than average Muslim population within the Stow Hill ward. There are 2 Mosques and a number of churches within a short distance from the site. Whilst this means the area may be well suited to culturally and religiously diverse residents, there is also potential for any negative impacts of the scheme to disproportionately affect people of Muslim faith due to the demography of the area.</p>
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>There are currently 52% males and 47% females known to the Housing teams who may be eligible for the proposed units.</p> <p>Whilst none of these schemes are specifically targeted at people based on their sex or gender, a sufficient supply of supported/temporary/move on accommodation will be beneficial to anyone in housing need.</p>

Protected characteristic	Impact:			Provide further details about the nature of the impact in the section below. Does it: 1. Promote equal opportunity 2. Promote community cohesion 3. Help eliminate unlawful discrimination/ harassment/ victimisation?
	Positive	Negative	Neither	
Sexual Orientation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Research has shown LGB people are more likely to experience homelessness as a result of issues which include increased likelihood of domestic abuse, or family breakdown. Whilst this scheme is not specifically targeted at people based on their sexual orientation a sufficient supply of supported/temporary/move on accommodation will be beneficial to anyone in housing need.
Welsh Language	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Anyone eligible for accommodation within the Hill street scheme will be able to make an application in Welsh. Living in good quality, suitable accommodation has been shown to have a positive impact on the educational attainment of children. Lack of appropriate housing is also a barrier to adults re-entering education so it may be that by providing this new supported/temporary/move on housing, built to the required Welsh Government standards, we are able to support an increase in Welsh speaking in Newport.

5 How has your proposal embedded and prioritised the sustainable development principle in its development?

Sustainable Development Principle	Does your proposal demonstrate you have met this principle? Describe how.
 <p>Long Term</p> <p>Balancing short term need with long term needs</p>	<p>Whilst the aim of this proposal is to meet the immediate need for temporary accommodation for homeless households, steps have been taken to ensure this location is sustainable in the long term. This will help ensure that the local authority has sufficient units of accommodation available in the long term to alleviate and prevent homelessness.</p>
 <p>Collaboration</p> <p>Working together to deliver objectives</p>	<p>The development and operation of Hill Street will be a partnership between Newport City Council, our housing association partner Linc Cymru and the third sector organisations that work with homeless people in Newport. The Hill Street site will be well situated to allow access to services essential to the client group, including GDAS (Gwent Drug and Alcohol Service) the Needle Exchange, the Olive Branch, Eden Gate, the Wallich, Pobl, Tredegar Sexual Health Clinic, RGH (Royal Gwent Hospital), several GPs and Dentists.</p>
 <p>Involvement</p> <p>Involving those with an interest and seeking their views</p>	<p>Due to the demanding timescales, limited consultation with stakeholders will be feasible, however the council will engage with a range of third sector, statutory partners, local residents and the BID around the development.</p>
 <p>Prevention</p> <p>Putting resources into preventing problems occurring or getting worse</p>	<p>This development will allow homeless households to access good quality accommodation in a timely manner. The supported element of this accommodation will help residents address any issues they have which may impact their ability to sustain long term accommodation. People will move onto more permanent accommodation when they are ready with the right support in place in order to successfully maintain a tenancy and prevent homelessness from reoccurring.</p>



Considering impact on all wellbeing goals together and on other bodies

A prosperous Wales

Enabling people to access secure, supported accommodation will allow people to develop their skills. The pods themselves will be provided by a UK based company in partnership with Linc Cymru and a range of support services will be commissioned to support the scheme.

A resilient Wales

Zedpods are a low impact development that do not involve intensive groundworks. Zedpods can be removed and the land they are sited on returned to its original use.

A healthier Wales

Providing secure, safe supported accommodation will have significant benefits for the people that live there. The health and wellbeing of people living on site will be supported through partnership working with specialist providers who will help to prevent the behaviours that contributed to homelessness.

A more equal Wales

The provision of this type of accommodation will help us to address inequalities.

A Wales of more cohesive communities

Providing this sort of accommodation provides an opportunity for tenants to participate in the wider community. It allows people to form networks and relationships that will help keep them safe in the future.

It is recognised that the location of Hill Street may cause some local tensions, and that communities are may be concerned about the impact that the site will have on surrounding areas and residents. Any issues will be reviewed through current support provision on site and by an existing multi-agency group to address anti-social behaviour and any other negative impact on the surrounding area.

A Wales of vibrant culture and thriving Welsh Language

Assisting people into secure supported accommodation will allow them to access and engage with their own and other cultures.

A globally responsible Wales

Pods are a low impact development that can be reused across different sites. The council will investigate ways to make the pods as sustainable as possible and ensure resources are used efficiently.

Newport City Council Well-being Goals

The provision of secure supported accommodation will contribute directly to the local authority's wellbeing goals to:

1. To enable people to be healthy, independent and resilient
2. To build cohesive and sustainable communities

Providing accommodation for rough sleepers and other households facing homelessness will address health inequalities these groups face.

Sustainable Development Principle	Does your proposal demonstrate you have met this principle? Describe how.
	It is the first step in allowing them to build resilience and live independent lives. This is turn will allow them to engage with the wider community in Newport and benefit from the opportunities that provides.

6. Will the proposal/policy have a disproportionate impact on a specific geographical area of Newport?

The Zedpods will be located on Hill Street (Stow Hill ward). Hill Street is a mixed residential/business area. The potential impact on BIP and residents will be monitored and reviewed. The site will be managed with support from partners and 24-hour security in place. The primary factor in locating the development at Hill Street was to ensure ease of access to services, which are all based in the locality, in order to support people effectively.

Waste Management:

There have been ongoing issues with excess waste in and around the Hill street area, which could be impacted by the development of the scheme. The developers are working closely with City Services to ensure the scheme fully complies with all waste management requirements, and the local situation will be monitored with regards any further impact once the site is completed.

Car park impact:

Newport City Council currently operate six 24 hour Pay and Display (P&D) car parks across the city, providing 368 off street parking spaces of which 59 are at Hill Street. This is complimented by a number of private P&D as well as some limited waiting zones and free off street parking. Hill Street location means that it predominantly services visitors to the Royal Gwent Hospital, Central Police Station as well as nearby offices and visitors to the South East areas of the City Centre.

There will be a short-term impact on the car park which will not available at all during construction, this could potentially be up to 6 months. The impact of this is unknown due to the impact of COVID-19, but will be monitored. The refurbished car park will have capacity for 30 spaces, a reduction of 26. There is potential that the reduction in spaces will have a detrimental impact on the car parks continued use but this will be monitored once the car park is re-opened to assess the impact.

Whilst the reduction of spaces required for this project is not considered to have a significant impact on the overall spaces available, or within the local area, the localised nature of P&D usage, may risk an increase in illegal parking. The council will monitor this through its car park enforcement (CPE officers).

7 How does the proposal/policy relate to the parameters of debate about Fairness identified by the Newport Fairness Commission

Equity – this scheme acknowledges that the needs of some homelessness households need to be met in a specific way that combines housing and support. The provision of temporary accommodation with support will reduce the inequalities faced by homeless households, enabling them to transition to and sustain permanent accommodation.

Priority – this scheme prioritises the needs of some of the most vulnerable people in society.

Inclusion – we have consulted with as many groups as possible given the limited time frame for this work. We have used the detailed knowledge and experience of people who have worked directly with homeless households in Newport to ensure this scheme meets their needs.

Communication – an internal project team liaising with external partners have agreed the terms of the proposal, which ensures the Council meets its objectives and the demands for homeless accommodation. A number of briefings have taken place with members and press releases drafted to communicate the proposal and decision.

8. Equality Impacts and Actions

Please complete the below action plan which sets out steps that will/will not be taken in order to mitigate any negative impacts that your assessment has identified.

Impact identified	Who does it affect?	What will you do to mitigate the impact? If you plan to take no action, please justify your rationale	Who is responsible?
The effects/influence of negative social consequences of the development on younger people	Younger people in the Stow Hill ward	<p>These impacts have been considered by the project team and will continue to inform the level of support that will be in place for residents (for example, 24/7 support vs. floating support) to minimise any unwanted behaviour</p> <p>Consultation will be shared directly with those communities identified as potentially impacted in order to gather feedback</p> <p>Ongoing impact will be monitored by the project team</p>	Head of RIH
The effects/influence of negative social consequences of the development on BAME communities	BAME people living in the Stow Hill ward	<p>These impacts have been considered by the project team and will continue to inform the level of support that will be in place for residents (for example, 24/7 support vs. floating support) to minimise any unwanted behaviour</p> <p>Consultation will be shared directly with those communities identified as potentially impacted in order to gather feedback</p> <p>Ongoing impact will be monitored by the project team</p>	Head of RIH

<p>The effects/influence of negative social consequences of the development on local Muslim/faith communities</p>	<p>Muslim/faith communities</p>	<p>These impacts have been considered by the project team and will continue to inform the level of support that will be in place for residents (for example, 24/7 support vs. floating support) to minimise any unwanted behaviour</p> <p>Consultation will be shared directly with those communities identified as potentially impacted in order to gather feedback</p> <p>Ongoing impact will be monitored by the project team</p>	<p>Head of RIH</p>
<p>Potential for exacerbation of existing local issues relating to waste management</p>	<p>Stow Hill residents</p>	<p>The developers are working closely with City Services to ensure the scheme fully complies with all waste management requirements, and the local situation will be monitored with regards any further impact once the site is completed.</p>	<p>Head of RIH</p>
<p>Impact on available car parking spaces in the area</p>	<p>Newport residents</p>	<p>Short-term impact during construction, and longer term impact on need/demand of car parking spaces will be monitored, including any increases in illegal parking.</p>	<p>Head of RIH</p>

9. Monitoring, evaluating and reviewing

We will continue to monitor and assess the impact of Hill Street via existing community networks, forums and meetings

10. Involvement

We will publish this and any updated version of this FEIA on the council's website