



Oversight and Governance

Chief Executive's Department

Plymouth City Council

Ballard House

Plymouth PL1 3BJ

T 01752 305155

www.plymouth.gov.uk/democracy

Published 06/09/23

Delegated Decisions

Delegated Executive/Officer Decisions

Delegated Executive and Officer decisions are published every week and are available at the following link - <https://tinyurl.com/ms6umor>

Cabinet decisions subject to call-in are published at the following link - <http://tinyurl.com/yddrql6>

Notice of call-in for non-urgent decisions must be given to the Democratic Support Unit by 4.30 pm on Wednesday 13 September 2023. Please note – urgent decisions and non-key Council Officer decisions cannot be called in. Copies of the decisions together with background reports are available for viewing as follows:

- on the Council's Intranet Site at <https://modgov/mgDelegatedDecisions.aspx>
- on the Council's website at <https://tinyurl.com/jhnax4e>

The decisions detailed below may be implemented on Thursday 14 September 2023 if they are not called-in.

Delegated Decisions

1. Councillor Tudor Evans OBE - Leader of the Council:

- 1.1. L16 23/24 Plymouth and South Devon Freeport Project – Millbay Terminal Development **(Pages 1 - 34)**
- 1.2. L18 23/24 - Car park waterproofing and structural works - budget increase **(Pages 35 - 52)**
- 1.3. L19 23/24 Local Authority Homes Fund (LAHF) Round 2 **(Pages 53 - 96)**

2. Councillor Sally Haydon - Cabinet Member for Community Safety, Libraries, Cemeteries & Crematoria:

- 2.1. CSLCC02 23/24 - PSPO 2023 – Reducing alcohol-related anti-social behaviour **(Pages 97 - 126)**

EXECUTIVE DECISION

made by a Cabinet Member



REPORT OF ACTION TAKEN UNDER DELEGATED AUTHORITY BY AN INDIVIDUAL CABINET MEMBER

Executive Decision Reference Number – L16 23/24

Decision	
1	Title of decision: Plymouth and South Devon Freeport Project – Millbay Terminal Development
2	Decision maker: Councillor Tudor Evans OBE, Leader of the Council
3	Report author and contact details: Amanda Ratsey - Amanda.Ratsey@plymouth.gov.uk Julia Blaschke - Julia.Blaschke@plymouth.gov.uk Victoria Glennon - Victoria.Glennon@plymouth.gov.uk
4	Decision to be taken: 1. To agree to allocate £1,300,000 of Freeport Seed Capital Funding into the Capital Programme to be used for the Millbay Terminal Development; 2. To authorise the Section 151 Officer to sign off claims and release funding in connection with the Freeport Seed Capital Funding.
5	Reasons for decision: Plymouth City Council is the Accountable Body for the Freeport and will receive and allocate the seed capital to support the delivery of the Freeport Annual Plan. The Accountable Body is responsible for the effective programme management of the Seed capital programme pipeline, including appraisal of individual business cases for Seed Capital projects. This decision is necessary in order to meet timeframes set by Department for Levelling Up, Housing & Communities (DLUHC) in order to deliver the proposed activities as set out in the Business Case and spend the funds accordingly and in time.
6	Alternative options considered and rejected: 1) Do nothing This would severely impact on the ability to spend the allocated amount for this financial year.
7	Financial implications and risks: The funding is received from Government for the purpose of delivering the Seed Capital Freeport funding and is underpinned by a Memorandum of Understanding and further funding agreements that binds Plymouth City Council and Partners within the Freeport delivery

	<p>governance into an agreement with the Department for Levelling Up, Housing & Communities (DLUHC) and further funding agreements between the Accountable Body and projects outlining that the funds are shouldered by the applicant as such is contractually obliged to deliver and spend according to the Fund parameters and requirements. Projects are subject to Accountable Body processes involving but not limited to procurement regulations, monitoring and governance, as such, failure to follow requirements from either the Accountable Body or DLUHC runs the risk of remedial action.</p> <p>We will maintain robust programme management protocols through regular monitoring and review to ensure that the projects are delivered within the grant terms and conditions. Remedial action will be taken where necessary.</p>			
8	<p>Is the decision a Key Decision? (please contact Democratic Support for further advice)</p>	Yes	No	Per the Constitution, a key decision is one which:
			x	in the case of capital projects and contract awards, results in a new commitment to spend and/or save in excess of £3million in total
			x	in the case of revenue projects when the decision involves entering into new commitments and/or making new savings in excess of £1million
			x	is significant in terms of its effect on communities living or working in an area comprising two or more wards in the area of the local authority.
	<p>If yes, date of publication of the notice in the Forward Plan of Key Decisions</p>	n/a		
9	<p>Please specify how this decision is linked to the Council's corporate plan/Plymouth Plan and/or the policy framework and/or the revenue/capital budget:</p>	<p>This decision can be linked to the Plymouth Plan chapters; Growing City and International City as well as other frameworks including the Climate Emergency Action Plan. This decision would be directly linked to the capital budget and will be managed and monitored in accordance with Plymouth City Council processes.</p>		
10	<p>Please specify any direct environmental implications of the decision (carbon impact)</p>	<p>The Millbay Development Project will contribute to the Freeport's Net Zero ambition; encouraging greener modes of travel and port activity.</p> <p>This Project will secure the future of ferry services calling at Associated British Ports (ABP) Plymouth. ABP are in advanced negotiations with Brittany Ferries to use the upgraded RoRo terminal. Brittany Ferries are investing in their fleet of ferries, buying three new Liquefied Natural Gas (LNG) ships which reduce nitrogen oxide emissions by 85% and CO2 emissions by around 20%. Brittany Ferries are retrofitting their existing fleet of ships with smoke filters, reducing sulphur and particulate emissions by 97%. This investment would also allow the quayside to support</p>		

		the weight of a shore power connection.	
Urgent decisions			
11	Is the decision urgent and to be implemented immediately in the interests of the Council or the public?	Yes	(If yes, please contact Democratic Support (democraticsupport@plymouth.gov.uk) for advice)
		No	x (If no, go to section 13a)
12a	Reason for urgency:		
12b	Scrutiny Chair Signature:		Date
	Scrutiny Committee name:		
	Print Name:		
Consultation			
13a	Are any other Cabinet members' portfolios affected by the decision?	Yes	
		No	x (If no go to section 14)
13b	Which other Cabinet member's portfolio is affected by the decision?		
13c	Date Cabinet member consulted		
14	Has any Cabinet member declared a conflict of interest in relation to the decision?	Yes	If yes, please discuss with the Monitoring Officer
		No	x
15	Which Corporate Management Team member has been consulted?	Name	Anthony Payne
		Job title	Strategic Director for Place
		Date consulted	09 August 2023
Sign-off			
16	Sign off codes from the relevant departments consulted:	Democratic Support (mandatory)	DS36 23/24

	Finance (mandatory)	DJN.23.24.84
	Legal (mandatory)	LS/00001312/AC/1/ 23/8/23.
	Human Resources (if applicable)	n/a
	Corporate property (if applicable)	n/a
	Procurement (if applicable)	n/a

Appendices

17	Ref.	Title of appendix
	A	Part I Supporting Summary Report
	B	Equalities Impact Assessment

Confidential/exempt information

18a	Do you need to include any confidential/exempt information?	Yes	<input checked="" type="checkbox"/>	If yes, prepare a second, confidential ('Part II') briefing report and indicate why it is not for publication by virtue of Part I of Schedule 12A of the Local Government Act 1972 by ticking the relevant box in 18b below. (Keep as much information as possible in the briefing report that will be in the public domain)
		No	<input type="checkbox"/>	

Exemption Paragraph Number

		1	2	3	4	5	6	7
18b	Confidential/exempt briefing report title: Final ABP Business Case			<input checked="" type="checkbox"/>				

Background Papers

19	Please list all unpublished, background papers relevant to the decision in the table below. Background papers are <u>unpublished</u> works, relied on to a material extent in preparing the report, which disclose facts or matters on which the report or an important part of the work is based. If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part I of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.
----	---


Title of background paper(s)

Exemption Paragraph Number

		1	2	3	4	5	6	7

Cabinet Member Signature

20 I agree the decision and confirm that it is not contrary to the Council’s policy and budget framework, Corporate Plan or Budget. In taking this decision I have given due regard to the Council’s duty to promote equality of opportunity, eliminate unlawful discrimination and promote good relations between people who share protected characteristics under the Equalities Act (2010) and those who do not. For further details please see the EIA attached.

Signature		Date of decision	05 September 2023
------------------	---	-------------------------	-------------------

Print Name	Councillor Tudor Evans OBE
-------------------	----------------------------

This page is intentionally left blank

MILLBAY TERMINAL DEVELOPMENT – FREEPORT PROJECT

Supporting Summary Paper for Executive Decision



Business Case Summary

The decision is to agree to use the Seed Capital Funds to carry out the proposed project and activities outlined below:

Associated British Ports (ABP) is embarking on a series of strategic infrastructure developments at Mill Bay Plymouth to secure the long-term future of the Ferry Terminal, strengthen the ports freight capability, increase the port's green credentials, and grow the offering to the cruise market. This project forms part of that overall plan – focusing specifically on the freight capability. The activities that the funding will support include:

- Wharf replacements – Jetty and Fender
- RoRo painting and recladding
- Project Management and Delivery Cost
- Contingency

The objective of this project is to commence a phased approach to replacing the existing historic wharf with a stronger wharf. This will increase the Ports ability to handle general cargo and containers over the berth, doubling the existing load capacity of the wharf.

The berth will meet code of practice loading thresholds for a 'General Cargo' and 'Single Height Container' berth, permitting much greater capture of cargo loading/unloading activities. Allowing existing and new customers to bring an increased amount of freight through the port. Supporting policies to increase global trade through Plymouth.

The project will align very strongly with the city's ambition to be a sustainable and clean growth city, investing in clean blue/green travel and tourism and freight activity.

With new businesses moving into the Freeport tax sites there will be an increased requirement for importing and exporting. This infrastructure project will facilitate that requirement, thereby helping to deliver Freeport objectives.

In the last 2 years ABP has had to turn away opportunities of short sea ships as the quay side has not been able to support the cargo, these opportunities include:

- Babcock – As part of their expansion they were looking for a commercial opportunity which ABP were unable to accommodate due to weight restrictions on the pier.
- 2 x Container vessels – An opportunity for a small container vessel to operate to and from Plymouth however as the vessel was not a self-discharge vessel, they were unable to service the calls as we were not able to put a large enough crane on the quayside.
- Project cargo – There have been 3 opportunities in the past 18 months for project cargo to come through Plymouth for the local area which they have had to turn away.

These industries need excellent maritime access for importing raw materials and components and exporting finished products. This requires investment in port infrastructure now ahead of demand which would be an uncertain proposition for a private investor like ABP. However, without this investment key industries will not have the connectivity they require to invest in the PASD Freeport. Without the intervention the project would not be financially viable.

This page is intentionally left blank


The following relates to exempt or confidential matters (Para(s) 3 of Part 1, Schedule 12A of the Local Govt Act 1972). Any breach of confidentiality could prejudice the Council/person/body concerned & might amount to a breach of the councillors /employees codes of conduct.

Document is Restricted

This page is intentionally left blank

EQUALITY IMPACT ASSESSMENT – [FREEPORT PROJECT BUSINESS CASE EXECUTIVE DECISION]

SECTION ONE: INFORMATION ABOUT THE PROPOSAL

Author(s): This is the person completing the EIA template.	Victoria Glennon	Department and service:	Economic Development	Date of assessment:	30/08/2023
Lead Officer: Please note that a Head of Service, Service Director, or Strategic Director must approve the EIA.	Amanda Ratsey	Signature:	Amanda Ratsey 	Approval date:	30/08/2023
Overview:	<p>Plymouth City Council is the Accountable Body for the Freeport and will receive and allocate the Seed Capital to support the delivery of the Freeport Annual Plan.</p> <p>The Accountable Body is responsible for the effective programme management of the Seed capital programme pipeline, including appraisal of individual business cases for Seed Capital projects.</p> <p>This decision is necessary in order to meet timeframes set by Department for Levelling Up, Housing & Communities (DLUHC) in order to deliver the proposed activities as set out in the Business Case and spend the funds accordingly and in time.</p> <p>Business Case Summary</p> <p>The decision is to agree the use the Seed Capital Funds to carry out the proposed project and activities outlined below:</p> <p>Associated British Ports (ABP) is embarking on a series of strategic infrastructure developments at Mill Bay Plymouth to secure the long-term future of the Ferry Terminal, strengthen the ports freight capability, increase the Port's green credentials, and grow the offering to the cruise market. This project forms part of that overall plan – focusing specifically on the freight capability. The activities that the funding will support include:</p> <p>Wharf replacements – Jetty and Fender</p>				

	<p>RoRo painting and recladding</p> <p>Project Management and Delivery Cost</p> <p>Contingency</p>
Decision required:	<ol style="list-style-type: none"> To agree to allocate £1,300,000 of Freeport Seed Capital Funding into the Capital Programme to be used for the Millbay Terminal Development. To authorise the Section 151 Officer to sign off claims and release funding in connection with the Freeport Seed Capital Funding.

SECTION TWO: EQUALITY IMPACT ASSESSMENT SCREENING TOOL

Potential external impacts: Does the proposal have the potential to negatively impact service users, communities or residents with protected characteristics?	Yes		No	x
Potential internal impacts: Does the proposal have the potential to negatively impact Plymouth City Council employees?	Yes		No	x
Is a full Equality Impact Assessment required? (if you have answered yes to either of the questions above then a full impact assessment is required and you must complete section three)	Yes		No	x
If you do not agree that a full equality impact assessment is required, please set out your justification for why not.	A full EIA has been completed below despite the answers above.			

SECTION THREE: FULL EQUALITY IMPACT ASSESSMENT

Protected characteristics	Evidence and information (e.g. data and consultation feedback)	Adverse impact	Mitigation activities	Timescale and
---------------------------	--	----------------	-----------------------	---------------

(Equality Act, 2010)				responsible department
Age	<p>Plymouth</p> <ul style="list-style-type: none"> • 16.4 per cent of people in Plymouth are children aged under 15. • 65.1 per cent are adults aged 15 to 64. • 18.5 percent are adults aged 65 and over. • 2.4 percent of the resident population are 85 and over. <p>South West</p> <ul style="list-style-type: none"> • 15.9 per cent of people are aged 0 to 14, 61.8 per cent are aged 15 to 64. • 22.3 per cent are aged 65 and over. <p>England</p> <ul style="list-style-type: none"> • 17.4 per cent of people are aged 0 to 14. • 64.2 per cent of people are aged 15 to 64. • 18.4 per cent of people are aged 65 and over. <p>(2021 Census)</p>	<p>Noise and disturbance – impacts</p> <p>Evidence has shown that both younger and older people are likely to have their physical and mental wellbeing negatively impacted by increased noise. For young people, for example, increased noise may impact on their wellbeing and ability to meet their educational potential. For older people noise disturbances can cause increased anxiety and exacerbate conditions such as dementia and tinnitus.</p> <p>Noise and disturbance – Plymouth Port</p> <p>The Freeport may increase the number of ships using the Plymouth Port and it is likely that this will increase noise and disturbance.</p> <p>Noise and disturbance – Increased traffic</p> <p>The Freeport will increase the amount of traffic on Plymouth roads, especially on roads near to the Freeport and within the Freeport itself.</p> <p>A new road link is planned in response to increased demand - spine roads are going to connect to the A38 to improve connectivity.</p>	<p>Noise and disturbance – Plymouth Port</p> <p>As the Port needs to operate at the time that the tide allows, it is not possible to mitigate against this impact given its nature.</p> <p>Although there is the potential for the increase in freight traffic to increase noise and disturbance for local residents, the parts of the Port that will be used are largely away from residential areas. The additional tax/customs sites will be on under-developed land, thus minimising impact to the extent that is possible. South Yard is in close proximity to a local school and the Sherford employment zone is part of the wider Sherford village development.</p> <p>Langage, the largest site where most of the construction is going to take place, is greenfield and is not directly adjacent to residential area.</p>	<p>March 2025 Economic Development</p>

		<p>Noise and disturbance – construction It is likely that the Freeport will result in an increase in noise from both construction and business as usual. Increases in noise have been linked to poorer health outcomes including negatively effecting both mental and physical health.</p> <p>Emissions Poor air quality and pollution has negative consequences for health and the local environment. In particular, a high quantity of particulate matter is linked to poorer health outcomes including negatively effecting both mental and physical health. This negative impact is more likely to affect young people as their lungs are still developing.</p> <p>Emissions – Plymouth Port The Freeport aims to significantly increase the volume of freight through the Port of Plymouth. Increasing the volume of freight brought in through the Port of Plymouth, rather than more distant UK ports, will reduce national emissions from the transport sector, as well as reducing congestion on trunk roads elsewhere.</p> <p>Emissions – Freeport (onsite) The increase in freight traffic and associated traffic within the Freeport will likely increase local traffic and thus local emissions.</p>	<p>Noise and disturbance – Increased traffic We will consider the possibility to explore noise monitoring and reduction initiatives in the vicinity if required. Any noise complaints will be monitored for trends.</p> <p>Our approach will require buildings to be built using sustainable materials, be well insulated and have renewables (such as solar or heat pumps) integrated.</p> <p>All construction will be delivered in line with local guidance to ensure minimal disruption to the local area.</p> <p>Within the Freeport we will use a combination of electric and hydrogen powered vehicles to move cargo between the Port and customs sites. There is already and EV charge point at Oceansgate and by 2025, all support vehicles will be low carbon. Charging infrastructure will also be put in place to encourage wider</p>	
--	--	---	---	--

			<p>port users (including RORO traffic) to use low carbon fuels. Emissions from commuter transport will be minimised through green transport initiatives, which will include public transport options (including park and ride) as well as walking and cycling, which build on existing infrastructure such as cycle ways.</p>	
<p>Care experienced individuals (Note that as per the Independent Review of Children’s Social Care recommendations, Plymouth City Council is treating care experience as though it is a protected characteristic).</p>	<p>It is estimated that 26 per cent of the homeless population in the UK have care experience. In Plymouth there are currently 7 per cent of care leavers open to the service (6 per cent aged 18-20 and 12 per cent of those aged 21+) who are in unsuitable accommodation.</p> <p>The Care Review reported that 41 per cent of 19-21 year old care leavers are not in education, employment or training (NEET) compared to 12 per cent of all other young people in the same age group.</p> <p>In Plymouth there are currently 50 per cent of care leavers aged 18-21 Not in Education Training or Employment (54 per cent of all those care leavers aged 18-24 who are open to the service).</p> <p>There are currently 195 care leavers aged 18 to 20 (statutory service) and</p>	<p>No adverse impact anticipated.</p>	<p>Not applicable.</p>	<p>March 2025 Economic Development</p>

	<p>58 aged 21 to 24 (extended offer). There are more care leavers aged 21 to 24 who could return for support from services if they wished to.</p>			
<p>Disability</p>	<p>9.4 per cent of residents in Plymouth have their activities limited ‘a lot’ because of a physical or mental health problem. 12.2 per cent of residents in Plymouth have their activities limited ‘a little’ because of a physical or mental health problem (2021 Census)</p>	<p>Noise and disturbance Evidence has shown that people with disabilities and underlying health conditions are more likely to have their physical and mental wellbeing negatively impacted by increased noise. For example, one study found that people living in areas with high levels of traffic noise were 25 per cent more likely than those living in quieter areas to develop depression.</p> <p>Noise and disturbance – Plymouth Port The Freeport will increase the number of ships using the Plymouth Port and it is likely that this will increase noise and disturbance.</p> <p>Noise and disturbance – Increased traffic The Freeport will increase the amount of traffic on Plymouth roads, especially on roads near to the Freeport and within the Freeport itself. A new road link is planned in response to increased demand - spine roads are going to connect to the A38 to improve connectivity.</p> <p>Noise and disturbance – construction</p>	<p>Noise and disturbance – Plymouth Port As the port needs to operate at the time that the tide allows, it is not possible to mitigate against this impact given its nature. Although there is the potential for the increase in freight traffic to increase noise and disturbance for local residents, the parts of the Port that will be used are largely away from residential areas. The additional tax/customs sites will be on under-developed land, thus minimising impact to the extent that is possible. South Yard is in close proximity to a local school and the Sherford employment zone is part of the wider Sherford village development. Langage, the largest site where most of the construction is going to take place, is greenfield and is not directly adjacent to residential area.</p>	<p>March 2025 Economic Development</p>

		<p>It is likely that the Freeport will result in an increase in noise from both construction and business as usual. Increases in noise have been linked to poorer health outcomes including negatively effecting both mental and physical health. This negative impact is more likely to be felt by people with disabilities, however this is not limited to this cohort</p> <p>Emissions Poor air quality and pollution has negative consequences for health and the local environment. In particularly, a high quantity of particulate matter is linked to poorer health outcomes including negatively effecting both mental and physical health. This negative impact is more likely for people with disabilities due to the increased likelihood that they may have an underlying health condition related to their breathing or lungs.</p> <p>Emissions – Plymouth Port The Freeport aims to significantly increase the volume of freight through the Port of Plymouth. Increasing the volume of freight brought in through the Port of Plymouth, rather than more distant UK Ports, will reduce national emissions from the transport sector, as well as reducing congestion on trunk roads elsewhere.</p> <p>Emissions – Freeport (onsite)</p>	<p>Noise and disturbance – Increased traffic We will consider the possibility to explore noise monitoring and reduction initiatives in the vicinity if required. Any noise complaints will be monitored for trends.</p> <p>Our approach will require buildings to be built using sustainable materials, be well insulated and have renewables (such as solar or heat pumps) integrated.</p> <p>All construction will be delivered in line with local guidance to ensure minimal disruption to the local area. Within the Freeport we will use a combination of electric and hydrogen powered vehicles to move cargo between the Port and customs sites. There is already and EV charge point at Oceansgate and by 2025, all support vehicles will be low carbon. Charging infrastructure will also be put in place to encourage wider port users (including RORO traffic) to use low carbon</p>	
--	--	--	---	--

		<p>The increase in freight traffic and associated traffic within the Freeport will likely increase local traffic and thus local emissions.</p> <p>Accessibility The large majority of buildings within the Freeport will be closed to members of the public, however we recognise that accessibility is still important. Where buildings are older, guidance will be taken from the appropriate colleagues and heritage organisation when appropriate</p>	<p>fuels. Emissions from commuter transport will be minimised through green transport initiatives, which will include public transport options (including park and ride) as well as walking and cycling, which build on existing infrastructure such as cycle ways.</p>	
<p>Gender reassignment</p>	<p>0.5 per cent of residents in Plymouth have a gender identity that is different from their sex registered at birth. 0.1 per cent of residents identify as a trans man, 0.1 per cent identify as non-binary and, 0.1 per cent identify as a trans women (2021 Census).</p>	<p>No adverse impacts are anticipated.</p>	<p>Not applicable.</p>	<p>March 2025 Economic Development</p>
<p>Marriage and civil partnership</p>	<p>40.1 per cent of residents have never married and never registered a civil partnership. 10 per cent are divorced, 6 percent are widowed, with 2.5 per cent are separated but still married.</p> <p>0.49 per cent of residents are, or were, married or in a civil partnerships of the same sex. 0.06 per cent of residents are in a civil partnerships with the opposite sex (2021 Census).</p>	<p>No adverse impacts are anticipated.</p>	<p>The employment and skills plan will include engagement with the Department for Work and Pensions, universities, schools and other partners working with young women and girls to promote STEM career and education pathways.</p> <p>Engagement will also take place with local voluntary and community sector partners working with women and girls</p>	<p>March 2025 Economic Development</p>

			to raise awareness of the employment and education offer available and communication materials will be shared.	
Pregnancy and maternity	The total fertility rate (TFR) for England was 1.62 children per woman in 2021. The total fertility rate (TFR) for Plymouth in 2021 was 1.5.	No adverse impacts are anticipated.	The employment and skills plan will include engagement with the Department for Work and Pensions, universities, schools and other partners working with young women and girls to promote STEM career and education pathways. Engagement will also take place with local voluntary and community sector partners working with women and girls to raise awareness of the employment and education offer available and communication materials will be shared.	March 2025 Economic Development
Race	In 2021, 94.9 per cent of Plymouth's population identified their ethnicity as White, 2.3 per cent as Asian and 1.1 per cent as Black (2021 Census) People with a mixed ethnic background comprised 1.8 per cent of the population. 1 per cent of the	No adverse impacts are anticipated.	The employment and skills plan will include engagement with the Department for Work and Pensions, universities, schools and other partners working with people from Black, Asian and minority ethnic backgrounds to promote career and education pathways.	March 2025 Economic Development

	<p>population use a different term to describe their ethnicity (2021 Census)</p> <p>92.7 per cent of residents speak English as their main language. 2021 Census data shows that after English, Polish, Romanian, Chinese, Portuguese, and Arabic are the most spoken languages in Plymouth (2021 Census).</p>		<p>Engagement will also take place with local voluntary and community sector partners working with this cohort and in particular refugees and asylum seekers to raise awareness of the employment and education offer available.</p> <p>Key information within the Freeport will be available in different languages, recognising the diversity of people using and passing through the Freeport.</p> <p>Staff employed by the Freeport will be trained in cultural awareness and cultural accessibility.</p>	
Religion or belief	<p>48.9 per cent of the Plymouth population stated they had no religion. 42.5 per cent of the population identified as Christian (2021 Census).</p> <p>Those who identified as Muslim account for 1.3 per cent of Plymouth’s population while Hindu, Buddhist, Jewish or Sikh combined totalled less than 1 per cent (2021 Census).</p>	Not applicable	Not applicable	March 2025 Economic Development
Sex	<p>51 per cent of our population are women and 49 per cent are men (2021 Census).</p>	No adverse impacts are anticipated.	<p>The employment and skills plan will include engagement with the Department for Work and Pensions, universities, schools and other partners working with young women and girls to promote</p>	March 2025 Economic Development

			<p>STEM career and education pathways.</p> <p>Engagement will also take place with local voluntary and community sector partners working with women and girls to raise awareness of the employment and education offer available and communication materials will be shared.</p>	
Sexual orientation	<p>88.95 per cent of residents aged 16 years and over in Plymouth describe their sexual orientation as straight or heterosexual. 2.06 per cent describe their sexuality as bisexual, 1.97 per cent of people describe their sexual orientation as gay or lesbian. 0.42 per cent of residents describe their sexual orientation using a different term (2021 Census).</p>	<p>No adverse impacts are anticipated.</p>	<p>Not applicable</p>	<p>March 2025 Economic Development</p>

SECTION FOUR: HUMAN RIGHTS IMPLICATIONS

Human Rights	Implications	Mitigation Actions	Timescale and responsible department
	<p>No adverse human rights implications are anticipated.</p>	<p>Not applicable. This will be reviewed and updated if or when any adverse impacts arise as a result of the project.</p>	<p>Not applicable.</p>

SECTION FIVE: OUR EQUALITY OBJECTIVES

Equality objectives	Implications	Mitigation Actions	Timescale and responsible department
Celebrate diversity and ensure that Plymouth is a welcoming city.	There are no anticipated direct negative implications to this objective.	Not applicable. This will be reviewed if in the case that any adverse impacts should arise during delivery.	March 2025. Economic Development
Pay equality for women, and staff with disabilities in our workforce.	There are no anticipated direct negative implications to this objective.	Not applicable. This will be reviewed if in the case that any adverse impacts should arise during delivery.	March 2025. Economic Development
Supporting our workforce through the implementation of Our People Strategy 2020 – 2024	There are no anticipated direct negative implications to this objective.	Not applicable. This will be reviewed if in the case that any adverse impacts should arise during delivery.	March 2025. Economic Development
Supporting victims of hate crime so they feel confident to report incidents, and working with, and through our partner organisations to achieve positive outcomes.	There are no anticipated direct negative implications to this objective.	Not applicable. This will be reviewed if in the case that any adverse impacts should arise during delivery.	March 2025. Economic Development
Plymouth is a city where people from different backgrounds get along well.	There are no anticipated direct negative implications to this objective.	Not applicable. This will be reviewed if in the case that any adverse impacts should arise during delivery.	March 2025. Economic Development

EXECUTIVE DECISION

made by a Cabinet Member



REPORT OF ACTION TAKEN UNDER DELEGATED AUTHORITY BY AN INDIVIDUAL CABINET MEMBER

Executive Decision Reference Number – L18 23/24

Decision	
1	Title of decision: Car Park Waterproofing and Structural works – Budget Increase
2	Decision maker: Councillor Tudor Evans OBE (Leader of Plymouth City Council)
3	Report author and contact details: Tim Thomas, Quantity Surveyor. Tim.thomas@plymouth.gov.uk 01752 305915
4	<p>Decision to be taken:</p> <p>The Leader:</p> <ol style="list-style-type: none"> 1. Approves the Business Case; 2. Allocates an additional £400,000 for the project into the Capital Programme funded by service borrowing; 3. Authorises the procurement process; 4. Delegates the award of contracts to Service Director for Street Services where they do not already have the authority to do so.
5	<p>Reasons for decision:</p> <p>I. The structural works are required to be undertaken to maintain the operation of the following car parks for a further 20 years, and the increase to budget requirement is as a result of further structural repairs being identified and requiring remediation within the existing repair contract. The works affect the following car parks:</p> <ul style="list-style-type: none"> • Napier Terrace • Western Approach • Regent Street • Theatre Royal • Mayflower East
6	<p>Alternative options considered and rejected:</p> <p>I. The ‘Do Nothing’ option was considered but rejected based on the risk to income and reduced parking availability and economic wellbeing of the city – the work volume of work has increased as a result of the original scope.</p>
7	<p>Financial implications and risks:</p> <p>The additional £400K investment will be funded through service borrowing from the parking trading account.</p> <p>Potential risks identified by not undertaking this additional work include:</p> <ul style="list-style-type: none"> • Loss in parking income from car parking areas not being serviceable

	<ul style="list-style-type: none"> • Reduced parking space availability • Negative impacts on reputation for PCC and the economic wellbeing of the city 		
<p>8</p> <p>Is the decision a Key Decision? (please contact Democratic Support for further advice) Please type an X into the relevant boxes</p>	Yes	No	Per the Constitution, a key decision is one which:
		x	in the case of capital projects and contract awards, results in a new commitment to spend and/or save in excess of £3million in total
		x	in the case of revenue projects when the decision involves entering into new commitments and/or making new savings in excess of £1million
		x	is significant in terms of its effect on communities living or working in an area comprising two or more wards in the area of the local authority.
<p>If yes, date of publication of the notice in the Forward Plan of Key Decisions</p>			
<p>9</p> <p>Please specify how this decision is linked to the Council’s corporate plan/Plymouth Plan and/or the policy framework and/or the revenue/capital budget:</p>	<p>As per the existing Executive Decision COD40 22/23 to undertake structural repair works on the above-named car parks, the budget to repair the car park must increase to allow the necessary repairs to be undertaken.</p> <p>Fewer potholes, cleaner, greener streets and transport.</p> <p>Green investment, jobs, skills and education.</p> <p>Policy HEA6 Delivering a safe, efficient, accessible, sustainable and health-enabling transport system:</p> <ul style="list-style-type: none"> • The car parks help promote the growth of the electric vehicle charging network. <p>Policy GRO1 Creating the conditions for economic growth:</p> <ul style="list-style-type: none"> • Access to businesses through car parks supports encouraging business growth and investment • Indigenous and inward investment helping local businesses to grow and supporting, attracting and providing the right conditions for new investment to the city, bringing in new jobs, skills and ideas. <p>Policy GRO4 using transport investment to drive growth:</p> <ul style="list-style-type: none"> • supporting and promoting car sharing and the establishment of co-ordinated car clubs in new developments • Management of demand for travel through the application of accessibility-based car parking standards, charging policy for car parks to discourage commuting, and targeted fiscal based management strategies in major employment locations. 		

10	Please specify any direct environmental implications of the decision (carbon impact)	None.		
Urgent decisions				
11	Is the decision urgent and to be implemented immediately in the interests of the Council or the public? Please type an X into the relevant box	Yes		(If yes, please contact Democratic Support (democraticsupport@plymouth.gov.uk) for advice)
		No	x	(If no, go to section 13a)
12a	Reason for urgency:			
12b	Scrutiny Chair Signature:		Date	
	Scrutiny Committee name:			
	Print Name:			
Consultation				
13a	Are any other Cabinet members' portfolios affected by the decision? Please type an X into the relevant box	Yes	x	
		No		(If no go to section 14)
13b	Which other Cabinet member's portfolio is affected by the decision?	Councillor Mark Coker (Cabinet Member for Strategic Planning & Transport)		
13c	Date Cabinet member consulted	30 August 2023		
14	Has any Cabinet member declared a conflict of interest in relation to the decision? Please type an X into the relevant box	Yes		If yes, please discuss with the Monitoring Officer
		No	x	
15	Which Corporate Management Team member has been consulted?	Name	Anthony Payne	
		Job title	Strategic Director for Place	
		Date consulted	24 August 2023	
Sign-off				
16		Democratic Support (mandatory)		DS 38 23/24

Sign off codes from the relevant departments consulted:	Finance (mandatory)	DJN.23.24.82
	Legal (mandatory)	LS/00001312/1/AC/3/9/23
	Human Resources (if applicable)	N/A
	Corporate property (if applicable)	N/A
	Procurement (if applicable)	SN/PS/694/ED/0823

Appendices

17	Ref.	Title of appendix
	A	Business Case
	B	Equalities Impact Assessment

Confidential/exempt information

18 a	Do you need to include any confidential/exempt information? Please type an X into the relevant box	Yes		If yes, prepare a second, confidential ('Part II') briefing report and indicate why it is not for publication by virtue of Part I of Schedule 12A of the Local Government Act 1972 by ticking the relevant box in 18b below. (Keep as much information as possible in the briefing report that will be in the public domain)
		No	X	

Exemption Paragraph Number

	1	2	3	4	5	6	7
18 b	Confidential/exempt briefing report title:						


Background Papers

19 Please list all unpublished, background papers relevant to the decision in the table below.
Background papers are unpublished works, relied on to a material extent in preparing the report, which disclose facts or matters on which the report or an important part of the work is based. If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part I of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.

Title of background paper(s)

Exemption Paragraph Number

	1	2	3	4	5	6	7

Cabinet Member Signature	
20	I agree the decision and confirm that it is not contrary to the Council's policy and budget framework, Corporate Plan or Budget. In taking this decision I have given due regard to the Council's duty to promote equality of opportunity, eliminate unlawful discrimination and promote good relations between people who share protected characteristics under the Equalities Act (2010) and those who do not. For further details please see the EIA attached.
Signature	
Date of decision	05 September 2023
Print Name	Councillor Tudor Evans OBE

This page is intentionally left blank

CAPITAL INVESTMENT BUSINESS CASE

01994-21 Car Park Waterproofing and Structural works – Budget Increase



EXECUTIVE SUMMARY

The Executive Summary is a short summary of the Business Case and should be the last section you complete, this will enable you to extract or only the key facts from relevant sections i.e. 'project on a page'. The summary is a 'snapshot' of the business case which will need to tell the story and sell the proposal.

Structural and condition surveys undertaken in 2017 identified a range of maintenance works that required to be undertaken if the Council wanted to maintain the future operation of its 5 car parks i.e. Regent Street, Mayflower East, Theatre Royal, Western Approach and Napier Terrace, protecting the Council's future ability to generate revenue from these assets.

In 2019/20, the leader of the council approved a £1.6m capital investment to undertake these works, however the works were delayed due to Covid-19 and, despite a number of approaches to the market, the Council was only able to award works to undertake the works in 2022.

Since the capital approval costs had increased, including the impact of inflation, where, in 2023, an additional £199,900 was approved via the S151 Officer to increase the budget to £1,799,900.

A survey was undertaken a year prior to the works commencing which identified there has been further degradation to the car parks to that which was identified in 2017. Unfortunately, the majority of the works is not apparent until the contractors are on site.

Works have commenced at Theatre Royal and Napier Terrace and hammer testing surveys have been undertaken which could only be carried out once the floors are closed to the public. The repairs were then exposed which have been found to be extensive. Repairs to the parapets are not obvious until jet washing has been undertaken; again, there have been more than expected. Further surveys are also being undertaken i.e. Chloride to establish the state of the concrete structures and Carbonation which will confirm whether there is any corrosion. Therefore, if this is the trend then the other 3 car parks may require a similar extent of repairs.

Regent Street Car Park recently closed for approx. 1 week as it became unsafe for the public to use. Urgent repairs were undertaken to the external panels above the entrance and exit to allow it to re-open. However, there are further surveys and repairs required to the other sides of the car park.

The risk of not undertaking these works are financial and reputational. There would be a reduction in car park capacity with the likelihood of phased closure of the car parks reduction income to the council, creating reputational risk such as recent closure of Regent Street Car Park and Mayflower West in 2013.

Any closure or reduction of car park capacity would significantly impact on businesses and the economic wellbeing of the City.

There are no real alternative options to consider. If the Council is to maintain its ability to generate income from these car parks for the next 20 years, this investment is required. These works do not include any 'cosmetic' works or works to improve the look and feel of the car park and customer experience, these works are solely associated with the absolute minimum work required to extend the asset life. Failure to deliver £2,199,900 of preventative maintenance will place £39m income at significant risk.

SECTION I: PROJECT DETAIL			
Project Value (indicate capital or revenue)	£400,000 Capital monies bringing the overall total to £ 2,199,900 of which £1,799,900 has been approved.	Contingency (show as £ and % of project value)	10% contingency of the overall budget.
Programme	To be incorporated within current programme of works and delivered by November 2023.	Directorate	Place - SP&I
Portfolio Holder	Cllr Mark Coker, Strategic Planning and Infrastructure	Service Director	Philip Robinson (Street Services)
Senior Responsible Officer (client)	Mike Artherton	Project Manager	Jackie Keith
Address and Post Code	Prince Rock Depot Macadam Road Plymouth PL4 0RZ	Ward	St Peter and the Waterfront
Current Situation: <i>(Provide a brief, concise paragraph outlining the current situation and explain the current business need, problem, opportunity or change of circumstances that needs to be resolved)</i>			
<p>A survey was undertaken a year prior to the works commencing, so there has been further degradation. Unfortunately, the majority of the works is not apparent until the contractors are on site.</p> <p>Works have commenced at Theatre Royal and Napier Terrace and hammer testing surveys have been undertaken which could only be carried out once the floors are closed to the public. The repairs are then exposed which have been found to be extensive. Repairs to the parapets are not obvious until jet washing has been undertaken; again, there have been more than expected. Further surveys are also being undertaken i.e. Chloride to establish the state of the concrete structures and Carbonation which will confirm whether there is any corrosion. Therefore, if this is the trend then the other 3 car parks may require a similar extent of repairs.</p> <p>The progress is speedy therefore, we are unable to wait for approval of additional monies when the extent of repairs are known at each car park. We believe this is the more pragmatic approach to request further monies upfront. If we wait until the full extent is known then this will cause a delay to the programme and the council will incur further costs.</p> <p>The risk of not undertaking these works are financial and reputational. There would be a reduction in car park capacity with the likelihood of phased closure of the car parks reduction income to the council, creating reputational risk such as recent closure of Regent Street Car Park and Mayflower West in 2013.</p> <p>Any closure or reduction of car park capacity would significantly impact on businesses and the economic wellbeing of the City.</p>			
Proposal: <i>(Provide a brief, concise paragraph outlining your scheme and explain how the business proposal will address the current situation above or take advantage of the business opportunity) and (What would happen if we didn't proceed with this scheme?)</i>			
<p>Works are due to be carried out on Mayflower East, Regent Street Car Park and Western Approach. We will not know the extent of the works until the contractor carries out further surveys.</p> <p>The risk of not undertaking these works are financial and reputational. There would be a reduction in car park capacity with the likelihood of phased closure of the car parks reduction</p>			

income to the council, creating reputational risk such as recent closure of Regent Street Car Park and Mayflower West in 2013.

Any closure or reduction of car park capacity would be expected to significantly impact businesses and the economic wellbeing of the City.

There are no real alternative options to consider. If the Council is to maintain its ability to generate income from these car parks for the next 20 years, this investment is required. These works do not include any 'cosmetic' works or works to improve the look and feel of the car park and customer experience, these works are solely associated with the absolute minimum work required to extend the asset life. Failure to deliver £2,199,900 of preventative maintenance will place £39m income at significant risk.

Milestones and Date:		
Contract Award Date	Start On Site Date	Completion Date
20 th January 2023	May 2023	November 2023

SECTION 2: PROJECT RISK, OUTCOMES AND BENEFITS

Risk Register: *The Risk Register/Risk Log is a master document created during the early stages of a project. It includes information about each identified risk, level of risk, who owns it and what measures are in place to mitigate the risks (cut and paste more boxes if required).*

Potential Risks Identified		Likelihood	Impact	Overall Rating
Risk	Lost income, reduced parking, reputation, economic wellbeing of the city.	High	High	High
Mitigation	Carry out the works identified in this programme.	Low	Low	Low
Calculated risk value in £ (Extent of financial risk)	£0			

Outcomes and Benefits

List the outcomes and benefits expected from this project.

*(An **outcome** is the result of the change derived from using the project's deliverables. This section should describe the anticipated outcome)*

*(A **benefit** is the measurable improvement resulting from an outcome that is perceived as an advantage. Benefits are the expected value to be delivered by the project, measurable whenever possible)*

Financial outcomes and benefits:	Non-financial outcomes and benefits:
Ensure the Councils car parks remain operational for the next 20 years (assuming subject to routine maintenance) enabling generation of parking income – equivalent to a net income of £39M based on current levels of income.	Enhanced customer service and customer experience

Low Carbon

What is the anticipated impact of the proposal on carbon emissions	Not Applicable	
How does it contribute to the Council becoming Carbon neutral by 2030		
Have you engaged with Procurement Service?	Yes	
Procurement route options considered for goods, services or works	Tender	
Procurements Recommended route.	Tender	
Who is your Procurement Lead?	Simone Newark	
Is this business case a purchase of a commercial property	No	
If yes then provide evidence to show that it is not 'primarily for yield'		
Which Members have you engaged with and how have they been consulted (including the Leader, Portfolio Holders and Ward Members)	Mark Coker, Cabinet Member for Transport Consulted through Portfolio brief	

SECTION 4: FINANCIAL ASSESSMENT

FINANCIAL ASSESSMENT: *In this section the robustness of the proposals should be set out in financial terms. The Project Manager will need to work closely with the capital and revenue finance teams to ensure that these sections demonstrate the affordability of the proposals to the Council as a whole. Exact amounts only throughout the paper - not to be rounded.*

CAPITAL COSTS AND FINANCING

Breakdown of project costs including fees surveys and contingency	Prev. Yr.	22/23	23/24	24/25	25/26	26/27	Future Yrs.	Total
	£	£	£	£	£	£	£	£
Surveys and Fees			30,000					
Construction Costs			350,000					
Contingency			20,000					
Total capital spend			400,000					

Provide details of proposed funding: Funding to match with Project Value

Breakdown of proposed funding	Prev. Yr.	22/23	23/24	24/25	25/26	26/27	Future Yrs.	Total
	£	£	£	£	£	£	£	£
Service Borrowing			400,000					
Total funding			400,000					

Which external funding sources been explored	N/A
Are there any bidding constraints and/or any restrictions or conditions attached to your funding	
Tax and VAT implications	
Tax and VAT reviewed by	

REVENUE COSTS AND IMPLICATIONS

Cost of Developing the Capital Project (To be incurred at risk to Service area)

Total Cost of developing the project	N/A as the project has already been developed.
Revenue cost code for the development costs	
Revenue costs incurred for developing the project are to be included in the capital total, some of the expenditure could be capitalised if it meets the criteria	Y/N
Budget Managers Name	

Ongoing Revenue Implications for Service Area

	Prev. Yr. £	22/23 £	23/24 £	24/25 £	25/26 £	26/27 £	Future Yrs. £
Service area revenue cost							
Other (eg: maintenance, utilities, etc)							
Loan repayment (terms agreed with Treasury Management)				34,874	34,874	34,874	592,855
Total Revenue Cost (A)				34,874	34,874	34,874	592,855
Service area revenue benefits/savings							
Annual revenue income (eg: rents, etc)							
Total Revenue Income (B)							
Service area net (benefit) cost (B-A)				34,874	34,874	34,874	592,855
Has the revenue cost been budgeted for or would this make a revenue pressure	The cost pressure to parking is accepted in order to mitigate the risks highlighted in this Business Case.						

Which cost centre would the revenue pressure be shown	0496	Has this been reviewed by the budget manager	Y
Name of budget manager	Mike Artherton		
Loan value	£400,000	Interest Rate	6%
		Term Years	20
		Annual Repayment	£34,873.82
Revenue code for annual repayments	0496/7802		
Service area or corporate borrowing	Service Borrowing		
Revenue implications reviewed by	Jozef Lewis		

Version Control: (The version control table must be updated and signed off each time a change is made to the document to provide an audit trail for the revision and update of draft and final versions)

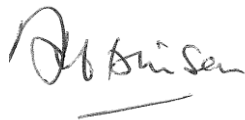
Author of Business Case	Date	Document Version	Reviewed By	Date
Jackie Keith	06/06/2023	v 1.0	Mike Artherton	08/06/2023
Jackie Keith	13/06/2023	v 3.0	Tim Thomas and Jackie Keith	17/07/2023

SECTION 6: RECOMMENDATION AND ENDORSEMENT

Recommended Decision

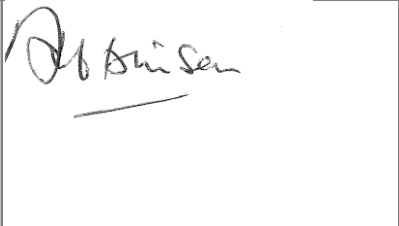
It is recommended that the Leader of the Council:

- Approves the Business Case
- Allocates an additional £400,000 for the project into the Capital Programme funded by service borrowing
- Authorises the procurement process
- Delegates the award of the contract to Service Director for Philip Robinson

Councillor Tudor Evans (The Leader of the Council)		Service Director - Phillip Robinson (Service Director for Street Services)	
Either email dated: 05/09/2023	<i>Date: 05/09/2023</i>	Either email dated:	<i>Date 05/09/2023</i>
Or signed:		Signed: 	
Date: 05/09/2023		Date: 05/09/2023	

EQUALITY IMPACT ASSESSMENT – CAR PARK REFURBISHMENT – BUDGET INCREASE

SECTION ONE: INFORMATION ABOUT THE PROPOSAL

Author(s): This is the person completing the EIA template.	Tim Thomas	Department and service:	Strategic Planning and Infrastructure	Date of assessment:	4 September 2023
Lead Officer: Please note that a Head of Service, Service Director, or Strategic Director must approve the EIA.	Philip Robinson	Signature:		Approval date:	5 September 2023
Overview:	The structural works are required to be undertaken to maintain the operation of the following car parks for a further 20 years, and the increase to budget requirement is as a result of further structural repairs being identified and requiring remediation within the existing repair contract. The works affect the following car parks: <ul style="list-style-type: none"> • Napier Terrace • Western Approach • Regent Street • Theatre Royal • Mayflower East 				
Decision required:	The Leader: <ol style="list-style-type: none"> 1. Approves the business case; 2. Allocates an additional £400,000 for the project into the Capital Programme funded by service borrowing; 3. Authorises the procurement process; 4. Delegates the award of contracts to the Service Director for Street Services where they would otherwise not have authority to do so. 				

SECTION TWO: EQUALITY IMPACT ASSESSMENT SCREENING TOOL

Potential external impacts:	Yes		No	x
-----------------------------	-----	--	----	---

Does the proposal have the potential to negatively impact service users, communities or residents with protected characteristics?				
Potential internal impacts: Does the proposal have the potential to negatively impact Plymouth City Council employees?	Yes		No	x
Is a full Equality Impact Assessment required? (if you have answered yes to either of the questions above then a full impact assessment is required and you must complete section three)	Yes		No	x
If you do not agree that a full equality impact assessment is required, please set out your justification for why not.	This is a budget increase. An EIA has already been completed for the project initially.			

SECTION THREE: FULL EQUALITY IMPACT ASSESSMENT

Protected characteristics (Equality Act, 2010)	Evidence and information (e.g. data and consultation feedback)	Adverse impact	Mitigation activities	Timescale and responsible department
Age	Plymouth <ul style="list-style-type: none"> 16.4 per cent of people in Plymouth are children aged under 15. 65.1 per cent are adults aged 15 to 64. 18.5 percent are adults aged 65 and over. 2.4 percent of the resident population are 85 and over. South West	No adverse impact anticipated.		

	<ul style="list-style-type: none"> • 15.9 per cent of people are aged 0 to 14, 61.8 per cent are aged 15 to 64. • 22.3 per cent are aged 65 and over. <p>England</p> <ul style="list-style-type: none"> • 17.4 per cent of people are aged 0 to 14. • 64.2 per cent of people are aged 15 to 64. • 18.4 per cent of people are aged 65 and over. <p>(2021 Census)</p>			
<p>Care experienced individuals (Note that as per the Independent Review of Children’s Social Care recommendations, Plymouth City Council is treating care experience as though it is a protected characteristic).</p>	<p>It is estimated that 26 per cent of the homeless population in the UK have care experience. In Plymouth there are currently 7 per cent of care leavers open to the service (6 per cent aged 18-20 and 12 per cent of those aged 21+) who are in unsuitable accommodation.</p> <p>The Care Review reported that 41 per cent of 19-21 year old care leavers are not in education, employment or training (NEET) compared to 12 per cent of all other young people in the same age group.</p> <p>In Plymouth there are currently 50 per cent of care leavers aged 18-21 Not in Education Training or Employment (54 per cent of all those care leavers aged 18-24 who are open to the service).</p> <p>There are currently 195 care leavers aged 18 to 20 (statutory service) and 58 aged 21 to 24 (extended offer). There are more care leavers</p>	<p>No adverse impact anticipated.</p>		

	aged 21 to 24 who could return for support from services if they wished to.			
Disability	9.4 per cent of residents in Plymouth have their activities limited 'a lot' because of a physical or mental health problem. 12.2 per cent of residents in Plymouth have their activities limited 'a little' because of a physical or mental health problem (2021 Census)	No adverse impact anticipated.		
Gender reassignment	0.5 per cent of residents in Plymouth have a gender identity that is different from their sex registered at birth. 0.1 per cent of residents identify as a trans man, 0.1 per cent identify as non-binary and, 0.1 per cent identify as a trans women (2021 Census).	No adverse impact anticipated.		
Marriage and civil partnership	40.1 per cent of residents have never married and never registered a civil partnership. 10 per cent are divorced, 6 percent are widowed, with 2.5 per cent are separated but still married. 0.49 per cent of residents are, or were, married or in a civil partnerships of the same sex. 0.06 per cent of residents are in a civil partnerships with the opposite sex (2021 Census).	No adverse impact anticipated.		
Pregnancy and maternity	The total fertility rate (TFR) for England was 1.62 children per woman in 2021. The total fertility rate (TFR) for Plymouth in 2021 was 1.5.	No adverse impact anticipated.		

<p>Race</p>	<p>In 2021, 94.9 per cent of Plymouth’s population identified their ethnicity as White, 2.3 per cent as Asian and 1.1 per cent as Black (2021 Census)</p> <p>People with a mixed ethnic background comprised 1.8 per cent of the population. 1 per cent of the population use a different term to describe their ethnicity (2021 Census)</p> <p>92.7 per cent of residents speak English as their main language. 2021 Census data shows that after English, Polish, Romanian, Chinese, Portuguese, and Arabic are the most spoken languages in Plymouth (2021 Census).</p>	<p>No adverse impact anticipated.</p>		
<p>Religion or belief</p>	<p>48.9 per cent of the Plymouth population stated they had no religion. 42.5 per cent of the population identified as Christian (2021 Census).</p> <p>Those who identified as Muslim account for 1.3 per cent of Plymouth’s population while Hindu, Buddhist, Jewish or Sikh combined totalled less than 1 per cent (2021 Census).</p>	<p>No adverse impact anticipated.</p>		
<p>Sex</p>	<p>51 per cent of our population are women and 49 per cent are men (2021 Census).</p>	<p>No adverse impact anticipated.</p>		
<p>Sexual orientation</p>	<p>88.95 per cent of residents aged 16 years and over in Plymouth describe their sexual orientation as straight or heterosexual. 2.06 per cent describe their sexuality as bisexual, 1.97 per cent of people describe their sexual orientation as gay or lesbian. 0.42 per cent of residents describe their sexual orientation using a different term (2021 Census).</p>	<p>No adverse impact anticipated.</p>		

SECTION FOUR: HUMAN RIGHTS IMPLICATIONS

Human Rights	Implications	Mitigation Actions	Timescale and responsible department

SECTION FIVE: OUR EQUALITY OBJECTIVES

Equality objectives	Implications	Mitigation Actions	Timescale and responsible department
Celebrate diversity and ensure that Plymouth is a welcoming city.			
Pay equality for women, and staff with disabilities in our workforce.			
Supporting our workforce through the implementation of Our People Strategy 2020 – 2024			
Supporting victims of hate crime so they feel confident to report incidents, and working with, and through our partner organisations to achieve positive outcomes.			
Plymouth is a city where people from different backgrounds get along well.			

EXECUTIVE DECISION

made by a **Cabinet Member**



REPORT OF ACTION TAKEN UNDER DELEGATED AUTHORITY BY AN INDIVIDUAL CABINET MEMBER

Executive Decision Reference Number – L19 23/24

Decision	
1	Title of decision: Local Authority Homes Fund (LAHF) Round 2
2	Decision maker: Councillor Tudor Evans OBE, Leader of the Council
3	Report author and contact details: Jackie Kings, Strategic Manager – Community Connections 01752 308989
4	<p>Decision to be taken:</p> <ol style="list-style-type: none"> 1. Accept the Local Authority Housing Fund, Round 2 (LAHF) capital grant £1,020,000 from (Department of Levelling Up, Housing and Communities; DLUHC); 2. Delegate authority to the Section 151 officer to sign the Memorandum of Understanding with DLUHC; 3. Approves the Capital Business Case and allocates £2,250,000 to the Capital Programme financed by £1,020,000 DLUHC Grant and £1,230,000 Service Borrowing.
5	<p>Reasons for decision:</p> <p>The Local Authority Housing Fund is a £500m capital grant fund in financial years 2022/2023 and 2023/2024 to support selected local authorities in England to obtain and refurbish property. Administered by the Department for Levelling Up, Housing and Communities (DLUHC), the fund is designed to provide sustainable housing for those unable to secure their own accommodation who are here under the following schemes:</p> <ul style="list-style-type: none"> • Afghan Citizen Resettlement Scheme (ACRS); • Afghan Relocations and Assistance Policy (ARAP); • Temporary Accommodation for Homeless Families (2 units). <p>Plymouth has been offered a capital grant allocation of £1,020,000 by DLUHC with an expectation to provide 10 homes (2-4 bedrooms) by March 2024. Capital borrowing would be used to meet the remainder of the costs:</p> <p>This paper recommends that the Local Authority Fund Allocation 2 is used to source, acquire, refurbish and let ten family homes to the above-mentioned schemes by March 2024.</p>
6	<p>Alternative options considered and rejected:</p> <p>Officers have consulted a wide range of potential delivery partners including registered providers, social enterprises, B-corps, and social investors. No suitable organisations have been found to deliver this programme. The two main reasons given were:</p> <ol style="list-style-type: none"> 1. Not having capacity to buy from the open market and refurbishing properties within the deadline; 2. Financial viability due to current interest rates and grant allocation.

7	<p>Financial implications and risk:</p> <p>Interest rates are higher than forecasted resulting in loan commitments which may not be fully met by the rental income stream over the life of the loan. The Council is only able to charge a rent at Local Housing Allowance or an Affordable (80% of market) Rent Levels. Local house prices remain volatile but there is evidence that they are reducing, which may mitigate against the higher loan costs.</p>		
8	<p>Is the decision a Key Decision? (Please contact Democratic Support for further advice)</p>	<p>Yes</p>	<p>No</p> <p>Per the Constitution, a key decision is one which:</p> <p>in the case of capital projects and contract awards, results in a new commitment to spend and/or save in excess of £3million in total</p> <p>in the case of revenue projects when the decision involves entering into new commitments and/or making new savings in excess of £1 million</p> <p>is significant in terms of its effect on communities living or working in an area comprising two or more wards in the area of the local authority.</p>
	<p>If yes, date of publication of the notice in the <u>Forward Plan of Key Decisions</u></p>	<p>N/A</p>	
9	<p>Please specify how this decision is linked to the Council's corporate plan/Plymouth Plan and/or the policy framework and/or the revenue/capital budget:</p> <p>Providing 8 affordable homes for Afghan refugees and 2 units of temporary accommodation for homeless families:</p> <p>Refurbished to EPC C, aligns with the following PCC policies, plans and priorities:</p> <p>Policy HEA8 of the Plymouth Plan outlines aims to ensure everyone has access to a decent, safe and affordable home, achieved through identifying sites and delivery programmes to develop a range of new and affordable homes to rent and buy.</p> <p>Section 4.71 of the Plymouth Plan further outlines the significant need for more affordable homes in Plymouth.</p> <p>Policy SPT3 of the JLP makes provisions to deliver 4,550 new affordable homes by 2034. In addition, Policy DEV7 of the JLP outlines the need to ensure there is a broad range of housing available to suit households with specific needs, including large family homes.</p> <p>This project will refurbish properties to an EPC C rating, thereby improving the energy efficiency of homes and supporting plans to improve the energy efficiency of homes in Plymouth as outlined in the Climate Emergency Action Plan (CEAP). A star action of the Plymouth's Future 'Our Opportunity,</p> <p>Our Delivery Plan involves delivering affordable homes in the city through our housing partnership agreements with housing associations. Furthermore, the reduction in carbon emissions from housing is outlined as a key measure of success.</p>		

10	Please specify any direct environmental implications of the decision (carbon impact)	Refurbishing 10 homes up to EPC C will improve the energy efficiency of these homes, thereby reducing carbon emissions of these properties, whilst simultaneously reducing fuel poverty/energy costs, and improving tenant comfort. By commissioning these works, we will also support Plymouth's green economy by further stimulating demand for green jobs, skills, products, services and local collaboration.		
Urgent decisions				
11	Is the decision urgent and to be implemented immediately in the interests of the Council or the public?	Yes		(If yes, please contact Democratic Support (democraticsupport@plymouth.gov.uk) for advice)
		No	x	(If no, go to section 13a)
12a	Reason for urgency:			
12b	Scrutiny Chair Signature:		Date	
	Scrutiny Committee name:			
	Print Name:			
Consultation				
13a	Are any other Cabinet members' portfolios affected by the decision?	Yes	x	
		No		(If no go to section 14)
13b	Which other Cabinet member's portfolio is affected by the decision?	Councillor Chris Penberthy (Cabinet Member for Housing, Cooperative Development, and Communities)		
13c	Date Cabinet member consulted	30 August 2023		
14	Has any Cabinet member declared a conflict of interest in relation to the decision?	Yes		
		No	x	

15	Which Corporate Management Team member has been consulted?	Name	Gary Walbridge
		Job title	Interim Strategic Director for People
		Date consulted	23 August 2023

Sign-off

16	Sign off codes from the relevant departments consulted:	Democratic Support (mandatory)	DS39 23/24
		Finance (mandatory)	DJN.23.24.98
		Legal (mandatory)	LS/00001312/AC/5/9/23.
		Human Resources (if applicable)	N/A
		Corporate property (if applicable)	N/A
		Procurement (if applicable)	N/A

Appendices

17	Ref.	Title of appendix
	A	Briefing report for publication: <i>LAHF2 Briefing Report</i>
	B	Equalities Impact Assessment: <i>LAHF2 EIA</i>
	C	Business case
	D	Memorandum of Understanding

Confidential/exempt information


18a	Do you need to include any confidential/exempt information?	Yes		If yes, prepare a second, confidential ('Part II') briefing report and indicate why it is not for publication by virtue of Part I of Schedule 12A of the Local Government Act 1972 by ticking the relevant box in 18b below. (Keep as much information as possible in the briefing report that will be in the public domain)
		No	x	

Exemption Paragraph Number

		1	2	3	4	5	6	7
18b	Confidential/exempt briefing report title:							

Background Papers

19	Please list all unpublished, background papers relevant to the decision in the table below.
----	---

Background papers are <u>unpublished</u> works, relied on to a material extent in preparing the report, which disclose facts or matters on which the report or an important part of the work is based. If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1 of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.							
Title of background paper(s)	Exemption Paragraph Number						
	1	2	3	4	5	6	7
Cabinet Member Signature							
20	I agree the decision and confirm that it is not contrary to the Council's policy and budget framework, Corporate Plan or Budget. In taking this decision I have given due regard to the Council's duty to promote equality of opportunity, eliminate unlawful discrimination and promote good relations between people who share protected characteristics under the Equalities Act and those who do not. For further details please see the EIA attached.						
Signature			Date of decision	6 September 2023			
Print Name	Councillor Tudor Evans OBE						

This page is intentionally left blank

LOCAL AUTHORITY HOUSING FUND 2

Community Connections and Housing Delivery Team



1. EXECUTIVE SUMMARY

Plymouth has been offered a capital grant allocation of £1,020,000 by the Department of Levelling Up, Housing and Communities (DLUHC) with an expectation to provide 10 homes (2-4 bedrooms) by March 2024.

- Eight homes for Afghan Families and two homes for Homeless Families (to be used as Temporary Accommodation)

This is broken down to include:

- £1,020,000 to provide 10 homes with a minimum of 2 bedrooms. For each property, 40% of capital costs can be funded through grant plus an additional £20,000 per property for refurbishment costs

The DLUHC capital grant allocation would provide approximately 40 per cent of the capital cost of purchasing the 10 properties. The council will need to fund the balance of the purchase cost and £1,230,000 of Service Borrowing has been included in the capital programme for 2023/24 to cover the council's share of the purchase costs.

2. BACKGROUND

The Local Authority Housing Fund is a £500m capital grant fund in financial years 2022/2023 and 2023/2024 to support selected local authorities in England to obtain and refurbish property. Administered by the Department for Levelling Up, Housing and Communities (DLUHC), the fund is designed to provide sustainable housing for families who would fall into the following categories:

- Afghan Citizen Resettlement Scheme (ACRS)
- Afghan Relocations and Assistance Policy (ARAP)
- Temporary Accommodation for Homeless Families

A number of local authorities have been allocated capital funding under section 31 of the Local Government Act 2003 based on a formula, set out in the LAHF (Local Authority Housing Fund) prospectus.

3. PROPOSED CHANGES AND REASONS

Plymouth City Council has been offered a capital grant allocation of £1,020,200 towards the provision of total of 10 homes to be let under Government schemes and as temporary accommodation to meet our duties for homeless families.

A Registered Provider partner has been sought in the first instance to deliver LAHF 2 on our behalf however this has not been possible, and this paper lays out the proposed framework for the Council using the LAHF 2 capital allocation to directly deliver these homes:

Moreover, the Council aims to:

- Deliver the target number of 10 homes, which meet the eligibility criteria outlined within the Local Authority Housing Fund (LAHF) prospectus. The Memorandum of Understanding (MoU) sets out the basis for the grant funding and needs to be approved and returned to the Department of Levelling, Housing and Communities by the 14th September 2023
- Outline the projected capital and revenue implications and potential risks and benefits of proceeding with this scheme. Given the capital funding and potential borrowing requirement necessary for the LAHF scheme, approval will need to be sought for appropriate financial allocations to be made to allow the scheme to proceed.

The necessary scoping, feasibility and assessment work, is underway, including with procurement to source external companies to support the purchasing of properties, related survey and legal work, and refurbishment of properties to bring them up to the appropriate standard and energy rating. The costs of engaging a specialist company can be covered from the capital grant allocation.

4. ALTERNATIVE OPTIONS

Officers have consulted a wide range of potential delivery partners including registered providers, social enterprises, B-corps, and social investors. No suitable organisations can deliver this programme.

The two main reasons given were:

1. Not having capacity to buy from the open market and refurbishing properties within the deadline
2. Financial viability due to current interest rates and grant allocation

5. FINANCIAL IMPLICATIONS AND RISK

Under the Local Authority Housing Fund Round 2, the Council have been awarded a capital grant allocation of £1,020,000 towards the provision of 10 additional family homes in the City to be let to meet the demand under Government resettlement schemes as well as wider homelessness temporary accommodation challenges in the City.

The time scales for delivery are tight with an expectation of using best endeavours to deliver the properties by March 2024. However, this is in line with the strategic direction of the council to acquire additional homes in the City to meet the demands for affordable housing and temporary accommodation to meet homelessness duties. This grant affords the opportunity for some of the purchase costs to be met through grant funding. There is a risk that the acquisition of suitable properties in appropriate locations at affordable prices within the necessary timeframes is not achieved however there are no financial or other penalties for not delivering this programme on time as the memorandum of understanding between the Council and DLUHC is not legally binding.

The DLUHC capital grant allocation will provide approximately 40 per cent of the capital cost of purchasing the 10 properties. The council will need to fund the balance of the purchase cost and £1,230,000 has been included in the capital programme for 2023/24 to cover the council's share of the purchase costs. For the purposes of financial modelling, this cost will be funded from service borrowing.

- DLUHC has not provided any specific funding for the management, financing and operational running costs of these properties and these revenue costs will need to be covered by the rental income paid by the residents living in these homes.
- A range of assumptions has been made to establish the likely financial impact on the revenue budget of the costs of providing a landlord function for these properties. These include principal

and interest costs on borrowing, rental income, repairs & maintenance costs, rent collection, staff costs, insurance costs, etc

- The financial modelling is based on the council buying the full 10 properties for which part funding has been provided. It assumes that Stamp Duty Land Tax will not be payable because the council is registered with the Regulator of Social Housing as a Registered Provider and the use of LAHF funding falls within the exemption category for Stamp Duty Land Tax announced in the recent budget.
- In setting the budget, it is assumed that the rental income will offset the borrowing and running costs for the properties.

In the long term, it is expected that these properties will become available for general needs or, if not required, could be sold. It should be borne in mind that whilst DLUHC has funded 40 per cent of the purchase price, the houses will be 100 per cent council owned assets and there is no clawback of grant funding should the house be transferred into general needs use or sold at some future date.

As these properties will be meeting the temporary accommodation need in the City, a partnership model is in development with a Registered Housing provider, to manage and maintain these properties on behalf of the Council. This approach means that the Department of Works and Pensions subsidy around housing benefit regulations would be higher and therefore is at a much-reduced overall cost to the local authority.


6. TIMESCALES

- Memorandum of Understanding to be signed and returned to DLUHC by the 14 September 2023. The Council to deliver ten family homes to be ready to let by March 2024

This page is intentionally left blank

EQUALITY IMPACT ASSESSMENT – LAHF 2

SECTION ONE: INFORMATION ABOUT THE PROPOSAL

Author(s): This is the person completing the EIA template.	Ruth Tune-Holmes	Department and service:	Community Connections	Date of assessment:	5 th September 2023
Lead Officer: Please note that a Head of Service, Service Director, or Strategic Director must approve the EIA.	Jackie Kings	Signature:		Approval date:	5 th September 2023
Overview:	<p>The Council has a statutory duty to support people who are homeless or threatened with homelessness.</p> <p>Access to good quality and affordable settled accommodation remains challenging in Plymouth. With LHA rates tied to the CPI rather than market rents; means there is a growing gulf between LHA rates and the market.</p> <p>Plymouth has very high numbers of homeless families in temporary accommodation, in B&B's, hostels, and shared house type temporary accommodation, accessed through the Plymouth Alliance. There are also high numbers of Afghan families in hotels who are at risk of homelessness</p> <p>Plymouth City Council will use the capital grant and its own service borrowing to purchase 10 family homes, comprising of 8 units for Afghan families and 2 units for Homeless Families. All properties will be used as temporary accommodation</p>				
Decision required:	To approve the EIA as part of the overall Local Authority Homes Fund Round 2 approval				

SECTION TWO: EQUALITY IMPACT ASSESSMENT SCREENING TOOL

Potential external impacts: Does the proposal have the potential to negatively impact service users, communities or residents with protected characteristics?	Yes		No	x
Potential internal impacts: Does the proposal have the potential to negatively impact Plymouth City Council employees?	Yes		No	x
Is a full Equality Impact Assessment required? (if you have answered yes to either of the questions above then a full impact assessment is required and you must complete section three)	Yes		No	x
If you do not agree that a full equality impact assessment is required, please set out your justification for why not.				

SECTION THREE: FULL EQUALITY IMPACT ASSESSMENT

Protected characteristics (Equality Act, 2010)	Evidence and information (e.g. data and consultation feedback)	Adverse impact	Mitigation activities	Timescale and responsible department
Age	Plymouth <ul style="list-style-type: none"> • 16.4 per cent of people in Plymouth are children aged under 15. • 65.1 per cent are adults aged 15 to 64. • 18.5 percent are adults aged 65 and over. • 2.4 percent of the resident population are 85 and over. 	All individuals relocated to the UK will have the opportunity to seek full citizenship and are likely to have enhanced life chances, with support for their social and medical care needs. Schools receive additional funding of £4500 for children	Not needed	Ongoing, Community Connections

	<p>South West</p> <ul style="list-style-type: none"> • 15.9 per cent of people are aged 0 to 14, 61.8 per cent are aged 15 to 64. • 22.3 per cent are aged 65 and over. <p>England</p> <ul style="list-style-type: none"> • 17.4 per cent of people are aged 0 to 14. • 64.2 per cent of people are aged 15 to 64. • 18.4 per cent of people are aged 65 and over. <p>(2021 Census)</p>	<p>aged 4+ who arrive via the scheme. £2500 is available for children aged 3-4 on arrival. Funding has also allowed for childcare facilities to be available for pre-school age children to enable parents to attend English classes.</p> <p>Where necessary older participants will be referred to Adult Social Care.</p>		
<p>Care experienced individuals (Note that as per the Independent Review of Children’s Social Care recommendations, Plymouth City Council is treating care experience as though it is a protected characteristic).</p>	<p>It is estimated that 26 per cent of the homeless population in the UK have care experience. In Plymouth there are currently 7 per cent of care leavers open to the service (6 per cent aged 18-20 and 12 per cent of those aged 21+) who are in unsuitable accommodation.</p> <p>The Care Review reported that 41 per cent of 19-21 year old care leavers are not in education, employment or training (NEET) compared to 12 per cent of all other young people in the same age group.</p> <p>In Plymouth there are currently 50 per cent of care leavers aged 18-21 Not in Education Training or Employment (54 per cent of all those care leavers aged 18-24 who are open to the service).</p> <p>There are currently 195 care leavers aged 18 to 20 (statutory service) and 58 aged 21 to 24</p>	<p>No</p>	<p>Monitoring of lettings and related services to families who are care experienced</p>	<p>Ongoing, Community Connections</p>

	(extended offer). There are more care leavers aged 21 to 24 who could return for support from services if they wished to.			
Disability	<p>9.4 per cent of residents in Plymouth have their activities limited ‘a lot’ because of a physical or mental health problem.</p> <p>12.2 per cent of residents in Plymouth have their activities limited ‘a little’ because of a physical or mental health problem (2021 Census)</p> <p>Some families may have significant medical and social care needs. It is possible that some may also experience PTSD or be assessed as having SEND needs after arrival in the UK.</p>	<p>No</p> <p>Some participants may require medical and social care. Children may have special needs that require support in mainstream schools. Education funding is provided by the tariff and additional costs can be claimed for where SEND is identified in the first 12 months.</p> <p>Additional costs for medical, educational and social care costs identified in the first year can be claimed over and above the standard tariff rate provided by the Scheme.</p>	<p>A partnership with health and social care colleagues will be established to assess all medical and social care needs in advance and which will then be met upon arrival.</p> <p>We do not anticipate any difficulty in meeting the needs of the dispersed families and are able to decline cases whose needs could not be met in Plymouth.</p> <p>Services have also been identified that can provide early intervention mental health support or support for young and adult carers This will be monitored through letting arrangements</p>	<p>Ongoing, Community Conenctions</p>
Gender reassignment	<p>0.5 per cent of residents in Plymouth have a gender identity that is different from their sex registered at birth. 0.1 per cent of residents identify as a trans man, 0.1 per cent identify as non-binary and, 0.1 per cent identify as a trans women (2021 Census).</p>	<p>No</p> <p>If participants fall within this category, existing support services will be made available.</p>	<p>Not applicable</p>	<p>Not applicable</p>

<p>Marriage and civil partnership</p>	<p>40.1 per cent of residents have never married and never registered a civil partnership. 10 per cent are divorced, 6 percent are widowed, with 2.5 per cent are separated but still married.</p> <p>0.49 per cent of residents are, or were, married or in a civil partnerships of the same sex. 0.06 per cent of residents are in a civil partnerships with the opposite sex (2021 Census).</p>	<p>No</p>	<p>Not applicable</p>	<p>Not applicable</p>
<p>Pregnancy and maternity</p>	<p>The total fertility rate (TFR) for England was 1.62 children per woman in 2021. The total fertility rate (TFR) for Plymouth in 2021 was 1.5.</p>	<p>No</p>	<p>Not applicable</p>	<p>Not applicable</p>
<p>Race</p>	<p>In 2021, 94.9 per cent of Plymouth’s population identified their ethnicity as White, 2.3 per cent as Asian and 1.1 per cent as Black (2021 Census)</p> <p>People with a mixed ethnic background comprised 1.8 per cent of the population. 1 per cent of the population use a different term to describe their ethnicity (2021 Census)</p> <p>92.7 per cent of residents speak English as their main language. 2021 Census data shows that after English, Polish, Romanian, Chinese, Portuguese, and Arabic are the most spoken languages in Plymouth (2021 Census).</p> <p>Afghan nationals will most likely identify their ethnicity as Asian Other.</p>	<p>No</p> <p>The impact of the decision will be to give Afghan LES an opportunity to apply for citizenship and create a stable home in the UK.</p> <p>There is potential for refugees to feel isolated and to be the target of racism and hostility based on current tension around immigration and security.</p> <p>Interpretation support and English classes will be provided.</p>	<p>We are seeking to address the potential for isolation and Islamophobia as part of wider COUNCIL strategy, including funding recently received via the Controlling Migration Fund and work undertaken by the Safer Communities Plymouth Board. Many of the wider Refugee and Asylum Seeker support providers are also third party reporters for hate crime and can help support families and raise</p>	<p>Ongoing, Community Connections</p>

			awareness of how to report incidents.	
Religion or belief	<p>48.9 per cent of the Plymouth population stated they had no religion. 42.5 per cent of the population identified as Christian (2021 Census).</p> <p>Those who identified as Muslim account for 1.3 per cent of Plymouth’s population while Hindu, Buddhist, Jewish or Sikh combined totalled less than 1 per cent (2021 Census).</p>	<p>No</p> <p>Plymouth has a Muslim population from a range of diverse national backgrounds. There are two Mosques offering prayer and other facilities. There are also a number of shops with halal provision.</p> <p>There are numerous churches in Plymouth that have a congregation from a range of diverse national backgrounds.</p> <p>There is the potential for Refugees to feel isolated and to be the target of Islamophobia and other race related Hate crimes.</p>	This will be monitored through letting arrangements	Ongoing, Community Connections
Sex	51 per cent of our population are women and 49 per cent are men (2021 Census).	<p>No</p> <p>Cultural practices may differ between countries of origin and the UK. These will be</p>		Ongoing, Community Connections

		addressed through our integration work		
Sexual orientation	88.95 per cent of residents aged 16 years and over in Plymouth describe their sexual orientation as straight or heterosexual. 2.06 per cent describe their sexuality as bisexual, 1.97 per cent of people describe their sexual orientation as gay or lesbian. 0.42 per cent of residents describe their sexual orientation using a different term (2021 Census).	No If participants fall within this category, existing support services will be made available.		Ongoing, Community Connections

SECTION FOUR: HUMAN RIGHTS IMPLICATIONS

Human Rights	Implications	Mitigation Actions	Timescale and responsible department
	<p>Plymouth City Council recognises Article 14 of the Human Rights Act – The right to receive Equal Treatment and prohibits discrimination including sex, race, religion and economic and social status in conjunction with the Equalities Act which includes age and disability.</p> <p>All staff and service users will be treated fairly and their human rights will be respected.</p> <p>No adverse impact on human rights has been identified.</p>		<p>Our participation promotes protection of the right to life.</p> <p>Scheme participants may have been subjected to torture. We will ensure that this is taken in account in health and social care assessments.</p> <p>Whilst this does not amount to a duty to make provision for someone to practice their faith we will have an early conversation with local places of worship about their ability to accommodate new worshipers and enable scheme participants to fully</p>

			<p>practise any religion or belief they hold in Plymouth.</p> <p>Right to education – all children arriving via the Scheme will be automatically entitled to mainstream education. We will work with the admissions team and the education, participation and skills team to ensure that children are allocated places at school within a reasonable timeframe. Places will be allocated with due regard to impact on the local area. Adults arriving on the scheme will be entitled to access ESOL classes and money provided by the Scheme will support the provision of a crèche facility and women’s only classes.</p>
--	--	--	--

SECTION FIVE: OUR EQUALITY OBJECTIVES

Equality objectives	Implications	Mitigation Actions	Timescale and responsible department
Celebrate diversity and ensure that Plymouth is a welcoming city.	Afghanistan is a predominantly Muslim country, it is anticipated that the majority of those relocated will be Muslims and will most likely identify their race as Asian Other.	Not applicable	The integration work we will be commissioning will ensure that families are supported and encouraged to engage positively with the wider

	<p>By taking the decision to participate in the Scheme the Council is remaining consistent with its values as Welcoming City and an area that celebrates and encourages people of different backgrounds, faiths and experiences.</p>		<p>community. Further projects undertaken by the Controlling Migration Fund will specifically look at improving community cohesion within neighbourhoods and across communities will further support this week.</p> <p>We will also seek to address any cultural norms of those arriving via the Scheme which may not be consistent with norms within the UK e.g. LGBTQ+ rights and right of women to work with peer to peer support networks.</p>
<p>Pay equality for women, and staff with disabilities in our workforce.</p>	<p>Women arriving via the scheme may initially have low levels of English, which impacts their ability to go into skilled work. Many of the women arriving on the scheme will have childcare responsibilities which may impact their ability to enter the workplace in the short-term.</p> <p>The Scheme will fund employment of Council staff and staff within commissioned services to deliver the scheme requirements.</p>	<p>Not applicable</p>	<p>Plymouth City Council has reported a Gender Pay Gap of 2.6 per cent with a median pay gap of 3.3 per cent in favour of women. Staff employed to support the scheme will be paid according to local authority banded scales to ensure equal pay rates. All commissioned services funded by the Scheme will be required to sign our Equality and Diversity policy, including a commitment to equal pay between genders.</p>

			Individuals arriving on the scheme will receive an Independent Advice and Guidance session on arrival to discuss future employment. This will include setting out rights and raising awareness of being an employee in the UK
Supporting our workforce through the implementation of Our People Strategy 2020 – 2024	<p>The Principal Applicants arriving via the ARAP Scheme will have been employed in Afghanistan by the Ministry of Defence and will have a unique and varied range of skills and experience. We are anticipating that English levels will be higher than some of the other migrants and refugees arriving into the city.</p> <p>There may be opportunities with the Council for people with existing skill set as well as potential to participate in future access programmes, including work experience, paid internships and graduate programme.</p>	Not applicable	As an employer we have committed to signing the Race at Work charter and to create a vibrant employee equality, diversity and inclusivity group with regular seminars
Supporting victims of hate crime so they feel confident to report incidents, and working with, and through our partner organisations to achieve positive outcomes.	<p>There is potential for individuals and families arriving via the Scheme to feel isolated and to be the target of racism and hostility based on current tension around immigration and security.</p> <p>Post the Brexit referendum neighbourhood surveys conducted indicate a decline in local community cohesion rates.</p>	Not applicable	Many of the wider Refugee and Asylum Seeker support providers are third party reporters for hate crime and can help support families and raise awareness of how to report incidents. Scheme funding supports events such as respect Festival, International Women's Day and Hope Festival. The Diverse Communities Team at Devon and Cornwall Police will attend all of these

			<p>events to educate families further.</p>
<p>Plymouth is a city where people from different backgrounds get along well.</p>	<p>Immigration is currently viewed negatively by a majority of UK residents (79%). Previously there has been significant public support for the relocation of foreign national civilians to the UK who have been employed by the Ministry of Defence and armed forces in recognition of the commitment and bravery shown often in challenging and dangerous situation.</p> <p>Post the Brexit referendum neighbourhood surveys conducted indicate a decline in local community cohesion rates.</p>		<p>The government has stated that one scheme aim is to remove the incentive to attempt risky crossings of the Eastern Mediterranean. Our participation promotes protection of the right to life.</p>

This page is intentionally left blank

CAPITAL INVESTMENT BUSINESS CASE

(Provision of council acquired temporary accommodation utilising the Local Authority Homes Fund, round 2 capital grant allocation)



EXECUTIVE SUMMARY

The Executive Summary is a short summary of the Business Case and should be the last section you complete, this will enable you to extract or only the key facts from relevant sections i.e. 'project on a page'. The summary is a 'snapshot' of the business case which will need to tell the story and sell the proposal.

Under the Local Authority Housing Fund Round 2, Plymouth City Council ("The Council") has been awarded a capital grant allocation of £1,020,000 towards the purchase of 10 family homes in the City to be let to meet the demand under Government resettlement schemes as well as wider homelessness temporary accommodation challenges in the City.

The time scales for delivery are tight with an expectation of using best endeavours to deliver the properties by March 2024. However, this is in line with the strategic direction of the council to acquire additional homes in the City to meet the demands for affordable housing and temporary accommodation to meet homelessness duties. This grant affords the opportunity for some of the purchase costs to be met through grant funding. A key risk is not being able to acquire suitable properties in appropriate locations at affordable prices within the necessary timeframes. There are no financial or other penalties for not delivering this programme on time as the memorandum of understanding between the Council and DLUHC is not legally binding.

Once the properties are acquired there will be a need to maintain and manage them to a standard compliant with our legal standards and duties. In order to mitigate any risk around this a partner with experience of repairs and maintenance and compliance in social housing will be sought to deliver these services on our behalf. This will enable the council to deliver a compliant service within the immediate programme delivery timescales.

Extensive modelling has been undertaken to understand the financial implications of the programme and the grant funding. However, elements of the financial modelling are based on assumptions around the numbers, sizes and locations of properties. There is therefore a risk that the predicted rental income based on the number of properties will not materialise, leading to a revenue funding shortfall which may not be able to be covered by grant funding.

SECTION I: PROJECT DETAIL

Project Value (indicate capital or revenue)	£2,250,000	Contingency (show as £ and % of project value)	Included within project value
Programme	Homes and Communities	Directorate	People
Portfolio Holder	Councillor Chris Penberthy	Service Director	Matt Garrett
Senior Responsible Officer (client)	Jackie Kings	Project Manager	Ruth Tune-Holmes
Address and Post Code	Various	Ward	Citywide

Current Situation: *(Provide a brief, concise paragraph outlining the current situation and explain the current business need, problem, opportunity or change of circumstances that needs to be resolved)*

The Local Authority Housing Fund is a £500m capital grant fund in financial years 2022/2023 and 2023/2024 to support selected local authorities in England to obtain and refurbish property. Administered by the Department for Levelling Up, Housing and Communities (DLUHC), the fund is designed to provide sustainable housing for families who would fall into the following categories:

- Afghan Citizen Resettlement Scheme (ACRS)
- Afghan Relocations and Assistance Policy (ARAP)
- Temporary Accommodation for Homeless Families

A number of Local Authorities have been allocated capital funding under section 31 of the Local Government Act 2003 based on a formula, set out in the LAHF prospectus.

Plymouth City Council have been offered a capital grant allocation of £1,020,200 towards the provision of total of 10 homes to be let under Government schemes including two temporary accommodation houses to meet our duties for homeless families.

A Registered Provider partner has been sought in the first instance to deliver LAHF 2 on our behalf however this has not been possible, and this paper lays out the proposed framework for the Council using the LAHF 2 capital allocation to directly deliver these homes:

Moreover, the Council aims to:

- Deliver the target number of 10 homes, which meet the eligibility criteria outlined within the Local Authority Housing Fund (LAHF) prospectus. The Memorandum of Understanding (MoU) sets out the basis for the grant funding and needs to be approved and returned to the Department of Levelling Up, Housing and Communities by the 14 September 2023
- Outline the projected capital and revenue implications and potential risks and benefits of proceeding with this scheme. Given the capital funding and potential borrowing requirement necessary for the LAHF scheme, approval will need to be sought for appropriate financial allocations to be made to allow the scheme to proceed.

The necessary scoping, feasibility and assessment work, is underway, including with procurement to source external companies to support the purchasing of properties, related survey and legal work, and refurbishment of properties to bring them up to the appropriate standard and energy rating. The costs of engaging a specialist company can be covered from the capital grant allocation.

Proposal: *(Provide a brief, concise paragraph outlining your scheme and explain how the business proposal will address the current situation above or take advantage of the business opportunity) and (What would happen if we didn't proceed with this scheme?)*

The DLUHC capital grant allocation will provide approximately 40 per cent of the capital cost of purchasing the 10 properties. Plymouth City Council will need to fund the balance of the purchasing costs. This will be financed by Service Borrowing.

DLUHC has not provided any specific funding for the management, financing and operational running costs of these properties and these revenue costs will need to be covered by the rental income paid by the residents living in these homes.

A range of assumptions have had to be made to establish the likely financial impact on the revenue budget of the costs of providing a landlord function for these properties. These include principal and interest costs on borrowing, rental income, repairs & maintenance costs, rent collection, staff costs, insurance costs, etc

The financial modelling is based on the council buying the full 10 properties for which funding has been provided. It assumes that Stamp Duty Land Tax will not be payable because the council is registered with the Regulator of Social Housing as a Registered Provider and the use of LAHF funding falls within the exemption category for Stamp Duty Land Tax announced in the recent budget.

In setting the budget, it is assumed that the rental income would offset the borrowing and running costs for the properties.

In the long term, it is expected that these properties will become available for general needs or, if not required, could be sold. It should be borne in mind that whilst DLUHC has funded 40 per cent of the purchase price, the houses will be 100 per cent council owned assets and there is no clawback of grant funding should the house be transferred into general needs use or sold at some future date.

As these properties will be meeting the temporary accommodation need in the City, a partnership model is in development with a Registered Housing provider, to manage and maintain these properties on behalf of the Council. This approach would also mean that the Department Works and Pensions subsidy around housing benefit regulations would be higher and therefore at a much-reduced cost to the local authority.

Milestones and Date:		
Contract Award Date	Start On Site Date	Completion Date

SECTION 2: PROJECT RISK, OUTCOMES AND BENEFITS

Risk Register: *The Risk Register/Risk Log is a master document created during the early stages of a project. It includes information about each identified risk, level of risk, who owns it and what measures are in place to mitigate the risks (cut and paste more boxes if required).*

Potential Risks Identified		Likelihood	Impact	Overall Rating
Risk	Refurbishment costs are higher than budgeted	Low	Low	Low
Mitigation	Surveys will be carried out prior to a decision to purchase. There is still a possibility of discovering a problem once works commence which was not previously detectable, but a contingency has been built into the modelling and some homes may need less than the full amount budgeted for refurbishment	Low	Low	Low
Calculated risk value in £ (Extent of financial risk)	£0			

Risk	Unable to identify sufficient properties capable of being refurbished to a high enough standard	Low	Low	Low
Mitigation	If possible, we will agree an extension to the funding deadline with DLUHC, otherwise the unspent grant will be returned to them.	Low	Low	Low
Calculated risk value in £ (Extent of financial risk)	£0			
Risk	Sales falling through near the final stages in acquisition resulting in abortive costs of around £2,000 per unit	Low	Low	Low
Mitigation	New properties will need to be quickly	Low	Low	Low
Calculated risk value in £ (Extent of financial risk)	£4,000			

Outcomes and Benefits

List the outcomes and benefits expected from this project.

(An **outcome** is the result of the change derived from using the project's deliverables. This section should describe the anticipated outcome)

(A **benefit** is the measurable improvement resulting from an outcome that is perceived as an advantage. Benefits are the expected value to be delivered by the project, measurable whenever possible)

Financial outcomes and benefits:

Non-financial outcomes and benefits:

Increase in PCC's fixed assets

Reduced B&B costs

Additional affordable, suitable temporary accommodation for homeless families and Afghan families living in hotels

In the future, these properties can be used for general needs

Reduction in carbon emissions from housing

Reduction in fuel poverty

Low Carbon

What is the anticipated impact of the proposal on carbon emissions

Refurbishing 10 homes up to EPC C will improve the energy efficiency of these homes, thereby reducing carbon emissions of these properties, whilst simultaneously reducing fuel poverty/energy costs, and improving tenant comfort.

How does it contribute to the Council becoming Carbon neutral by 2030

By commissioning these works, we will support Plymouth's green economy by further stimulating demand for green jobs, skills, products, services and local collaboration.

Have you engaged with Procurement Service?

Yes

Procurement route options considered for goods, services or works

Procurements Recommended route.

Not needed at this stage

Who is your Procurement Lead?

Kim Kingdom

Is this business case a purchase of a commercial property

No

If yes then provide evidence to show that it is not 'primarily for yield'	
Which Members have you engaged with and how have they been consulted (<i>including the Leader, Portfolio Holders and Ward Members</i>)	

SECTION 4: FINANCIAL ASSESSMENT

FINANCIAL ASSESSMENT: *In this section the robustness of the proposals should be set out in financial terms. The Project Manager will need to work closely with the capital and revenue finance teams to ensure that these sections demonstrate the affordability of the proposals to the Council as a whole. Exact amounts only throughout the paper - not to be rounded.*

CAPITAL COSTS AND FINANCING

Breakdown of project costs including fees surveys and contingency	Prev. Yr.	23/24	24/25	25/26	26/27	27/28	Future Yrs.	Total
	£	£	£	£	£	£	£	£
Purchase Price		2,050,000						
Fees, Surveys & Refurbishment		200,000						
Total capital spend		2,250,000						

Provide details of proposed funding: *Funding to match with Project Value*

Breakdown of proposed funding	Prev. Yr.	23/24	24/25	25/26	26/27	27/28	Future Yrs.	Total
	£	£	£	£	£	£	£	£
DLUHC Grant		1,020,000						
Service Borrowing		1,230,000						
Total funding		2,250,000						

Which external funding sources been explored	
Are there any bidding constraints and/or any restrictions or conditions attached to your funding	Target delivery date of 29 th March 2024
Tax and VAT implications	The receipt of rental income from the properties will relate to a VAT-exempt activity of the Council. This means that the VAT incurred by the Council on costs relating to the purchase of the properties, and the future ongoing revenue costs, will need to be included in the

	Council's partial exemption review and so the expenditure will need to be closely monitored to ensure that the VAT is fully recoverable by the Council. Since the properties will be used for a residential purpose, the Council will be unable to opt to tax the properties to be able to exclude the VAT on costs from the partial exemption
Tax and VAT reviewed by	Sarah Scott, Service Accountant

REVENUE COSTS AND IMPLICATIONS

Cost of Developing the Capital Project (To be incurred at risk to Service area)

Total Cost of developing the project	N/A
Revenue cost code for the development costs	0915
Revenue costs incurred for developing the project are to be included in the capital total, some of the expenditure could be capitalised if it meets the criteria	Y
Budget Managers Name	Jackie Kings

Ongoing Revenue Implications for Service Area

	Prev . Yr. £	23/24 £	24/25 £	25/26 £	26/27 £	27/28 £	Future Yrs. £
Service area revenue cost							
Other (eg: maintenance, utilities, etc)		2,956	57,052	57,052	57,052	157,052	57,052
Loan repayment (terms agreed with Treasury Management)			86,319	86,319	86,319	86,319	86,319
Total Revenue Cost (A)		2,956	143,371	143,371	143,371	243,371	143,371
Service area revenue benefits/savings							
Annual revenue income (eg: rents, etc)		(5,035)	(60,415)	(60,415)	(60,415)	(60,415)	(60,415)
Savings on nightly paid accommodation		(19,830)	(237,962)	(237,962)	(237,962)	(237,962)	(237,962)
Total Revenue Income (B)		(24,865)	(298,377)	(298,377)	(298,377)	(298,377)	(298,377)
Service area net (benefit) cost (B-A)		(21,909)	(155,006)	(155,006)	(155,006)	(55,006)	(155,006)
Has the revenue cost been budgeted for or would this make a revenue pressure	This would create a revenue saving vs what we are currently paying/forecasting to pay						

Which cost centre would the revenue pressure be shown	0915	Has this been reviewed by the budget manager	Y/N
Name of budget manager	Jackie Kings		
Loan value	£1,230,000	Interest Rate	6.75%
		Term Years	50
		Annual Repayment	£86,319
Revenue code for annual repayments	0915		
Service area or corporate borrowing	Service		
Revenue implications reviewed by	Nathan Franklin		

Version Control: (The version control table must be updated and signed off each time a change is made to the document to provide an audit trail for the revision and update of draft and final versions)


Author of Business Case	Date	Document Version	Reviewed By	Date
Ruth Tune-Holmes	04/09/2023	v 1.0	Anna-Leigh Selvester Jackie Kings	05/09/2023

SECTION 6: RECOMMENDATION AND ENDORSEMENT

Recommended Decision

It is recommended that the Leader of the Council:

1. Accept the Local Authority Housing Fund, Round 2 (LAHF) capital grant £1,020,000 from (Department of Levelling Up, Housing and Communities; DLUHC);
2. Delegate authority to the Section 151 officer to sign the Memorandum of Understanding with DLUHC;
3. Approves the Capital Business Case and allocates £2,250,000 to the Capital Programme financed by £1,020,000 DLUHC Grant and £1,230,000 Service Borrowing.

Councillor Tudor Evans, Leader of the Council		Service Director: Matt Garrett	
Either email dated:		Either email dated:	5 th September 2023
Or signed:		Or signed:	
Date: 06 September 2023		Date:	

This page is intentionally left blank

MEMORANDUM OF UNDERSTANDING

Between

Department for Levelling Up, Housing and Communities

-and-

Plymouth City Council

1. Purpose

- 1.1. This Memorandum of Understanding ('MOU') sets out the agreed working relationship between the Department for Levelling Up, Housing and Communities ('DLUHC') and Plymouth City Council ('the Council') regarding the administration and delivery of the Local Authority Housing Fund - second funding round ('LAHF R2').
- 1.2. This MOU will be for the period Q1-Q4 2023/24. It will be reviewed and updated only where either of the signatories deem it necessary, in which case it will require joint agreement. Further detail on changing the MOU is set out in Paragraph 5.4.
- 1.3. This MOU is not intended to create legal or binding obligations. It describes the understanding between both parties for the use of funding specified in Section 3 of this agreement.

2. Background

- 2.1. LAHF R2 was launched on 07 June 2023. The details of the fund were shared on that date with the Council in the document 'Local Authority Housing Fund - second funding round Prospectus and Guidance' ('the Prospectus').
- 2.2. LAHF R2 is a £250m capital grant fund to:
 - provide sustainable housing for those on Afghan resettlement schemes (ARAP/ACRS) who currently reside or formerly resided in bridging accommodation
 - ease wider homelessness pressures.
- 2.3. The objectives of LAHF R2 are to:
 - Provide sustainable housing to those on Afghan resettlement schemes at risk of homelessness so that they can build new lives in the UK, find employment and integrate into communities.

- Reduce local housing pressures beyond those on Afghan resettlement schemes by providing better quality temporary accommodation to families owed homelessness duties by LAs.
 - Reduce emergency, temporary and bridging accommodation costs.
 - Reduce impacts on the existing housing and homelessness systems and those waiting for social housing.
- 2.4. DLUHC has accepted the Council's plan to provide 10 homes ('the delivery target') under LAHF R2, and DLUHC will provide a grant of £1,020,000 ('the total allocation'). The Council agrees the following targets to deliver at least:
- 8 properties for households that meet the resettlement scheme element eligibility criteria outlined in section 3.2 of the Prospectus;
 - 2 properties to be allocated to households that meet the TA element eligibility criteria outlined in section 3.2 of the Prospectus.
- 2.5. This MOU covers the funding commitments from DLUHC and the delivery, financial expenditure, agreed milestones, reporting and evaluation, and communications between the Parties. It also sets out the steps DLUHC could take in the event of underperformance if required.

3. Purpose of the Funding

- 3.1. LAHF R2 funding has been provided specifically for spending on LAHF R2 priorities and the Council agrees to spend LAHF R2 funding on activity set out in this MOU as agreed by DLUHC or subsequently agreed by DLUHC as per Paragraph 4.4.
- 3.2. DLUHC will part fund the cost of the Council obtaining properties for use by households that meet the eligibility criteria. The Council will use its best endeavours to meet the delivery target and to achieve value for money. DLUHC's contributory share of funding ('the average grant rate per unit') should not exceed the maximum described below but the grant per unit for individual properties can be higher.
- 3.3. The maximum average grant rate per unit (for the portfolio of all properties, not individual purchases) is calculated as 40% of the costs of acquisition or refurbishment that the council charges to its capital budget plus £20,000 per property. Eligible costs funded by the 40% and the £20,000 per property could include the purchase price, stamp duty, surveying, legal and other fees, refurbishments, energy efficiency measures, decoration, furnishings, or otherwise preparing the property for rent and potentially irrecoverable VAT incurred on these items. The Council should ensure it complies with the Code of Practice for Local Authority Accounting.

- 3.4. The Council can determine how it uses the £20,000 per property and can choose how much of the grant is to be spent on each individual property.
- 3.5. The Council or its delivery partner(s) will fund the outstanding share for each property.
- 3.6. The funding will be provided by DLUHC in two tranches. The 'Tranche 1 allocation' is 30% of the total allocation. The 'Tranche 2 allocation' is 70% of the total allocation. Both are set out in Table 1.

Table 1 – Funding allocation

	Tranche 1 allocation	Tranche 2 allocation	Total allocation
Total funding	£306,000	£714,000	£1,020,000

4. Delivery Profile

- 4.1. Delivery of the fund will be measured on the basis of exchange of contracts, or equivalent milestone where exchange of contract will not occur, and the number of resettlement scheme households housed. Any variations to this, and necessary changes to the MOU, will need to be agreed by the parties and an amendment to this MOU made.
- 4.2. Funding outlined in Table 1 above is provided to deliver the delivery target. The Council agrees to make best endeavours to meet the delivery target by 29 March 2024.
- 4.3. This MOU is for the full term of the total allocation unless signatories agree to change as per Paragraph 4.4. A further Grant Determination Letter (GDL) will be provided following confirmation of each tranche payment.
- 4.4. DLUHC and the Council both have the right to request a change to the MOU. With regards to changing the target number of units, the Council may ask for either a higher or lower target. Any proposed change will impact the amount of funding received (as set out in the Prospectus) unless the Council is seeking to deliver more units for the same amount of money. Requests will be considered based on the progress of the reallocations process as outlined in Section 5.1 of the Prospectus and confirmed in writing.

5. Financial Arrangements

- 5.1. The agreed funds will be issued to the Council as grant payments under section 31 of the Local Government Act 2003. The Council may pass on the funding to a third party (e.g. Registered Providers) as appropriate to deliver the delivery target, complying with the Subsidy Control Act 2022.
- 5.2. Table 2 sets out the timetable for payments to be made to the Council. Payment for Tranche 1 allocation will be made in July 2023 or August 2023. The Tranche 2 allocation will be paid once the Council has demonstrated that at least 60% of the Tranche 1 allocation has been committed ('the spend requirement') via a Section 151 officer Statement of Grant Usage. This will be paid in line with timings outlined in Table 2.
- 5.3. Should the Council not meet the spend requirement for Tranche 2 payments by the dates set out in Table 2 below, DLUHC will consider putting in place further payment dates.
- 5.4. The Council may wish to return unspent monies to the Department.

Table 2 – Payments timetable

Payment milestone	Requirements for payment milestone	Payment by
Tranche 1 payment (30% of total allocation)	EITHER Signing of this MOU by 14 July 2023	Last working day of July 2023
	OR Signing of this MOU by 14 August 2023	Last working day of August 2023
Tranche 2 payment (70% of total allocation)	EITHER Submission of Statement of Grant Usage (demonstrating 60% of the first tranche has been committed) by 9 October 2023	Last working day of October 2023
	Relevant monitoring information as outlined in section 8 submitted by 9 October 2023	
	OR Submission of Statement of Grant Usage (demonstrating 60% of the first tranche has been committed) by 24 November 2023	Mid-December 2023
	Relevant monitoring information as outlined in section 8 submitted by 24 November 2023	

6. Charging Affordable Rents for LAHF funded homes

- 6.1. The LAHF Prospectus specified “It is up to local authorities to determine the precise rent level and tenure of homes in line with the fund objectives. This could include...Affordable Rent.”
- 6.2. The Rent Standard <https://www.gov.uk/government/publications/rent-standard/rent-standard-april-2023-accessible-version> provides that Affordable Rents may be charged only in limited circumstances.
- 6.3. This MOU records the agreement between the Secretary of State and the Council that relevant accommodation, provided by the Council or a partner Registered Provider pursuant to LAHF grant funding, is permitted to be let at an Affordable Rent, and that accordingly that an Affordable Rent may be charged for such accommodation in accordance with paragraph 3.8b of the Rent Standard - April 2023.
- 6.4. In Paragraph 6.3, “relevant accommodation” means accommodation:
 - in the Council area;
 - which is being used to further the LAHF objectives set out at paragraph 2.3 of the MOU;
 - which has never been let at a social rent; and
 - where the accommodation is provided by a partner Registered Provider, for which the Council has agreed that the partner Registered Provider may charge affordable rent.

7. Roles and Responsibilities

DLUHC Responsibilities

- 7.1. DLUHC is responsible for setting national housing policy, providing grant(s) to the Council and monitoring the delivery of homes.

Council Responsibilities (fund delivery)

- 7.2. The Council will make housing investment decisions, review existing housing policies and products, maximise leverage of this public sector investment and ensure that funds provide value for money and are deliverable within the timescale of the fund. The Council may work in partnership with private Registered Providers, local authority housing companies or other bodies to deliver homes. The Council will also report on the fund by providing Management Information (MI) as set out in **Annex A** of this MOU and will work with DLUHC to ensure they have the capability to deliver the fund and provide MI within the set timescales.

- 7.3. The Council is expected to have the necessary governance and assurance arrangements in place and that all legal and other statutory obligations and consents will be adhered to, which may include, but not solely:
- **subsidy control**, at all levels e.g. the funding the Council allocates to project deliverers and subsidies that project deliverers provide to third parties.
 - **equalities duties**, the Council must ensure that all LAHF funded activity is delivered in accordance with its obligations under the public sector equality duty (PSED)
 - **procurement**, the Council must ensure that the allocation of funding to project deliverers that constitutes a procurement is managed in compliance with the public contract regulations
 - **fraud**, the Council must ensure that robust arrangements are in place to manage fraud risk, including ensuring that project deliverers have robust fraud risk management process and paying particular attention to projects that involve the payment of grants to beneficiaries e.g. businesses.
- 7.4. The Council's Section 151 Officer is expected to ensure that these legal duties and all other relevant duties are considered and that delivery of LAHF investment is carried out with propriety, regularity and value for money.

Council Responsibilities (Affordable Rents – where required by LAs)

- 7.5. The Council should note (and remind partner Registered Providers) that conversion of social rent properties to affordable rent is not permitted pursuant to paragraph 3.15 of the Rent Standard other than in the circumstances set out in chapter 2 of the Rent Policy Statement.
- 7.6. Where the Council has agreed that a partner Registered Provider may charge affordable rent, the Council will confirm to the Registered Provider that the Registered Provider may charge affordable rent in accordance with Paragraph 6.3 of this MOU.
- 7.7. The Council will require partner Registered Providers to provide details to the Council of any accommodation provided pursuant to LAHF grant funding for which Affordable Rent is charged.
- 7.8. The Council will maintain a register of any accommodation provided pursuant to LAHF grant funding for which it or a partner Registered Provider is charging Affordable Rent. This register should be available for inspection upon request by either DLUHC or the Regulator for Social

Housing. The fields of information required in register are specified in **Annex C**.

8. Monitoring Arrangements and Accountability

- 8.1. The Council will put in place appropriate governance and oversight arrangements to ensure that delivery of housing is on track and that plans remain ambitious and provide value for money.

Reporting Arrangements

- 8.2. The Council has agreed to provide reporting information to DLUHC on fund allocations and delivery. The Council will be asked to provide a mix of quantitative and qualitative summary updates to DLUHC; a full list of MI can be found in **Annex A**.
- 8.3. The first report will be due in October 2023 and then every two months thereafter, until the Council's programme has completed. The schedule for monitoring reports is outlined in **Annex B**.
- 8.4. Spend outturn and forecast should be signed off by the Section 151 officer or deputy Section 151 officer.
- 8.5. A Statement of Grant Usage Section 151 officer or deputy Section 151 officer should be submitted when at least 60% of the Tranche 1 allocation has been committed
- 8.6. The Council also agrees to work with the department to provide any reasonable additional MI as and when requested by the DLUHC Senior Reporting Officer (SRO). DLUHC will provide an appropriate amount of time to return any additional MI requests.
- 8.7. The Council agrees to work collaboratively with any requests from DLUHC to support any retrospective assessment or evaluation as to the impact or value for money of LAHF. As a minimum, the Council is expected to monitor spend, outputs and outcomes against agreed indicators and keep this information for at least 5 years.

9. Governance & Assurance

- 9.1. The Council is expected to ensure that all legal and other statutory obligations and consents will be adhered to, which may include, but not solely, state aid / subsidy control, equalities duties, procurement, health and safety, and fraud prevention. The Council has prerogative to establish internal governance and assurance arrangements as they see fit to achieve this.

- 9.2. The Council will ensure data can be shared for the prevention and detection of fraud by including the following clause in all agreements with companies or external entities in relation to LAHF – including, but not limited to, property contracts, professional services contracts, construction contracts and lease agreements:

“Data may be shared with other enforcement agencies for the prevention and detection of crime.”

Signed for and on behalf of DLUHC

Signature:

Name:

Position:

Date:

Signed for and on behalf of Plymouth City Council

Signature:

Name:

Position:

Date:

Annex A – Reporting and Monitoring Arrangements

Scope and Purpose

1. This annex sets out the agreed reporting and monitoring arrangements for LAHF, including the expected frequency and content of the regular reports that the Council will provide to DLUHC.

DLUHC Role

2. DLUHC will support the running of the fund and maintain a national picture of delivery by putting in place a proportionate monitoring and governance framework. This will include a fund governance board(s) attended by the DLUHC Senior Reporting Officer (SRO) and other relevant stakeholders. Wherever possible DLUHC will avoid duplication of requests towards the Council.

Council Role

3. Day-to-day project monitoring and delivery responsibilities will be delegated to the Council. The Council will submit reports to DLUHC in accordance with the agreed timescales and frequency set out in the MoU. The Council will also work with DLUHC to provide any reasonable additional MI required as and when requested by the DLUHC Senior Reporting Officer. DLUHC will provide an appropriate amount of time to return any additional MI requests.

Management Information (MI)

4. The list of MI is split between operational data – required for monitoring the ongoing fund delivery (Table 3) and evaluation data (Table 4) required to assess the strategy-level success of the fund and inform future policy development. Tables 4 and 5 present the required routine MI and is subject to change, with agreement by DLUHC and the Council. For MI purposes, “committed spend” is considered funding which has been allocated to a property where there has been an exchange of contracts or equivalent milestone where exchange of contract will not occur.

Table 3 – Monitoring Data

Item	Frequency
Number of properties where contracts exchanged, including: <ul style="list-style-type: none"> • bedroom size • whether located in another borough area • who will own the dwellings • how properties obtained 	Every 2 months
Number of properties occupied/ ready to let, including bedroom size	Every 2 months
Number of resettlement scheme households housed	Every 2 months
Number of pending resettlement scheme properties pre-matched to current/former bridging hotel households	Every 2 months
Total expenditure (incl grant and other funding)	Every 2 months
Total committed spend (incl grant and other funding)	Every 2 months
DLUHC grant used	Every 2 months
Overall assessment (RAG rated) of whether delivery is on track as determined by the responsible Council officer	Every 2 months

Table 4 – Evaluation Data

Item	Frequency
How properties have been sourced (e.g. through stock acquisition or another delivery route)	In April 2024 and thereafter upon request to aid with evaluation of the fund
How the Council has funded its contributory share	
Breakdown of resettlement scheme households housed by previous housing situation, e.g. in bridging hotel, in LA emergency accommodation/temporary accommodation	
Tenancy duration	
Rent levels	
Number of properties obtained outside the local authority's area, if applicable, and where these are located.	

- In addition, to enable the assessment of relative value for money and to assist with future spending reviews, we may occasionally ask for additional information including details of how the fund is delivered and housing market conditions. This will provide important data to support future policy developments and will also support engagement with HM Treasury. This information will be provided to agreed timeframes when requested by DLUHC.
- Should the Council wish to amend and/or not collect any of these proposed data points, they should submit a proposal to DLUHC for agreement.

Frequency of Reporting

- The Council will be asked to provide reports every two months. The schedule for monitoring reports is outlined in Annex B.

Data Consistency

8. DLUHC and the Council have a shared commitment to ensure that, for clarity and transparency purposes, consistent methods of recording outputs are maintained. It is expected that the provided reporting will be robust, accurate and quality assured to a high standard. As such minimal revisions would be expected – although, where these are required, DLUHC should be advised as soon as practical.

Use of Material Provided

9. DLUHC will use the provided material to monitor delivery nationally.

Annex B – Monitoring Milestones

1. The Council is requested to submit the monitoring information summarised in **Annex A** via a Microsoft Form every two months by 5pm on the dates outlined below. DLUHC will provide the link to the form directly to the Council well in advance of each touchpoint date.
2. In order to demonstrate that the spend requirement has been met to enable a Year 2 payment, the Council will also need to submit a Section 151 Officer Statement of Grant Usage to LAHF@levellingup.gov.uk in addition to submitting the form by 5pm on the dates outlined below.
3. The Section 151 Officer Statement of Grant Usage only needs to be submitted when the Council wishes to demonstrate the spend requirement has been met, and also at the end of the programme. It does not need to be submitted at every monitoring touchpoint.
4. The Microsoft Form needs to be submitted at every monitoring touchpoint. DLUHC will provide full guidance for submitting the form directly well in advance of each touchpoint date.

Table 5 – Monitoring Touchpoint Dates

Monitoring touchpoint	Microsoft Form to be submitted by 5pm on the following dates	Section 151 Officer Statement of Grant Usage required?
Touchpoint 1	9 October 2023	Yes, if LA wishes to enable Tranche 2 payment in October 2023
Touchpoint 2*	24 November 2023	Yes, if LA wishes to enable Tranche 2 payment in December 2023
Touchpoint 3	8 February 2023	N/A
Touchpoint 4	8 April 2023	N/A
Evaluation	April 2024 onwards	N/A

*this touchpoint has been brought forward slightly earlier than the 2-month mark to account for the holiday period in December

Annex C – Register of LAHF accommodation for which an Affordable Rent is charged

This annex sets out the agreed information which will be contained in the Council's Register of LAHF accommodation for which an Affordable Rent is charged.

This register should be available for inspection upon request by either DLUHC or the Regulator for Social Housing.

Property address			
Completion date			
Name of Registered Provider			
Registration Code			

(Note: The Council is not required to submit this information as part of regular delivery monitoring submissions.)

This page is intentionally left blank

EXECUTIVE DECISION

made by a Cabinet Member



REPORT OF ACTION TAKEN UNDER DELEGATED AUTHORITY BY AN INDIVIDUAL CABINET MEMBER


Executive Decision Reference Number – CSLCC02 23/24

Decision	
1	Title of decision: PSPO 2023 – Reducing alcohol-related anti-social behaviour
2	Decision maker (Cabinet member name and portfolio title): Councillor Sally Haydon (Cabinet member for Community Safety, Libraries, Cemeteries and Crematoria)
3	Report author and contact details: Kristina Browning – Technical Lead, Safer Communities, Community Connections, Plymouth City Council. Email: Kristina.Browning@plymouth.gov.uk Tel: 01752 398333
4	Decision to be taken: Agree a three year extension to the current city-wide Public Spaces Protection Order linked to alcohol-related anti-social behaviour commencing on 20 October 2023 and ending on 20 October 2026.
5	<p>Reasons for decision:</p> <p>In October 2020, a city-wide Public Spaces Protection Order (PSPO) was granted across the entire city of Plymouth for three years, aiming to reduce alcohol-related anti-social behaviour.</p> <p>The prohibitions of the PSPO state:</p> <ol style="list-style-type: none"> 1. No person shall continue to consume alcohol, or anything which is reasonably believed to be alcohol, when asked to stop by an authorised officer who, in their view believe this would assist in preventing further anti-social behaviour, public nuisance or disorder 2. No person shall fail to surrender a vessel(s) of alcohol, sealed or unsealed, when requested by an authorised officer who, in their view believe this would assist in preventing further anti-social behaviour, public nuisance or disorder <p>This PSPO is due to end on 19 October 2023.</p> <p>The Council have undertaken the required consultation process to establish whether the current city-wide alcohol-related PSPO should be extended for a further three years. The feedback from both partner agencies and members of the public shows significant support for the PSPO to be extended and for this to continue being city-wide. This is also supported by crime data showing an increase in rates of alcohol-related crime, impacting all communities within Plymouth.</p>
6	<p>Alternative options considered and rejected:</p> <ol style="list-style-type: none"> 1. Not to extend the PSPO – consultation with partners and members of the public has shown overwhelming support for the PSPO to be extended as a vital tool to prevent and reduce anti-social behaviour linked with alcohol use across the city. Should the PSPO not be extended, it is likely anti-social behaviour and crime linked with alcohol use will increase and there will be significant impact on the police's ability to resource this demand.

	2. Amend the prohibitions of the PSPO – consultation with partners and members of the public has shown a significant majority are in favour of the prohibitions remaining the same with a general consensus that these are fair, reasonable and effective.			
7	Financial implications and risks: As the proposal is for the prohibitions to remain the same, there is no cost with changing existing signage. There will be a requirement to purchase additional signage as all the current stock has been used but the cost for this will be minimal.			
8	Is the decision a Key Decision? (please contact Democratic Support for further advice)	Yes	No	Per the Constitution, a key decision is one which:
			x	in the case of capital projects and contract awards, results in a new commitment to spend and/or save in excess of £3million in total
			x	in the case of revenue projects when the decision involves entering into new commitments and/or making new savings in excess of £1million
		x	is significant in terms of its effect on communities living or working in an area comprising two or more wards in the area of the local authority.	
	If yes, date of publication of the notice in the Forward Plan of Key Decisions			
9	Please specify how this decision is linked to the Council's corporate plan/Plymouth Plan and/or the policy framework and/or the revenue/capital budget:	<p>A PSPO to reduce alcohol-related ASB in Plymouth is in-line with our priorities of the Corporate Plan which are working with the Police to tackle crime and anti-social behaviour and keeping children, adults and communities safe.</p> <p>We believe in:</p> <p>Democracy– consultation showed members of the public were overwhelmingly in favour of the PSPO.</p> <p>Responsibility – we are responsible for working with partners to prevent and reduce crime and ASB in Plymouth.</p> <p>Fairness – the PSPO does not discriminate against any community and applies to any individual causing ASB linked with their alcohol consumption. It does not prevent people from drinking alcohol, unless there is associated ASB.</p> <p>Co-operation – the PSPO is supported by, and used in partnership with, agencies such as Police and PARC.</p>		
10	Please specify any direct environmental implications of the decision (carbon impact)	Not applicable.		
Urgent decisions				

I 1	Is the decision urgent and to be implemented immediately in the interests of the Council or the public?	Yes		(If yes, please contact Democratic Support (democraticsupport@plymouth.gov.uk) for advice)
		No	x	(If no, go to section I 3a)
I 2a	Reason for urgency:			
I 2b	Scrutiny Chair Signature:		Date	
	Scrutiny Committee name:			
	Print Name:			
Consultation				
I 3 a	Are any other Cabinet members' portfolios affected by the decision?	Yes		
		No	x	(If no go to section I 4)
I 3 b	Which other Cabinet member's portfolio is affected by the decision?			
I 3 c	Date Cabinet member consulted			
I 4	Has any Cabinet member declared a conflict of interest in relation to the decision?	Yes		If yes, please discuss with the Monitoring Officer
		No	x	
I 5	Which Corporate Management Team member has been consulted?	Name	Matt Garrett	
		Job title	Service Director	
		Date consulted	30 June 2023	
Sign-off				
I 6	Sign off codes from the relevant departments consulted:	Democratic Support (mandatory)	DS 34 23/24	
		Finance (mandatory)	HLS170723	
		Legal (mandatory)	1995 – 03.08.23 - IW	
		Human Resources (if applicable)	n/a	
		Corporate property (if applicable)	n/a	

		Procurement (if applicable)	n/a						
Appendices									
17	Re f.	Title of appendix							
	A	Briefing report							
	B	Equalities Impact Assessment							
	C	DRAFT PSPO							
	D	Certificate of Consultation - OPCC							
	E	Certificate of Consultation - Police							
Confidential/exempt information									
18 a	Do you need to include any confidential/exempt information?	Yes		If yes, prepare a second, confidential ('Part II') briefing report and indicate why it is not for publication by virtue of Part I of Schedule 12A of the Local Government Act 1972 by ticking the relevant box in 18b below. (Keep as much information as possible in the briefing report that will be in the public domain)					
		No	x						
			Exemption Paragraph Number						
			1	2	3	4	5	6	7
18 b	Confidential/exempt briefing report title:								
Background Papers									
19	Please list all unpublished, background papers relevant to the decision in the table below. Background papers are <u>unpublished</u> works, relied on to a material extent in preparing the report, which disclose facts or matters on which the report or an important part of the work is based. If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part I of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.								
Title of background paper(s)			Exemption Paragraph Number						
			1	2	3	4	5	6	7
Cabinet Member Signature									

20	I agree the decision and confirm that it is not contrary to the Council's policy and budget framework, Corporate Plan or Budget. In taking this decision I have given due regard to the Council's duty to promote equality of opportunity, eliminate unlawful discrimination and promote good relations between people who share protected characteristics under the Equalities Act (2010) and those who do not. For further details please see the EIA attached.		
Signature		Date of decision	06 September 2023
Print Name	Councillor Sally Haydon (Cabinet Member for Community Safety, Libraries, Cemeteries and Cremetoria)		

This page is intentionally left blank

PUBLIC SPACES PROTECTION ORDER (PSPO)

Safer Communities, Community Connections



1. Introduction

This briefing displays relevant information for the Portfolio Holder in relation to the renewal of the city-wide Public Spaces Protection Order focused on alcohol-related anti-social behaviour.

2. Background to Public Space Protection Orders

Public Spaces Protection Orders (PSPOs) were introduced in the Anti-social Behaviour, Crime and Policing Act 2014. The primary purpose of the PSPO is to empower local authorities to deal with anti-social behaviour that adversely affects other people using the same public space.

A PSPO may only prohibit or impose requirements that are reasonable to prevent or reduce the detrimental effect from anti-social behaviour continuing, occurring or recurring. A local authority may make a PSPO if they are satisfied that the following 2 conditions are met:

1. Activities carried out in a public place within the authority's area are having or have had a detrimental effect on the quality of life of those in the locality, or it is likely that the activities will be carried out in a public place within that area and they will have such an effect
2. The effect or likely effect of the activity:
 - Is or is likely to be of a persistent or continuing nature
 - Is or is likely to be such as to make the activities unreasonable, and
 - Justifies the restrictions imposed by the notice

Local authorities should consider that the requirements and prohibitions are reasonable. When drafting an Order placing restrictions on any activity, Councils should propose restrictions which focus on specific behaviours and be proportionate to the detrimental effect that the behaviour is causing or can cause, and are necessary to prevent it from continuing, occurring or reoccurring.

A person will commit an offence if they do something that is prohibited or fails to comply with a PSPO.

A PSPO can be put in place for up to 3 years. Then the PSPO must be reviewed to ensure it is still necessary. Before extending or varying the PSPO, local authorities must consult with the local chief of police, the police and crime commissioner, owners or occupiers of land within any affected area and appropriate community representatives. The new PSPO will remain in force for a further 3 years.

In accordance with the Anti-social Behaviour, Crime and Policing Act 2014 (Publication of Public Spaces Protection Orders) Regulations 2014, the local authority must publish the order as made, extended or varied on its website and erect appropriate notices on or adjacent to the public place to which the order relates.

3. Plymouth's Current Public Spaces Protection Order

In October 2020, a city-wide Public Spaces Protection Order (PSPO) was granted across the entire city of Plymouth for three years, aiming to reduce alcohol-related anti-social behaviour.

The prohibitions of the PSPO state:

1. No person shall continue to consume alcohol, or anything which is reasonably believed to be alcohol, when asked to stop by an authorised officer who, in their view believe this would assist in preventing further anti-social behaviour, public nuisance or disorder
2. No person shall fail to surrender a vessel(s) of alcohol, sealed or unsealed, when requested by an authorised officer who, in their view believe this would assist in preventing further anti-social behaviour, public nuisance or disorder

This PSPO is due to end on 19th October 2023.

Over the past few months, we have been consulting with relevant partners and the general public to determine whether the PSPO should be extended for a further 3 years and, if so, in what format this should be.

4. Consultation

4.1 Consultation with internal departments and partner agencies

Consultation took place with relevant internal departments within Plymouth City Council as well as key partners within the Safer Plymouth Community Safety Partnership. 43 responses were received including from the Police and Crime Commissioner, Devon and Cornwall Police, Plymouth Against Retail Crime (PARC), Harbour, BCHA, Plymouth Waterfront Partnership, Plymouth Sound National Marine Park, and the Salvation Army.

The consultation responses were as follows:

1. Do you consider alcohol-related ASB to be an issue in Plymouth?
 - a. 62% a significant issue, 36% somewhat an issue, 0% not an issue, 2% don't know
2. Do you feel alcohol-related ASB has improved or worsened since the PSPO was introduced in October 2020?
 - a. 33% improved, 40% stayed the same, 7% worsened, 19% don't know
3. How effective do you feel the current city-wide PSPO has been in reducing alcohol-related ASB since it was introduced?
 - a. 5% very effective, 69% somewhat effective, 7% neither effective or ineffective, 10% somewhat effective, 0% not effective, 10% don't know
4. Do you agree that Plymouth should have a city-wide PSPO linked to alcohol-related anti-social behaviour for a further 3 years?
 - a. 88% yes, 2% no, 10% don't know

We also received a significant number of comments in support of extending the PSPO, including:

- "There were previous incidents in public spaces where large gatherings involving alcohol caused a number of incidents...since the introduction of the PSPO, it has allowed officers to challenge people early before large groups set up."

- “I police the City Centre and my view on the PSPO is extremely positive. Having a city wide PSPO will negate moving the issues out of one area into another.”
- “Street drinking in the city centre is mostly dealt with by PARC during the day. If the PSPO doesn't continue then this would put more pressure on the police to deal with the issue. They wouldn't have the resources to do this to the same extent so crime and ASB would rise in the city centre.”
- “Without the PSPO, violence within the ENTE would increase, including VAWG”

4.2 Consultation with members of the public

Consultation took place via the Plymouth City Council Consultation Portal over a 3 week period. 104 responses were received.

The consultation responses were as follows:

1. To what extent do you agree or disagree that alcohol-related ASB is an issue in Plymouth?
 - a. 63% strongly agree, 29% agree, 7% neither agree or disagree, 0% disagree, 2% strongly disagree
2. To what extent is the area in which you live impacted by alcohol-related ASB?
 - a. 15% not impacted, 45% somewhat impacted, 32% significantly impacted, 6% unsure
3. To what extent do you agree or disagree that Plymouth should have a PSPO to try and reduce alcohol-related ASB?
 - a. 72% strongly agree, 13% agree, 7% neither agree or disagree, 1% disagree, 2% strongly disagree
4. Do you think prohibition 1 of the current PSPO is fair and reasonable?
 - a. 84% yes, 4 % no, 13% no response
5. Do you think prohibition 2 of the current PSPO is fair and reasonable?
 - a. 83% yes, 3% no, 14% no response

We also received a significant number of comments in support of extending the PSPO, including:

- “The PSPO has been well used by Police to tackle alcohol related ASB. To lose this would have a negative impact on the entire city”
- “Without this PSPO, Plymouth city centre would become a no go area for many people. Seeing currently that the city is trying to attract investment the removal of such an order would be very detrimental to our economy in Plymouth and surrounding areas.”

4.3 Consultation with alcohol-dependent communities

Consultation took place with service users of George House Hostel, Salvation Army Hostel, and Hamoaze House via a series of small focus groups. Informal conversations were had to understand the experiences of those most impacted by the prohibitions within the PSPO, including any thoughts they had about it being renewed for a further three years.

A number of common concerns were raised indicating a lack of understanding about the PSPO and the consequences for breach, an inconsistency in the way it was applied by officers, and the potential risk of removing alcohol from someone who is alcohol-dependent.

5. Plymouth Data

An analysis of alcohol-related crime data over the past three years was conducted as part of our consultation with Devon and Cornwall Police. The data showed that:

- In 2019, there were on average 3.1 alcohol-related crimes per day. In 2022, there were on average 3.8 alcohol-related crimes per day. These figures indicate an increase in the average number of alcohol-related crimes per day over the past three years. (It should be noted that these statistics cover all alcohol-related crimes, including those not linked with the consumption of alcohol in public places, such as vehicle offences and domestic offences. However, this is the most relevant data available to understand the picture of alcohol-related crime and anti-social behaviour in Plymouth)
- Although there are specific areas within Plymouth where demand is higher, alcohol-related offences occur across the entire city of Plymouth.

6. Conclusion and Recommendations

The Council have undertaken the required consultation process to establish whether the current city-wide alcohol-related PSPO should be extended for a further three years commencing on 20th October 2023 and ending on 20th October 2026. The feedback from both partner agencies and members of the public shows significant support for the PSPO to be extended and for this to continue being city-wide. This is also supported by crime data showing an increase in rates of alcohol-related crime, impacting all communities within Plymouth.

The consultation did however also highlight a lack of understanding around the PSPO within some communities and a disparity in the way it was applied across the city. Concerns were also highlighted about the impact on those who were alcohol-dependent including the risk of removing their alcohol and missed opportunities for diverting this community to support agencies.

Based on the above, the following recommendations have been made:

1. The city-wide alcohol-related PSPO should continue, with the same terms, for a further three years – from 20 October 2023 until 20th October 2026. A final draft of the PSPO is attached with this briefing.
2. A training package will be created by PCC Safer Communities team in relation to the PSPO and how it should be applied in a trauma-informed way.
3. An easy-read leaflet will be produced so this can be given to those who are asked to stop drinking or those who have their alcohol removed under the PSPO. This leaflet will explain the terms of the PSPO and have information about agencies who may be able to offer support, e.g. with alcohol dependency and homelessness.
4. PCC to release external comms in relation to the renewal of the PSPO and an updated copy published on the PCC website.


7. Decision:

It is recommended the Portfolio Holder agrees a three-year extension to the current city-wide Public Spaces Protection Order linked to alcohol-related anti-social behaviour commencing on 20 October 2023 and ending on 20 October 2026.

This page is intentionally left blank

EQUALITY IMPACT ASSESSMENT – CITY-WIDE PUBLIC SPACES PROTECTION ORDER

SECTION ONE: INFORMATION ABOUT THE PROPOSAL

<p>Author(s): This is the person completing the EIA template.</p>	<p>Kristina Browning</p>	<p>Department and service:</p>	<p>People – Community Connections</p>	<p>Date of assessment:</p>	<p>15 August 2023</p>
<p>Lead Officer: Please note that a Head of Service, Service Director, or Strategic Director must approve the EIA.</p>	<p>Matt Garrett</p>	<p>Signature:</p>		<p>Approval date:</p>	<p>15 August 2023</p>
<p>Overview:</p>	<p>This EIA assesses the impact of a three year extension to the city-wide alcohol-related Public Spaces Protection Order (PSPO). The prohibitions of the proposed order state:</p> <ol style="list-style-type: none"> 1. No person shall continue to consume alcohol, or anything which is reasonably believed to be alcohol, when asked to stop by an authorised officer who, in their view believe this would assist in preventing further anti-social behaviour, public nuisance or disorder 2. No person shall fail to surrender a vessel(s) of alcohol, sealed or unsealed, when requested by an authorised officer who, in their view believe this would assist in preventing further anti-social behaviour, public nuisance or disorder <p>The Public Spaces Protection Order (PSPO) is one of the powers available to Local Authorities under the Anti-Social behaviour, Crime and Policing Act 2014. This legislation enables the Local Authority to introduce a PSPO to an area to deal with a particular nuisance which is detrimental to the local community’s life. It is designed to ensure the majority can use and enjoy public spaces safe from crime and antisocial behaviour (ASB). The aim of this PSPO is to reduce anti-social and nuisance behaviour that can be attributed to the consumption of alcohol in public spaces .This is an issue that is known to have a detrimental effect in communities and can impact both quality of home life and business. The PSPO</p>				

does not place a ban on public alcohol consumption; rather it allows for greater control of alcohol consumption where it becomes of a problematic nature – e.g. large groups of consuming alcohol intimidating residents/passers-by; and gives police additional powers within a designated area to tackle alcohol consumption in public spaces where those anti-social behaviours are attributed to alcohol consumption.

The Council have undertaken the required consultation process to establish whether the current city-wide alcohol-related PSPO should be extended for a further three years. The feedback from both partner agencies and members of the public shows significant support for the PSPO to be extended and for this to continue being city-wide. This is also supported by crime data showing an increase in rates of alcohol-related crime, impacting all communities within Plymouth.

The consultation did however also highlight a lack of understanding around the PSPO within some communities and a disparity in the way it was applied across the city. Concerns were also highlighted about the impact on those who were alcohol-dependent including the risk of removing their alcohol and missed opportunities for diverting this community to support agencies.

Based on the above, the following recommendations have been made:

1. The city-wide alcohol-related PSPO should continue, with the same terms, for a further three years – from October '23 until 20th October '26. A final draft of the PSPO is attached with this briefing.
2. A training package will be created by PCC Safer Communities team in relation to the PSPO and how it should be applied in a trauma-informed way.
3. An easy-read leaflet will be produced so this can be given to those who are asked to stop drinking or those who have their alcohol removed under the PSPO. This leaflet will explain the terms of the PSPO and have information about agencies who may be able to offer support, e.g. with alcohol dependency and homelessness.
4. PCC to release external comms in relation to the renewal of the PSPO and an updated copy published on the PCC website.

Decision required:

Agree a three-year extension to the current city-wide Public Spaces Protection Order linked to alcohol-related anti-social behaviour commencing on 20 October 2023 and ending on 20 October 2026.

SECTION TWO: EQUALITY IMPACT ASSESSMENT SCREENING TOOL

<p>Potential external impacts: Does the proposal have the potential to negatively impact service users, communities or residents with protected characteristics?</p>	<p>Yes</p>	<p>x</p>	<p>No</p>	
<p>Potential internal impacts: Does the proposal have the potential to negatively impact Plymouth City Council employees?</p>	<p>Yes</p>		<p>No</p>	<p>x</p>
<p>Is a full Equality Impact Assessment required? (if you have answered yes to either of the questions above then a full impact assessment is required and you must complete section three)</p>	<p>Yes</p>	<p>x</p>	<p>No</p>	
<p>If you do not agree that a full equality impact assessment is required, please set out your justification for why not.</p>				

SECTION THREE: FULL EQUALITY IMPACT ASSESSMENT

<p>Protected characteristics (Equality Act, 2010)</p>	<p>Evidence and information (e.g. data and consultation feedback)</p>	<p>Adverse impact</p>	<p>Mitigation activities</p>	<p>Timescale and responsible department</p>
<p>Age</p>	<p>Plymouth does not hold any precise data as to the average age of those who are alcohol addicted “street drinkers”. For the purpose of this EIA the term “street drinker” refers to those who regularly drink alcohol in public places, and while they may have accommodation they are known to lead street based lifestyles.</p>	<p>There is no anticipated adverse impact of the PSPO on any particular age demographic. The process of enforcing the PSPO is solely focussed on the prohibitions in the order, which is ASB linked to the consumption of alcohol in public spaces.</p>	<p>All ages of vulnerability will be referred onto relevant support agencies.</p>	<p>Community Connections – as required</p>

<p>Care experienced individuals</p> <p>(Note that as per the Independent Review of Children’s Social Care recommendations, Plymouth City Council is treating care experience as though it is a protected characteristic).</p>	<p>It is estimated that 26 per cent of the homeless population in the UK have care experience.</p> <p>Plymouth does not hold any precise data in relation to those alcohol-addicted ‘street drinkers’ who are care experienced individuals however it is recognised that a number of street drinkers are homeless and may be care experienced.</p>	<p>There is no anticipated adverse impact of the PSPO on those who are care experienced. The process of enforcing the PSPO is solely focussed on the prohibitions in the order, which is ASB linked to the consumption of alcohol in public spaces.</p>	<p>n/a</p>	<p>n/a</p>
<p>Disability</p>	<p>Addiction to alcohol is not a recognised disability however you might be disabled if your addiction caused an impairment. For example if you have liver disease or depression caused by alcohol dependency, that would be an impairment.</p> <p>Plymouth does not hold any precise data in relation to disabilities of those who are alcohol-addicted ‘street drinkers’ however it is recognised that many alcohol dependent street drinkers have multiple complex interlinked conditions.</p>	<p>This PSPO may impact those who are alcohol dependent more than other communities as they are more likely to have their alcohol removed or be asked to stop drinking.</p> <p>However, it is only those who are causing ASB when they drink alcohol that will be impacted by the prohibitions within the PSPO. An alcohol-dependent individual can drink alcohol anywhere in the city so long as they are not causing ASB.</p>	<p>The impact will be mitigated by additional training for police and PARC officers to ensure that ‘every contact counts’ and that those who are asked to stop drinking or hand over their alcohol are signposted to relevant support services or safeguarded, where appropriate.</p> <p>In acknowledgement that some of the street drinking community will have low levels of literacy or may have learning</p>	<p>Community Connections – as required</p>

		The PSPO will also have a positive impact as it provides opportunities for those dependent on alcohol to be referred into appropriate support mechanisms or safeguarded.	difficulties, we will also produce an easy read leaflet to ensure all can understand the terms of the PSPO and why they need to comply with it.	
Gender reassignment	<p>The 2021 Census found that 94.2 per cent (205,959) people aged 16 years and over in Plymouth have a gender identity the same as their sex observed and registered at birth compared to 93.5 per cent in England and Wales. Just over 5 per cent chose not to respond. The remaining 0.5 per cent (1,221) have a gender identity different from their sex observed and registered at birth. This is identical to the England and Wales rate.</p> <p>Plymouth does not hold any precise data in relation to those who are alcohol-addicted street drinkers who have a gender identity the same as their sex observed and registered at birth.</p>	There is no anticipated adverse impact of the PSPO linked with gender reassignment. The process of enforcing the PSPO is solely focussed on the prohibitions in the order, which is ASB linked to the consumption of alcohol in public spaces.	n/a	n/a
Marriage and civil partnership	<p>40.1 per cent of residents have never married and never registered a civil partnership. 10 per cent are divorced, 6 percent are widowed, with 2.5 per cent are separated but still married.</p> <p>0.49 per cent of residents are, or were, married or in a civil partnerships of the same sex. 0.06 per cent of residents are in a civil partnerships with the opposite sex (2021 Census).</p>	There is no anticipated adverse impact of the PSPO linked with marriage or civil partnership status. The process of enforcing the PSPO is solely focussed on the prohibitions in the order, which is ASB linked to the consumption of alcohol in public spaces.	n/a	n/a

	<p>Plymouth does not hold any precise data in relation to the marriage or civil partnership status of those who are alcohol-addicted street drinkers.</p>			
<p>Pregnancy and maternity</p>	<p>The total fertility rate (TFR) for England was 1.62 children per woman in 2021. The total fertility rate (TFR) for Plymouth in 2021 was 1.5.</p> <p>Plymouth does not hold any precise data in relation to the pregnancy or maternity status of those who are alcohol-addicted street drinkers.</p>	<p>There is no anticipated adverse impact of the PSPO linked with pregnancy or maternity status. The process of enforcing the PSPO is solely focussed on the prohibitions in the order, which is ASB linked to the consumption of alcohol in public spaces.</p> <p>However, the PSPO will have a positive impact as it provides opportunities for those who may be pregnant and dependent on alcohol to be referred into appropriate support mechanisms or safeguarded.</p>	<p>n/a</p>	<p>n/a</p>

<p>Race</p>	<p>In 2021, 94.9 per cent of Plymouth’s population identified their ethnicity as White, 2.3 per cent as Asian and 1.1 per cent as Black (2021 Census)</p> <p>People with a mixed ethnic background comprised 1.8 per cent of the population. 1 per cent of the population use a different term to describe their ethnicity (2021 Census)</p> <p>92.7 per cent of residents speak English as their main language. 2021 Census data shows that after English, Polish, Romanian, Chinese, Portuguese, and Arabic are the most spoken languages in Plymouth (2021 Census).</p> <p>Plymouth does not hold any precise data in relation to the race of those who are alcohol-addicted street drinkers.</p>	<p>There could be an adverse impact on those who do not speak English as their main language as they may not be aware, or understand, the terms of the PSPO. Should they refuse to stop drinking or hand over their alcohol, they would be in breach of the PSPO - which is a criminal offence - but this may be because they do not understand what the authorised officer is saying.</p>	<p>Training will be provided to Police and PARC Officers in relation to dealing with situations where a person does not understand English. Police have access to interpretation services. PARC can take a person’s details so PCC can provide further follow-up or call Police for assistance. PCC will work with partner agencies to ensure those who do not speak or understand English, can have the terms of the PSPO fully explained to them.</p>	<p>Community Connections – as required</p>
<p>Religion or belief</p>	<p>48.9 per cent of the Plymouth population stated they had no religion. 42.5 per cent of the population identified as Christian (2021 Census).</p> <p>Those who identified as Muslim account for 1.3 per cent of Plymouth’s population while Hindu, Buddhist, Jewish or Sikh combined totalled less than 1 per cent (2021 Census).</p>	<p>There is no anticipated adverse impact of the PSPO linked with a person’s religion or belief. The process of enforcing the PSPO is solely focussed on the prohibitions in the order, which is ASB linked to the consumption of alcohol in public spaces.</p>	<p>n/a</p>	<p>n/a</p>
<p>Sex</p>	<p>51 per cent of our population are women and 49 per cent are men (2021 Census).</p> <p>Plymouth does not hold any precise data in relation to the sex of those who are alcohol-</p>	<p>There is no anticipated adverse impact of the PSPO linked with a person’s sex. The process of enforcing the</p>	<p>n/a</p>	<p>n/a</p>

	<p>addicted street drinkers. However, data from a Plymouth partnership seeking to address issues of street drinking, homelessness and begging show there are currently 12 males and 7 females open to services.</p> <p>National data indicates that men are more likely to drink alcohol than women.</p>	<p>PSPO is solely focussed on the prohibitions in the order, which is ASB linked to the consumption of alcohol in public spaces.</p>		
Sexual orientation	<p>88.95 per cent of residents aged 16 years and over in Plymouth describe their sexual orientation as straight or heterosexual. 2.06 per cent describe their sexuality as bisexual, 1.97 per cent of people describe their sexual orientation as gay or lesbian. 0.42 per cent of residents describe their sexual orientation using a different term (2021 Census).</p> <p>Plymouth does not hold any precise data in relation to the sexual orientation of those who are alcohol-addicted street drinkers.</p>	<p>There is no anticipated adverse impact of the PSPO linked with a person’s sexual orientation. The process of enforcing the PSPO is solely focussed on the prohibitions in the order, which is ASB linked to the consumption of alcohol in public spaces.</p>	n/a	n/a

SECTION FOUR: HUMAN RIGHTS IMPLICATIONS

Human Rights	Implications	Mitigation Actions	Timescale and responsible department
	<p>The following articles of the Human Rights Act 1998 have been considered:</p> <p>Article 1: Protection of Property</p> <p>Point to be considered:</p> <p>Every natural or legal person is entitled to the peaceful enjoyment of his</p>	<p>The removal of a container of alcohol will deprive a person of his possession. However, alcohol is only removed when its use is impacting upon others’ right to have peaceful enjoyment of the local area. Prevention of crime,</p>	n/a

	<p>possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law.</p> <p>Article 8: Right to respect for private and family life</p> <p>Point to be considered:</p> <p>8.2 There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.</p>	<p>disorder and anti-social behaviour is in the public interest. The ASB, Crime and Policing Act 2014 provides the legislative framework for this.</p> <p>The removal of a container of alcohol from a person within a public space may remove their right to a public and private life. However, alcohol is only removed when its use is impacting upon others' right to have peaceful enjoyment of the local area and is necessary for the prevention of crime or disorder. The ASB, Crime and Policing Act 2014 provides the legislative framework for this.</p>	
--	---	---	--

SECTION FIVE: OUR EQUALITY OBJECTIVES

Equality objectives	Implications	Mitigation Actions	Timescale and responsible department
Celebrate diversity and ensure that Plymouth is a welcoming city.	The PSPO will have a positive impact on helping to Plymouth to be a welcoming city.	n/a	n/a

Pay equality for women, and staff with disabilities in our workforce.	No implications	n/a	n/a
Supporting our workforce through the implementation of Our People Strategy 2020 – 2024	No implications	n/a	n/a
Supporting victims of hate crime so they feel confident to report incidents, and working with, and through our partner organisations to achieve positive outcomes.	The PSPO will help to reduce incidents of all crime in the city, including hate crime	n/a	n/a
Plymouth is a city where people from different backgrounds get along well.	No implications	n/a	n/a

CITY-WIDE PUBLIC SPACES PROTECTION ORDER



Anti-social Behaviour, Crime and Policing Act 2014

PLYMOUTH CITY COUNCIL CITY WIDE PUBLIC SPACES PROTECTION ORDER 2023

Plymouth City Council (“the Council”) makes this Order under section 59 of the Anti-social Behaviour, Crime and Policing Act 2014 (the Act) having consulted with relevant parties as required by section 72 of the Act.

The Order takes effect on 20th October 2023 for a period of 3 years until 20th October 2026.

The order relates to all public places within the City of Plymouth, the boundaries of which are edged black on the map and schedule of land attached to this Order at Appendix 1 (“the Restricted Area”).

The Council is satisfied that anti-social behaviour and criminal activities have been carried out in the Restricted Area associated with the consumption of alcohol which have had a detrimental effect on the quality of life of those in the locality, and a detrimental effect on the City as a whole.

Further, it is satisfied that the effect of these activities is, or is likely to be, of a persistent or continuing nature, and, is, or is likely to be, such as to make the activities unreasonable and the effect therefore justifies the restrictions imposed.

The activities have given rise to nuisance and complaints to both the Council and the Police from local residents and businesses.

The effects of this Order is to impose the following prohibitions and/or requirements at all times within the Restricted Area:

1. No person shall continue to consume alcohol, or anything which is reasonably believed to be alcohol, when asked to stop by an authorised officer who, in their view believe this would assist in preventing further anti-social behaviour, public nuisance or disorder
2. No person shall fail to surrender a vessel(s) of alcohol, sealed or unsealed, when requested by an authorised officer who, in their view believe this would assist in preventing further anti-social behaviour, public nuisance or disorder

Unless:

- a) he/she has an reasonable excuse for failing to do so or
- b) the area is subject to exemptions listed in Appendix 2

An “authorised officer” means an employee of the council, Police Officer, Police Community Support Officer, or other person who is authorised in writing by the council.

Penalty:

In accordance with Section 63 of the Act, a person who, without reasonable excuse fails to comply with this Order shall be guilty of an offence and liable on a summary conviction to a fine not exceeding level 2 (£500) on the standard scale.

Persistent breaches of the Order may also lead to additional orders being sought against perpetrators under the Act.

A police officer or an authorised person, may issue an anti-social behaviour warning to anyone he or she has reason to believe has committed an offence under section 63 in relation to this Order. Subsequent offences will result in a further warning leading to a summary conviction

Challenging the validity of the Order (section 66 of the Act)

- (1) An interested person may apply to the High Court to question the validity of—
 - (a) a public spaces protection order, or
 - (b) a variation of a public spaces protection order.

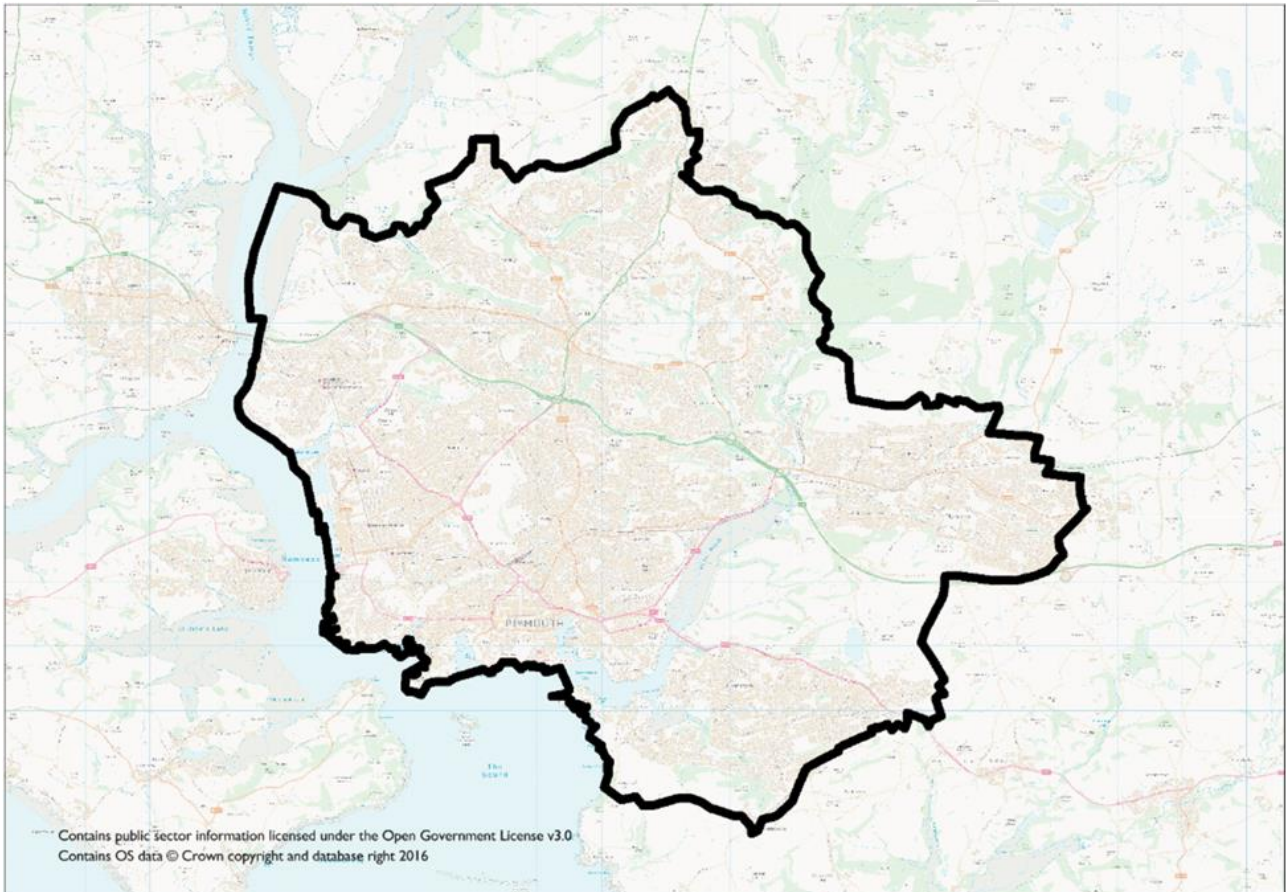
“Interested person” means an individual who lives in the restricted area or who regularly works in or visits that area.

- (2) The grounds on which an application under this section may be made are—
 - (a) that the local authority did not have power to make the order or variation, or to include particular prohibitions or requirements imposed by the order (or by the order as varied);
 - (b) that a requirement under this Chapter was not complied with in relation to the order or variation.

- (3) An application under this section must be made within the period of 6 weeks beginning with the date on which the order or variation is made.

Appendix 1 Schedule of Land

The order applies to all land in the administrative area of Plymouth City Council that is open to the air and to which the public are entitled to, or permitted to, have access (with or without payment). For the purposes of the order, the land which is covered is to be treated as land which is 'open to the air', if it is open to the air on at least one side.



Appendix 2
Exemptions

- a) Premises authorised by a premises licence or a temporary event notice to be used for the supply of alcohol;
- b) Premises authorised by a club premises certificate to be used by the club for the supply for alcohol;
- c) A place within the curtilage of premises with paragraph (a) or (b);
- d) Premises which by virtue of Part 5 of the Licensing Act 2003 may at the relevant time be used for supply of alcohol or which, by virtue of that Part, could have been so used within the 30 minutes before that time;
- e) A place where facilities or activities relating to the sale or consumption of alcohol are at the relevant time permitted by virtue of a permission granted under section 115E Highways Act 1980 (highway-related uses).

The Common Seal of
The Council of the City of Plymouth
was hereunto affixed in the presence of

Authorised signatory

Dated



CERTIFICATE OF CONSULTATION

PUBLIC SPACES PROTECTION ORDER

S. 59 Anti Social Behaviour, Crime and Policing Act 2014

I, **Matthew Garrett**

Service Director, Community Connections, Plymouth City Council

Certify that:

I have consulted: **Alison Hernandez**

Police and Crime Commissioner for Devon, Cornwall and Isles of Scilly

in connection with an application for a Public Spaces Protection Order and she is satisfied that the conditions set out in S. 59(2) and S.59(3) of the Anti Social Behaviour Crime and Policing Act 2014 have been met in respect of:

A city-wide PSPO related to alcohol-related anti-social behaviour within the city of Plymouth should be extended for a further three years

And Alison Hernandez has no objections to the application.

Print Name: Matt Garrett.....

Signed: 

Office: Community Connections, Ballard House, Plymouth City Council

Date: 26/05/2023

This page is intentionally left blank



CERTIFICATE OF CONSULTATION

PUBLIC SPACES PROTECTION ORDER

S. 59 Anti Social Behaviour, Crime and Policing Act 2014

I, **Matthew Garrett**

Service Director, Community Connections, Plymouth City Council

Certify that:

I have consulted: **Chief Superintendent Matthew Longman**

Plymouth Police Commander, Devon and Cornwall Police

in connection with an application for a Public Spaces Protection Order and he is satisfied that the conditions set out in S. 59(2) and S.59(3) of the Anti Social Behaviour Crime and Policing Act 2014 have been met in respect of:

A city-wide PSPO related to alcohol-related anti-social behaviour within the city of Plymouth being extended for a further three years

And Chief Superintendent Matthew Longman has no objections to the application.

Print Name: Matt Garrett.....

Signed: 

Office: Community Connections, Ballard House, Plymouth City Council

Date: 26/05/2023

This page is intentionally left blank