Equality Impact Assessment

Title of Project/Service/Policy	Hastings Town Centre Public Realm and Green Connections
Team/Department	Major Projects & Growth
Directorate	Communities, Economy and Transport
Provide a comprehensive description of your proposal	As part of the Hastings Town Deal, the Hastings Town Centre Public Realm and Green Connections project looks to improve connectivity within the town centre, prioritise active travel and increase greening and biodiversity. The project was first approved by DLUHC in 2022 with a budget of £3m. Following a subsequent business case in 2023 this was increased to £9.7m funded until March 2026, with an additional £400k of LGF match funding. (1). In line with the project objectives, the design aims to put people and nature first. A carefully considered movement strategy prioritises pedestrian and cycle movement through the site, considering the arrival sequence of those entering the area from multiple points and using multiple modes of transport. The planting design will be functional, evoking unique landscape characters and providing seasonal interest whilst contributing to storm-water management and the resilience of the town centre (2). The Public Realm and Green Connections project will be a significant step towards to Hastings' ambition to become the South East's first green Garden Town (3). The project framework key moves are: 1) Arrival experience: Improvements to the train station forecourt, as a primary gateway, would enhance the experience of those arriving in the town by rail.

- 2) Station to Sea: Prioritising active travel and connecting the train station to sea would facilitate permeable movement through the heart of the town to the coast.
- 3) Town to Castle: Improving east-west movement across the town and introducing additional planting would establish a corridor between White Rock, the Castle and the Old Town beyond.
- 4) Improve Public Spaces for Local People: Hastings has an expansive network of pedestrian areas and public spaces. Improving the multifunctionality of these spaces would support increased animation, vibrancy and the overall quality of the townscape.
- 5) Bringing Nature into the Town: There is a critical need to bring nature into the town. A coherent green infrastructure network should be established to connect existing sites, improve biodiversity, contribute to the health and wellbeing of people in the town and support improvements to the public realm.
- 6) Improve Junctions: To tackle issues of severance caused by major vehicular thoroughfares around the town centre, improved pedestrian and cycle crossings should be considered to dovetail proposals in the town centre with spaces beyond.

 (4)

The project's policy context aimed to embed concepts drawn from relevant strategic and policy documents listed below and which all had their own equality considerations via assessments and stakeholder engagement (3):

Local Cycling and Walking Infrastructure Plan (LCWIP) Hastings Greenway Project Biodiversity Action Plan (BAP) (3).

Hastings Planning Strategy (2014)
Hastings Local Plan Consultation Draft (2021)
Hastings Biodiversity Action Plan
Hastings Town Centre and Bohemia Area Action Plan (2018)

Hastings Town Centre and White Rock Retail and Leisure Assessment and Urban Design Analysis (2016)

Hastings Greenway Group Walking and Cycling Strategy (2014)

Hastings Strategic Open Space and Play Space Assessment (2020)

East Sussex Local Cycling and Walking Infrastructure Plan (2020)

East Sussex Bus Improvement Plan (2021)

Trinity Triangle Hastings - Heritage Action Zone

<u>(3)</u>

We are taking our proposals to public consultation over 6 weeks, between 22nd of January 2024 and 1st March. There will be 2 in person, public events on Saturday 27th January and Tuesday 6th February. We will also hold stakeholder workshops on 24th of January and 1st of February specifically for access and voluntary groups, greening and community groups and the business community.

At this stage the EqIA only covers the design proposals. As the project develops the EqIA will be reviewed and updated to reflect any changes and the implementation phases.

Update on previous EqIAs and outcomes of previous actions (if applicable)

What actions did you plan last time?	What improved as a result?	What <u>further</u> actions do you need to
(List them from the previous EqIA)	What outcomes have these actions	take? (add these to the Action Plan
	achieved?	below)
Not applicable: this is the first plan of this		
sort.		

1. Review of information, equality analysis and potential actions

Consider the actual or potential impact of your project (service, or policy) against each of the equality characteristics.

Protected characteristics	What do you know? Summary of data about your	What do	What does this mean?	What can you do? All potential actions to:
groups under the Equality Act 2010	service-users and/or staff	people tell you? Summary of service-user and/or staff feedback	Impacts identified from data and feedback (actual and potential)	 advance equality of opportunity, eliminate discrimination, and foster good relations
Age	All figures are based on the 2021 census. Hastings is ageing with its' population median age increased from 14 to 43 years between the 2011 and 2021 census. Its median age is higher than the South East (41) and England's average (40). It	Will analyse feedback from consultation.	Potentially all age groups who study, live, work, or visit Hastings' town centre will benefit from the scheme given the proposals submitted. The framework key moves provide access for local communities to healthcare, education, retail and leisure uses as well as providing access to the	Actively target older, younger and population groups during the consultation period. Provide alternative means for older people to engage with the consultation process.

saw an increase of 30% on residents aged between 65 and 74 years while the age group between 35 and 49 years decreased 11.3%. (6) (7)

65 and over

Hastings (20.2%) has is the lowest percentage of people 65 and over in East Sussex (26.1%) although higher than the South East (19.4%) and national (18.4%) rates.

15 to 64

Hastings (63%) is the highest percentage of people aged between 15 and 64 in East Sussex (58.5%), although slightly below the South East (63.1%) and national (64.2%) rates.

0 to 14

Hastings (16.8%) is the highest percentage of people aged between 0 and 14 in East Sussex (15.4%), although below the South East (17.4%) and national (17.4%) rates. (5)

Projections across East Sussex estimate an ageing seafront area in Hastings. It is also important for supporting the delivery of potential new housing, growth in the local economy and access to jobs, all of which have benefits for people of different ages.

Older and younger people can be at more risk from accidents.

The scheme's proposal to close and/or restricting general traffic on roads within the scheme has the potential to reduce the current level of collisions, reduce air pollution and promote active lifestyles with cycle lanes and improved green infrastructure network.

Passengers on the bus services in the proposed scheme locations are likely to be older, particularly during inter-peak times.

Older passengers may find it confusing if bus stops are relocated.

Older people may be more at risk when using shared pedestrian/cycle ways, so the current design proposals include a segregated cycle path.

Older passengers may have safety concerns when traveling late at night or

Approach key organisations that work with and/or represent older and young people as well as working age people.

Maintain clear communication throughout consultation and moving into next design stage – not just relying on online platforms.

A full safety assessment will be carried out on all proposed routes that are taken through to the next design stage.

Hastings Borough do not currently intend to reopen the Harold Place toilet block, so the removal does not restrict access further than existing. Potential to work with Hastings Borough on clear wayfinding to nearest available public toilets.

	population due to internal migration of adults and older people into the area. (6) (7)		in winter. There may also be concerns about anti-social behaviour. The new designs aim to improve the experience and perception of the safety of local spaces and transport. Older passengers will benefit from reduced journey times and greater bus reliability due to bus only routes. Older car drivers may be concerned about the reallocation of road space on some of the schemes and what this might mean for them. This scheme proposes to remove the closed toilet block at Harold Place, which means older people may continue to feel limited in their use of this public spaces due to lack of access to public toilets. Young people are more likely to be reliant on public transport, and more likely to have concerns about fares and bus reliability.	
Disability	All figures are based on the 2021 census. In East Sussex, the number of residents who identify as	Will analyse feedback from consultation.	Collectively the proposed schemes are aimed at reducing general traffic on the roads and thus reducing vehicle emissions. This will have great health	Reach out to groups and representatives during the consultation period.

disabled is 20.3% - Census 2021.

In Hastings over 20% of residents identify as disabled (whether limited a lot or a little)

The 2021 Census is the latest comprehensive data we have on the number of people with a disability in the county. Our local projections suggest that by 2032 there will be over 130,000 people with a disability in East Sussex of which 22,968 are projected to Hastings. (6) (9)

National data shows that disabled people are more likely to be injured as a pedestrian than no-disabled people (8)

benefits for all but especially those with long-term respiratory conditions.

Those with disabilities (including physical, learning disability and mental health) may have concerns about safety travelling from, to and at town centre, for example walking or using and accessing public transport.

The scheme proposes improvements including access, signage and street furniture that will work for everyone such as seating with back and armrests, with various heights and positioned at accessible points. Street clutter will be reduced, which improves access for blind and visually impaired people.

Disabled people or with limited mobility will benefit from a town centre with limited general traffic and open wide spaces that prioritises people and nature.

Disabled car drivers may be concerned about the reallocation of road space on some of the schemes and what this might mean for them.

Those with disabilities (especially blind, visually impaired and deaf people) may

Ensure that proposed designs are tested for accessibility and safety as we move through to the next design stage.

			be more at risk when using shared use pedestrian/cycle ways. The current design proposals include a segregated cycle path, and signage and access will be considered as the designs progress. Increasing safe junctions and crossings will assist disabled people to keep safe and maintain independence when travelling by foot or in wheelchairs/scooters. Materials and hard surfacing will be selected to ensure good visual and tactile clues for people with limited vision. Clear colour contrasts will be used to identify different areas and uses.	
Gender reassignment	0.5% of people from Hastings responding in the Census 2021 indicated that their gender identity was different from their sex registered at birth. Nevertheless, a significant percentage of people across the county provided no response, therefore the percentage of people with a different gender identity to their sex registered at birth could be either higher or lower than shown (7).	Will analyse feedback from consultation.	Transgender people may benefit from non-sex-segregated public spaces that are people friendly with wide well lit open spaces. Improved green infrastructure can improve overall wellbeing and can also reduce general anti-social behaviour. It also has the potential to allow transgender people to navigate the dichotomy of visibility and invisibility as a management technique for potential vulnerability in public spaces. With this approach, the proposed schemes have the potential to	Make the safety benefits clear when communicating about the schemes proposals. Reach out to groups and representatives during the consultation period. (13)

		improve perceived and actual safety.	
		(12)	
ONS MSOA's data sho in Hastings 383 people to have a gender ident different from sex regis birth (5).	e stated ity		
The National LGBT su (2018) highlighted that Transgender people had lowest average life satin UK (5.5 to 5.1) compute national average (7 also confirmed that transgender people are target for abuse, harast and anti-social behavior can raise concerns regard their safety in public sp "59% of trans women and frans men who resp the survey said they have avoided expressing the gender identity for fear negative reaction from (10)	ave the isfaction pared to 7.7), it e a sment pur which parding paces. and 56% onded to ad eir		
"Transgender people			
more likely to experie			
threats of physical or s			
harassment or violence			
compared with the LG	BT		

	community as a whole (National LGBT Survey, Government Equalities Office)." (11)			
Pregnancy and maternity	According to ONS data, Hastings had 909 live births in 2021 and a rate of 15 births per 1,000 females in 2020 (7). The trend is a clear decline since the Census in 2011 when there were 1,202 live births in Hastings (5).	Will analyse feedback from consultation.	Pregnant people and those on maternity will greatly benefit from family friendly spaces, reduction of general traffic and green infrastructure. Improvements junctions and pedestrian crossings will make it safer for those with pushchairs and small children.	Make the social benefits clear when communicating about the schemes' proposals.
Race (ethnicity) Including migrants, refugees and asylum seekers	89.3% in 2011 Censes and 85.1% in 2021 Census identified as "white British and Northern Irish", which meant an increase of ethnic minority groups in Hastings(5). The ESCC Schools Census from January 2023 shows that Hastings had 20% of ethnic minority students in primary schools and 16% in secondary schools. Sussex police recorded 1512 racially or religiously aggravated offences in the 2022 and 2023 year across the	No feedback received currently. Will analyse feedback from consultation.	Safety for those who identify as black or ethnic minorities may have perceived and actual risks using public spaces and when travelling on public transport. The scheme looks to improve safety by considering street lighting and other public realm improvements. Also, possibly some issues for people with English as an additional language, or new arrivals to the UK (although these numbers are relatively small - but growing) when navigating public transport.	Make the social benefits clear when communicating about the schemes' proposals.

	South East Region and 467 for the current year (14). The Home Office and the Department for Levelling Up, Housing & Communities Immigration System Statistics data published in May 2023 shows that Hastings has 262 refugees from the Homes for Ukraine, Afghan Resettlement Programme and other Supported Asylum programme, 0.29% of Hastings total			
	population (15). National data analysis by specific ethnic groups has revealed that there is large variation in collision risk between different ethnic minority communities, potentially linked to car ownership (16)			
Religion or belief	In the 2021 Census 51.4% of Hastings residents stated that they had no religion. Of those with a religion, 37.8% were Christians, 1.9% Muslim, 0.9% Other, 0.6% Buddhist, 0.5% Hindu and 0.2% Jewish (6).	No feedback received currently. Will analyse feedback from consultation.	Safety concerns perceived and actual risks of hate crime especially for religious minority groups is a key concern. The scheme looks to improve safety by considering street lighting and other public realm improvements.	Make the safety benefits clear when communicating about the proposals.

Sex	In 2021 Census 51.5% of Hastings population was female, an increase from 48.8% in 2011 Census (5). With Hastings Town Hall in an adjacent area to the schemes' proposals, it's relevant to include Hastings council workforce gender constitution since 55% are female but only 35% work full time as per data release for 2023 (17). The percentage of women (51.8% is slightly higher in East Sussex than the national average and consequently the number of men (48.1%) is slightly lower. Data from 2011 Census (5).	Will analyse feedback from consultation.	Women are more likely to have caring responsibilities which could mean a higher use during the day of the areas within the schemes and bring those in their care to the area such as children and older people. They are also more likely to make multiple short journeys or 'chain-journeys' during a day, (for example to drop children off at school, visit an elderly parent and shop for food). This can bounce them out of 'usual' commuting routes. Women are most likely to be the victims of sexual harassment and sexual abuse on public spaces and transport. Safety when walking or using public transport is a key concerns perceived and actual	Seek opportunities for women to feedback on the proposed schemes consultation. Offer alternative options for providing feedback and be mindful of certain times (e.g. school pick up time) where women are more likely to have caring responsibilities. Make the safety benefits clear when communicating about the proposals.
Sexual orientation	that 3.3% of people 16 years and older from the East Sussex identify as Lesbian, Gay, Bisexual or Other (LGB+) and in Hastings 4.6% (7).	received currently.	Safety concerns perceived and actual risks of hate crime especially for those identifying as LGBTQ+ is a key concern. The scheme looks to improve safety by considering street lighting and other public realm improvements.	Make the safety benefits clear when communicating about the proposals.

	The National LGBT survey (2018) highlighted both perceived and real risks of hate crime targeting the LGB+ communities (10).	Will analyse feedback from consultation.		
Marriage and civil partnership	Hastings latest data for marital status is from the 2021 Census. 39.6% of respondents were single, 38.4% were married or in a civil partnership. 12.7% of respondents were divorced, 2.9% separated and 6.3% were widowed (5).	No feedback received currently. Will analyse feedback from consultation.	It is not considered that this protected characteristic will experience disproportionate, negative, neutral or positive impact by the report.	It is not considered that this protected characteristic will experience disproportionate, negative, neutral or positive impact by the report.
Armed Forces	Based on the 2021 Census, 2,914 people in Hastings reported that they served as regular or reserve in UK armed forces which is 3.9% of Hastings usual residents aged 16 years and over, the lowest percentage within East Sussex District Councils (5).	No feedback received currently. Will analyse feedback from consultation.	It is not considered that this protected characteristic will experience disproportionate, negative, neutral or positive impact by the report.	It is not considered that this protected characteristic will experience disproportionate, negative, neutral or positive impact by the report.
Impacts on community cohesion	Hastings Community Cohesion Framework 2011 – 2013 states that "A significant barrier to community cohesion is poor knowledge and understanding of one another and of different	No feedback received.	Although it is not considered that there will be any disproportionate, negative impact on community cohesion by the scheme, the project's objectives and the design aims to put people and nature first may facilitate the building of	it is not considered that there will be any disproportionate, negative impact on community cohesion by the scheme.

ways of life, which can lead to prejudice and discrimination" (18).

Although the document refers to a context from over 10 years ago, parts of it remain relevant such as key factors such as reduced public sector spending, to current inflation and cost of living crisis can "exacerbate already existing problems of high levels of deprivation" (18).

The projects area of direct intervention includes one part of Hastings that is in the 10% most Deprived areas on the Indec of Multiple Deprivation (IMD 2019) and another on the second Decile. 57.9% of households in Hastings is deprived in at least one dimension based on the Households by deprivation dimensions in 2021, a percentage higher than East Sussex as a whole (53.1%) and higher than both South East (48%) and the national (51.6%) levels (19) (5).

social capital referred to on Hastings Community Cohesion Framework 2011 – 2013 and aligned with its mission: "To build on the town's strong community spirit, culture, diverse population and extraordinary natural environment to create a safer, healthier more sustainable and more prosperous place with lasting opportunities for everybody" (18).

The project may also contribute towards the following 2023-24 Corporate Plan update priorities (20):

- 2 Keeping Hastings clean and safe
- 3 Minimising our environmental impact
- 4 Making the best use of our land and buildings
- 5 Changing how we work to meet the future
- 6 Delivering responsible regeneration for the town

Additional categories (identified locally as potentially causing / worsening inequality)

Characteristic	What do you know?	What do people tell you?	What does this mean?	What can you do?
Rurality	The proposed project is located in Hastings; therefore this characteristic is not relevant (21).			
Carers	"In all 5 districts of East Sussex, there was a smaller proportion of unpaid carers in 2021 compared with 2011. Hastings registered the largest proportion of people aged 5 and over providing 20 or more hours of unpaid care a week: 5.5% (4,780 residents) in 2021, compared with 4.1% (3,730) in 2011." (22) "At LSOA-level, Hastings 003C once again ranked top, with 15.4% of residents providing some form of unpaid care" (22). Note: Census 2021 was undertaken during the coronavirus (COVID-19) pandemic. This may have influenced how people perceived and managed their provision of unpaid care, and therefore may have affected how people chose to respond. Caution should also be taken when making comparisons between 2011 and 2021 because of changes in question's wording (22).	No feedback received currently. Will analyse feedback from consultation.	Carers, as a vulnerable group due to their role which can lead them to become socially isolated, may benefit from the project's potential contribution to community cohesion by putting people and nature first when designing and developing public spaces as it may enhance the opportunity to develop social capital's bonding and bridging within existing and new social networks.	Actively engage with carer groups and representatives during the consultation period to ensure their voices are heard.

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One of the highest areas (MSOA level) overlaps with the project's main area of intervention, Central Hastings (27).

"Office for National Statistic figures show there were 18 drug poisoning deaths in Hastings in 2022 – up from 17 the year before and the highest on record." (28) (29)

Assessment of overall impacts and any further recommendations - include assessment of cumulative impacts (where a change in one service/policy/project may have an impact on another)

The public consultation period between 22nd of January 2024 and 1st March will be key in better understanding the needs, concerns and preferences on people living and working in Hastings. There will be 2 in person, public events on Saturday 27th January and Tuesday 6th February. We will also hold stakeholder workshops on 24th of January and 1st of February specifically for access and voluntary groups, greening and community groups and the business community.

Answers and the responses given on the proposals will help to shape the next stage of design and influence the final works. Technical consultants ARUP will attend the events, facilitate the workshops, and use software to analyse the data. Their report will be available from Spring 2024.

Ongoing engagement with stakeholder groups representing these specific groups will continue and will also form significant dialogue within the detailed design process, thus making sure that people who share protected characteristics will not experience detrimental or substantial disadvantage.

2. List detailed data and/or community feedback that informed your EqIA

Source and type of data (e.g. research, or direct engagement (interviews), responses to questionnaires, etc.)	Date Accessed	Gaps in data	Actions to fill these gaps: who else do you need to engage with? (add these to the Action Plan below, with a timeframe)
(1) 140323 - Hastings Towns Fund Green Connections Phase 2 - Post Gate 1 Assessment	03/01/24		
(2) Hastings Public Realm & Green Connections – Appendix II: Design Strategies	03/01/24		
(3) Hastings Public Realm & Green Connections – Appendix I: Baseline Analysis	03/01/24		
(4) Hastings Public Realm & Green Connections – Summary of RIBA 2 Design Work	03/01/24		
(5) ESiF (eastsussexinfigures.org.uk)	03/01/24		
(6) How life has changed in Hastings: Census 2021 (ons.gov.uk)	03/01/24		
(7) State of the County 2022: Focus on East Sussex	03/01/24		
(8) Supplementing official statistics: self-reported road injuries in the National Travel Survey — UK Data Service	03/01/24		
(9) State of the County 2021 Focus on East Sussex: Appendix 1 Item 5 - Appendix 1 - Focus on East Sussex.pdf	03/01/24	No data on sexuality	Have sourced data elsewhere
(10) National LGBT Survey: Summary report (publishing.service.gov.uk)	03/01/24		
(11) <u>Transgender Hate - Stop Hate UK</u>	03/01/24		
(12) Final Full Manuscript Criminology and Criminal Justice PDF.pdf (bcu.ac.uk)	03/01/24		

(13) <u>Hastings & Rother Rainbow Alliance Trans (HRRAT) – – Gender Identity Research & Education Society – Tranzwiki directory (gires.org.uk)</u>	03/01/24
(14) Police recorded crime and outcomes open data tables - GOV.UK (www.gov.uk)	03/01/24
(15) Regional and Local authority data - Immigration groups	03/01/24
(16) Ethnicity & Road Safety – Agilysis	03/01/24
(17) The Councils Current Employment Profile (hastings.gov.uk)	03/01/24
(18) Hastings Community Cohesion Framework 2011 – 2013	03/01/24
\$Community Cohesion Appdx 2 (31 10 11).doc.pdf (moderngov.co.uk)	
(19) East Sussex – Indices of Deprivation 2019, 2015 and 2010 (Map & Stats) InstantAtlas™ Report (eastsussexinfigures.org.uk)	03/01/24
(20) Corporate plan 2023-24 Hastings Borough Council	03/01/24
(21) Publication title: Rural Urban Classification - Output area	03/01/24
(22) East Sussex 2021 Census Briefing: Health (eastsussexjsna.org.uk)	03/01/24
(23) At least 271,000 people are homeless in England today - Shelter England	03/01/24
(24) Finance Peer Challenge: Hastings Borough Council Local Government Association	03/01/24

(25) <u>Hastings: Increase in homeless due to cost of living says</u> council The Argus	03/01/24
(26) Homelessness Review 2019 (hastings.gov.uk)	03/01/24
(27) <u>substance-misuse-aon-august-2022.pdf</u> (<u>eastsussexjsna.org.uk</u>)	03/01/24
(28) Record number of drug deaths in Hastings last year (sussexexpress.co.uk)	03/01/24
(29) Deaths related to drug poisoning by local authority, England and Wales - Office for National Statistics (ons.gov.uk)	03/01/24
Hastings population change, Census 2021 – ONS	03/01/24
Trans people in the UK (publishing.service.gov.uk)	03/01/24
Transgender Hate - Stop Hate UK	03/01/24
Hastings Strategic Open and Play Space Assessment	03/01/24
Town Centre Public Realm & Green Connections — Hastings Town Deal	03/01/24
Planning Strategy - 2013-2018 - Low Resolution (hastings.gov.uk)	03/01/24
Final Full Manuscript Criminology and Criminal Justice PDF.pdf (bcu.ac.uk)	03/01/24
Hate Crime Statistics CBP-8537.pdf (parliament.uk)	03/01/24

4. Prioritised Action Plan

NB: These actions must now be transferred to service or business plans and monitored to ensure they achieve the outcomes identified.

Impact identified and group(s) affected	Action planned	Expected outcome	Measure of success	Timeframe
Age	Actively target older population groups during the consultation period. Provide alternative means for older people to engage with the consultation process. Actively target younger population groups during the consultation period.	Receive feedback from key stakeholders and the general public.	A high return of completed consultation surveys from those aged 65 and over. A return of completed consultation surveys from those aged 30 and under.	Consultation window: 22 January - 1 March 2024
Disability Gender reassignment	Actively engage with disability activist groups and representatives during the consultation period to ensure their voices are heard. Actively engage with transgender activist groups and representatives during the consultation period to ensure their voices are heard.	All comments will be investigated further during the detailed design stage of these proposals.	A good return of completed consultation surveys from those identifying or representing	
Religion or belief	Actively engage with religious groups especially those who have places of worship or work places in or near to schemes' proposals.		detailed design stage of these	transgender people. A good return of completed consultation surveys from those identifying or representing religious groups.
Sex	Seek opportunities for women to feedback on the proposed schemes consultation. Offer alternative options for providing feedback and be mindful of certain times (e.g. school pick up time) where women are more likely to have caring responsibilities.		At least a 50% return of completed consultation surveys from women.	

	Look more strategically within ESCC at the representation of women's needs within transport planning and infrastructure.	
Carers	Actively target carer groups during the consultation period.	A good return of completed consultation surveys from those identifying as carers.
Homeless people	Actively engage with relevant voluntary groups during the consultation period to ensure their voices are heard.	A good return of feedback collected at stakeholder workshops from groups representing homeless people.
Substance misusers	Actively engage with relevant voluntary groups during the consultation period to ensure their voices are heard.	A good return of feedback collected at stakeholder workshops from groups representing substance misusers.