



Oversight and Governance

Chief Executive's Department
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CABINET

Monday 9 March 2026
2.00 pm
Council House, Plymouth

Members:

Councillor Evans OBE, Chair

Councillor Laing, Vice Chair

Councillors Aspinall, Briars-Delve, Cresswell, Haydon, Lowry, Penberthy, Stephens and Taylor.

Members are invited to attend the above meeting to consider the items of business overleaf.

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Tracey Lee

Chief Executive

Cabinet

Agenda

Part I (Public Meeting)

1. Apologies

To receive apologies for absence submitted by Cabinet Members.

2. Declarations of Interest

Cabinet Members will be asked to make any declarations of interest in respect of items on this agenda.

3. Minutes

(Pages 1 - 24)

To sign and confirm as a correct record the minutes of the meeting held on 09 February 2026.

4. Questions from the Public

To receive questions from the public in accordance with the Constitution.

Questions, of no longer than 50 words, can be submitted to the Democratic Services Unit, Plymouth City Council, Ballard House, Plymouth, PL1 3BJ, or email to democraticservices@plymouth.gov.uk. Any questions must be received at least five clear working days before the date of the meeting.

5. Chair's Urgent Business

To receive reports on business which, in the opinion of the Chair, should be brought forward for urgent consideration.

Items for discussion

6. City Living Framework and Masterplan

(Verbal Report)

7. Freeport

(Verbal Report)

8. Safer Plymouth Modern Slavery Toolkit

(Pages 25 - 74)

Items for decision

- | | |
|---|--------------------------|
| 9. Pride in Place | (Pages 75 - 100) |
| 10. Parking Services Annual Review and Proposed Updates 2026/27 | (Pages 101 - 134) |
| 11. Plymouth Local Plan: commencement, programme and delivery arrangements | (Pages 135 - 154) |
| 12. SEND Sufficiency | (To Follow) |

Items for noting

- | | |
|-----------------------------------|------------------------|
| 13. Leader's Announcements | (Verbal Report) |
| 14. Cabinet Member Updates | (Verbal Report) |
| 15. LGA Update | (Verbal Report) |

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Cabinet

Monday 9 February 2026

PRESENT:

Councillor Evans OBE, in the Chair.

Councillor Laing, Vice Chair.

Councillors Aspinall, Briars-Delve, Cresswell, Lowry, Penberthy, Stephens and Taylor.

Apologies for absence: Councillors Haydon

The meeting started at 2.02 pm and finished at 4.41 pm.

Note: The full discussion can be viewed on the webcast of the City Council meeting at www.plymouth.gov.uk. At a future meeting, the Council will consider the accuracy of these draft minutes, so they may be subject to change. Please check the minutes of that meeting to confirm whether these minutes have been amended.

86. **Declarations of Interest**

There was one declaration of interest made:

Minute	Councillor	Reason	Interest
93	Councillor Mary Aspinall	Family Member employed at the Life Centre.	Personal

87. **Minutes**

Cabinet agreed the minutes of the meeting held on 12 January 2026 as a correct record.

88. **Questions from the Public**

There were two questions from members of the public:

Question	With public toilet provision under review, can the council confirm whether the well-used toilets at Freedom Fields Park will remain open, and explain what public consultation has taken place with local residents and park users?
Response	<p>Thank you for your question.</p> <p>Councillor Aspinall has been speaking to me on behalf of local residents about the toilets in Freedom Fields Park for a number of months and I would like to thank her for her engagement with me.</p> <p>Your premise that public toilet provision is under review is incorrect.</p>

	<p>As I recently reported to the Housing and Communities Scrutiny Committee, the Council has a commitment to the continued provision of public toilets. At that meeting I made it clear that there are no plans to close any public toilets and we discussed the key principles for provision.</p> <p>Councillors Aspinall, Dann and Cuddihee are in agreement with me that the Freedom Fields Park toilets should remain open. As there are no changes proposed nor any plans to close these toilets, we have not undertaken any consultation.</p>
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Question	<p>With recent sea front storm damage should the Gormley statue be moved? Moving to Belvedere vicinity will allow better access for all and make it more prominent and protect it more, it's currently hidden, exposed, rusting and liable to be washed away.</p>
Response	<p>Thank you for your question.</p> <p>The pier was significantly strengthened in this area, with the statue's foundations drilled into bed rock. This was anticipating future weather conditions and was a significant investment at the time. This investment was match-funded with the support of Arts Council England funding for public art.</p> <p>There was a selection process and Sir Antony Gormley was selected as the artist. He chose the location.</p>

89. **Chair's Urgent Business**

There were no items of Chair's urgent business.

90. **Budget Scrutiny Recommendations**

Councillor Coker (Chair of Scrutiny Management Board) introduced the Budget Scrutiny Recommendations report and discussed:

- a) The Scrutiny Management Board held Budget Scrutiny sessions on 21, 22 and 28 January 2026 and undertook a detailed review of the Draft 2026/27 Budget, Cabinet Member risks and supporting financial information. The Board engaged with Cabinet Members and senior officers to assess the robustness of assumptions and risk management across portfolios;
- b) The Board recognised the significant financial pressures affecting local government nationally, noting that demand-led pressures continued to exceed available funding and that Plymouth's circumstances reflected challenges facing councils across the country;

- c) A challenge-based approach was adopted in which Cabinet Members provided written briefings identifying their top three budget risks within each portfolio. This approach enabled Scrutiny to focus on issues Cabinet Members themselves flagged as high priorities. This method had worked effectively and should continue in future years;
- d) Five structured scrutiny sessions were held across three days, arranged by Cabinet portfolio. In each session, Cabinet Members presented their briefings, officers provided technical and financial evidence, and Scrutiny Members questioned underlying assumptions and tested the strength of proposed mitigations;
- e) Scrutiny Members made 15 informal requests for further information during the sessions. Officers provided responses in time for the wash-up meeting on 28 January 2026, which enabled the Board to agree its final recommendations based on complete information;
- f) A total of 19 recommendations were produced, all of which were agreed unanimously by the Scrutiny Management Board. Councillor Coker emphasised that each recommendation related either to a challenge identified by Cabinet in their own briefings or to risks probed by Scrutiny during questioning;
- g) The recommendations covered a range of topics including children's social care, the Dedicated Schools Grant (DSG) deficit, agency staffing costs, transport and connectivity, partnership working and financial oversight, with a focus on supporting budget delivery and improving risk management;
- h) Many of the recommendations could be implemented through existing reporting and monitoring mechanisms;
- i) Councillor Coker recorded the Board's thanks to Cabinet Members for engaging fully with the scrutiny process and to officers for responding quickly to information requests.

Councillor Evans OBE (Leader of the Council) responded to the report and discussed:

- j) Appreciation was expressed to Councillor Coker and the Scrutiny Management Board for carrying out thorough cross-party scrutiny and for highlighting how effective scrutiny added value to the wider budget process;
- k) The Leader stated that the revised format for budget scrutiny in 2026/27 had strengthened the quality of the process. He noted that Scrutiny's request for Cabinet Members to identify their three key worries had helped portfolio holders focus their own thinking and promoted more efficient scrutiny of the relevant risks;
- l) The Leader observed that the clearer information flow between Cabinet and Scrutiny had made this year's scrutiny stronger than in previous years. He thanked Councillor Coker for initiating this improved approach;

- m) The Leader outlined the next steps, confirming that Cabinet would first note the Scrutiny report and would then consider a separate item on the agenda containing the Cabinet's formal responses to each of the 19 recommendations.

The Cabinet agreed:

- 1. To note the Budget Scrutiny Recommendations report of the Scrutiny Management Board arising from the Budget Scrutiny sessions held on 21, 22 and 28 January 2026;
- 2. To record its thanks to the Scrutiny Management Board, Cabinet Members and officers for their engagement in the 2026/27 Budget Scrutiny process.

91. **Cabinet Response to Budget Scrutiny Recommendations**

Councillor Evans OBE (Leader of the Council) introduced the Cabinet Response to Budget Scrutiny Recommendations report and discussed:

- a) The Cabinet had considered the 19 recommendations arising from the Scrutiny Management Board's Budget Scrutiny sessions held on 21, 22 and 28 January 2026;
- b) The Leader confirmed that the Cabinet was minded to accept the majority of recommendations, noting that only one presented a difficulty;
- c) The Leader invited Cabinet Members to comment on recommendations relevant to their portfolios;
- d) Recommendation 1: Fostering Recruitment Effectiveness was accepted;
- e) Recommendation 2: Children's Social Care Market Regulation Advocacy was accepted. Councillor Laing (Deputy Leader and Cabinet Member for Children's Social Care, Culture and Communications) welcomed the reference to exploring profit capping or windfall taxation on high-charging providers and highlighted that withdrawal of local authorities from the provider market over many years had resulted in councils being placed in a vulnerable purchaser position;
- f) Recommendation 3: DSG (Dedicated Schools Grant) Deficit was accepted. The Leader noted that Plymouth was not the only authority facing this issue and highlighted concerns about how DSG deficits might be treated in future local government reorganisation negotiations;
- g) Recommendation 4: SEND (Special Educational Needs and Disabilities) Sufficiency Strategy Review was accepted;
- h) Recommendation 5: EHCP (Educational Health and Care Plan) Language in Budget Documentation was accepted;
- i) Recommendation 6: Children's Homes Investment, Value for Money and Expansion Potential was accepted;

- j) Recommendation 7: Alternative Accommodation Models for Children in Care was rejected. Councillor Laing explained that the term alternative accommodation models was ambiguous and appeared to refer to repurposing office or municipal buildings. It was emphasised that the workstream was titled Family Homes for Plymouth Children, and that providing genuine family homes, not institutional or office-based accommodation, was essential. For this reason, the recommendation was rejected;
- k) Recommendation 8: Agency Spend Analysis was accepted;
- l) Recommendation 9: Railways and Integrated Transport Connectivity was accepted. Councillor Stephens noted that the Team Plymouth programme already included a transport strand and that work was supported by Peninsula Transport. A future briefing to the Scrutiny Management Board was welcomed;
- m) Recommendation 10: Early Scrutiny Engagement on Major Projects was accepted. Councillor Lowry stated that early scrutiny of large, highly visible projects, such as the Civic Centre, was beneficial, and welcomed engagement between Scrutiny and Cabinet;
- n) Recommendation 11: Corporate Asset Management Strategy was accepted. Councillor Penberthy clarified that the strategy would be high-level and principle-based. An accompanying action plan with timelines would follow the strategy, and Scrutiny would be engaged in the development of the action plan;
- o) Recommendation 12: NHS Integrated Care Funding Assurance was accepted. Councillor Penberthy explained that this related to fair shares funding, including allocations for community builders and disabled facilities grants, and emphasised that earlier certainty would improve planning. The Leader noted the uncertainty regarding the future configuration of ICBs and the risk of decisions being delayed by administrative issues;
- p) Recommendation 13: Customer Experience Strategy: Pre-Decision Scrutiny was accepted. Councillor Taylor expressed support for pre-decision scrutiny as part of the development of a large programme of work;
- q) Recommendation 14: Cabinet Member Risks and Mitigations was accepted. Councillor Lowry noted that risk registers were already produced regularly for Cabinet and Scrutiny. Additional detail would be provided to the Scrutiny Management Board;
- r) Recommendation 15: Further Risk Information for Budget Scrutiny was accepted. Councillor Lowry noted that risk registers were already produced regularly for Cabinet and Scrutiny. Additional detail would be provided to the Scrutiny Management Board;
- s) Recommendation 16: Food Waste Participation and Engagement Measures was 'partially accepted'. Councillor Briars-Delve explained that much of the proposed engagement activity, including door-to-door support and recycling officers, was already funded and in place as part of the Street Services restructure. Clarification was provided that while initial distribution of food-waste liners would occur,

providing ongoing free liners was not considered good value for money given alternative low-cost local availability. Ring-fencing savings for reinvestment was not deliverable at this stage, as participation levels and tonnage outcomes were not yet known;

- t) Recommendation 17: Flood Risk Management was accepted. Councillor Briars-Delve (Cabinet Member for Environment and Climate Change) clarified that extensive partnership engagement with South West Water, the Environment Agency and others was already in place. Examples included the multi-million-pound Trefusis Park scheme and the Phase 2 Integrated Urban Drainage Modelling programme. The Leader referenced anticipated growth in the city centre and the importance of mitigating increased surface-water runoff. More information would be shared with Scrutiny but much of the work was longstanding;
- u) Recommendation 18: Property Regeneration Fund Portfolio Oversight was accepted. Councillor Lowry welcomed further scrutiny involvement but noted that the portfolio contained significant commercial information. Therefore, elements would need to be considered in Part II settings to protect commercial sensitivity;
- v) Recommendation 19: Final Settlement Budget Impact reporting was accepted. The Section 151 Officer agreed to provide a written briefing to the Scrutiny Management Board upon receipt of the Final Local Government Finance Settlement. It was noted that the settlement was expected imminently, and while the provisional settlement had been received late, future years would benefit from the new three-year funding settlement structure.

Cabinet agreed:

- 1. To approve the responses to the Budget Scrutiny Recommendations;
- 2. To note its thanks to the Scrutiny Management Board for the Budget Scrutiny undertaken.

92. **Proposed Revenue and Capital Budget 2026/27**

Councillor Lowry (Cabinet Member for Finance) introduced the Proposed Revenue and Capital Budget 2026/27 report and discussed:

- a) Officers, including David Northey (Interim Service Director for Finance), Tracey Lee (Chief Executive) and Helen Slater (Assistant Head of Finance), had undertaken a significant amount of work to deliver the budget to this stage and further work would be required in the coming weeks ahead of Full Council consideration;
- b) The report set out both the revenue and capital budgets for 2026/27, including an indicative Council Tax level showing the proposed Plymouth City Council element, while confirmation of the Fire Authority precept was still awaited. Once received, this would be incorporated into the final Council Tax proposals for consideration at Full Council later in February;

- c) Budget engagement activity had been carried out with residents, the voluntary and community sector, businesses, and other stakeholders, and the report included the Capital Strategy, Treasury Management Strategy and Capital Receipts Strategy for 2026/27, together with a full schedule of proposed fees and charges and the Tamar Bridge and Torpoint Ferry budget;
- d) A three-year Local Government Finance Settlement had been secured, following sector lobbying, which provided greater financial certainty and enabled more effective medium-term planning of departmental budgets and service spending;
- e) Approximately £73 million of grants that had previously been awarded as one-off funding streams had now been consolidated into the Council's core funding, improving stability and predictability within the financial framework;
- f) The budget included additional funding for highways, including potholes, and for waste collection services to support the implementation of the new food waste collection service, as well as dedicated funding for ongoing maintenance of the Armada Way public realm scheme in response to public concerns about its long-term upkeep;
- g) An additional £25.7 million was proposed for demand-led statutory services, particularly adults' and children's social care, SEND and homelessness, reflecting continued exceptional pressure in these areas. The average annual cost per client aged 65 and over had increased for seven consecutive years, rising from around £15,000 in 2021/22 to approximately £23,000 in 2024/25, representing an increase of about 55% over that period;
- h) Homelessness pressures were highlighted, with the number of households in bed and breakfast accommodation increasing by around 15% since 2022/23, from 181 to 209 households;
- i) Home to school transport demand for children with SEND and other eligible pupils had risen by approximately 49% over five years, from 724 children to more than 1,000, and the average cost per child had increased by around 65%, from about £4,600 to £7,500 per year;
- j) Independent specialist placements for children's services had increased from 487 children to 636 over the last three years (an increase of 149) and the weekly cost of some children's care placements had risen from about £4,400 per child in 2021 to approximately £7,300 per child, equivalent to an annual cost of around £385,000 per child. This contributed to significant growth in the total children's services budget (excluding education) from around £42 million in 2021 to approximately £73 million in 2026/27;
- k) The Council could not simply accept the status quo in the face of these trends and therefore a transformation programme had been launched, as set out in Section 8.8

of the report, to address both cost and demand pressures while maintaining or improving service quality;

- l) The capital programme totalled around £320 million over the next five years, with planned capital expenditure of nearly £140 million in 2026/27 alone, representing a major programme of investment in the city's infrastructure, economy and communities;
- m) Key capital schemes included the completion of the Armada Way regeneration, commencement of the Civic Centre regeneration and associated City Centre Homes and Skills Campus, further investment in children's homes, major transport and employment schemes, leisure and recreation projects such as the National Marine Park, as well as flood protection, energy bills, nature recovery and play space improvements;
- n) Subject to Cabinet's agreement, the proposed revenue and capital budgets and associated strategies would be recommended to City Council for approval in February 2026;
- o) As the Final Local Government Finance Settlement had not been confirmed at the time of publication, an additional recommendation was included delegating authority to the Section 151 Officer, in consultation with the Leader, to reflect any technical amendments or changes arising from the final settlement in the budget submitted to Full Council.

In response to questions, the Cabinet discussed:

- p) The importance of the three-year settlement in enabling better forward planning, with the Section 151 Officer explaining that three of the five years in the Medium Term Financial Plan (MTFP) now contained confirmed funding numbers rather than estimates, thereby providing greater stability for both Cabinet and senior management in addressing the scale of future financial challenges;
- q) While greater certainty was welcome, it also removed any residual assumption that further Government funding might plug the budget gap. The Council therefore needed to address its structural deficit over the medium term through a combination of demand management, transformation and cost reduction, particularly in high-pressure areas such as adults' and children's social care, homelessness and SEND;
- r) The transformation and prevention programmes, including work on Loving Homes for Plymouth Children, reablement in adult social care, expansion of temporary accommodation, and other initiatives already underway, which aimed to improve outcomes whilst reducing long-term costs. Further detailed reports on these programmes would be brought to Cabinet in March 2026;

- s) The Chief Executive's emphasis that every part of the Council would need to be examined, not only the biggest demand-led services, with particular focus on reducing placement costs across adults, children and homelessness, maximising income (including through the Property Regeneration Fund portfolio) and investing in early intervention and prevention to turn the curve on rising demand;
- t) The role of digital transformation and AI (Artificial Intelligence) in delivering efficiency and improving services, including the development of a cohort of digital and AI apprentices within the organisation and the need to invest in capacity and skills to enable change while frontline services remained stretched;
- u) The ongoing in-year financial controls, including restrictions to essential spend only, to minimise the drawdown from usable reserves in 2025/26 and protect the working balance. The Chief Executive stressed that drawing significantly on reserves was not sustainable and that the Council must watch every penny;
- v) The decision to utilise the Council's interest rate swap as a one-off budget measure, generating an estimated net benefit of around £10 million in 2026/27. The Section 151 Officer stressed this was a one-off measure and that reliance on one-off solutions could not continue. Any additional Government funding received through the Final Settlement should first be used to reduce this reliance;
- w) The Section 151 Officer's assessment of robustness and legality, noting that historic issues related to the capitalisation direction and outstanding accounts had been resolved, with five years of accounts now signed off. Table one relating to usable reserves showed that around one-third of usable reserves would be consumed if the Council continued to rely on one-off measures, and concluded that, subject to the transformation and cost-reduction programmes being delivered, the budget was robust and lawful;
- x) The Leader's reflection that the three-year settlement allowed the light of optimism to enter after many years of uncertainty, enabling the Council to plan for growth in population, housing and industry which, in turn, would positively affect the tax base and the medium-term financial position;
- y) The Leader's comments on the administration's growth strategy, including partnership work with Homes England and the dockyard expansion project, and the aim to rebuild an "active growth" approach where population and economic growth supported both social outcomes and the Council's revenue base;
- z) The Leader's emphasis that the theme of the budget was one of optimism, focused on creating a city of which residents could be proud, supported by projects such as Armada Way and other place-shaping investments;
- aa) The Council's renewed focus on the local environment and public realm, including the substantial additional investment in grounds maintenance and tree safety in recent

years, which had led to a reported reduction in grass-cutting complaints of around 70–80% compared with the previous year;

- bb) The decision to double the revenue budget for play maintenance so that equipment could be kept safe and enjoyable, noting the emerging multi-million pound play and public realm investment programme within the capital pipeline;
- cc) Confirmation of libraries as key community assets, with Cabinet Members and officers re-affirming the commitment not to close libraries but instead to modernise them through co-locating services, extending opening hours, utilising self-service technology and developing “one-stop shop” functions for wider council and partner services;
- dd) The development of a Future Libraries Plan that would repurpose library facilities as community hubs supporting health, wellbeing and access to council services, while recognising the strong cultural and emotional connection residents had with libraries;
- ee) Recognition of approximately £75 million of highways investment over the next five years (averaging around £15 million per year), which would support planned maintenance based on assessed need, reduce reactive works and allow residents and Members to have greater certainty about when particular roads would be addressed;
- ff) Recognition that while around 15,000 potholes and carriageway defects had been repaired over recent years, proactive, multi-year planning and modern repair techniques were essential to keep pace with usage, particularly given Plymouth’s role in providing around 116,000 jobs for the wider region and the heavy traffic volumes this generated;
- gg) Recognition that drainage responsibilities were shared with South West Water and the Environment Agency, and that effective flood risk management depended on multi-agency cooperation as well as local maintenance;
- hh) Observations that national funding formulas for highways, which often relied heavily on road length, tended not to favour urban authorities with relatively short but heavily-used road networks. Cabinet Members supported further lobbying to reform these formulas;
- ii) Confirmation that the Final Local Government Finance Settlement had been received during this meeting and appeared to include a positive adjustment to Revenue Support Grant reflecting issues previously raised by Plymouth, and a national one-off grant to address local authority High Needs DSG deficits as at the end of the current financial year, with further analysis required before the full impact for Plymouth could be confirmed;
- jj) Cabinet Members’ positive reaction to the initial settlement news, noting that while the decision to support DSG deficits was pragmatic given wider local government

reorganisation, Plymouth had contributed to the effective lobbying and engagement with Government;

- kk) Alongside the necessary focus on risk and pressure within the revenue budget, there was significant optimism embedded in the capital programme and pipeline, with around £140 million of capital investment planned in 2026/27, approximately 45% of which was funded by grants and additional external contributions taking the externally funded proportion to over half, and a further capital pipeline of around £50 million supported by future grants and developer funding;
- ll) The Leader summarised that the Council had received assurance from the Section 151 Officer regarding the robustness and legality of the budget, had resolved historic accounting issues with external auditors, and was now able to invest in capital projects that underpinned growth and delivered services that residents valued, while still meeting unavoidable statutory obligations for the most vulnerable;
- mm) The Leader concluded that although the Council faced continued financial challenge and a significant medium-term gap, the budget represented a serious, balanced response which combined realism about risks with a clear ambition to support growth, civic pride and improved outcomes for Plymouth residents.

Cabinet agreed to:

1. Note the financial risks;
2. Note the section from the Council's Section 151 Officer on the robustness of the budget estimates and the adequacy of the level of reserves;
3. Note that the Fire Precept would not be confirmed until after the Cabinet meeting and delegate to the Section 151 Officer to make final amendments to Council Tax Resolution prior to Full Council;
4. Recommend the following to City Council, subject to amendments by the Section 151 Officer in consultation with the Leader reflecting any final technical adjustments and changes upon receipt of the Final Local Government Finance Settlement;
 - i) The Revenue Budget 2026/27: £329.275m;
 - ii) The drawdown of a maximum of £3.618m of flexible capital receipts, as set out in the report;
 - iii) The Capital Budget 2026/27 £113.938m and five-year programme £319.725m;
 - iv) The Capital Financing Strategy 2026/27;
 - v) The Treasury Management Strategy 2026/27 (incorporating the Non-Treasury Management Strategy and the Minimum Revenue Provision Statement);

- vi) The Medium-Term Financial Plan for the period 2026/27 to 2030/31;
 - vii) The Tamar Bridge & Torpoint Ferry Joint Committee 2026/27 Revenue Budget and Capital Programme and the 2026/27 draft Business Plan, as referenced in Appendix 16, and the longer-term forecast to 2029/30 is noted;
- 5. Approve the partial reversal of up to £31m of the council's Interest Rate Swap to provide a net£9.7m one-off benefit to the council's revenue budget position in 2026/27, noting the overall financial impact and alternative options set out in Section 20 of the report;
 - 6. Approve Fees and Charges Setting 2026/27;
 - 7. Approve the Cabinet Savings Proposals 2026/27.

93. **Plymouth Active Leisure Contract Extension**

Councillor Taylor (Cabinet Member for Customer Experience for Customer Experience, Sport, Leisure and HR and OD) presented the report and highlighted the following key points:

- a) Since January 2026 she had spent considerable time engaging with Council officers and the team at Plymouth Active Leisure (PAL) to fully understand the service, future ambitions, and opportunities for development. These discussions had focused on driving improvements to health, confidence and wellbeing across the city;
- b) PAL had demonstrated significant progress since its establishment in 2022, despite challenges including the pandemic and key performance achievements included:
 - i. 29% income growth;
 - ii. 48% growth in fitness memberships;
 - iii. Over 49,000 unique users;
 - iv. 31% growth in swim school participation.
- c) PAL had strengthened its financial and operational position through new investments, including the upgraded gym at the Life Centre and improved facilities at Tinside, which had attracted wider audiences and increased income. The service was no longer solely about sport and leisure but had become integral to tackling inequalities, supporting long-term health conditions, working with children and families, delivering physio services in partnership with Derriford Hospital, and would soon support those on weight-management waiting lists;
- d) PAL played an important role as a venue for elite and community-level sport, hosting diving events, regional and county swimming championships, and acting as the home venue for Plymouth Raiders, while continuing to remain accessible for all residents. The Mount Wise pools was an example of social value, which allowed free access for children;
- e) Investment in the Life Centre continued to be essential for supporting Plymouth's sporting talent and ensuring facilities capable of developing future elite athletes. The

proposal to extend PAL's contract would provide long-term stability enabling capital investment, reducing the management fee to the Council, and supporting the development of business cases for income-generating improvements;

- f) The report included detailed KPIs, enhanced governance arrangements, and an annual report to Scrutiny to ensure accountability and focus on outcomes. PAL provided not only services but substantial social value, and they were praised for their brilliant board, strong leadership, and the team's commitment to delivering for Plymouth residents;

Rhys Jones, Chief Executive of PAL, added the following:

- g) PAL was deeply passionate about serving Plymouth, and the team was committed to delivering growth, health, wellbeing and further opportunities for communities. The staff were incredibly passionate about the organisation's future direction;

Professor Steve Madden (Director of Public Health) added:

- h) Leisure services as a traded service represented a significant opportunity for both the Council and residents. PAL consistently delivered beyond the value of the Council's financial contribution and emphasised the wider benefits to residents, both through health and wellbeing and the creation of memories and legacy;
- i) PAL had succeeded despite a difficult early period, demonstrating that strong performance and progress were achievable even during adversity;

The Leader commented that:

- j) There had been strong use of facilities such as the Central Park pool and the investment had proven worthwhile for the community;
- k) The proposal was not only about facilities but also about mindset and the importance of health and wellbeing. The financial commitments, although appearing significant, were proportionate to the value delivered to the people of Plymouth;

David Draffan (Service Director for Economic Development) added the following:

- l) The ambition of the plan and the governance improvements achieved through collaboration between the Board and Council officers were praised. The Life Centre attracted one million visitors per year, highlighting its scale and community importance;
- m) Outlined key financial strengths of the proposal, including:
 - i. £200 million investment over the contract term;
 - ii. Reduction of the management fee from £700,000 to £50,000;
 - iii. A significant surplus at the end of the term;
 - iv. Expanded capital and maintenance budgets;
 - v. £4.7 million in additional income through the plan.

The Leader further noted:

- n) That failure to proceed with the proposal would have significant consequences, and that the investment represented good value for money, not only in financial terms but in wellbeing, civic pride and the maintenance of high-quality facilities.

Cabinet agreed to:

1. Approve a cashflow loan of up to £975,000 to Plymouth Active Leisure (PAL);
2. Approve the reprofiling of two existing loans to PAL to increase the repayment term by three years, including a utility costs loan of £565,983 and a start-up loan of £365,000, totalling £930,983 plus accrued interest;
3. Approve an extension of 10 years to the existing contract with PAL to conclude in March 2042, including the provision of a break clause in 2035/36;
4. Agree to support feasibility studies and the submission of capital funding business cases through the Council's capital governance process for enhancements to facilities;
5. Note the following contract amendments: (a) the drafting of new Key Performance Indicators as set out in Appendix B; and (b) a requirement for an annual performance update to the Housing Scrutiny Panel;
6. Note the positive impact of the Agency Model, as approved by Cabinet on 10 March 2025, and the generation of VAT savings, which have been included in the PAL financial model.

94. **Re-procurement and Renewal of School Transport Contracts**

Sally Cresswell (Cabinet Member for Education, Skills and Apprenticeships) presented the report and highlighted the following key points:

- a) The report sought the re-procurement and renewal of school transport contracts, for future commissioning arrangements for home to school transport over the next eight years;
- b) The Council provided statutory transport for more than 1,000 children every school day, including pupils with special educational needs, children from low-income families and young people supported by social care;
- c) The existing Dynamic Purchasing System (DPS) was due to expire in January 2026 and was no longer permitted under the Procurement Act 2023, which meant a new, compliant route was required to ensure continuity of service for pupils and families;
- d) A full appraisal of procurement options had been undertaken, each assessed for operational practicality, value for money, compliance, market resilience and long-term sustainability;
- e) The recommended option was for the Council to adopt an internally managed open framework, which would build on existing strengths while offering a more efficient

and future-proofed solution. The model would maintain strong supplier competition, reduce administrative burdens, improve access for local operators and ensure legal compliance. The framework would support transparency, robust quality assurance and the flexibility to reopen to new providers throughout its eight-year lifespan;

- f) Although the re-procurement itself was not expected to generate savings, the open framework was the most cost-effective and administratively efficient option for procuring the £7.8–£8 million annual transport provision needed to support over 1,000 children on approximately 280 routes;
- g) Key risks, included market volatility and rising demand, had been identified and would be managed through strong governance, contract oversight and provider engagement. She noted that demand pressures had been a recurring theme in previous meetings;
- h) Environmental, legal and equality considerations had been fully reviewed, with safeguarding and emissions-reduction measures embedded where feasible. It was confirmed that the framework ensured the Council would continue to meet its statutory duties under the Education Act 1996;
- i) Cabinet approval was sought to implement the internally managed open framework for all home-to-school transport services, including social-care-commissioned transport, for the next eight years to ensure resilience, flexibility and legal compliance.

In response to questions raised it was reported that:

- j) Under the proposed Local Government Re-organisation the framework's flexibility would allow services to expand into new areas, including parts of the South Hams, if required;
- k) No amendments would be required to the City of Plymouth Act in relation to taxi operations, as procurement would continue from within Plymouth, meeting existing legislative requirements.

The Leader commented and:

- l) Thanked officers, noting that he had been advised of the significant work undertaken, particularly in relation to children's SEND-related transport, and expressed appreciation for the progress and commitment demonstrated. He added that the Council was very excited about where that's going to lead over the next few years;
- m) Reflected further on local government reorganisation, agreeing that aligning cross-border transport and SEND provision made sense and that a unified service would be well-placed to operate effectively under any new arrangements.

Cabinet agreed to:

- 1. Adopt an internally managed Open Framework as the procurement route for all contracted Home to School Transport services, including Social Care transport routes commissioned through the Home to School Transport team, for the next eight years.

95. **Finance Monitoring Report Month 9**

Councillor Lowry (Cabinet Member for Finance) presented the Month Nine Finance Monitoring Report and highlighted the following key points:

- a) The financial position at the end of Month 9 reflected data from approximately five and a half weeks prior, due to the one-month cycle required for officers to complete accounting processes and prepare monitoring reports. The reporting timetable remained on schedule and consistent with normal practice;
- b) The Council's financial position had improved since Month 8, with the forecast overspend now estimated at £4.8 million;
- c) In line with previous monitoring reports, the primary areas of budgetary pressure continued to be:
 - i. Adult Social Care, with an overspend of approximately £3.3 million; and
 - ii. Homelessness, with an overspend of approximately £600,000.
- d) The Council had around three months of the financial year remaining in which to mitigate pressures. It was confirmed that both officers and Cabinet were working intensively to deliver the Council's legal duty to balance the budget by year-end;
- e) The Council had always succeeded in balancing its budget in previous years, and there was no reason to believe this outcome would not be achieved again;
- f) Although a lower forecast overspend would have been preferable, the Council had a clear plan in place to manage pressures and continued to take robust measures to reduce spend where possible.

In response to questions raised it was reported that:

- g) The Council's gross budget was over £600 million and the overspend was less than 1%. While such figures appeared small relative to the whole budget, they nevertheless remained significant and required continued focus;
- h) The Council's position, being under 1% from the target set during last year's budget setting, represented a remarkable performance considering the extent of the pressures faced.

Cabinet agreed to:

1. Note the forecast revenue monitoring position at Month 9 is an adverse variance of £4.874m with further risks highlighted;
2. Note the overall Capital Budget 2025-2030 is revised to £319.725 as shown in Table 18, with reconciliation and detail of the movements in the quarter set out in Tables 18 and Table 21;

3. Note the performance against Prudential Indicators for Q3 2025/26, detailed in section 15.

96. **Local Area SEND Inspection Report Outcome**

Councillor Cresswell (Cabinet Member for Education, Skills and Apprenticeships) presented the report and highlighted the following key points:

- a) The Ofsted and CQC monitoring inspection letter had been published on the Council's website on 05 February 2026;
- b) The monitoring inspection, carried out in December 2025, was a significant moment for Plymouth as it assessed whether effective action had been taken in relation to the five priority areas identified in the 2023 Area SEND Inspection. Inspectors concluded that Plymouth had taken effective action in all priority areas;
- c) The positive outcome reflected the outstanding work of teams across education, health, social care, schools, partners, children, young people and families. It was noted feedback from the lead inspector, said 'Your children and young people shone'. This comment was described as uplifting and a source of pride;
- d) Inspectors recognised a marked cultural shift since the previous inspection, including:
 - i. stronger leadership;
 - ii. clearer governance;
 - iii. improved early identification;
 - iv. significantly reduced exclusions;
 - v. better multi-agency working for children with the most complex needs;
 - vi. improved support for families awaiting assessments; and
 - vii. strengthened oversight of vulnerable children.
- e) Partnership working was highlighted as central to the improvement journey. Inspectors praised the SEND Improvement Board for achieving strong buy-in from senior leaders across political parties, which was described as important and commendable;
- f) While the findings were very positive, the report made clear that further work was required. Waiting times for neurodevelopmental assessments and speech and language therapy remained too long, and not all families felt the benefits of improvements or clarity around available support;
- g) The next phase of improvement would include embedding consistency across schools and services, strengthening communication with families, reducing waiting times and ensuring that improvements were sustained and resilient;
- h) The publication demonstrated real progress but also set out the ongoing improvement journey required to ensure children and young people with SEND remained at the heart of all decision-making across the system.

David Haley (Director of Children's Services) addressed the Cabinet and:

- i) Stated that the progress recognised by Ofsted and CQC was heartening and represented a significant achievement for the entire local area SEND partnership. It was noted that achieving effective action in all five priority areas was substantial progress;
- j) Confirmed that inspectors recognised further areas for continued improvement, particularly sustaining cultural change and keeping children and young people at the centre of all work;
- k) Reported that a full re-inspection would take place within 12–18 months. Current governance arrangements would remain in place to ensure continued oversight, pace and assurance of improvement.

The Leader commented and:

- l) Highlighted that the work to deliver SEND improvement was substantial and system-wide, reflected in the fact that meetings were normally full with officers and partners. It was emphasised that the importance of strong managerial and political leadership working together was essential;
- m) Recalled that previous inspections had not always reflected the progress being made, and expressed relief that progress had been formally recognised. He stressed the importance of staying on the right road as changes to national SEND policy were expected imminently;
- n) Referenced discussions with national leaders, including Georgia Gould MP, regarding the SEND White Paper, and anticipated significant reforms. He stated his ambition for Plymouth was to get ahead of the reforms, not wait for them;
- o) Announced his intention to bring forward to the next Cabinet meeting firm proposals for a new SEND school in Plymouth, including a suggested location. He stated that while mainstream inclusion would remain essential, the city must also expand specialist provision due to increasing demand. He confirmed financial provision was available and ambition should match need.

Councillor Cresswell added that:

- p) The White Paper was expected to emphasise both mainstream inclusion and the necessity of specialist settings for children with high-level needs. She stressed that Plymouth must provide both effective mainstream inclusion and sufficient specialist places;
- q) She welcomed the Leader's proposal for a new SEND school and highlighted the city's innovative work on inclusion, belonging strategy and targeted approaches that had already been acknowledged by inspectors.

Councillor Aspinall (Cabinet Member for Health and Adult Social Care added:

- r) Members referred to the importance of transition planning and ongoing discussions with officers to support families at key educational transition points.

Cabinet agreed to:

1. Note the Local Area SEND Inspection Report and the significant progress recognised by Ofsted and CQC;
2. Receive at the next Cabinet meeting firm proposals for a new SEND school in Plymouth, including a recommended location and delivery approach.

97. **Leader's Announcements**

Councillor Evans OBE (Leader of the Council) made the following announcement on Local Government Reorganisation (LGR):

- a) The government had opened a public consultation on the future of local government in Devon, marking the formal start of a significant reorganisation process;
- b) Plymouth City Council and Exeter City Council had jointly submitted a proposal for four new unitary authorities across Devon;
- c) The aim was to simplify local government structures, bring decision-making closer to communities, and create councils with the scale and capability to tackle long-term challenges relating to housing, transport, economic development, and strategic planning;
- d) The proposal was not a merger between Plymouth and Exeter; instead, the two cities shared a common vision for what would be in Devon's best interests;
- e) The Leader emphasised that the proposal would allow Plymouth to strengthen its economic role, support growth, improve public services, and help meet challenging housing targets;
- f) The consultation closed on 26 March 2026, and public participation was vital;
- g) Statutory bodies—including police, fire, voluntary organisations, and others would also be formally consulted;
- h) A shared website had been created to explain the proposed options:
www.devonlgr.co.uk;
- i) The Leader encouraged residents to engage with the process and stressed that the proposal related to who provided services, not to community identities or boundary changes;
- j) The Leader explained that residents in neighbouring parishes would retain their parish and town councils and identities, but would benefit from high-quality unitary services such as waste collection and libraries;
- k) He emphasised that the proposals would end the two-tier system for areas outside Plymouth, creating clearer accountability and stronger capability to support future

prosperity;

- l) He concluded by urging residents to complete the consultation, stressing the once-in-a-generation opportunity to shape Plymouth's long-term future and by expressing thanks to the officers involved in submitting the proposal.

Tracey Lee (Chief Executive) added:

- m) The Council had prepared extensively ahead of the consultation launch and had now submitted its formal proposal;
- n) Government would consider consultation responses over spring 2026, with decisions expected from summer 2026;
- o) Devon was in the second national wave for LGR, with six earlier priority areas, which were already providing valuable learning;
- p) Work was underway across all Devon Councils on a decision-agnostic basis so that implementation could begin swiftly once government confirmed the new structure;
- q) Officers were already analysing learning from other counties and working closely with partners across Devon to prepare for next steps.

98. **Cabinet Member Updates**

Councillor Laing (Deputy Leader and Cabinet Member for Children's Social Care, Culture and Communications) gave the following update on The 2026 Fostering Summit;

- a) It brought together carers, staff, partners and the wider fostering community, providing an important space to reflect on progress, feedback and priorities, with lived experience playing a central role;
- b) Thanks were expressed for Dartmoor Zoo for hosting and supporting the event;
- c) Strong praise was received for improvements and support to foster carers, alongside constructive challenge on areas that required further development;
- d) Key achievements included:
 - i. Successful transitions of children from residential care into in-house fostering;
 - ii. Establishment of four Mockingbird constellations, strengthening peer support networks;
 - iii. Expansion of social events for carers and families;
 - iv. Positive feedback on the new financial support package and council tax refund for carers;

- v. For the first time, Plymouth now had more in-house foster carers than independent fostering agency carers;
- e) Themes raised by carers included training access, support for complex needs, and improved communication with partner agencies;
- f) A full report on actions and next steps would be submitted to the Corporate Parenting Board.

Other announcements included:

- g) Submission to the UK City of Culture 2029 competition, made jointly by Plymouth Culture and The Box after extensive engagement with more than 1,000 residents and stakeholders;
- h) Significant public interest in the Beryl Cook exhibition at The Box, with:
 - i. 25,975 tickets booked to date (exhibition free but ticketed);
 - ii. £14,000 raised in donations, with 12% of people visiting making a donation;
 - iii. National media coverage reaching 16 million people;
 - iv. 83% of visitors were first-time online bookers;
 - v. 842 catalogues had been sold;
 - vi. Visitors to the exhibition were from across the country;
- i) Opening of the Journeys with Mai exhibition in partnership with the National Portrait Gallery at The Box;
- j) Appointment of The Box as Museum in Residence at 10 Downing Street, with Plymouth artworks displayed throughout 2026;
- k) Preview openings of the refurbished Efford and Honicknowle Youth Centres, funded through significant capital investment;
 - i. New facilities included music rooms, AV (Audio Visual) suites, gaming spaces, and high-quality creative environments;
 - ii. Expressed pride at the transformation, emphasising Plymouth's commitment to delivering exceptional youth facilities.

Councillor Penberthy (Cabinet Member for Housing, Co-operative Development and Communities) made the following announcements regarding a recent Sports Ground Safety Authority (SGSA) audit of the Council's regulatory work at Home Park, covering football matches and major stadium concerts;

- l) The audit had assessed nine areas of governance, operational practice and safety management;
- m) Key strengths identified included:
 - i. Strong safety culture and leadership;
 - ii. Effective Safety Advisory Group governance;
 - iii. Robust safety certification processes;
 - iv. Proactive enforcement practices;
 - v. Strong professional expertise and training;
 - vi. Improved capacity and resilience within the service;
- n) The Council achieved a score of 95 out of 100, reflecting high confidence in its statutory safety performance;
- o) The work of officers Victoria Stubbs (Registered Building Inspector) and Rosie Starr (Sustainable Transport Manager) were specifically commended within the report and he added thanks to Will Tomkins (Environmental Health and Trading Standards Officer), Graham Hooper (Senior Intelligence and Licensing Officer), Katherine O'Connor (Head of Food Safety and Miscellaneous Licensing) and Helen Collingbourne (Digital and Graphics Planning Technician);
- p) Cross-department collaboration, involving Environmental Protection, Digital Services and Transport, was highlighted as integral.

He added the following with regards to the St Budeaux Toilets project:

- q) A solution had been identified for the replacement toilet block following complex challenges involving power supply, a damaged septic tank, antisocial behaviour and capital costs;
- r) A planning application had been submitted for a single-unit modular toilet, expanding provision beyond the current disabled-only access;
- s) Subject to planning approval, demolition and installation of new power/sewage connections would take place, followed by installation of the new unit later in the year;
- t) Expected timeframe for the utility works, dependent on National Grid, was approximately 12 weeks;
- u) Councillor Penberthy praised Councillor Haydon for her persistent advocacy on behalf of residents.

He then provided an update on behalf of Councillor Stephens (Cabinet Member for Strategic Planning and Transport) regarding the Royal Parade Transport Scheme:

- v) Severe weather had delayed resurfacing, though significant progress continued;
- w) All bus shelters had been installed, glazed, and had surrounding paving completed;
- x) Road-preparation works had progressed where weather permitted;
- y) Additional bus stops were now allocated in partnership with operators, with service improvements anticipated;
- z) Bus stops would open on Monday 23 February 2026, two months ahead of schedule, and within budget;
- aa) If resurfacing completed by 20 February 2026, the eastbound bus lane would reopen on the 21 February 2026;
- bb) The contractor's compound would be removed from Courtenay Street car park by 20 February 2026;
- cc) Public engagement teams would provide on-street information and leaflets for four weeks;
- dd) The temporary shelter at Derry's Cross would be relocated to Poole Farm to support youth activities;
- ee) Consideration was being given to retaining benches currently in storage for future use at bus/coach stops.

99. **LGA Update**

Councillor Evans OBE (Leader) introduced the update and highlighted:

- a) Attendance at the LGA (Local Government Reorganisation) Labour Group Conference and Leaders' Summit, which included an opportunity to speak directly with the Secretary of State for Local Government and Housing, Steve Reed;
- b) Discussions included:
 - i. Funding pressures on councils;
 - ii. The issue of cost-shunting between councils and the NHS, particularly around children's healthcare contributions where Plymouth's ICB had imposed an arbitrary 20% funding cap;

- iii. The need for clear national guidance for ICBs to ensure fairness and consistency;
- c) The Leader also raised concerns about LGR implementation, specifically the national policy that all authorities would become new authorities rather than some being designated continuing authorities;
 - i. This distinction affected the transfer of staff (TUPE), organisational complexity and transition costs;
 - ii. The Secretary of State committed to examining the issue urgently;
- d) The Leader had written to Louise Gittins, Chair of the LGA, regarding proposed changes to LGA regional structures;
 - i. Current proposals would form a vast South of England region from Cornwall to East Anglia, risking reduced service quality and increased travel inefficiencies.

Cabinet



Date of meeting:	09 March 2026
Title of Report:	Safer Plymouth Modern Slavery Toolkit
Lead Member:	Councillor Sally Haydon (Cabinet Member for Community Safety, Libraries, Events, Cemeteries & Crematoria)
Lead Strategic Director:	Gary Walbridge (Strategic Director for Adults, Health and Communities)
Author:	Matt Lawrence. Technical Lead (Community Safety), Community Connections
Contact Email:	Matt.lawrence@plymouth.gov.uk
Your Reference:	n/a
Key Decision:	No
Confidentiality:	Part I - Official

Purpose of Report

This report is to provide Cabinet with information regarding the refresh of the Safer Plymouth Modern Slavery Toolkit.

Recommendations and Reasons

- I. That Cabinet notes the refresh of the Safer Plymouth Modern Slavery Toolkit.

Reason: This refresh represents a significant step forward in strengthening our city's response to exploitation. It brings clearer guidance, more accessible information, and a more user-friendly structure, making it easier for practitioners to identify concerns and take confident, informed action. The refreshed content reflects current best practice, incorporates learning from recent casework, and provides practical tools that support effective decision-making. These improvements ensure the toolkit is more consistent, more trauma-informed, and better aligned with our multiagency ambitions — ultimately enhancing our ability to safeguard vulnerable individuals and support earlier intervention.

Alternative options considered and rejected

- I. For Cabinet to not consider this report: This option was rejected because the report is informational in nature and supports Cabinet's oversight role by ensuring awareness of the refreshed Safer Plymouth Modern Slavery Toolkit. Choosing not to consider the report would limit Cabinet's visibility of this important preventative and safeguarding work and would not support the Council's commitment to tackling exploitation and protecting vulnerable individuals.

Relevance to the Corporate Plan and/or the Plymouth Plan

Our Corporate Plan highlights the Council's priorities to work with the Police to tackle crime and anti-social behaviour and to keep children, adults and communities safe.

Sign off:

Fin	HS.25 .26.00 5	Leg	LS/0 0001 312/ 1/AC /25/2 /26	Mon Off	N/A	HR	N/A	Asset s	N/A	Strat Proc	N/A
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Originating Senior Leadership Team member: Matt Garrett

Please confirm the Strategic Director(s) has agreed the report? Yes

Date agreed: 23/02/2026

Cabinet Member approval: *Approved by Councillor Sally Haydon at Portfolio Holder briefing 04 February 2026*

Date approved: 04/02/2026

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Modern Slavery and Human Trafficking Toolkit

The purpose of this Modern Slavery Toolkit

Plymouth City Council has adopted a public health approach to modern slavery. This involves a comprehensive and multidisciplinary approach to prevent, detect, respond to, and support individuals affected by this crime. It recognises that modern slavery is not just a legal or criminal justice issue, but a public health concern that requires action across multiple sectors, including law enforcement, fire and rescue, health, social services, education, and community engagement.

A community-centred approach to modern slavery involves localising our approach to directly address the needs of communities in Plymouth. It recognises the importance of mobilising assets within our communities to encourage equity amongst our residents and empower individuals to contribute to the fight against modern slavery. Community-centred approaches focus on co-design with those with lived experience of modern slavery, reducing barriers to accessing services, and building social capital.

A person-centred approach to modern slavery places the needs and experiences of those subjected to modern slavery at the heart of its response. It places emphasis on the impact of trauma on survivors, dispels the concept of the 'perfect victim', advocates for survivors to be in control of their recovery plan, and encourages professionals to communicate effectively to build trust with the survivors they support.

SLAVERY IS CLOSER THAN YOU THINK

This Modern Slavery Toolkit has been developed to equip all partner organisations, and First Responders across Plymouth to recognise modern slavery and/or human trafficking, and report concerns about a child, young person, or adult at risk, who is at risk of, or is being exploited or trafficked, and to respond appropriately.

Under the Modern Slavery Act 2015 [First Responders](#) have a statutory responsibility and legal obligation to refer potential victims of modern slavery into the National Referral Mechanism (NRM). This will assist the person's access to support, such as recovery and reflection period of at least 35 days, safe accommodation, assistance and advice.

First Responders are responsible for

- Identifying victims, recognise indicators, and respond
- Ensure survivors are Safeguarded, and not subject to re-trafficking at point of identification
- Gather information to inform the NRM referral and decision-making process.
- Making a referral into the NRM or completion of an anonymous Duty to Notify (DtN) report.
- Provide a point of contact for the Home Office for the decision / reconsideration request.

Details of how to raise a concern are covered in [Chapter 10](#) of this document.

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1. [Modern Slavery](#)
2. [Risk factors, warning signs and locations of concern](#)
3. [Barriers to survivor co-operation](#)
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6. [Clandestine entry, people smuggling and illegal migrants](#)
7. [The National Referral Mechanism \(NRM\)](#)
8. [Crime recording](#)
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I. Modern Slavery

What is Modern Slavery and Human Trafficking?

Modern Slavery and Human Trafficking are crimes in which children, young people and adults at risk are treated as commodities and exploited for criminal gain. It is a global issue which transcends age, gender, ethnicity, and borders. People at risk of modern slavery or exploitation may have been brought legally or illegally from overseas, or they may be British citizens living in the United Kingdom.

Data on Modern Slavery

Statistics from the National Referral Mechanism, (2025), highlighted the following.

- 6,414 potential victims of modern slavery were referred to the Home Office from July to September 2025, representing a 13% increase compared to the previous quarter (5,689) and a 35% increase from July to September 2024 (4,752).
- the number of referrals received this quarter is the highest number of referrals received in a single quarter since the NRM began in 2009
- 81% (5,165) were sent to the Single Competent Authority (SCA) for consideration and 19% (1,249) to the Immigration Enforcement Competent Authority (IECA)
- the most common nationalities referred this quarter were UK (20%; 1,312), Eritrean (16%; 1,044) and Somali (10%; 662).
- this was the highest number of referrals for UK, Eritrean and Somali nationals in a quarter since the NRM began.
- 112 disqualification requests were made this quarter, representing a 50% increase compared to the previous quarter (56).
- 6,470 reasonable grounds and 6,708 conclusive grounds decisions were issued this quarter; of these, 64% of reasonable grounds and 68% of conclusive grounds decisions were positive.
- the number of conclusive grounds decisions issued this quarter was the highest in a quarter since the NRM began.
- the number of cases awaiting a conclusive grounds decision continues to fall, with 9,107 cases awaiting a decision at the end of September 2025, a reduction of 21% from the previous quarter (11,645) and a reduction of 69% from the peak at the end of 2022 (29,275).
- the average age of cases awaiting a conclusive grounds decision at the end of June 2025 was 141 days, as compared to 304 days at the end of the previous quarter.
- the Home Office received 2,001 reports of adult potential victims via the DtN process, the highest in a single quarter since the DtN began.

The true extent of modern slavery in the United Kingdom and globally is unknown, but it's estimated there were over 50 million people living in modern slavery in 2021. With 1.8 in every 1000 living in modern Slavery in the UK. [World | The Global Slavery Index \(walkfree.org\)](#)

SLAVERY IS CLOSER THAN YOU THINK

Definitions

The Modern Slavery Act 2015 covers both the **holding** of a person in a position of slavery, servitude forced or compulsory labour **AND** Human Trafficking which involves **moving** a person for the purpose of exploitation (sexual exploitation, forced labour, forced criminality, organ donation, servitude or slavery).

Section 1 of the Modern Slavery Act 2015 states:

1(1) A person commits an offence if – The person **holds** another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is **held** in slavery or servitude

or

The person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

Section 2 of the Modern Slavery Act 2015 states:

2(1) A person commits an offence if the person arranges or **facilitates the travel** of another person with a view of [the victim] being exploited. It is irrelevant whether [the victim] has consented to the travel; it is the intent that is relevant.

Slavery: The status or condition of a person over any or all the powers attaching to the rights of ownership is exercised (in essence treating a person as an item of “property” that you can do whatever you want with/to).

Servitude: An aggravated form of Forced or Compulsory Labour the fundamental distinguishing feature is in the victim feeling that their condition is permanent and unlikely to change.

Forced labour: Victims are forced to work against their will, often working very long hours for little or no pay in dire conditions, under verbal or physical threats of violence to them or their families.

Sexual exploitation: Victims are forced to perform non-consensual or abusive sexual acts against their will, such as prostitution and pornography. Whilst women and children make up the majority of victims, men can also be sexually exploited.

Forced criminality: Victims are forced or coerced into committing crimes such as cannabis cultivation, pick pocketing, shoplifting and begging.

Organ donation: Victims may be recruited through deception, not being fully informed as to the nature of the procedure, the recovery and the impact of the organ removal on his or her health. Their consent may also be obtained through coercion or abuse of a position of vulnerability.

Debt bondage: Victims are forced to work to pay off debts that realistically they will never be able to pay off. Low wages and arbitrary deductions mean not only that

SLAVERY IS CLOSER THAN YOU THINK

they cannot ever hope to pay off the loan, but that the debt may increase or be passed down to their children.

The internationally accepted [definition](#) of Human Trafficking (Palermo Protocol) involves 3 component parts (for adults):

Human Trafficking		
The Act	The Means	The Purpose
Recruitment Transport Transfer Harbour Receipt	Fraud Deception The threat of/or the use of Force Abduction Coercion Abuse of a position of vulnerability Abuse of power	Sexual exploitation Forced labour Forced criminality Organ donation Servitude Slavery

The terms ‘human trafficking ‘and ‘modern slavery’ are often used interchangeably. However, there is a distinction: the Modern Slavery Act differentiates human trafficking offences from offences of slavery, servitude and forced or compulsory labour. The government has described the difference as follows:

For a person to have been a victim of human trafficking there must have been;	For a person to have been a victim of slavery, servitude and forced or compulsory labour there must have been:
Action (recruitment, transportation, transfer, harbouring or receipt, which can include either domestic or cross border movement) Means (threat or use of force, coercion, abduction, fraud, deception, abuse of power or vulnerability – however, there does not need to be a means used for children as they are not able to give informed consent) Purpose of exploitation (e.g. sexual exploitation, forced labour or domestic servitude, slavery, financial exploitation, illegal adoption, removal or organs).	Means (being held, either physically or through threat of penalty – e.g. threat or use of force, coercion, abduction, fraud, deception, abuse of power or vulnerability. However, there does not need to be a means used for children as they are not able to give informed consent) Service (an individual provides a service for benefit, e.g. begging, sexual services, manual labour, domestic service).

SLAVERY IS CLOSER THAN YOU THINK

Child Criminal Exploitation, County Lines and Forced Criminality

Child Criminal Exploitation (CCE) is not yet defined in law, though the government's Serious Violence Strategy defines it as occurring where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity:

- in exchange for something the victim needs or wants
- for the financial or other advantage of the perpetrator or facilitator
- through violence or the threat of violence

County Lines is a common form of child criminal exploitation. Gangs and organised criminal networks are involved in exporting illegal drugs around the UK (often from urban to rural areas, although this can happen within the same county) using dedicated mobile phone lines or other forms of a 'deal line' and they exploit children and vulnerable adults to move and store drugs and money. They will often use coercion, intimidation, violence (including sexual violence) and weapons. Children can also be criminally exploited in other ways, such as theft, acquisitive crime, knife crimes and other forms of criminality and exploitation.

(Home Office Disruption Toolkit [Child exploitation disruption toolkit \(publishing.service.gov.uk\)](https://publishing.service.gov.uk))

Forced Criminality

County Lines and Child Criminal Exploitation are not expressly mentioned in the definition of Modern Slavery and Human Trafficking; they fall within the scope of "Forced Criminality". The [definition](#) of "Forced Criminality" is taken from the International Labour Organisation, which is centred upon the "involuntary" nature of the act coupled with a "threat of penalty".

This can be a little confusing when it comes to County Lines and CCE as it implies that a child needs to be forced, threatened, or coerced into committing a crime before they can be considered to be a victim. This is NOT the case as, legally, a child CANNOT consent to their own exploitation. When it comes to determining whether a child has been exploited, the following must be determined.

Have they been recruited, transported, transferred, harboured or received (**The ACT**)

AND

Have they been criminally exploited i.e. has the child committed the crime for the benefit of another (**The PURPOSE**)?

SLAVERY IS CLOSER THAN YOU THINK

Human Trafficking (for those under 18)		
The Act	The Means	The Purpose
Recruitment Transport Transfer Harbour Receipt	A child cannot consent to their own exploitation; therefore, the Means does not need to be established.	Sexual exploitation Forced labour Forced criminality Organ donation Servitude Slavery Kidnap for Ransom

Child Sexual Exploitation

Child Sexual Exploitation (CSE) is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. Children can never consent to sexual activity. Child sexual exploitation does not always involve physical contact, it can also occur through the use of technology.

(Home Office Disruption Toolkit) [Child exploitation disruption toolkit \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/442117/child-exploitation-disruption-toolkit.pdf)

It is important to remember the clear link between Child Sexual Exploitation and Modern Slavery. The Modern Slavery Act 2015 provides effective legislation to tackle CSE, and potential victims should be referred to the National Referral Mechanism. Again, it is important to note that a child cannot consent to their own exploitation and therefore the Act and the Purpose need only be ascertained (see diagram above).

2. Risk factors, warning signs and locations of concern

Risk factors of modern slavery

Anyone, regardless of age, gender, ethnicity and sexuality, can be at risk of modern slavery. However, traffickers or modern slavery facilitators often target people at risk of exploitation as they are easier to manipulate and coerce.

Vulnerable groups may include.

- People with lower incomes and people experiencing poverty.
- People experiencing loneliness and/or social isolation.
- People experiencing homelessness or experiencing housing insecurity
- People who may be missing or may frequently go missing.
- People experiencing harms associated with substance misuse or/ people dependent on alcohol or drugs.
- People with poor or no access to education.
- Care-experienced Young People.
- People experiencing mental ill health, physical ill health, learning difficulties or neurodiversity, or physical disability.
- People experiencing domestic abuse.
- People who have insecure migration status or are seeking asylum.
- People who may have previously been a victim of Modern Slavery or Human Trafficking.
- Young people who are at risk of or experiencing exploitation.
- Sex workers.
- Women and girls often go unseen and may experience multiple vulnerabilities, trauma, and unmet needs, and often face violence, intimidation, sexual abuse, and criminal and/or sexual exploitation. They are often recruited as they are believed to be less likely to attract the attention of police and they can be made to fulfil several roles in the group, from administrator and organiser to girlfriend or sexual partner. Exploitation can be overlooked as they may not fit into society's idea of what a "victim" should be.
- Unaccompanied asylum-seeking children and young people.
- People who have witnessed/experienced domestic abuse.
- People who have experienced child abuse/child neglect historically.

Modern slavery warning signs

Taken from Modern Slavery: Statutory guidance [Modern Slavery: statutory guidance for England and Wales \(under s49 of the Modern Slavery Act 2015\)](#) and [non-statutory guidance for Scotland and Northern Ireland \(accessible version\) – GOV.UK \(www.gov.uk\)](#)

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To identify a potential victim of modern slavery, frontline practitioners who might encounter a potential victim should be familiar with the indicators. In practice it is not easy to identify a potential victim – there are many different physical and psychological elements to be considered as detailed below.

In determining whether a person has been subjected to slavery, servitude or forced or compulsory labour, regard may be had to all the circumstances including any of the person's personal circumstances, such as the person's age, the person's family relationships, and any physical or mental disability or illness, that significantly impair the person's ability to protect themselves from being subjected to slavery, servitude or forced or compulsory labour.

It is important to remain observant of signs of physical injuries, health conditions and psychological trauma. However, it should also be noted that physical injuries, psychological problems and illnesses may not be visible in many cases and may not be easily disclosed by victims. For those who have been both physically and psychologically abused over prolonged periods, the physical and psychological complaints are deeply entwined.

The indicators below are relevant to both child and adult victims of modern slavery.

General indicators of modern slavery

A person with lived experience may

- believe that they must work against their will
- be unable to leave their work environment or home environment
- show signs that their movements are being controlled (e.g., always accompanied by a minder, or are being closely monitored through devices/technology)
- feel that they cannot leave
- show fear or anxiety
- be subjected to violence or threats of violence against themselves or their family members and loved ones
- suffer injuries that appear to be the result of an assault (including sexual assault)
- suffer injuries or impairments typical of certain jobs or control measures
- suffer injuries that appear to be the result of the application of control measures
- be distrustful of the authorities
- be threatened with being handed over to the authorities
- be afraid of revealing their immigration status
- not have their passports or other travel or identity documents, as those documents are being held by someone else
- come from a place known to be a source of human trafficking
- have had the fees for their transport to the country of destination paid for by facilitators, whom they must pay back by working or providing services in the destination
- have a false identity or travel documents (or no documentation)

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- be found in or connected to a type of location likely to be used for exploiting people
- be unfamiliar with the local language
- do not know their home or work address
- allow others to speak for them when addressed directly
- act as if they were instructed by someone else
- be forced, threatened or deceived into working in poor conditions
- be disciplined through punishment
- be unable to negotiate working conditions
- receive little or no payment
- have no access to their earnings or bank account
- work excessively long hours over long periods
- do not have any days off
- live in poor or substandard accommodations
- have no access to medical care
- have limited or no social interaction
- have limited contact with their families or with people outside of their immediate environment
- be unable to communicate freely with others
- be under the perception that they are bonded by debt
- be in a situation of dependence
- have acted on the basis of false promises

Physical Indicators

- physical injuries – these may have unclear explanations as to how or when they were sustained, they may be untreated, or partially treated, or there may be multiple or unusual scars or healed fractures, or injuries of a sexual nature i.e., indicative of frequent forced sexual intercourse.
- work-related injuries – often through inadequate personal protective equipment or poor health and safety
- physical consequences of captivity, neglect, poor environmental conditions – for example, infections including tuberculosis, chest infections or skin infections, malnutrition and vitamin deficiencies or anaemia
- neurological symptoms – for example, headaches, dizzy spells, poor memory, poor concentration, problems with cognition, post-traumatic epilepsy
- dental problems – from physical abuse and/or neglect of dental hygiene
- deterioration of pre-existing chronic medical conditions – these may be untreated (or poorly treated) chronic conditions such as diabetes, hypertension or cancers
- cardiovascular or respiratory symptoms – often chest pain, palpitations, breathlessness (may be due to anxiety, but poor health in victims means that such symptoms need exploring)
- gastrointestinal symptoms – abdominal pain or health conditions related to swallowed, internally placed or ruptured packets of illegal substances
- non-specific symptoms – fatigue, weight loss, fainting
- chronic pain – this can be from specific injuries or may be more generalised – “all over body pain”. Exacerbated by lack of sleep and stress. Maybe psychosomatic

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- medically unexplained symptoms – symptoms without an identifiable physical cause are common, and can be non-specific such as headaches, dizziness or back pain, or may be related to trauma to a particular part of the body, for example, abdominal pain in rape victims
- disfigurements – cutting, burning, or branding may be used as a means of punishment or to indicate ownership by exploiters. Victims are sometimes forced to undergo cosmetic procedures, for example, breast implantation, and use of skin-lightening creams. Disfigurement can also be the result of self-harm and attempted suicide
- post-operative pain – infection or scarring from organ harvesting, particularly of a kidney

Psychological Indicators

Trauma can manifest in many ways, and this could be as a mental health problem, for example, anxiety, low mood or suicidal thinking. Victims may also have diagnosable psychiatric disorders such as post-traumatic stress disorder (PTSD), complex PTSD, depressive disorders, anxiety disorders and adjustment reactions. Symptoms may be worsened by exacerbating factors, such as significant sleep deprivation and malnutrition. Psychological indicators of modern slavery may include:

- expression – of fear or anxiety
- depression – lack of interest in engaging in activities, lack of interest in engaging with other individuals, hopelessness
- isolation or alienation
- attachment and identity issues – can create detachment from others or an over-dependence (or both). This can include a dependency on exploiters
- an inability to regulate emotions – for example, a persistent shifting between sadness, forgiveness, anger, aggression, frustration and/or emotional detachment or emotional withdrawal
- difficulties with relationships – difficulties with trusting others (either lack of trust or too trusting) causing difficulties in relationships and difficulties assessing/addressing risks or warning signs in relationships
- loss of autonomy – for example, difficulty in making simple decisions, tendency to acquiesce to the views/desires of others
- memory difficulties – either problems with concentration/attention or poor memory for past events e.g., gaps or confusion about events
- dissociative episodes and re-experiencing phenomena such as flashbacks
- other indicators may include:
 - hostility
 - aggression
 - difficulty concentrating
 - self-harm
 - suicidal ideation
 - an attitude of guilt, self-blame, shame or low self-esteem
 - psychosis or the presence of hallucinations and delusions
 - substance misuse and addictions

Situational or Environmental indicators

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It is important to also know about the situational and environmental signs that can indicate a person is being exploited and is a victim of Modern Slavery.

- withheld passports or identity documents, contracts, payslips, bank information, health records.
- lack of information about rights as workers in the UK as well as support and advice services.
- lack of information about a person's rights as a visitor in the UK or a lack of knowledge about the area they live in the UK.
- acting as if coerced or controlled by another.
- going missing for periods.
- fearful and emotional about their family or dependents.
- limited English, for example only having vocabulary relating to their exploitative situation.
- restriction of movement (noting that victims are not often 'locked- up' but movement can be restricted) or being held in isolation.
- withholding wages (including deductions from wages).
- debt bondage.
- abusive working and/or living conditions.
- excessive overtime.

Child-specific indicators

Children may be victims of child sexual exploitation, and/or child criminal exploitation including county lines. There are several indicators associated with these forms of exploitation and all those working with children need to be aware of them. Children may display any of the indicators above. In addition, the following child-specific indicators should be considered:

- have no access to their parents or guardians (although children may be living with their parents or guardians and still be exploited).
- look intimidated.
- behave in a way that does not correspond with behaviour typical of children their age, especially sexualised behaviours.
- have friendships/relationships with older peers or adults.
- frequently missing or late to education if they are accessing education.
- have no time for playing or cannot play.
- live apart from other children and in substandard accommodation.
- eat apart from other members of the "family".
- be given only leftovers to eat.
- be engaged in work that is not suitable for children.
- travel unaccompanied by adults.
- travel in groups with persons who are not relatives.
- make frequent requests for condoms and/or emergency contraception.
- have possession of more than one phone.
- have unexplained gifts or new possessions.
- may be carrying large amounts of cash.
- may have hotel goods e.g. key cards, branded toiletries etc.

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- may have travel documents e.g. train, and bus tickets, for areas that they have no apparent connection to.

The following might also indicate that children have been trafficked:

- the presence of child-sized clothing typically worn for doing manual work or forced prostitution.
- the presence of toys, beds and children's clothing in inappropriate places such as brothels and factories.
- the claim made by an adult that he or she has "found" an unaccompanied child.
- the finding of unaccompanied children carrying telephone numbers for calling taxis.
- the discovery of cases involving illegal adoption.

Locations of concern regarding modern slavery

Modern slavery operates in a variety of public and private locations however, low-paid, poorly regulated, labour-intensive industries are particularly susceptible. These industries may include construction, food packaging and processing, agriculture and fisheries, restaurants and takeaways, hand car washes, nail bars, and care homes.

Brothels and Adult Service Websites (ASWs) may also be used to facilitate sexual exploitation (it must be noted that the internet has allowed many sex workers to work independently and in a safer environment, and that only a minority of sex workers are victims of Modern Slavery). Many brothels operate out of short-term or holiday lettings and hotel rooms. These are often referred to as "pop-up brothels" (a brothel requires 2 or more persons working from the same premise, even if they're not working at the same time). The victims work out of these locations for just a few days, generating custom via adverts placed on Adult Services Websites before moving on to a new location, often in a different town.

Whilst particular industries e.g. hand car washes and nail bars are frequently discussed in the context of Modern Slavery, it is important that we understand our own communities and recognise that Modern Slavery may manifest itself in a very localised manner.

Modern Slavery, Trafficking, County Lines, criminal exploitation and serious violence is not only limited to the most deprived parts of inner-city Britain but can stretch to small rural villages. Rural market towns could also be lucrative import areas for County Lines, as these are seen as relatively low risk for perpetrators of exploitation compared to more traditional urban export cities. It is also important to recognise that it is not always gangs from large urban cities that may target young people; local crime groups, using the same recruitment strategies as their larger counterparts, may also target and exploit local people.

Criminal, labour, sexual, domestic servitude are the primary forms of modern slavery in the UK.

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In Devon & Cornwall, and across the UK, NRM referrals increased sharply in 2023–24, particularly for:

- Child exploitation (44–58% of referrals),
- Labour/criminal exploitation (mostly male adults),
- Sexual exploitation (mostly female adults and minors).

Plymouth’s Modern Slavery Update (Aug 2024) outlines areas of high vulnerability including port-related industries and the care sector. The Progress Report (Aug 2025) highlights actual cases involving car washes, pop-up brothels, fast-food outlets, shoplifting and drug-related exploitation, along with the need for increased vigilance in care homes and social services.

Operation Makesafe (Sep 2024), a Police campaign and 2025 ITV coverage focused on child exploitation: grooming, forced criminality, drug-related exploitation, targeted by plain-clothes inspections in hotels and taxi checks identified hotel-based child exploitation.

Being a naval and commercial port city, Plymouth sees high risk of cross-border trafficking via seaports and the use of hidden brothels and exploitative labour schemes near transport hubs. Its vulnerable population includes children, migrants, those facing homelessness or economic precarity.

Please note: Policing and referral statistics rely on detected and reported cases. Underreporting—especially of sexual exploitation and labour abuse—is still a major concern.

3. Barriers to victim cooperation

The barriers to victim cooperation and disclosure are significant and should **not** be underestimated. Building trust and developing a rapport with the potential victim is often key, but this can take days, weeks, months and even years to achieve! In many cases, victims of Modern Slavery do not consider themselves to be victims, particularly if they come from a low-income background.

It is also important to remember that psychological and emotional abuse/coercion can be very difficult to evidence and outwardly, victims may appear to be making free and independent choices, yet this psychological and emotional abuse/coercion can be just as effective as physical and visible controlling mechanisms.

Barriers to disclosure/co-operation

- the fear of being beaten, raped or even killed at the hands of their traffickers if they were to ask for help.
- believing that UK law enforcement is corrupt, ineffective or disinterested in their circumstances.
- where the victim is an illegal immigrant, believing that UK law enforcement will pursue.
- legal migration status.
- their deportation rather than prioritising the investigation into the abuse and exploitation they've been subjected to.
- reprisals against family members or from an employer.
- discrimination from their community, families and religious groups (e.g., being viewed as a prostitute rather than a victim of multiple rapes).
- the fear of stigma or shame.
- situational dependency and a lack of awareness of the help and support available.
- victims may feel responsible for their situation/may have consented to elements of their exploitation i.e., knowing that they were to be a sex worker but NOT knowing the conditions they'd be subject to.
- cultural differences i.e., children may see themselves as "young adults" with a responsibility to help provide for their family.
- fear of juju or [witchcraft](#) ceremonies.
- Stockholm syndrome - a coping mechanism for a captive or abusive situation where there is emotional identification with the perpetrator.
- belief that their current situation is only temporary and a stepping stone to a better future.
- people experiencing trauma.

Many Modern Slavery victims have been subject to unimaginable abuse and exploitation. The trauma that they've been subjected to may make it difficult for a victim to accurately recall events. There may be inconsistencies and contradictions in the accounts that they give, and they may be hostile and aggressive towards the police and those who are trying to help them.

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Methods to build trust

A consistent, trauma-informed and survivor centred approach across partners is required to support the recovery and empowerment of survivors and build trust. All staff need to understand the importance of trust, and organisations should embed consistent practices that promote safety, dignity, and empowerment. This will improve survivor outcomes through coordinated, respectful and ethical service delivery.

This can be achieved through the following guiding principles:

- Trauma informed care to avoid re-traumatisation.
- Survivor centred care to prioritise the needs, rights and voice of the survivor.
- Cultural competence regarding cultural, linguistic and individual differences.
- Transparency and accountability about roles, responsibilities and limitations.
- Collaboration across agencies to provide holistic support.

Staff Training and Development

- Mandatory training on trauma-informed care, modern slavery indicators, and cultural sensitivity.
- Ongoing reflective practice and supervision to support staff wellbeing and effectiveness.

Survivor Engagement and Communication

- Use clear, jargon-free language.
- Provide access to trained interpreters and culturally appropriate communication tools.
- Ensure survivors are informed about their rights, options, and the role of each agency.

Confidentiality and Consent

- Develop clear protocols for information sharing, with survivor consent at the core.
- Explain data use and storage in accessible formats and languages.

Service Delivery Standards

- Ensure services are accessible, inclusive, and responsive to individual needs.
- Provide consistent points of contact to reduce re-traumatisation.
- Offer long-term support pathways (e.g., housing, legal aid, mental health, employment).

Multi-Agency Coordination

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- Establish a shared case management system or lead professional model.
- Regular multi-agency meetings to review cases and ensure continuity of care.
- Joint protocols for safeguarding, referral, and crisis response.

Monitoring and Evaluation

- Collect feedback from survivors to assess trust and satisfaction.
- Monitor outcomes related to engagement, wellbeing, and service uptake.
- Review and update the policy annually in consultation with survivor advisory groups.

4. Key Investigative Considerations

Safety and Support

- Call 999 if a crime is occurring.
- Utilise the Pathway (Annex 2) to ensure provision of immediate support and referral to most suitable agency.
- Address any immediate health concerns, keeping in mind forensic opportunities and the possibility of any sexual offences being disclosed.
- Remove victims from the place of exploitation and away from potential perpetrators.
- Contact the [Salvation Army](#) (Modern Slavery Victim Care Contract) and police (101) to support with immediate Safeguarding and arrange attendance of a Police Modern Slavery Victim Liaison Officer via 101.
- Where an individual requires MSVCC support via The Salvation Army to prevent destitution, depending on their individual circumstances, they will either be provided accommodation, and financial support to meet their essential living needs; or financial support to meet their essential living needs (where they do not require accommodation).
- The Salvation Army (MSVCC) and Devon and Cornwall Police will work together to provide suitable alternative clothing and toiletries (Do not use forensic suits/prisoner clothing) and provide substantial meals and refreshments (seek advice if malnutrition is suspected).
- Separate but do not isolate potential victims from one another. Ensure that they are moved to a trauma-informed, accessible space.
- Dispel any fears or anxieties. Victims may be in fear of the Police and other authorities due to corruption and bad practices in their Country of origin.
- Explain the NRM process thoroughly and seek victims' consent for referral Adults (over 18) need to consent to the NRM process. If they don't then a duty to notify form can be completed. Children do not have to consent.
- Take necessary measures to prevent the victim from going missing or being re-trafficked by arranging safe and supervised accommodation if required.

Age Assessments

In some cases, it may be unclear whether the victim is younger than 18. Aside from the physical, sexual or emotional abuse they may have suffered, many trafficked children and young people have been forced by their traffickers to tell a false story if they are questioned. All these factors may impact the victim's ability to participate fully and openly in an age assessment.

- Age assessments should only be carried out where there is a significant reason to doubt that the claimant is a child, as the repeated questioning of the child or young person's credibility and identity can leave them feeling angry and bewildered and affect the way they engage with social workers and other professionals.
- Where there is uncertainty about age, a suspected victim must be presumed to be a child and be afforded special protection measures pending assessment of their age

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- Care must be given to planning accommodation for potential victims who may be at risk of going missing very soon after discovery. For example, bed and breakfast accommodation is not suitable for any child, even on an emergency basis.
- The venue for age assessment interviews needs to be conducive to helping the child or young person feel safe and comfortable. Police Stations are not considered appropriate for conducting age assessments.
- Age assessments are the responsibility of Children's Social Care; they are **NOT** conducted by the police. Access this via the Multi-Agency Safeguarding Hub 01752 668000 or familiesfirst@plymouth.gov.uk

Remember that there is a duty of care towards any potential victim of modern slavery regardless of whether they have identified themselves as such, or whether they have consented to enter the NRM.

5. Information for Police

Translation and Interviews

- Provide victims with access to an accredited interpreter
- Consider the gender of the interpreter and any cultural issues or sensitivities
- Do not use potential victims as interpreters as they could themselves be exploited, or exploited by others, even if they are being forced to.

Suspects

- Consider that suspects could also be victims of modern slavery and be subject to threats and coercion themselves
- Remember, exploitation includes forced criminality. For example, begging, shop theft and cannabis cultivation. Therefore, suspects who indicate that they have been exploited to commit such criminality will have a statutory defence under the S45 Modern Slavery Act 2015.
- If a suspect raises a statutory defence under S45 Modern Slavery Act 2015 you should seek a disposal decision from CPS. You should not charge a suspect and simultaneously submit an NRM referral as this could lead to the punishment of a victim.
- Assess the risk to the victim (s) and implement suitable control measures if a suspect is released on bail. For example, bail conditions and civil orders.

Crime Scenes

- Treat victims, the locations where the exploitation occurred (including vehicles used to transport) and suspects as crime scenes. S12 MSA provides a Constable with the power to seize/detain any vehicle, boat or plane.
- Commence a scene log
- Consult with a Crime Scene Manager at the earliest opportunity

Evidential Items

- Identity Documents: Passports, Driving Licences, and National Insurance Cards may provide evidence of forgery, identity theft and fraud.
- Travel Documents: Flight and train tickets, baggage tags, travel labels, hotel bookings, taxi and petrol receipts may identify routes or points of entry. They may also help evidence the “act” of trafficking, including transportation or transfer of individuals.
- Telecommunications: Contact lists, SIM cards, SMS, browsing history, navigation app data, photos, and files may all provide intelligence in relation to the wider organised crime networks and the scale of criminality involved.
- Financial Documents: Credit Cards, Bank Statements, pay slips, loan agreements, benefit statements and tax credit receipts may identify opportunities for CCTV as well as identifying the flow of money and hierarchical arrangements of the organised crime group.

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- Employment Documents: Duty sheets, pay slips, address books, diaries, contracts, and recruitment agency papers may evidence working arrangements, locations, facilities, etc.

Spontaneous investigations should be overseen by the Duty Detective Inspector in the first instance.

6. Clandestine entry, people smuggling and illegal migrants

There is a clear distinction between people smuggling and human trafficking.

- People smuggling is a voluntary process which occurs when an individual seeks the help of a facilitator to enter the U.K. illegally (or cross any other international border) and the relationship between both parties ends once that objective is met.
- Human trafficking involves the ongoing exploitation of an individual. It can occur across international boundaries or internally within countries. As per the definition above, it requires an element of force, coercion, deception etc.

Despite this clear distinction, smuggled people are vulnerable people and during their journey, it's not unusual for a smuggled person to enter, or be forced to enter into an exploitative relationship and therefore become trafficked.

Unaccompanied Migrant Children

Unaccompanied migrant children who arrive in the United Kingdom do so voluntarily, either to flee persecution and seek asylum or to pursue a better standard of living/be reunited with family members. They or their family often pay 'agents' to help them get into the United Kingdom (people smuggling). Some children however will arrive in the United Kingdom having been forced, threatened or deceived into doing so, with the intention that they will be exploited by someone, somewhere for something (human trafficking). Some may even have incurred a debt for the cost of their travel into the United Kingdom which needs to be repaid.

Regardless as to whether an unaccompanied migrant child has been smuggled or trafficked into the United Kingdom, he/she is at potential risk of significant harm. To identify and manage this risk as far as possible, Police Officers should follow the **"Operation Innerste"** Process Guidance whenever an unaccompanied migrant child is encountered.

Click on this link here: <https://www.gov.uk/government/publications/operation-innerste-process-caseworker-guidance>

Police: For further information please refer to the Operation Innerste guide on the Modern Slavery & Organised Immigration Crime share point sites

Treatment of illegal migrants as victims

Following concerns that on occasions, individuals with no leave to remain in the U.K. had reported being the victims of serious criminality BUT were detained for immigration offences instead, the National Police Chiefs Council published the following recommendations (Oct 2018):

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1. Fundamentally, an undocumented migrant (person without leave to remain) reporting a crime to the police should be **treated first and foremost as a victim of a crime**.
2. A Police National Computer PNC check should NOT be conducted for the **sole** purpose of determining a victim's immigration status, BUT it is accepted that PNC/PND (police national database/NICHE and other intelligence enquiries can be conducted to help inform risk assessments and identify investigative opportunities.
3. During an investigation, it is wholly appropriate to share information with Home Office Immigration Enforcement BUT the police will take NO enforcement action in respect of any immigration offences committed whilst their investigation is ongoing.

Once the police investigation has concluded, it **may** be appropriate to pursue the immigration offences committed. Much will depend on individual circumstances, and there may be a fine balancing act to perform. On the one hand, being the victim of a crime is not an automatic "barrier" to deportation/removal but on the other hand, some offenders prey upon the vulnerability of an individual's illegal status and by ultimately arresting and detaining a victim (even after an investigation has been fully completed) we are potentially playing into the hands of the perpetrators who exploit their victim's fears of being deported to not disclose the abuse that they have suffered.

7. The National Referral Mechanism

The National Referral Mechanism (NRM) & the Duty to Notify (DtN) – For adults

The National Referral Mechanism (NRM) is the national framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support. Any agency or organisation that suspects an adult may be a victim/at risk of modern slavery/human trafficking has a duty to report their concerns. You can do this by contacting the Modern Slavery Helpline on 0800 0121 700 or by clicking on the link to report it online:

<https://www.modernslaveryhelpline.org/report>

First responders

First responders can use the National Referral Mechanism (NRM) to:

- report cases of modern slavery
- refer potential victims for support and protection

First responders work for [designated organisations](#) and help identify and support potential victims of modern slavery. Please refer to the National Referral Mechanism Guidance: adult (England and Wales for first responder organisations, link here: <https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales#Section-4>

Verbal consent is required for an adult to be referred to the NRM (signature no longer required). For an adult to provide their informed consent, you must explain:

- What the NRM is
- What support is available
- What the possible outcomes are for an individual being referred

You should also make it clear that information may be shared or sought by the Single Competent Authority ([SCA](#)) including from other public authorities to help them determine whether the individual is a victim of Modern Slavery.

If the potential victim is under 18, or may be under 18, an NRM referral **must** be made. Child victims do **not** have to provide their consent and indeed in many cases, might not even know that a referral has been made. If a child is approaching 18, it is useful to discuss future consent to remain in the NRM with them.

If an adult does not consent to entering the NRM but you still suspect that they're a potential victim of Modern Slavery, you must submit a Duty to Notify form instead. A Duty to Notify form should never be submitted in relation to a child.

The threshold for submitting an NRM referral is LOW. You do not need to believe that an individual is a victim, nor do you need any evidence, suspicion alone will suffice.

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The referral process

As of November 2019, both NRM and DtN referrals must be made online at:

<https://www.modernslavery.gov.uk/start>

Once completed, the NRM referral will be sent to the Single Competent Authority for assessment AND a link will be sent to the submitting officer to allow him/her to download a copy of the referral form. The referrer will also receive an email receipt which can be replied to if further information needs to be provided.

An NRM referral should clearly articulate the specific and detailed concerns held for the individual. It should also:

- contain enough information to allow decision-makers within the Home Office to make an informed decision.
- Include relevant information held by Partners

Whilst completing the NRM referral it is important to note that the potential victim does **NOT** have to accept support **NOR** do they have to co-operate with any police investigation.

The decision-making process

The NRM is a two-stage process:

I. Reasonable Grounds decision

Upon receipt of an NRM referral from any First Responder, the SCA have 5 working days to make a “Reasonable Grounds” decision. The threshold for this decision is:

“I suspect but cannot prove that the person is a victim of Human Trafficking, Slavery, Servitude and Forced or Compulsory Labour”

The more information that is provided at the point of referral, the easier and quicker this decision-making process can be.

A positive “Reasonable Grounds” decision is the gateway to specialist-tailored support for a minimum of 30 days (recovery and reflection period). This support may include:

- Legal advice
- Accommodation
- Counselling
- Protection

In England and Wales support to survivors of trafficking who have entered the NRM is provided under the [Modern](#) Slavery Victim Care Contract (MSVCC). MSVCC support is not a public fund and so support will be available to person regardless of

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their immigration status. The prime supplier of the MSVCC is currently The Salvation Army. This is coordinated by the [No Recourse to Public Funds](#) (NRPF) Network. They have responsibility for coordinating the safeguarding the welfare of destitute families, adults and care leavers who are unable to access benefits due to their immigration status.

The provision of emergency accommodation can be available to a person prior to receiving a reasonable grounds (RG) decision, if it is necessary to prevent [destitution](#) or the person is at risk of further exploitation. To access emergency support through the MSVCC, a person must meet the destitution test, meaning that they are without access to adequate accommodation and/or other essential living needs. If a person has access to public funds or has claimed asylum and can access accommodation from other sources, such as local authority homelessness assistance or Home Office asylum support, they will not qualify for MSVCC support. Where a person is being supported by social services under the Care Act 2014 or section 17 of the Children Act 1989 or the Social Services and Well-being (Wales) Act 2014, they would not usually be able to access emergency MSVCC support.

Currently the Salvation Army nationally are responsible for providing this support and will contact the Officer in Charge (OIC) who submitted the NRM referral if a positive decision is so that they can take over the care and support of the potential victim. The OIC / First Responder can contact The Salvation Army using the phone number [0800 808 3733](#).

2. Conclusive Grounds decision

During the 30-day “recovery and reflection” period, the SCA will try and gather as much information as possible to allow them to make a “Conclusive Grounds” decision. The threshold for this decision is:

“On the balance of probabilities, there is sufficient information to decide that the individual is a victim of modern slavery”

Whilst a positive “Conclusive Grounds” decision recognises the exploitation and abuse that an individual has been subjected to, it does not confer any automatic rights i.e., to remain in the U.K., right to receive compensation etc. It does however allow the individual to apply for discretionary leave to remain in the U.K. to allow him/her to:

- Assist the police investigation
- To seek compensation through the courts
- Access medical treatment that wouldn't ordinarily be available in their country of origin

Children and the NRM

As stated above, children do **NOT** need to consent before being referred to the NRM and as consent is **NOT** an issue, a DtN form should never be submitted.

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It is important to remember that a referral to the NRM does NOT replace or supersede established child protection processes which should continue in tandem (a child safeguarding referral should accompany any NRM referral). Under the 1989 and 2004 Children's Acts, Local Authorities have a statutory responsibility to safeguard and protect potential child victims irrespective of their immigration status. In terms of the NRM therefore, a child referral is very much about identifying and assessing whether a child is a victim of Modern Slavery rather than offering any subsequent support as this is the responsibility of Local Authorities.

Independent Child Trafficking Guardians (ICTG)

Independent Child Trafficking Guardians (ICTG) are an independent source of advice for children who have been trafficked and somebody who can speak up on their behalf. If the first responder considers a child to be a potential victim of modern slavery or human trafficking, they should refer them to the ICTG service. This is in addition to following usual safeguarding routes and NRM referrals. The NRM referral and ICTG referral should be made in parallel.

More information on the ICTG service in Plymouth can be found [here](#) or at the Barnardo's page [here](#).

8. Crime Recording

The Home Office Counting Rules for Recorded Crime (April 2019) stipulate that:

- All NRM and DtN referrals made by the police must be subject of a recorded crime of Modern Slavery unless it is determined that the Modern Slavery occurred outside England and Wales.
- All NRM referrals received by the police from the Single Competent Authority (SCA) (those that have been submitted by other first responders) must be subject of a recorded crime of Modern Slavery if a **positive** “Reasonable Grounds” decision has been reached.

Tactical options in dealing with modern slavery

Aside from arresting perpetrators for offences committed under the Modern Slavery Act 2015, numerous other options and tactics can be used to disrupt, deter and prosecute Modern Slavery perpetrators.

A number of these options have been detailed in National Working Group (NWG) /BARNADO’s: [Criminal, Civil and Partnership Disruption Options for Perpetrators of Child and Adult victims of Exploitation.](#)

These tactics include:

- Slavery and Trafficking and Risk Orders
- Domestic Violence Prevention Notices and Orders
- Forfeiture Orders
- Sexual Harm Prevention and Risk Orders
- Criminal Behaviour Orders
- Community Protection Notices
- Emergency Protection Orders and Police Protection
- Civil Injunctions
- Restraining Orders
- Non-Molestation Orders
- Child Abduction Warning Notices

In addition to the tactics detailed in the [HO Child Exploitation Disruption Toolkit](#), there are specific pieces of legislation, many of which fall within the skills and experience of our partners that we can consider including:

- The National Minimum Wage Act 1998
- The Housing Act 2004 (governing conditions in relation to Houses of Multiple Occupancy)
- Section 179 Licensing Act 2003 (rights of entry to investigate licensable activity and immigration offences)
- Immigration, Asylum and Nationality Act 2006 (ability to issue Civil Recovery Notices in respect of employing illegal migrants)

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- Health and Safety at Work Act 1974 (governing the health and safety of individuals in the workplace)
- Fire and Rescue Services Act 2004 (particularly relevant if we suspect persons are sleeping in or above commercial premises)

All partner organisations that work or volunteer with children, young people or adults, have a duty of care to report any safeguarding concerns. Refer to your organisation's Safeguarding Policy and Procedure or through Families First, Children's Service's Consultation line. Tel: 01752 668000 or via email to familiesfirst@plymouth.gov.uk.

9. Legislation, the law and civil orders

Under the European Court of Human Rights (ECHR), everyone is entitled to the right to life, liberty and security; no one shall be subjected to torture or inhuman or degrading treatment or punishment. Any public body must protect individuals from the violation of these fundamental rights.

The Modern Slavery Act 2015

- **Section 1** provides an offence of slavery, servitude and forced or compulsory labour

1(1) A person commits an offence if – The person holds another person in slavery or servitude and the circumstances are such that the person knows or ought to know that the other person is held in slavery or servitude, or The person requires another person to perform forced or compulsory labour and the circumstances are such that the person knows or ought to know that the other person is being required to perform forced or compulsory labour.

- **Section 2** provides for a single offence of human trafficking covering sexual and non-sexual exploitation

2(1) A person commits an offence if the person arranges or facilitates the travel of another person with a view of [the victim] being exploited. It is irrelevant whether [the victim] has consented to the travel; it is the intent that is relevant

- **Sections 14–22 & 23–29: Slavery and Trafficking Prevention Orders (STPOs) and Slavery and Trafficking Risk Orders (STROs).**
 - Who can apply: Police, National Crime Agency, immigration officers, and GLAA labour abuse prevention officers may apply to a court (including magistrates' court on complaint) for an order where the person is convicted (STPO) or poses a demonstrable risk (STRO).
 - What they can do: Orders can impose tailored restrictions and requirements—including prohibitions on foreign travel and requirements to provide name and address and notify changes—to protect persons from physical or psychological harm likely to occur from slavery/trafficking offences.
 - Interim orders & duration: Courts may make interim orders pending determination; orders can be varied, renewed, or discharged.
 - **Section 30:** Breach of STPO/STRO is a criminal offence (punishable on indictment by up to 5 years' imprisonment).
 - Enforcement: Breach of an order constitutes an offence; officers may arrest a suspect for this indictable offence and pursue prosecution.

Practical note: Use Home Office statutory guidance forms STPO1/STRO1 for applications and follow evidential standards in Part 2 guidance.

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Children Act 1989

- **Section 46** empowers an officer to remove a child to suitable safe accommodation if there is reason to believe that the child would otherwise be at risk of significant harm

Sexual Offences Act 2003

- **Section 14** – It is an offence to arrange or facilitate a child sex offence (child under 16)
- **Section 47** – It is an offence to pay for the sexual services of a child
- **Section 48, 50** – It is an offence to cause, incite, arrange or facilitate child prostitution or pornography
- **Section 49** – It is an offence to control a child prostitute or a child involved in pornography
- **Section 57 to 59:** It is an offence to traffic a child into, within or out of the United Kingdom for sexual exploitation
- **Section 103A – 103K** – Sexual Harm Prevention Orders (SHPO) can be made in relation to a person who has been convicted of or cautioned for a sexual offence (including offences committed overseas) and who poses a risk of sexual harm to the public. The Order can contain any prohibitions aimed at protecting children and others
- **Section 122A-122k** – Sexual Risk Orders (SRO) may impose any restriction the court deems necessary for protecting the public from harm, and requires the individual concerned to notify the police of their name and address, including where this information changes. For an SRO to be imposed, the individual does not need to have committed an offence. An SRO is available on free-standing application to a magistrates' court by the police or National Crime Agency

Working Together to Safeguard Children (2023)

- Section 194 referenced 'supporting children at risk of, or experiencing, harm outside the home. It specifically mentions modern slavery and trafficking, alongside exploitation by criminal and organised crime groups and individuals (such as county lines and financial exploitation), serious violence, online harm, sexual exploitation, teenage relationship abuse, and the influences of extremism which could lead to radicalisation

Care Act 2014 and Care and Support Statutory Guidance 2025

- **Section 14 Safeguarding** This chapter provides guidance on sections 42 to 46 of the Care Act 2014 and covers:
 - adult safeguarding: what it is and why it matters
 - abuse and neglect. (N.b. Modern slavery is a form of abuse)
 - understanding what they are and spotting the signs
 - reporting and responding to abuse and neglect
 - carers and adult safeguarding

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- adult safeguarding procedures
- local authority's role and multi-agency working
- criminal offences and adult safeguarding
- safeguarding enquiries
- Safeguarding Adults Boards
- Safeguarding Adults Reviews
- information sharing, confidentiality and record-keeping
- roles, responsibilities and training in local authorities, the NHS and other agencies

Link here <https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance#safeguarding-1>

Anti-Social Behaviour Act 2014

- **Section 76** of the Anti-Social Behaviour, Crime and Policing Act 2014 allows the police and local authority to issue a closure notice on a premises if they have reasonable grounds to believe that use of the premises has resulted in, or is likely soon to result in, nuisance to the public or disorder, and that the notice is necessary to prevent the nuisance or disorder from continuing, recurring or occurring.

Powers under the Police and Criminal Evidence Act (PACE)

- **Section 17:** Power for a Constable to enter a premise without a warrant to save life or limb, or arrest a person where there are reasonable grounds for believing that the person you seek is on the premise.
- **Section 24:** Power for a constable to arrest anyone who has committed an indictable offence, is about to commit an indictable offence, is committing an indictable offence or has reasonable grounds to suspect either one of the above.

I 0. How to report a concern about Modern Slavery

If you see a crime in progress or someone is in immediate danger telephone 999.

Intelligence:

Devon and Cornwall Police rely on intelligence from communities, partners and other law enforcement agencies. Intelligence can come from a range of sources such as a concerned member of the community worried about a neighbouring address, a local authority worker who has received a disclosure from a person, or from police in another area.

Report Intelligence using the [Devon and Cornwall Police Partnership Intelligence sharing form](#) or through the [Police Intelligence link](#).

How to report a safeguarding concern to Plymouth City Council:

Worried about a child:

Families First, Children's Service's Consultation line. Tel: 01752 668000 or via email to familiesfirst@plymouth.gov.uk

Worried about an adult at risk, click on this link to report a concern:

<https://www.plymouth.gov.uk/report-adult-abuse-neglect-or-safeguarding-concern>

General enquiries and outside office hours, at weekends and on public holidays contact the Emergency Duty Team Telephone: 01752 668000

First Responders:

If you're a first responder working for a [designated organisation](#) you can use the following services to:

- refer potential victims of any age to the National Referral Mechanism
- help potential victims receive support and medical care
- notify the Home Office of potential victims (Duty to Notify)

[Report modern slavery – GOV.UK](#)

Call the Modern Slavery Helpline on 0800 0121 700 or report it online by clicking on this link

<https://www.modernslaveryhelpline.org/report>

Support and safety for children are considered through Child Exploitation Risk Assessments which are discussed and endorsed through a Multi-Agency Child Exploitation Risk Assessment Panel. Individualised support, safety and disruption are

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then managed through the child's individual plan at all levels – Early Help, Child in Need, Child Protection and Children in our care.

For Children at risk of Exploitation, these multi-agency partners will consider disruption, safety and support through the child's Multi-agency plan and Multi-agency Child Exploitation disruption meetings.

To report information about modern slavery 100% anonymously, contact the charity Crimestoppers on 0800 555 111 or online at www.crimestoppers-uk.org

11. Contacts – Local and National Organisations

NRM Single Competent Authority (SCA)

NRM Single Competent Authority (SCA)
Tackling Slavery and Exploitation Directorate
Serious and Organised Crime Group
Tel. No. 020 7035 5689
Email: nationalreferralmechanism@homeoffice.gov.uk

Gangmasters & Labour Abuse Authority (GLAA)

Report problems: 0800 4320804
Email: licensing@gla.gov.uk

H.O. Immigration Enforcement

[Contact details for immigration compliance and enforcement teams - GOV.UK](#)

H.O. Command and Control UNIT (CCU)

Tel. No. 0300 0134999 (for live time status and intelligence checks)

[Hope for Justice](#)

Hope for Justice
P.O. BOX 5527,
Manchester, M61 0QU
Tel. No. 0300 008 8000
Email: info.uk@hopeforjustice.org

[Independent Child Trafficking Advocates \(Barnardo's\)](#)

Tel. No. 0800 043 4303 (24/7 referral and support help line)
Email: countertrafficking@barnardos.org.uk (general enquiries)

Devon and Somerset Fire and Rescue

[Homepage | Devon and Somerset Fire and Rescue Service](#)

Plymouth City Council Housing

[Housing Services | PLYMOUTH.GOV.UK](#)

Plymouth City Council Protective Services (Licensing & Environmental Health)

[Public Protection advice and support | PLYMOUTH.GOV.UK](#)

Heart of South West Trading Standards

[Trading standards - Devon, Plymouth, Somerset and Torbay](#)

His Majesties Revenue & Customs

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[HMRC inspections - His Majesty's Inspectorate of Constabulary and Fire & Rescue Services](#)

National Minimum Wage

Serious Non-Compliance Team
Office Tel. No. 03000 538706

Department for Work and Pensions (Plymouth)

64 Exeter Street, Plymouth PL40AJ
Tel. No. 08001690190

[Contact Jobcentre Plus - Find your nearest office - GOV.UK](#)

The Salvation Army

Tel: +44 (0)30 0303 8151

Email info@salvationarmy.org.uk

Web: <http://www.salvationarmy.org.uk/human-trafficking>

The Children's Society

Tel: 030 0303 7000

Email safeguarding@childrenssociety.org.uk

Web: <http://www.childrenssociety.org.uk/>

Ivison Trust (formerly PACE)

[Ivison Trust](#)

Crimestoppers: Crimestoppers: If you have information on crime or criminals you can contact us, as an independent charity, 100% anonymously – your identity will never be revealed. If you are already in the UK, call free on 0800 555 111 or report details online:

[Giving information anonymously | Crimestoppers](#)

[Modern slavery | Crimestoppers](#)

I2. Further information

Guides and resources

Relevant guidance can be accessed on the following webpages:

Plymouth Safeguarding | [Livewell Southwest](#)

Plymouth Safeguarding Children Board [Right Help, Right Time - Plymouth Safeguarding Children Partnership](#)

North Yorkshire Safeguarding Adults Board: [NYSAB](#), [NYSAB](#)

[Transitional Safeguarding](#)

Useful websites

[Plymouth Safeguarding Adults Partnership | PLYMOUTH.GOV.UK](#)

[Front Page - Plymouth Safeguarding Children Partnership](#)

Modern slavery – GOV.UK (www.gov.uk)

Anti- Slavery Partnership Toolkit: [Home – Anti-Slavery Partnership Toolkit \(nottingham.ac.uk\)](#)

The Clewer Initiative: [The Clewer Initiative | The Clewer Initiative](#)

[Human Trafficking Foundation](#)

Hope for Justice: [Hope for Justice | End Slavery. Change Lives.](#)

Anti-Slavery: [Anti-Slavery International | Fighting for Freedom from Slavery \(antislavery.org\)](#)

Framing Modern Slavery: A messaging guide – [Modern Slavery PEC | framing, modern, slavery](#)

Training and resources

[Hope for Justice | Hope for Justice Learning Academy | UK online training | Free Modern Slavery Training](#)

[December 2023 NYSCP Masterclass Modern Slavery](#)

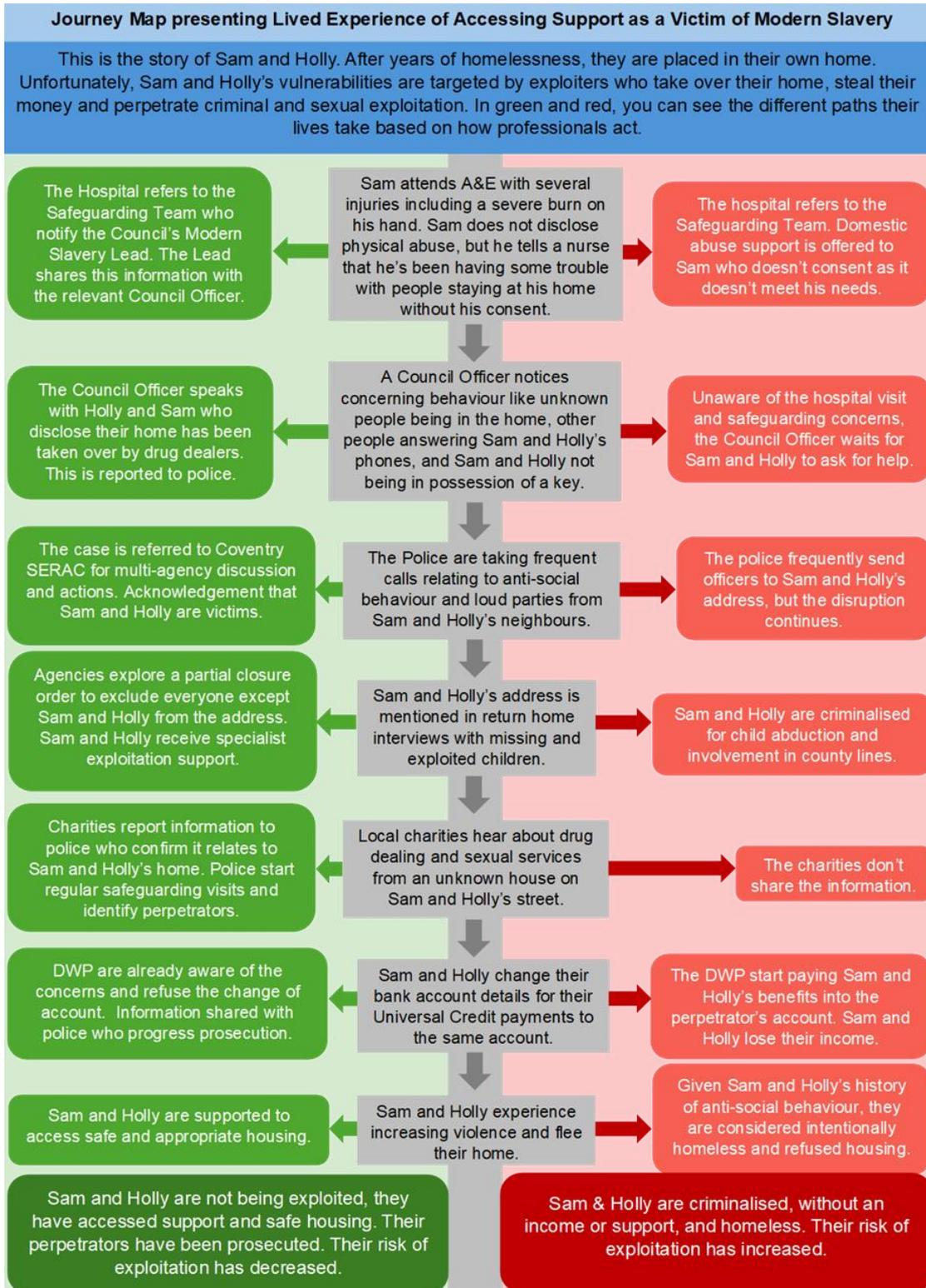
[NYSC Podcast Mythbusting Modern Slavery \(youtube.com\)](#)

[Working Together To Disrupt Child Exploitation In North Yorkshire \(youtube.com\)](#)

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Appendix A



Appendix 2

Glossary

4P approach to modern slavery: The UK Government's strategy which aims to reduce the prevalence of modern slavery in the UK by prioritising four components: prosecuting and disrupting individuals and groups responsible for modern slavery (Pursue); preventing people from engaging in modern slavery crime (Prevent); strengthening safeguards against modern slavery by protecting vulnerable people from exploitation and increasing awareness and resilience against this crime (Protect); and reducing the harm caused by modern slavery through improved survivor identification and enhanced support and protection (Prepare).

Abduction: the act of making a person go somewhere with you using pressure, threats or violence.

Bad faith: An individual may be considered to have claimed to be a survivor of modern slavery in bad faith where they, or someone acting on their behalf, have knowingly made a dishonest statement in relation to being a survivor of modern slavery.

Best practice: professional procedures that are accepted as being most effective.

Coercion: the use of force or intimidation to obtain compliance.

Deception: the act of causing someone to accept as true or valid what is false or invalid.

Duty to Notify (DtN): is the duty placed on public authorities in England and Wales by section 52 of the Modern Slavery Act 2015 to notify the Secretary of State when encountering a potential survivor of Modern Slavery. In practice, this is discharged by informing the Home Office.

European Convention on Human Rights: The Convention protects the right to: life, freedom and security, respect for private and family life, freedom of expression, freedom of thought, conscience and religion, vote in and stand for election, a fair trial in civil and criminal matters, property and peaceful enjoyment of possessions. The Convention prohibits: the death penalty, torture or inhuman or degrading treatment or punishment, slavery and forced labour, arbitrary and unlawful detention, discrimination in the enjoyment of the rights and freedoms secured by the Convention, deportation of a state's own nationals or denying them entry and the collective deportation of foreigners.

Exploitation: Exploitation occurs when an exploiter uses means of control such as the threat or use of force, coercion, abduction, fraud, deception, or an abuse of power or vulnerability to use another person for personal, financial, or commercial

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gain. Exploitation may include sexual exploitation, forced labour, domestic servitude, forced criminality, slavery, financial exploitation, or removal of organs.

First responders: referrals to the NRM can only be made by authorised agencies known as First Responders. First Responders are responsible for identifying potential survivors, gathering information and referring them to the NRM or, in the case of adults, notifying the Home Office if someone does not consent to being referred.

Fraud: is any activity that relies on deception to achieve a gain. Fraud becomes a crime when it is a knowing misrepresentation of the truth.

Gender specific needs: survivors may need access to single sex support and accommodation due to previous trauma associated with a particular gender.

Holistic support: support which treats the whole of someone and not just a part.

Human trafficking: the recruitment, transportation, transfer, harbouring or receipt of people through force, fraud or deception, with the aim of exploiting them for profit.

Immigration Enforcement Competent Authority ('IECA'): is one of the competent authorities that is responsible for making Reasonable Grounds decisions and Conclusive Grounds decisions regarding individuals in the following groups: All adult Foreign National Offenders (FNOs) detained in an Immigration Removal Centre. All adult FNOs in prison where a decision to deport has been made. All adult FNOs in prison where a decision has yet to be made on deportation. Non-detained adult FNOs where action to pursue cases towards deportation is taken in the community. All individuals detained in an Immigration Removal Centre (IRC) managed by the National Returns Command (NRC), including those in the Detained Asylum Casework (DAC) process. All individuals in the Third Country Unit (TCU)/inadmissible process irrespective of whether detained or non-detained.

Independent Child Trafficking Guardians (ICTGs): The ICTG service provides somebody who can speak up on behalf of, and act in the best interests of, the child. The ICTG service model provides two discrete services to children who have been trafficked; ICTG Direct Worker to support children for whom there is no one with parental responsibility for them in the UK and ICTG Regional Practice Co-ordinator whose role is to focus on children who do have a figure with parental responsibility for them in the UK.

Lived Experience Consultants: A lived experience consultant is skilled with the ability to share wisdom and insights they have gained from walking their path in life. They are commissioned to provide input on the impact of an organisation's work on people who have similar experiences to their own.

Lived experience: Personal knowledge about the world gained through direct, first-hand involvement in events rather than through representations constructed by other people.

Modern Slavery Lead: A role within Plymouth City Council with responsibility for developing and implementing the Council's approach to exploitation through various operational and strategic responsibilities.

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Modern slavery statement: Certain commercial organisations must publish an annual statement setting out the steps they take to prevent modern slavery in their business and their supply chains. This is a requirement under section 54 (Transparency in Supply Chains) of the Modern Slavery Act 2015.

Modern slavery: an umbrella term which encompasses all forms of slavery, human trafficking, and exploitation. In all forms of modern slavery an exploiter uses means of control such as the threat or use of force, coercion, abduction, fraud, deception, or an abuse of power or vulnerability to exploit another person for personal, financial, or commercial gain. This exploitation may include sexual exploitation, forced labour, domestic servitude, forced criminality, slavery, financial exploitation, or removal of organs. People who are subjected to modern slavery can be children or adults, of any gender, from all backgrounds, countries, and communities.

National Referral Mechanism (NRM): refers to the UK's framework for identifying and referring potential survivors of modern slavery and ensuring they receive the appropriate support. Consent is required for an adult to be referred to the NRM. If an adult does not consent to enter the NRM, a DtN referral should be completed using the same online process. Adults in England and Wales who are recognised as a potential survivor of modern slavery through the NRM have access to specialist tailored support for a period of at least 30 days while their case is considered.

Perfect victim: is a myth which dictates that victims should be weak or vulnerable and involved in a respectable activity at the time of victimisation.

Police and Crime Board (PCB): Otherwise known as the Community Safety Board, the Police and Crime Board is a requirement within the Crime & Disorder Act 1998. Several agencies were given "Responsible Authority" status that places a statutory duty on them to work together and do all they reasonably can to prevent, detect and reduce crime and nuisance and prevent re-offending. These agencies must work with local businesses and communities to improve the safety of the communities they live and work in.

Priority need: Housing authorities have duties to try and prevent or relieve homelessness for all applicants who are eligible for assistance and are homeless or threatened with homelessness, irrespective of whether they may have a priority need for accommodation. If a housing authority is unable to prevent an applicant from becoming homeless, or to help them to secure accommodation within the 'relief' stage, they are required to reach a decision as to whether the applicant has a priority need for accommodation. Examples of categories of priority need are pregnancy, dependent children, domestic abuse, physical or mental disability, time in care as a child, risk of violence.

Public health: public health contributes to reducing the causes of ill-health and improving people's health and wellbeing through health protection, and health services.

Re-trafficked: Re-trafficking refers to when a survivor of trafficking has been trafficked and/or exploited on more than one occasion.

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Single Competent Authority (SCA): refers to one of the UK's decision-making bodies that is responsible for making Reasonable Grounds decisions and Conclusive Grounds decisions regarding individuals not in the groups covered by the IECA.

Slavery and Exploitation Risk Assessment Conference (SERAC): The purpose of the SERAC is to establish a forum - where suspected or known cases of exploitation/slavery/trafficking can be discussed, in confidence, with an open exchange of information so that a multi-agency plan of action can be developed. The aim of this is to increase effectiveness and co-operation between agencies to result in better service provision, greater protection for survivors and better outcomes and safeguarding interventions for individuals who have been exploited.

Slavery and Trafficking Prevention Orders: STPOs are aimed at those convicted, cautioned, who received a reprimand or final warning in respect of a slavery or human trafficking offence, but cannot be put on trial in the usual way because they are not fit to plead/stand trial. The Court may impose a wide range of restrictions on individuals depending on the nature of the case, if these are necessary to prevent harm associated with slavery or trafficking offences. The Orders are designed so that law enforcement bodies and the Courts can respond flexibly to the risks posed by an individual of committing future modern slavery offences.

Slavery and Trafficking Risk Orders: STROs are aimed at individuals who have not been convicted of a slavery or human trafficking offence but there is a risk of them committing these offences in the future. The Court may impose a wide range of restrictions on individuals depending on the nature of the case, if these are necessary to prevent harm associated with slavery or trafficking offences. The Orders are designed so that law enforcement bodies and the Courts can respond flexibly to the risks posed by an individual of committing future modern slavery offences.

Social capital: the networks of relationships among people who live and work in a particular society, enabling that society to function effectively.

Supply chains: A supply chain is a network of individuals and companies that are involved in creating a product and delivering it to the consumer.

Survivor: someone who has been subjected to modern slavery. Often used to describe someone who has left exploitation. Often interchangeable with the term victim. Some people prefer this term to victim as it is perceived as a more empowering word.

Temporary leave to remain for survivors of slavery or human trafficking: A survivor with a positive conclusive grounds decision and no existing right to remain in the UK is automatically considered for permission to stay. Leave is given based on the survivor needing to receive medical treatment, contribute to a criminal justice process or apply for compensation in the UK. VTS leave does not provide a route to settlement, although longer periods of stay might be considered under the VTS Guidance.

The push and pull factors of exploitation: these factors are what increases someone's risk of being targeted by exploiters. Push factors include war and conflict,

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lack of job opportunities and lack of support network. Pull factors include economic and social stability, the promise of a better life, a sense of belonging.

Threat to public order: applies when the competent authority is satisfied that the individual is a threat to public order and that disqualification from NRM support is appropriate considering the individual recovery needs of the person.

Transition to adulthood: The transition to adulthood is a process that brings childhood to an end and turns the individual into a young adult at the age of 18. This process is characterised by the acquisition of new roles for young people, roles linked to the development of personal autonomy that culminate in their emotional and functional independence.

Trauma-informed support: Trauma-informed support acknowledges the widespread impact of trauma on an individual's neurological, biological, psychological and social development. Trauma informed support aims to help the individual to understand paths for recovery and actively avoid re-traumatisation through multi-agency interventions.

UK Independent Anti-Slavery Commissioner: The Commissioner's role is independent from Government and is to 'encourage good practice sharing' amongst all those with a role to play in tackling every aspect of modern slavery and human trafficking in the UK. The Modern Slavery Act also places a duty on public authorities to co-operate with the Commissioner, share data with their office and comply with requests. The legislation is clear that the Commissioner has no responsibility for or powers over individual cases.

Wider determinants of health: a range of social, economic and environmental factors which impact on people's health. They're also known as social determinants. These factors are influenced by the local, national and international distribution of power and resources which shape the conditions of daily life. They determine the extent to which different individuals have the physical, social and personal resources to identify and achieve goals, meet their needs, and deal with changes to their circumstances.

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Cabinet



Date of meeting:	09 March 2026
Title of Report:	Pride in Place
Lead Member:	Councillor Tudor Evans OBE (Leader)
Lead Strategic Director:	Glenn Caplin-Grey (Strategic Director for Growth)
Author:	Amanda Ratsey, Service Director Team Plymouth
Contact Email:	Amanda.Ratsey@plymouth.gov.uk
Your Reference:	AR_Feb2026
Key Decision:	Yes
Confidentiality:	Part I - Official

Purpose of Report

The purpose of this report is to secure Cabinet approval for the governance, representation and delivery arrangements required to enable Plymouth City Council to mobilise the Pride in Place Programme in line with Government expectations and programme timelines. Specifically, the report seeks approval for Plymouth City Council to act as the Accountable Body, agreement for the Service Director for Team Plymouth to act as the Council's representative for all matters relating to the programme, including signing the Memorandum of Understanding, support in finalising governance structures, endorsing the Regeneration Plan and administering the full funding allocation as the Accountable Body.

The recommendations ensure that Plymouth City Council can meet the expectations set out in Government guidance, including the requirement for the Local Authority to act as the Accountable Body from the outset of the programme. This includes responsibility for grant compliance, financial controls, monitoring, reporting and due diligence

Recommendations and Reasons

1. Agrees that Plymouth City Council will act as the Accountable Body for the Pride in Place Programme and all of its requirements;
2. Delegates authority to the Service Director Team Plymouth to sign all associated contracts, funding agreements, where necessary in consultation with relevant officers, including the s151 Officer and the Monitoring Officer, and approve Pride in Place claims;
3. Agrees to accept and ringfence the capacity funding for Pride in Place and provides delegation to the Service Director Team Plymouth to use the capacity funding in line with government guidance and eligible activities.
4. Delegates authority to the Strategic Director for Growth, in consultation with the Leader, to undertake the necessary recruitment processes for the selection of the Independent Chair and members of the Neighbourhood Board, working in close collaboration with the MP for the area.
5. Agrees that the Service Director Team Plymouth shall act as Plymouth City Council's representative for all matters relating to the Pride in Place Programme.
6. Delegates authority to the Service Director Team Plymouth, to act as the Council's representative, including for the purposes of signing the Pride in Place Memorandum of

Understanding (MoU) and completing any associated documentation required as part of the Council's participation in Pride in Place.

7. Delegates authority to the Service Director Team Plymouth, working in consultation with the MP and the Chair of the Neighbourhood Board to:
 - a. Finalise the boundaries and governance arrangements for the Plymouth Pride in Place Neighbourhood Board
 - b. Ensure appropriate local oversight, community involvement and decision-making structures are established in line with Pride in Place requirements.
8. Delegates authority to the newly appointed Board, once constituted, in consultation with the Service Director Team Plymouth, to develop the Pride in Place Regeneration Plan on behalf of Plymouth City Council, to include public consultation and to submit to Government in line with the Pride in Place guidance.
9. Delegates authority to the Service Director Team Plymouth, in consultation relevant officers, including the S151 Officer and the Monitoring Officer, to review and formally accept the Pride in Place full funding allocation and any associated grant conditions;
10. Delegates authority to the Service Director Team Plymouth to distribute the funding in line with the programme requirements.

Reason:

The Pride in Place programme represents an investment of £19.6m in St Budeaux and £19.6m in Devonport, Morice Town and Mount Wise over the next ten years, supporting neighbourhood-led regeneration and delivery of local priorities.

To ensure timely and compliant mobilisation of the Pride in Place Programme. Delegating authority to the Service Director Team Plymouth enables Plymouth City Council to meet the demanding programme timetable set by Government, including tight deadlines linked to Board establishment, boundary confirmation and Regeneration Plan development.

Government Guidance states that the Local Authority must act as the Accountable Body for the Pride in Place Funding at the start of the programme, with responsibility for ensuring that public funds are distributed fairly and effectively. Therefore, Plymouth City Council must ensure there are appropriate governance structures and controls in place to fulfil this role.

Alternative options considered and rejected

I. Alternative options considered and rejected

Do nothing: This option would mean the Council does not proceed with the Pride in Place programme. As a result, Devonport, Morice Town and Mount Wise and St. Budeaux would lose access to approximately £40 million of government investment, significantly undermining community empowerment and regeneration opportunities. This option was rejected because it would materially disadvantage the neighbourhoods.

Do not delegate authority: key operational and financial decisions would require repeated Executive or Cabinet approvals. Given the scale and pace required for Pride in Place delivery this approach is unworkable in practice. It would create unnecessary bottlenecks, slow down implementation, risk missing government deadlines, and compromise the Council's role as Accountable Body. This option was therefore rejected.

Passporting funding to an external organisation: This option would involve transferring responsibility for managing and delivering the programme to another organisation. It was rejected because the Pride in Place model requires the Council to fulfil Accountable Body duties, including due diligence,

monitoring, assurance and financial oversight. These responsibilities cannot be delegated to an external body under the Pride in Place requirements.

For these reasons, the preferred options are the recommendations that this report is seeking in the above section.

Relevance to the Corporate Plan and/or the Plymouth Plan

The Pride in Place Programme provides long-term investment to improve local infrastructure, public spaces, community wellbeing and social cohesion, with interventions agreed by Neighbourhood Boards. This directly aligns with the Corporate Plan's commitment to trust and engage our communities. The programme also supports a multitude of aims in the Plymouth Plan, particularly within the strategic theme of 'Plymouth as a Healthy City'.

Implications for the Medium Term Financial Plan and Resource Implications:

The Pride in Place programme is fully funded by government grant and therefore does not create a direct budget pressure within the Council's Medium Term Financial Plan.

Financial Risks

This programme is additional grant funding, targeted at a specific local area, for which the council will act as Accountable Body. Officer resource will be required to successfully meet the requirements of the Accountable Body function, programme management and community engagement activity. The council will work with the Neighbourhood Board to explore how the costs for these resources can be met.

Legal Implications

Plymouth City Council, as the proposed Accountable Body for the Pride in Place Programme, will be responsible for ensuring compliance with all terms and conditions set out in the government's Memorandum of Understanding, grant agreements, and any associated guidance. This includes obligations relating to proper use of public funds, financial control, monitoring, reporting, procurement, subsidy control, and audit requirements.

Officers and the proposed Board must ensure that Subsidy Control is considered in consultation with finance and legal officers and that all relevant regulations and legislation is complied with to the satisfaction of the s151 Officer and the Monitoring Officer.

Acting as Accountable Body establishes a legal duty for the Council to:

Ensure that grant funds are administered, spent and recorded in accordance with government conditions and applicable legislation.

Maintain appropriate governance, assurance, and oversight arrangements to mitigate the risk of financial mismanagement or non-compliance.

Carry out due diligence on the Neighbourhood Board and any delivery partners receiving funding.

Ensure that recruitment of the Independent Chair and Board members complies with constitutional, governance and probity requirements, including joint appointment with the Member of Parliament.

Entering into funding agreements and issuing onward agreements to delivery partners will create binding contractual obligations. Any breach of grant conditions or failure to comply with monitoring and reporting requirements may result in clawback of funding or other sanctions.

The delegation of authority to the Service Director Team Plymouth and the Strategic Director for Growth is lawful under the Council's Constitution, provided that decisions taken under delegated powers remain within the scope of the authority granted and are recorded appropriately.

Carbon Footprint (Environmental) Implications:

No direct environmental implications, however, a full CIA will be completed in line with guidance on Key Decisions.

Other Implications: e.g. Health and Safety, Risk Management, Child Poverty:

* When considering these proposals members have a responsibility to ensure they give 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.

An Equalities Impact Assessment has been completed for this programme.

Appendices

*Add rows as required to box below

Ref.	Title of Appendix	Exemption Paragraph Number (if applicable) <i>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.</i>						
		1	2	3	4	5	6	7
A	Pride in Place							
B	Equalities Impact Assessment							
C	Climate Impact Assessment							

Background papers:

*Add rows as required to box below

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.

Title of any background paper(s)	Exemption Paragraph Number (if applicable) <i>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.</i>						
	1	2	3	4	5	6	7

Sign off:

Fin	DN.2 5.26. 026	Leg	LS/0 0003 010/ 11/L B/26/ 2/26	Mon Off		HR		Asset s		Strat Proc	
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Originating Senior Leadership Team member: Glenn Caplin-Grey (Strategic Director for Growth)

Please confirm the Strategic Director(s) has agreed the report? Yes

Date agreed: 26/02/2026

Cabinet Member approval: *Councillor Tudor Evans OBE (Leader)*

Date approved: 26/02/2026

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PRIDE IN PLACE

Background Paper



This briefing draws upon the guidance issued by MHCLG on 3rd December 2025. Full details can be found here:

[Pride in Place Programme prospectus - GOV.UK](#)

[Pride in Place Programme: funding profiles and timelines - GOV.UK](#)

[Pride in Place Programme: governance and boundary guidance - GOV.UK](#)

[Pride in Place Programme: list of indicative interventions - GOV.UK](#)

[Pride in Place Programme: Pride in Place Plans - GOV.UK](#)

[Pride in Place Programme: monitoring guidance - GOV.UK](#)

The content of the briefing does not cover every aspect of the guidance, it picks out the key areas to support roll out of the programme from early in 2026.

Purpose of the Programme

The Pride in Place Programme is a government initiative designed to empower local communities to shape and improve their neighbourhoods. It provides up to £20 million per area over 10 years, supporting regeneration and community-led decision-making. In Plymouth, the two areas selected to participate in the programme are St Budeaux and Devonport, Mount Wise and Morice Town. These places have been selected using a national methodology that identified the most disadvantaged areas in the country.

There are 3 strategic objectives of the funding:

1. Stronger communities

Tackle the root causes of social division by rebuilding relationships, restoring a collective sense of belonging, and bringing people together so they feel proud of their area and safe in their neighbourhood.

2. Thriving places

Revitalise high streets and neighbourhoods and encourage the design of public services that are tailored to local needs, accessible, responsive, and effective in tackling health and social inequalities.

3. Taking back control

Empower people to have a greater say in shaping their local area and to feel more in control of their lives.

Governance and Roles

Neighbourhood Boards

Neighbourhood Boards will be established to lead the development of a 10-year vision and 4-year investment plan for each area. These Boards are designed to:

- Be predominantly resident led (at least 51%) of members should live or work within the boundaries of the neighbourhood)
- Reflect the diversity of each community
- Strengthen accountability and local voice
- Drive continuous community engagement

The Boards will be led by an Independent Chair, appointed and approved by the local MP and local authority. The Chair should be someone who is 'from' the area, i.e. living or working, holds a prominent role in the community or has a passion for the place, such as the head of a local charity, a local GP or a teacher. The Chair, supported by the local authority and the local MP, will then lead the process of recruiting and convening the Board.

Boards must include the local MP and at least one ward councillor, other representatives may include

- Community leaders, local charities, organisers and activists
- Local businesses and social enterprises
- Cultural, arts, heritage and sporting organisations
- Public agencies and anchor institutions, such as local schools or GPs from local practices

Boards will operate transparently, meeting quarterly and publicly sharing their governance, discussions, and decisions to ensure community trust.

Community

The guidance is clear on the importance and centrality of the community in decision making. The Boards must be diverse and represent the full breadth of their community. They will lead organising and be responsible for the pro-active and ongoing engagement with the community to ensure they hear from everybody, including groups who have been marginalised or whose voices are less often heard. It must be 'deep, broad and sustained'. This includes considering how local community organisations can be used to help deliver engagement. Boards will work with the new Communities Delivery Unit to ensure plans are robust and reflective of best practice, through the new Network for Neighbourhoods.

It is expected that community engagement doesn't stop at the submission of the regeneration plan, and MHCLG expect evidence of long-term neighbourhood level discussions to continue throughout the lifetime of the project.

Local Authorities

- Agree and appoint the Independent Chair with the MP. The Local Authority is responsible for conducting due diligence when appointing.
- Provide the Accountable Body function for the funding:
 - Ensure compliance with key principles and laws (Nolan Principles, Equality Act, Managing Public Money, Subsidy Control and Procurement Act 2023).

- Manage grant funding as Accountable Body and provide First Line Assurance of financial management through S151.
- Act as the Accountable Body for the first three years of the programme, then support the transition of Boards to sustainable, community-led delivery models (such as co-operatives or charities) by year three of the programme. The default position is the local authorities remain as Accountable Body, but the Board can change this with the agreement of MHCLG.
- Fulfil monitoring and reporting requirements for the funding
- Support Boards in setting up robust governance and management systems, including a Terms of Reference and transparency requirements. Provide advice on legal obligations, such as impact assessments, declarations of interests, or other processes board members may be less familiar with.
- Facilitate the development and delivery of the Plan, whilst recognising Boards as the decision-making forum.
- Develop processes for meaningful community involvement.

Funding model and delivery

Plymouth will receive a total of £19.6m over 10 years, which is 63% capital and 37% revenue.

Grant type (£m)	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	Total
Cap funding	0	0.12	0.67	1.46	1.46	1.46	1.46	1.46	1.46	1.46	1.46	12.43
Rev funding	0.15	0.27	0.69	0.69	0.77	0.77	0.77	0.77	0.77	0.77	0.77	7.17
Total	0.15	0.39	1.36	2.15	2.23	2.23	2.23	2.23	2.23	2.23	2.23	19.6

The programme enables communities to select local priorities from a wide menu of eligible interventions, including:

- Improving local facilities and spaces
- Supporting health and wellbeing services.
- Enhancing youth and family provision.
- Investing in skills, culture, and local identity.
- Strengthening safety, cohesion, and resilience.

Boards are expected to undertake deep and sustained engagement with residents to ensure investment aligns with community priorities.

The early capacity payment of £150,000 in 2025/26 is intended for setup costs e.g. staffing, board set up, community engagement and Pride in Place plan development.

Key Dates

1 April 2026: Start of delivery phase; first delivery funding payment; 50% up front, 50% on approval of Pride in Place Plan.

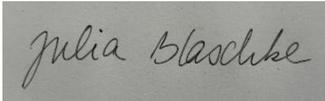
17 July 2026: Boards confirm membership and any changes to area boundaries.

Autumn 2026: Membership and boundaries reviewed and confirmed by MHCLG

28 November 2026: Boards submit their Pride in Place Plans to MHCLG for approval.

EQUALITY IMPACT ASSESSMENT – PRIDE IN PLACE PROGRAMME

SECTION ONE: INFORMATION ABOUT THE PROPOSAL

Author(s): The person completing the EIA template.	Kezia Lock	Department and service:	Economic Development	Date of assessment:	03.02.2026
Lead Officer: Head of Service, Service Director, or Strategic Director.	Julia Blaschke, Head of Economy and Enterprise	Signature:		Approval date:	26.02.2026
Overview:	Pride in Place is a 10-year national regeneration and community empowerment programme, providing up to £20m per neighbourhood. Plymouth has two participating neighbourhoods: Devonport, Mount Wise & Morice Town and St Budeaux. The programme focuses on strengthening communities, improving local places, and giving residents genuine power in decision-making. The interventions/ projects will be decided by Neighbourhood Boards, supported and advised by PCC.				
Decision required:	All decisions relating to the Pride in Place Programme currently stated in the Cabinet Decision report dated 25.02.2026.				

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	X	No	
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	X	No	

<p>If you do not agree that a full equality impact assessment is required, please set out your justification for why not.</p>	
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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
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<p>Age</p>	<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>Both selected neighbourhoods experience higher deprivation, affecting younger families and older people disproportionately.</p>	<ul style="list-style-type: none"> • Risk of under-representation of younger people and older residents in Board membership or engagement activities. • Investment decisions may not meet the needs of children/young people or older people if not deliberately included. 	<p>The Pride in Place Programme has significant potential to advance equality, strengthen community voice, and reduce long-standing inequalities in two of Plymouth’s most disadvantaged neighbourhoods. Early attention to representation, accessible engagement, and inclusive design is essential to ensure benefits are shared equitably and no group is left behind.</p> <p>Decisions on funding interventions will be made by Neighbourhood Boards. Boards must include a majority of members who live or work within the neighbourhood and should broadly reflect the full diversity of local people in terms of age, ethnicity, gender, faith, disability and income</p>	<p>St Budeaux Neighbourhood Board and Devonport, Morice Town and Mount Wise Neighbourhood Board</p>
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		<p>levels. This requirement is embedded directly in the governance guidance, which states that Boards should be convened by an Independent Chair and must bring together residents, community organisations, local businesses, public services and elected representatives in a way that ensures decisions are shaped by grassroots priorities and local lived experience. PCC will ensure chair recruitment emphasises inclusive leadership and importance of creating an environment that people feel safe to participate in.</p> <p>PCC will support the Neighbourhood Boards in embedding a data driven approach and ensuring they have a strong evidence base to inform decisions, including data relating to</p>	
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			<p>EDI protected characteristics.</p> <p>In addition, the programme will encourage accessible engagement formats.</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 aged 21 to 24 who could return for support from services if they wished to.</p>	<ul style="list-style-type: none"> • Risk of care experienced in Board membership or engagement activities. • Investment decisions may not meet the needs of care experienced individuals if not deliberately included. 	<p>As above.</p>	<p>St Budeaux Neighbourhood Board and Devonport, Morice Town and Mount Wise Neighbourhood Board</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>	<ul style="list-style-type: none"> • Risk of under-representation of people with a disability in Board membership or engagement activities. • Investment decisions may not meet the needs of disabled people if not deliberately included. 	<p>As above</p> <p>In addition, encourage adjustments for additional needs.</p>	<p>St Budeaux Neighbourhood Board and Devonport, Morice Town and Mount Wise Neighbourhood Board</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>	<ul style="list-style-type: none"> • Risk of under-representation of trans or non-binary people in Board membership or engagement activities. • Investment decisions may not meet the needs of trans or non-binary people if not deliberately included. 	<p>As above</p>	<p>St Budeaux Neighbourhood Board and Devonport, Morice Town and Mount Wise Neighbourhood Board</p>

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>	N/A	N/A	St Budeaux Neighbourhood Board and Devonport, Morice Town and Mount Wise Neighbourhood Board
Pregnancy and maternity	<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>	<ul style="list-style-type: none"> Barriers to participation for pregnant women or women with babies 	Make adjustments for flexible participation	St Budeaux Neighbourhood Board and Devonport, Morice Town and Mount Wise Neighbourhood Board
Race	<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>	<ul style="list-style-type: none"> Risk of under-representation in Board membership or engagement activities. 	<p>As above</p> <p>Additional adjustments for foreign language speakers will be encouraged as necessary.</p>	St Budeaux Neighbourhood Board and Devonport, Morice Town and Mount Wise Neighbourhood Board

<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>	<ul style="list-style-type: none"> • Risk of under-representation of different faith groups in Board membership or engagement activities. • Investment decisions may not meet the needs of different faith groups if not deliberately included. 	<p>As above</p> <p>Additional adjustments will also be encouraged such as avoiding major religious holidays when scheduling activities.</p>	<p>St Budeaux Neighbourhood Board and Devonport, Morice Town and Mount Wise Neighbourhood Board</p>
<p>Sex</p>	<p>51 per cent of our population are women and 49 per cent are men (2021 Census).</p>	<p>Women disproportionately have childcare responsibilities that may be a barrier.</p>	<p>As above</p> <p>Encourage flexible meeting times and childcare-supportive approaches.</p>	<p>St Budeaux Neighbourhood Board and Devonport, Morice Town and Mount Wise Neighbourhood Board</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>	<ul style="list-style-type: none"> • Risk of under-representation of different sexual orientations in Board membership or engagement activities. • Investment decisions may not meet the needs of different groups if not deliberately included. 	<p>As above</p>	<p>St Budeaux Neighbourhood Board and Devonport, Morice Town and Mount Wise Neighbourhood Board</p>
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SECTION FOUR: HUMAN RIGHTS IMPLICATIONS

Human Rights	Implications	Mitigation Actions	Timescale and responsible department
<p>Right to Participate in Public Life</p>	<p>Strongly engaged through community-led Boards; risk of exclusion if barriers not addressed.</p>	<p>Inclusive recruitment, accessible engagement methods encouraged.</p>	<p>Ongoing</p> <p>St Budeaux Neighbourhood Board and Devonport, Morice Town and Mount Wise Neighbourhood Board</p>
<p>Right to Non-Discrimination</p>	<p>Programme operates in disadvantaged neighbourhoods with inequalities.</p>	<p>Emphasis of Boards and engagement activities as inclusive environments that feel safe to participate in.</p>	<p>Ongoing</p> <p>St Budeaux Neighbourhood Board and Devonport, Morice Town and Mount Wise Neighbourhood Board</p>

Right to Privacy	Engagement activities must protect personal data.	GDPR-compliant processes; trained staff.	Ongoing St Budeaux Neighbourhood Board and Devonport, Morice Town and Mount Wise Neighbourhood Board
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SECTION FIVE: OUR EQUALITY OBJECTIVES

Equality objectives	Implications	Mitigation Actions	Timescale and responsible department
Work together in partnership to: <ul style="list-style-type: none"> ▪ promote equality, diversity and inclusion ▪ facilitate community cohesion ▪ support people with different backgrounds and lived experiences to get on well together 	High opportunity to advance inclusion through resident-led Boards.	Inclusive recruitment; transparent decision-making; ongoing engagement.	Ongoing St Budeaux Neighbourhood Board and Devonport, Morice Town and Mount Wise Neighbourhood Board
Give specific consideration to care experienced people to improve their life outcomes, including access to training, employment and housing.	Project decisions will be made by the Boards but indicative interventions could support training, employment and housing pathways for care experienced people.	Partner with relevant services; ensure representation.	Ongoing St Budeaux Neighbourhood Board and Devonport, Morice Town and Mount Wise Neighbourhood Board
Build and develop a diverse workforce that represents the community and citizens it serves.	Internal workforce not directly affected.	Equalities training for board members; encourage reflective practice.	Ongoing St Budeaux Neighbourhood Board and Devonport, Morice Town and Mount Wise Neighbourhood Board

<p>Support diverse communities to feel confident to report crime and anti-social behaviour, including hate crime and hate incidents, and work with partners to ensure Plymouth is a city where everybody feels safe and welcome.</p>	<p>Project decisions will be made by the Boards but indicative interventions could support safety in the community.</p>	<p>Safeguarding will be a key part of board training.</p>	<p>Ongoing</p> <p>St Budeaux Neighbourhood Board and Devonport, Morice Town and Mount Wise Neighbourhood Board</p>
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Pride in Place Programme

Project details

Assessment author

Kezia Lock

Project summary

The Pride in Place Programme is a government initiative designed to empower local communities to shape and improve their neighbourhoods. It provides up to £20 million per area over 10 years, supporting regeneration and community-led decision-making. In Plymouth, the two areas selected to participate in the programme are St Budeaux and Devonport, Mount Wise and Morice Town. These places have been selected using a national methodology that identified the most disadvantaged areas in the country.

There are 3 strategic objectives of the funding:

1. Stronger communities

Tackle the root causes of social division by rebuilding relationships, restoring a collective sense of belonging, and bringing people together so they feel proud of their area and safe in their neighbourhood.

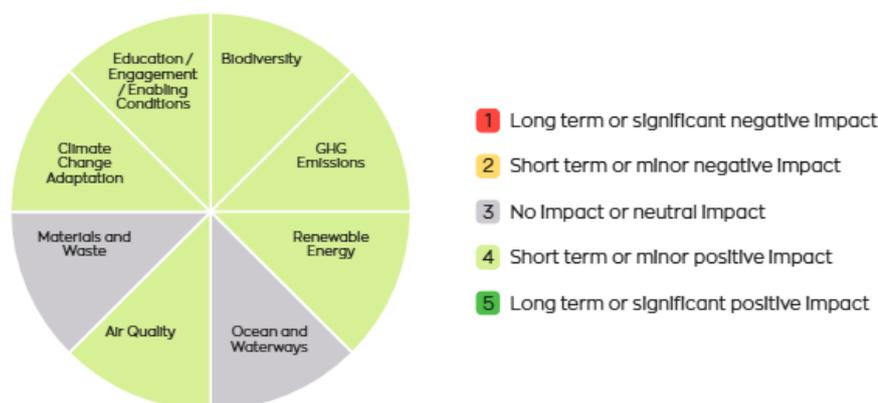
2. Thriving places

Revitalise high streets and neighbourhoods and encourage the design of public services that are tailored to local needs, accessible, responsive, and effective in tackling health and social inequalities.

3. Taking back control

Empower people to have a greater say in shaping their local area and to feel more in control of their lives.

Summary of assessment



The outputs are dependant on the Regeneration Plan which is yet to be developed. As stated, decision making power is devolved to the Neighbourhood Boards in consultation with the community. The projects stated above are purely suggestions taken from government guidance, they serve as ideas but will not necessarily form part of the Regeneration Plan.

Assessment scores

Biodiversity

Score

(4) Short term or limited positive impact

Score justification

Decision making in Pride in Place is devolved to the community, therefore Neighbourhood Boards will be deciding how and what they can deliver. The Government has provided a list of interventions that indicates ideas for spend. One of the suggested themes for delivery is "creating and improving green spaces, community gardens, watercourses and embankments in the local area, along with incorporating natural features into wider public spaces". Projects could include urban tree planting, or development of a new community garden. Once a Regeneration Plan is developed and projects are brought forwards, consideration will be given to any negative consequences on biodiversity and mitigation measures will be identified.

GHG Emissions

Score

(4) Short term or limited positive impact

Score justification

Decision making in Pride in Place is devolved to the community, therefore Neighbourhood Boards will be deciding how and what they can deliver. The Government has provided a list of interventions that indicates ideas for spend. One of the suggested themes for delivery is "support for non-domestic energy efficiency measures and decarbonisation in local businesses, high streets and community infrastructure". Projects could include support grants for local businesses to upgrade current infrastructure. Once a Regeneration Plan is developed and projects are brought forwards, consideration will be given to any negative consequences on greenhouse gas emissions and mitigation measures will be identified at the project planning stage.

Renewable Energy

Score

(4) Short term or limited positive impact

Score justification

Decision making in Pride in Place is devolved to the community, therefore Neighbourhood Boards will be deciding how and what they can deliver. The Government has provided a list of interventions that indicates ideas for spend. As with above, one of the suggested themes for delivery is "support for non-domestic energy efficiency measures and decarbonisation in local businesses, high streets and community infrastructure". Projects could include support grants for local businesses to upgrade current infrastructure (including to renewables).

Ocean and Waterways

Score

(3) No impact or neutral impact



Score justification

We don't anticipate any of the projects that fall out of the Pride in Place Programme to affect water quality or increase pollution.

Air Quality

Score

(4) Short term or limited positive impact

Score justification

Decision making in Pride in Place is devolved to the community, therefore Neighbourhood Boards will be deciding how and what they can deliver. The Government has provided a list of interventions that indicates ideas for spend. One of the suggested themes for delivery is "support for active travel enhancements in the local area", "improving local bus services", or "improvements to local road networks". Projects therefore may impact travel routes. Once a Regeneration Plan is developed and projects are brought forwards, consideration will be given to any negative consequences such as reduced air quality and mitigation measures will be identified at the project planning stage.

Materials and Waste

Score

(3) No impact or neutral impact

Score justification

Reducing waste is not in the scope of this programme, larger capital projects will be managed and due consideration will be given to resource and waste management as part of this service.

Climate Change Adaptation

Score

(4) Short term or limited positive impact

Score justification

Decision making in Pride in Place is devolved to the community, therefore Neighbourhood Boards will be deciding how and what they can deliver. The Government has provided a list of interventions that indicates ideas for spend. One of the suggested themes for delivery is "enhance community resilience to natural hazards, such as flooding". Projects could include updating existing defences, or organising flood kits for emergencies. The project is not anticipated to have any negative impact on heat islands or flooding risk.

Education / Engagement / Enabling Conditions

Score

(4) Short term or limited positive impact

Score justification

Decision making in Pride in Place is devolved to the community, therefore Neighbourhood Boards will be deciding how and what they can deliver. The Government has provided a list of interventions that indicates ideas for spend.



One of the suggested themes for delivery is "provide healthy and climate-resilient homes". Projects could include domestic water saving features, or fitting property flood resilience measures in homes at risk of flooding. Education could form an element of this.

Cabinet



Date of meeting:	09 March 2026
Title of Report:	Parking Services Annual Review and Proposed Updates 2026/27
Lead Member:	Councillor John Stephens (Cabinet Member for Strategic Planning and Transport)
Lead Strategic Director:	Glenn Caplin-Grey (Strategic Director for Growth)
Author:	Mike Artherton (Group Manager - Parking, Marine and Garage Services)
Contact Email:	mike.artherton@plymouth.gov.uk
Your Reference:	PSAR2627
Key Decision:	Yes
Confidentiality:	Part I - Official

Purpose of Report

This report outlines a suite of amendments to parking as part of a plan that seeks to balance improvements in service delivery and enhance customer experience while responding to the significant challenges relating to increasing costs of delivering services alongside resources needed to set a balanced budget for 2026/27 and the need to maintain levels of income critical to the delivery of key services.

Recommendations and Reasons

1. To agree to the following:
 - 1.1. To apply parking charges to all motor vehicles in Council car parks, as set out within section 5.4, ensuring a consistent approach across all chargeable parking bays.
 - 1.2. To remove cash payments once the On Street payment system upgrades are complete, as set out within section 5.7, improving customer experience through greater payment choice, ensuring consistency across all parking locations, and reducing CO₂ emissions linked to cash collection and processing.
2. To agree to implement the following changes not less than 21 days following publication of these changes through a Notice of Variation:
 - 2.1. Increase on-street parking charges, as set out in section 5.2 and Appendix D, to align more closely with other councils and meet rising service delivery costs.
 - 2.2. Increase off-street parking fees, as set out in section 5.4 and Appendix E, to ensure charges remain comparable with other councils and support rising service costs.

2.3. Increase parking permit fees, as set out in sections 5.8, 5.9 and Appendix F, to meet the rising costs of maintaining schemes and encourage more sustainable travel choices in line with the Council's Net Zero Action Plan.

3. To agree to undertake statutory consultation on the following proposals:

3.1. Introduce coastal car park charges at Jennycliff, Mountbatten and Strand Street, as set out within section 5.5 and Appendix C, to ensure a more consistent approach while maintaining support for short-stay visitors.

3.2. Introduce charges for Blue Badge holders on the Hoe Promenade, as set out within section 5.6 and Appendix E, to ensure a fair and consistent charging approach across all car parks.

Alternative options considered and rejected

Not increase fees and charges.

The proposals have been considered fully by officers considering benchmarking and the need to achieve cost recovery and maintain levels of income critical to the delivery of key services. Fees are proposed at the level considered appropriate in light of this and the substantial shortfall in resources needed to set a balanced budget for 2026/27. The option of setting no increase has been rejected on the basis it would not achieve cost recovery, and/or may affect the viability of services.

Relevance to the Corporate Plan and/or the Plymouth Plan

The report is fundamentally linked to delivering the priorities within the Council's Corporate Plan. Allocating limited resources to key priorities will maximise the benefits to the residents of Plymouth, and links directly to 'providing quality public services', and 'spending money wisely'.

Implications for the Medium Term Financial Plan and Resource Implications:

Robust and accurate financial monitoring underpins the Council's Medium Term Financial Plan (MTFP). The Council's MTFP is updated based upon on-going monitoring information, both on a local and national context. Any adverse variations from the annual budget will place pressure on the MTFP going forward and require additional savings to be generated in future years.

Financial Risks

In relation to increases in charges there is some risk that proposed increases will impact customer demand and choice. Fees are proposed at the level considered appropriate in light of benchmarking and the need to generate income critical to the continued delivery of key services, as such the impact of the increases, if approved, will be monitored and amendments sought as necessary.

It is expected that this decision will generate a maximum amount of additional income of £1.443M.

Legal Implications

The proposals set out within this report are required to follow statutory processes which are set out within this report.

Carbon Footprint (Environmental) Implications:

If approved, the proposals within this report will reduce the Council's carbon footprint by 8,000kg CO₂ and encourage the use of more sustainable travel, aligned to the Council's ambitions around the environment and sustainability including actions within the Net Zero Action Plan

Other Implications: e.g. Health and Safety, Risk Management, Child Poverty:

* When considering these proposals members have a responsibility to ensure they give 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.

Appendices

*Add rows as required to box below

Ref.	Title of Appendix	Exemption Paragraph Number (if applicable) 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.						
		1	2	3	4	5	6	7
I	Briefing Report – Parking Services Annual							
A	On Street Benchmarking							
B	Off Street Benchmarking							
C	Coastal Car Parks Benchmarking							
D	On Street Proposals							
E	Off Streets Proposals V2							
F	Permit Proposals							
G	EIA Parking Modernisation February 2026 V2							

Background papers:

*Add rows as required to box below

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.

Title of any background paper(s)	Exemption Paragraph Number (if applicable) 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.						
	1	2	3	4	5	6	7

Sign off:

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Originating Senior Leadership Team member: Andy Sharp, Interim Service Director for Street Services

Please confirm the Strategic Director(s) has agreed the report? Yes

Date agreed: 23/02/2026

Cabinet Member approval: Councillor John Stephens (Cabinet Member for Strategic Planning and Transport)

Date approved: 26/02/2026

PARKING SERVICES ANNUAL REVIEW AND PROPOSED UPDATES 2026/27

1. EXECUTIVE SUMMARY

1.1. This report outlines a suite of amendments to parking as part of a plan that seeks to balance improvements in service delivery and enhanced customer experience while responding to challenges relating to increasing costs of delivering services alongside the need to maintain levels of income critical to the delivery of key services.

1.2. The proposals and changes set out within this report have been developed in alignment to our corporate values: -

- **Democracy** – Because we listen and hear what people want
- **Responsibility** – Because we care about the impact of our decisions and actions
- **Fairness** – Because we want to address inequality and inequity in our city
- **Co-operation** – Because we achieve more together than we would alone

1.3. The proposals directly support the priorities within the Council's Corporate Plan, notably *providing quality public services* and *spending money wisely*. They also contribute to cleaner, greener streets and transport by ensuring services remain financially sustainable.

2. BACKGROUND

2.1. A range of changes came into effect in April 2025 as part of the Parking Modernisation Plan, including fee increases in response to rising service costs, protecting disabled driver provision, and maintaining charges more in line with other cities.

3. CURRENT POSITION

3.1. Since April 2023, the Council has continued to improve parking standards and customer experience through:

- 3.1.1. Delivering over 400 extra wide bays across city centre car parks making it is easier for visitors and shoppers to park.
- 3.1.2. Extended EV charging across city car parks greatly increasing access to charging facilities and encouraging the use of more sustainable cars
- 3.1.3. Committed an investment of £180k to upgrade and replace On Street payment systems, having already expanded payment choice and accessibility

through introducing debit/credit, contactless, Apple and Android payments options On Street within the West End.

- 3.1.4. Supporting shoppers and visitors through extending the time motorists can park On Street from one to three hours across city centre locations and from three to five hours in shopper's car parks.
- 3.1.5. Supporting a safer shopping experience through the delivery of the Public Space Protection Order and enhanced security across city car parks, including the installation of a new and extensive CCTV system throughout the popular Western Approach car park.
- 3.1.6. Supporting businesses in the delivery of goods and services through enabling business permit use within the permitter road of Marks and Spencer's car park.
- 3.1.7. We strengthened road safety around schools by investing in two dedicated school enforcement officers and expanding the use of mobile enforcement cameras, focusing on locations with the greatest need.

Regional and National Context

- 3.2. To better understand current trends and markets, benchmarking was undertaken in September 2025 with twenty-six other councils as part of the 'Key Cities' group in relation to On Street and off-street parking (*Bournemouth, Brighton, Birmingham, Bristol, Blackpool, Cambridge, Canterbury, Cardiff, Cornwall, Coventry, Derby, Doncaster, Exeter, Liverpool, Manchester, Newcastle, Norwich, Nottingham, Oxford, Poole, Portsmouth, Reading, Southampton, Torbay, Wolverhampton and Worcester*).
- 3.3. Councils were contacted again in January 2026 where some councils indicated that they were undertaking processes to review charges for 2026/27; however, they could not share further details ahead of undertaking the required statutory processes and consultations.
- 3.4. Benchmarking of On Street charges (Appendix A) was undertaken using the average of the highest and lowest fees for an hour stay. Plymouth was shown to be lower than eleven (44%), and greater than fourteen (56%) of Councils (figure 1.1).

Figure 1.1 – Summary of Benchmarking for On Street Charge

Councils Higher than Plymouth		Councils Lower than Plymouth		Councils Same as Plymouth	
11	44%	14	56%	0	0%

- 3.5. The structure and charges for Off Street charges often vary greater than those of On Street charges, therefore benchmarking of off-street charges (Appendix B) was

undertaken using the average of the highest and lowest fees for a two hour stay and an above four hours (all day) stay.

Figure 1.2 – Summary of Benchmarking for Off Street Charges

Stay (Hours)	Councils Higher than Plymouth		Councils Lower than Plymouth		Councils not offering this Option	
	Count	Percentage	Count	Percentage	Count	Percentage
2	22	85%	4	15%	0	0%
Over 4	20	77%	5	19%	1	4%

- 3.6. The benchmarking identifies Plymouths parking fees to be lower than most other councils benchmarked and, in the case of Off Street charges, some of the lowest charges of all the councils. Whilst it is understood that increases to fees and charges are not often welcome, the benchmarking highlights a clear gap between Plymouths fees and those of other cities and where other councils are equally undertaking reviews to set fees and charges for 2026/27. This presents an opportunity to review Plymouth parking fees, to better align with other councils and in maintaining our commitment for continuous improvement and enhanced customer experience.

4. CHALLENGES AND OPPORTUNITIES

On Street Parking

- 4.1. There is an opportunity to review On Street charges in response to rising operational costs and to align more closely with other councils. To support motorists there is also scope to raise awareness that unused time purchased at one On Street location can be used at others.

Off Street Car Parking

- 4.2. There is an opportunity to review Off Street charges to reflect increased delivery costs, align with other councils, and promote the use of remaining parking time across eligible sites. As an example, motorists visiting the city centre Theatre Royal car park can use any remaining parking time to visit the waterfront parking within the Elphinstone car park.
- 4.3. Motorbikes are free to use car parks and in doing so occupy spaces otherwise available to four-wheel vehicles. Whilst not exempt from charges within Plymouths traffic orders, motorbikes have historically not paid due to previous impracticalities of placing pay and display tickets on bikes. With modern ticketless technology, there is an opportunity to require all motor vehicles to pay when occupying pay and display parking bays.

Coastal Car Parks

- 4.4. The Council operates several parking locations that support leisure activities, including Jennycliff, Mountbatten and Strand Street. While defined as car parks, sites such as Jennycliff and Mountbatten are not traditional, tarmac surfaced car parks but informal parking areas similar to those found at other coastal locations. All are currently free to use; however, many comparable coastal car parks not owned by the Council apply charges (Appendix C). There is an opportunity to explore introducing charges for these facilities, generating revenue to help support the continued delivery of key services.

Parking Permits

- 4.5. Permits were last subject to increases in April 2025 recognising the cost of delivering these services has increased. The Council is not permitted to use permit fees to drive net income; however, permit fees are set to meet the costs associated with administering and managing the city's permit schemes; therefore, there is an opportunity to review permit fees and charges.
- 4.6. Over the years, rises in car ownership has created increasing pressures within residential permit areas, where it is simply not possible to build new roads or provide additional On Street parking to accommodate the growing number of vehicles. While the Council does not limit the number of permits a household may obtain, the existing policy aims to reduce parking pressures by preventing non permit holders, such as commuters, from using residents' streets. There is now an opportunity to consider options that would help disincentivise multiple car ownership, supporting the Council's commitments to environmental sustainability and helping to ease parking pressures in situations where multiple vehicles are registered to a single address and to promote the use of sustainable travel options.

Blue Badge Parking

- 4.7. The Council provides a range of services to support persons with disabilities, these include dedicated disabled parking On Street and in car parks, and residential disabled persons parking spaces to support persons with disabilities access their homes.
- 4.8. The Council previously introduced dedicated Blue Badge holder parking on the Hoe Promenade to provide additional support for people with disabilities. This provision has been extremely popular and was expanded to increase capacity. Maintaining this dedicated facility costs the Council £35k per year, due to the need to restrict access to Blue Badge holders only. In all other city centre car parks, Blue Badge use is regulated through traffic orders, and charges apply in line with standard arrangements. The Council has also received reports that vehicles

are parking for extended periods consistent with commuter use, which is not the intended purpose of this dedicated facility.

Payment for Parking

- 4.9. The Council currently has an inconsistent approach to how people can pay for their parking, particularly between On Street and Off Street locations, where car parks have operated cashless since 2020:
- In car parks customers have the choice of debit/credit, contactless, Apple pay, Android pay, RingGo (mobile app, website or phone call). Cash is not an option.
 - On Street customers have the choice of cash payment or RingGo (mobile app, website or via a phone call)
- 4.10. The Council has committed to invest £180k to upgrade and replacing ageing On Street payment systems through an approved capital programme. The new machines will provide a much broader and more inclusive range of payment options, debit, and credit card, contactless, Apple Pay, Android Pay and RingGo (web, app and phone), ensuring consistency between On Street and Off Street payment methods. There is an opportunity to ensure complete consistency in parking payments by removing cash as an option following the upgrades.
- 4.11. In 2024/25, cash payments for parking services accounted for only 3% of all parking transactions (£300k compared with total income of £9.8m). Over 84% of customers paying to park On Street chose to do so via RingGo. While cashless payments offer convenience, the use of cash for On Street parking has also become less practical as parking costs have increased, due to the number of coins required.

5. PROPOSALS

On Street Parking

- 5.1. It is proposed to revise On Street parking charges to bring Plymouth's fees more in line with those of other councils and to respond to increasing service delivery costs, ensuring income levels remain sufficient to support the provision of key services.
- 5.2. It is proposed to (Appendix D) increase the hourly rate of parking to **£2.80 per hour** and promote the ability for motorists to use any remaining parking time in other On Street locations. This approach provides a balanced response between the need to maintain income critical to supporting the delivery of key services, while also supporting motorists who wish to visit more than one location during the same parking session.

Off Street Car Parking

5.3. It is proposed to revise off-street charges to:

- Bring Plymouth's parking fees in line with those of other councils and maintain levels of income critical to the delivery of key services.
- Maintain the current strategy to incentivise longer stays in the city centre by offering greater value through longer stay tariffs.
- Maintain Western Approach tariffs as a value parking proposition supporting shoppers, visitors, and employees in the city centre
- Support shoppers and visitors by promoting the ability to use remaining parking time in other locations.
- Adopt a consistent approach to charges

5.4. To achieve this, it is proposed to amend the schedule of charges as set out within the schedule of Off-Street charges to this report (Appendix E) and that these charges apply to all motor vehicles.

Coastal Car Parks

5.5. It is proposed to retain one hour's free parking at the Jennycliff, Mountbatten and Strand Street car parks, with a £2 charge applied for stays over one hour. This approach provides a fair balance by continuing to support short visits while introducing a modest charge for longer stays that remains lower than comparable coastal locations (Appendix C).

Blue badge Parking

5.6. To continue supporting persons with disabilities, it is proposed to protect the long-term provision of this dedicated parking by removing the current subsidy and ensuring consistency with other car parks. This would be achieved by classifying the Hoe Promenade Blue Badge car park as a Band B car park (Appendix D), regulating its use through a traffic order, and applying charges consistent with other Band B car parks. As with other pay and display car parks, Blue Badge holders will be permitted an additional hour beyond their paid period as a reasonable adjustment, in line with existing Off Street arrangements.

Payment for Parking

5.7. It is proposed that, as payment systems are upgraded and the range of payment options is expanded to match those available in the Council's cashless car parks, the

option of cash payment is withdrawn. Moving to cashless payments supports the Council's environmental sustainability commitments, as the collection and banking of cash currently generates 8,000kg of CO₂ emissions.

Parking Permits and Services

- 5.8. It is proposed to revise the charges for parking permits to reflect the increased costs associated with delivering these services (Appendix F) including the ongoing costs of maintaining the roads and streets within the controlled parking zones.
- 5.9. It is not proposed to consider limiting the number of permits a household may obtain; however, in seeking to discourage multiple car ownership and support the Council's environmental and sustainability ambitions, it is proposed to take a more balanced approach by introducing an escalating charge whereby each subsequent permit increases by 50%.

6. FINANCIAL IMPLICATIONS

- 6.1. Funding available to local government has been reducing steadily in recent years despite rising demand for services. As a council we have undergone huge changes to maintain good local services with fewer resources. The fees proposed within this report are at the level considered appropriate in light of this where the proposals seek to strike a balance between maintaining the Council's commitment to continuing to deliver service improvements and raise customer experience, alongside the need to meet increasing costs and generate income critical to the delivery of key services.
- 6.2. All net income from parking is reinvested back into service delivery, delivery of key services which includes highways and transport.
- 6.3. The savings and income are broken down as follows:

Proposal		Net Benefit 2026/27
Permits	Increase Permit Fees	£225k
	Apply Escalating Residents Permit Fee	£113k
On Street Parking	Increase On Street parking	£440k
	Upgrade payment systems	£18k
Off Street Parking	Increase Off Street parking	£513k
	Charges to apply to all motor vehicles	£19k
	Charges on Hoe Promenade	£30k
Coastal Car Parks	One hour parking charge	£85k
Total		£1.443M

6.4. There are revenue costs of £40k to implement these proposals associated with procurement of new payment systems, advertising, signage and reconfiguring systems. There is an approved capital project within the Councils capital programme for the replacement of the On Street parking payment systems.

7. RECOMMENDATION

7.1. To agree to the following:

7.1.1. To apply parking charges to all motor vehicles in Council car parks, as set out within section 5.4, ensuring a consistent approach across all chargeable parking bays.

7.1.2. To remove cash payments once the On Street payment system upgrades are complete, as set out in section 5.7, improving customer experience through greater payment choice, ensuring consistency across all parking locations, and reducing CO₂ emissions linked to cash collection and processing.

7.2. To agree to implement the following changes not less than 21 days following publication of these changes through a Notice of Variation:

7.2.1. Increase On Street parking charges, as set out in section 5.2 and Appendix D, to align more closely with other councils and meet rising service delivery costs.

7.2.2. Increase Off Street parking fees, as set out in section 5.4 and Appendix E, to ensure charges remain comparable with other councils and support rising service costs.

7.2.3. Increase parking permit fees, as set out in sections 5.8, 5.9 and Appendix F, to meet the rising costs of maintaining schemes and encourage more sustainable travel choices in line with the Council's Net Zero Action Plan.

7.3. To agree to undertake statutory consultation on the following proposals:

7.3.1. Introduce coastal car park charges at Jennycliff, Mountbatten and Strand Street, as set out within section 5.5 and Appendix C, to ensure a more consistent approach while maintaining support for short stay visitors.

7.3.2. Introduce charges for Blue Badge holders on the Hoe Promenade, as set out within section 5.6 and Appendix E, to ensure a fair and consistent charging approach across all car parks.

ON STREET BENCHMARKING

September 2025



Council	1 Hour Average	% diff to Plymouth (Current)
Oxford	£6.95	190%
Bristol	£4.50	88%
Cambridge	£3.90	63%
Liverpool	£3.50	46%
Cardiff	£3.50	46%
Birmingham	£3.20	33%
Norwich	£3.10	29%
Manchester	£3.00	25%
Plymouth (Proposed)	£2.80	17%
Canterbury	£2.80	17%
Bournemouth	£2.75	15%
Brighton	£2.45	2%
Plymouth (current)	£2.40	
Reading	£2.25	-6%
Doncaster	£2.20	-8%
Exeter (Devon County)	£2.15	-10%
Newcastle	£2.15	-10%
Derby	£2.15	-10%
Southampton	£2.00	-17%
Nottingham	£2.00	-17%
Torbay	£2.00	-17%
Coventry	£1.80	-25%
Portsmouth	£1.75	-27%
Blackpool	£1.65	-31%
Wolverhampton	£1.50	-38%
Poole	£1.20	-50%
Worcester	£0.65	-73%

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OFF STREET BENCHMARKING

September 2025



Council	Two Hour Average	Difference to Plymouth (%)	Council	Above 4 Hours Average	Difference to Plymouth (%)
Brighton	£10.00	251%	Cambridge	£31.50	240%
Oxford	£7.70	170%	Brighton	£24.75	168%
Cambridge	£6.60	132%	Oxford	£19.10	106%
Manchester	£6.55	130%	Canterbury	£15.90	72%
Liverpool	£6.50	128%	Manchester	£14.75	60%
Bristol	£5.40	89%	Torbay	£14.25	54%
Canterbury	£5.30	86%	Bournemouth	£13.50	46%
Nottingham	£5.25	84%	Nottingham	£13.50	46%
Cornwall (Truro)	£4.90	72%	Exeter	£13.45	45%
Bournemouth	£4.60	61%	Birmingham	£13.00	40%
Reading	£4.35	53%	Newcastle	£12.90	39%
Newcastle	£4.30	51%	Reading	£12.90	39%
Birmingham	£4.25	49%	Norwich	£12.55	36%
Cardiff	£4.25	49%	Wolverhampton	£11.50	24%
Norwich	£4.25	49%	Cornwall (Truro)	£11.10	20%
Blackpool	£3.50	23%	Plymouth (Proposed)	£10.75	16%
Plymouth (Proposed)	£3.50	23%	Portsmouth	£10.15	10%
Southampton	£3.35	18%	Coventry	£10.10	9%
Portsmouth	£3.15	11%	Cardiff	£10.00	8%
Torbay	£3.05	7%	Liverpool	£9.50	3%
Wolverhampton	£3.00	5%	Poole	£9.45	2%
Coventry	£3.00	5%	Plymouth (Current)	£9.25	-
Derby	£2.85	0%	Blackpool	£8.75	-5%
Plymouth (Current)	£2.85	-	Derby	£8.70	-6%
Worcester	£2.80	-2%	Doncaster	£8.40	-9%
Exeter	£2.70	-5%	Worcester	£8.40	-9%
Poole	£2.20	-23%	Southampton	£8.00	-13%
Doncaster	£2.00	-30%	Bristol	N/A	-100%

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COASTAL CAR PARK CHARGES

Plymouth Highways



Location	Free Period	1 hour	All day
Proposed Coastal Charges	1 hour	Free	£2
Bovisand Car Parks	None	£1	£4
Bovisand Beach Car Park (Winter)	None	£0.70	£3
Bovisand Beach Car Park (Summer)	None	£1.40	£6
Mount Batten Watersports	40 mins	n/a	£5
Wembury Beach and Point February-October (Non Members)	None	n/a	£6
Wembury Beach and Wembury November-January (Non members)	None	n/a	£3
Cremyll Car Park	None	£1.30	£5
Drywalk Car Park	None	£1.30	£5
Barrow Centre Car Park	None	£1.30	£5

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APPENDIX D – ON STREET CHARGES

Plymouth Highways



Please note blue badge holders may park for free and for as long as they need to.

Street	Current Tariff	Proposed Tariff
Zone 1 Cornwall Street*, Market Avenue and New George Street	(6am – 12am) 15 mins Free 30 mins £1.20 £2.40 per hour 3 hours max	(6am – 12am) 15 mins Free 30 mins £1.40 £2.80 per hour 3 hours max
Zone 2 Armada Way*, Cornwall Street* and Mayflower Street	(6am – 12am) 30 mins £1.20 £2.40 per hour 3 hours max	(6am – 12am) 30 mins £1.40 £2.80 per hour 3 hours max
Zone 3 Alton Place, Alton Road, Armada Way*, Athenaeum Place, Athenaeum Street, Basket Ope, Batter Street, Buckwell Street, Catherine Street, Citadel Road, Citadel Road East, Cliff Road, Constantine Street, Derry Avenue, Derry's Cross, Elliot Street, Evelyn Place, Gibbon Lane, Gibbon Street, Gooseberry Lane, Gordon Terrace, Grand Parade, Great Western Road, Hampton Street, Hoe Approach, Hoe Road, Houndiscombe Road, How Street, Kirby Place, Lambhay Hill, Leigham Street, Lockyer Street, Looe Street, Madeira Road, Napier Terrace, North Road East, Notte Street, Palace Street (East), Pier Street, Princess Street, Princess Street Ope, Prospect Place, Radford Road, Regent Street, Runway Road, St Andrews Street, St James Place East, St Lawrence Road, Sutherland Place, Sutherland Road, Tavistock Place, The Barbican, The Parade, Walker Terrace, Welbeck Avenue, West Hoe Road, Whimble Street, Windsor Place, Winston Avenue. Pier Street	(6am – 12am) £2.40 an hour 24 hours £16.50	(6am – 12am) £2.80 an hour 24 hours £19.30

* The street falls within more than one charging tariff

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APPENDIX E - OFF-STREET CHARGES

Plymouth Highways



Category/Car Parks	Current Tariff	Proposed Tariff
Band A (City Centre Long Stay)		
Derry's Cross, Elphinstone, Exchange Street, Guildhall, Mayflower House Court, Mayflower Street (East), North Hill, Regent Street, St Andrews, Theatre Royal	(at all times) 2 hours – £3.30 3 hours – £4.30 4 hours – £5.20 6 hours – £6.60 24 hours – £13 Weekly – £55 Monthly – £165	(at all times) 2 hours – £4.00 3 hours – £5.00 4 hours – £6.00 6 hours – £7.00 24 hours – £15 Weekly – £60 Monthly – £250
Band B (City Centre - Short Stay)		
Bretonside (B) and (C), Civic Centre, Colin Campbell Court, Cornwall Street East, Cornwall Street West, Courtenay Street, Marks & Spencer, Mayflower Street (West) and Hoe Promenade	(8am to 12am) 1 hour £1.85 2 hours £3.20 3 hours £4.20 4 hours £5.50 5 hours (max) £6.60	(8am to 12am) 1 hour £2.50 2 hours £3.90 3 hours £4.90 4 hours £7 5 hours (max) £9
Band C (Value Long Stay)		
Western Approach	(8am to 10pm) 2 hours £2.40 3 hours £3.50 4 hours £4.50 Daily £5.50 Weekly £27.50 Monthly £55	(8am to 10pm) 2 hours £3 3 hours £4 4 hours £5 Daily £6.50 Weekly £35 Monthly £65
Band D (Outer City Centre)		
Mutley Barracks	(8am to 8pm) 2 hours free 3 hours £3.50 4 hours £4.50	(8am to 8pm) 2 hours free 3 hours £4 4 hours £5
Mutley Napier Terrace	(8am to 8pm) 2 hours Free 3 hours £3.50 4 hours £4.50 Over 4 £5.50 Monthly £55	(8am to 8pm) 2 hours free 3 hours £4 4 hours £5 Over 4 £7 Monthly £75
Other Car Parks		
Lipson Road	(8am – 8pm) 3 Hours free Over 3 hours £6 Monthly £55	(8am to 8pm) 2 hours free 3 hours £4 4 hours £5 Over 4 £7 Monthly £75
Meavy Way	(8am to 6pm) 1 hour £1.50	(8am to 8pm) 1 hour £2

	2 Hours £2.50 All Day £4 Monthly £60 Annual Season Ticket £440	2 hours £3 All Day £4 Monthly £60 Annual Season Ticket £450
William Prance Road	(8am to 6pm) 12 hours £5	(8am to 8pm) 12 hours £6

PROPOSED PERMIT CHARGES

Plymouth Highways



Permit/s	Current	Proposed
Business Long Stay Permit	£475	£617.50
Business Permit (Short Stay)	£237	£308.10
Business Visitor Permit	£2.35	£3.00
Essential Visitor Permit	Free – High Dependency Essential Care	
Health & Home Care Permit (Short Stay)	£118	£153.40
Health & Home Care Permit (Long Stay)	£178	£231.40
Hotel/Guest House Visitor Ticket	£8.30	£10.70
Residents Parking Permit	£48.50	1 st Permit - £63 2 nd Permit - £94.50 3 rd Permit - £141.75 (Each subsequent permit subject to 50% increase)
Residents Annual Visitor Permits	£48.50	£63
Residents Daily Visitor Ticket	£2.35	£3
Residents Visitor Tickets (Book 1)	£23.50	£30.50
Residents Visitor Tickets (Book 2)	£41.40	£53.90
Residents Visitor Tickets (Book 3)	£53.50	£69.50
Pedestrian Zone (General) - Weekly	£35.50	£46.10
Pedestrian Zone (General) - Annual	£118	£153.40
Pedestrian Zone (Emergency) - Weekly	£35.50	£46.10
Pedestrian Zone (Emergency) - Annual	£118	£153.40
Accessibility Permit	£60	£78
Commercial Wharf Access Permits – Weekly	N/A	£46.10
Commercial Wharf Access Permits - Annual	£33	£153.40
Disabled Driver Parking Space Application	£43	£55.90
Disabled Driver Parking Space (Install and Remarketing)	£188	£244.40

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EQUALITY IMPACT ASSESSMENT – PARKING MODERNISATION FEBRUARY 2026

SECTION ONE: INFORMATION ABOUT THE PROPOSAL

Author(s): This is the person completing the EIA template.	Darren Stoneman	Department and service:	Plymouth Highways, Traffic Management	Date of assessment:	19/02/2026
Lead Officer: Please note that a Head of Service, Service Director, or Strategic Director must approve the EIA.	Mike Artherton	Signature:		Approval date:	19/02/2026
Overview:	Changes to the parking charges schedule for On Street and off-street parking including: <ul style="list-style-type: none"> • Changes to the rate of On Street and off-street charges • Increases to parking permits to support reduction in car ownership • Increases to the costs associated with applying and installing disabled driver parking spaces (DDPS) • Implement parking restrictions with Coastal Car Parks • Implement changes to parking on the Hoe Promenade • Standardise payment options across both On Street and Off Street to provide modern, adaptable payment options ensuring Mobile Phone, App & Contactless Car Payment Options in all locations 				
Decision required:	I. To agree the following: I.1. To amend the charging schedules, not less than 21 days following publication of these changes, through a Notice of Variation for the following: I.1.1. Changes to Off Street parking fees as set out within section 5.4 and appendix E of the briefing report. I.1.2. Changes to Off Street parking fees as set out within section 5.4 and appendix E of the briefing report. I.1.3. Changes to parking permits fees as set out within section 5.8, 5.9 and appendix F of the report.				

	<p>1.1.4. Changes to On Street parking fees as set out within section 5.2 and appendix D of the briefing report.</p> <p>1.2. Some proposals set out within the associated report are subject to statutory consultation. to consult on the following proposals:</p> <p>1.2.1. Introduction of coastal car parking charges at Jennycliff, Mountbatten and Strand Street as set out within section 5.5 and Appendix C</p> <p>1.2.2. Introduction of charges for blue badge holder parking on the Hoe Promenade as set out within section 5.6 and Appendix E.</p>
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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>	Yes		No	√
<p>Potential internal impacts: Does the proposal have the potential to negatively impact Plymouth City Council employees?</p>	Yes		No	√
<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>	Yes		No	√
<p>If you do not agree that a full equality impact assessment is required, please set out your justification for why not.</p>	<p>The report associated with this Equality Impact Assessment does contain recommendations that will impact on the whole of the community, potentially through increased fees and charges, this however is applicable to all service users and does not negatively impact on those with protected characteristics.</p>			

Access to Bank Accounts It is possible that the proposals may affect somebody who does not have a bank account. There are approximately 1.5 million people in the UK (United Kingdom) who do not have a bank account. There are at least 9 different banking organisations that offer a basic bank card with Chip and Pin facilities. In an increasingly cashless society, especially since the Covid-19 pandemic, it is becoming more difficult to conduct transactions without a bank account. Prepayment bank cards are also available if necessary.

The Finance Conduct Authority published research estimating that 1.3 million UK adults are 'unbanked', meaning they do not have a bank account. The unbanked rate in 2021 (4.5%) was the lowest since the survey began in 2009. Between 2019 and 2021, the unbanked rate fell 0.9% corresponding to an increase of approximately 1.2 million banked households. The highest percentage of unbanked people fall into the 18–24-year age group followed by the 75+ age group. We must consider that motorists pay for petrol/diesel/EV, insurances, MOT's, servicing and road tax. Many of these services are on-line accepting payment by cards only (i.e., require a bank account).

Access to Mobile Phone

There may be a differing impact for older residents who may not have a mobile phone. In 2023, 87% of UK adults owned

a smartphone. 96% of 16- to 24-year-olds owned a smartphone, but just 69% of over-65s own a smartphone.

There are 66.11 million internet users in the UK, around 98% of the population. 7% of UK households do not have access

	<p>to the internet at home in 2023. A quarter (25%) of those aged 65 and over don't have access to the internet at home.</p> <p>The table below presents the percentage of the population with access to a mobile phone.</p> <p>Age % of Population with a mobile phone</p>
	65+ 69%
	55-64 77%
	35-54 95%
	25-34 94%
	16-24 96%
	<p>Source: https://www.finder.com/uk/mobile-internet-statistics</p> <p>Analysis conducted by finder.com</p>
	<p>There is a lot of research and consultation on the 'going cashless' route.</p> <p>Age UK believe pay by phone parking and other automated services present "huge difficulties" for many older people, more than half of whom are deaf or have hearing problems, with large numbers suffering from arthritis, making it hard for them to use mobile technology.</p> <p>On their own each payment method has limitations and could result in access issues but the combination of both card and PayByPhone / App parking limits this impact.</p> <p>Any impact is likely to be negligible given that it is increasingly difficult to legally buy a car, obtain annual insurance, obtain a driving license, obtain car tax etc.,</p>

without a bank account or electronic means of payment or by persons for whom English or reading are difficult.

The introduction of pay by phone and contactless payment options as an additional payment method can also help improve accessibility for disabled people who may not be able to walk far or to where a pay & display machine is located.

Liaising with the British Parking Association (BPA) The councils parking services team asked other councils via the BPA as to whether they were intending to go cashless (or already operated cashless).

In 2024 the responses were as follows ;

Rutland – went cashless and progressed to not accepting chip and pin at their machines.

Allerdale – went cashless as a result of Covid-19.

Cotswold District Council (including Forest of Dean and West Oxfordshire District Council) went cashless in 2022

Oxford are progressively moving towards cashless payments, car park by car park Oct 2023 (5th car park gone cashless)

Telford & Wrekin Council has gone cashless 2022

Tower Hamlets went cashless in November 2019

Somerset, who had reintroduced charges, have removed the cash facility from all their seafront machines and 50% of their other machines.

BathNES are making a gradual move to cashless

Nottingham have gone cashless and are removing pay and display machines gradually

Brighton Cashless since 2024

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	<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>	No adverse impact anticipated		

<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 aged 21 to 24 who could return for support from services if they wished to.</p>	<p>No adverse impact anticipated.</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.</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>The fees for applying for a DDPS service will increase by inflation.</p>	<p>Persons meeting the eligibility criteria would have access to support/grant funds. The criteria associated with this courtesy service is not changing under this decision.</p>	<p>No further action required</p>

		Implementation of parking charges on The Hoe Promenade and Coastal Car Parks	The Council currently offer an additional one hour free parking in addition to the time purchased by a Blue Badge Holder, in addition those who wish can purchase an annual Accessibility Permit which then negates the need for payment in Off Street car parks.	
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
	No adverse impact anticipated.		

SECTION FIVE: OUR EQUALITY OBJECTIVES

Equality objectives	Implications	Mitigation Actions	Timescale and responsible department
Celebrate diversity and ensure that Plymouth is a welcoming city.	No adverse impact anticipated.		
Pay equality for women, and staff with disabilities in our workforce.	No adverse impact anticipated.		
Supporting our workforce through the implementation of Our People Strategy 2025-2028	No adverse impact anticipated.		
Supporting victims of hate crime so they feel confident to report incidents, and working with, and through our partner organisations to achieve positive outcomes.	No adverse impact anticipated.		
Plymouth is a city where people from different backgrounds get along well.	No adverse impact anticipated.		

Cabinet



Date of meeting:	09 March 2026
Title of Report:	Plymouth Local Plan: commencement, programme and delivery arrangements
Lead Member:	Councillor John Stephens (Cabinet Member for Strategic Planning and Transport)
Lead Strategic Director:	Glenn Caplin-Grey (Strategic Director for Growth)
Author:	Jonathan Bell (Head of Spatial Planning & Sustainable Development)
Contact Email:	Jonathan.bell@plymouth.gov.uk
Your Reference:	
Key Decision:	Yes
Confidentiality:	Part I - Official

Purpose of Report

The purpose of the report is to seek authorisation the formal commencement of a new Local Plan for Plymouth by 30 June 2026, to set out a proposed timetable and programme, and to put in place appropriate delegated authorities for the programme moving forward. The report also highlights the significant achievements of the current Plymouth & South West Devon Joint Local Plan (JLP) and looks ahead to the role the new Local Plan in refreshing and delivering the Plymouth radical vision for growth and transformation.

Recommendations and Reasons

That Cabinet:

1. Approves the publication of the Plymouth Local Plan timetable.

Reason: To meet the requirements for the new plan-making system for local plans prepared and adopted under the Planning and Compulsory Purchase Act 2004, as amended by the Levelling-Up and Regeneration Act 2023, and to comply with proposed plan-making regulations that are described in the Ministry of Housing, Communities and Local Government's Plan-making Regulations Explainer, published on 27 November 2025.

2. Approves the publication of the Council's formal 'Notice of Intention to Commence' the Plymouth Local Plan before 30 June 2026.

Reason: To comply with the requirements set out in the Written Ministerial Statement and proposed plan-making regulations that are described in the Ministry of Housing, Communities and Local Government's Plan-making Regulations Explainer, published on 27 November 2025, and to enable the City Council to benefit from potential government funding for local planning authorities that commit to start their local plans by 30 June 2026 and complete Gateway 1 by 31 October 2026.

3. Delegates authority to approve updates to the Local Plan timetable to the Service Director for Strategic Planning & Infrastructure, in consultation with the Cabinet Member for Strategic Planning & Transport.

Reason: To reflect the need for possible amendments to the timetable, including where set out in the proposed plan-making regulations as described in the Ministry of Housing, Communities and Local Government's Plan-making Regulations Explainer, published on 27 November 2025, and to be able to respond to any issues arising from the local government reorganisation and spatial development strategy processes.

4. Delegates authority to approve, publish and submit the required documents and statements for statutory Gateways 1, 2 and 3 to the Service Director for Strategic Planning & Infrastructure, in consultation with the Cabinet Member for Strategic Planning & Transport.

Reason: In order to ensure that the Plymouth Local Plan can be adopted within a 30-month period, as required by the Ministry of Housing, Communities and Local Government's '30-month local plan process: an overview', published on 27 November 2025.

5. Delegates authority to approve all evidence documents, reports and supporting data and analysis for publication to the Service Director for Strategic Planning & Infrastructure, in consultation with the Cabinet Member for Strategic Planning & Transport.

Reason: To ensure the effective and efficient preparation of supporting evidence and material for the Plymouth Local Plan to ensure the overall timetable to adoption can be met.

6. Delegates authority to deliver the statutory 'scoping stage' consultation to the Service Director for Strategic Planning & Infrastructure, in consultation with the Cabinet Member for Strategic Planning & Transport.

Reason: To ensure that statutory Gateway 1 can be completed 31 October 2026 which is a conditional date for potential government grant funding, and to support the efficient delivery of the local plan programme.

7. Instructs Officers to report to Cabinet for approval for the statutory consultation on the proposed local plan content and evidence.

Reason: To ensure that there is appropriate political oversight of the proposed content and evidence of the Plymouth Local Plan prior to the statutory consultation stage.

8. Instructs Officers to report to Cabinet for approval for the statutory consultation on the proposed Plymouth Local Plan.

Reason: To ensure that there is appropriate political oversight of the proposed Plymouth Local Plan prior to the statutory consultation stage.

9. Instructs officers to report to Cabinet to approve any further changes to the Plymouth Local Plan following the statutory consultation.

Reason: To ensure that Cabinet has oversight of any further changes to the content of the Plymouth Local Plan in response to representations received during the period of statutory consultation prior to submission for Independent Examination.

10. Delegates authority to formally submit the proposed Plymouth Local Plan for Independent Examination once Gateway 3 is successfully completed.

Reason: To ensure that the Local Plan is promptly submitted for examination once Gateway 3 is successfully completed in order for the overall 30-month local plan timetable to be achieved.

11. Authorises officers to agree a dedicated work programme with the Scrutiny Management Board on the emerging Plymouth Local Plan.

Reason: To ensure detailed scrutiny oversight and consideration at key stages of the local plan programme.

12. Authorises officers to explore with Devon County Council the opportunity of fulfilling the City Council's statutory responsibilities in relation to minerals and waste planning through the preparation of a Joint Minerals and Waste Plan rather than by incorporating waste and minerals policies into the Plymouth Local Plan.

Reason: To simplify the preparation of the Plymouth Local Plan in order that it can comply with the mandatory 30-month plan preparation period and to explore opportunities for joint working recognising that minerals and waste issues are more effectively and efficiently planned at a strategic level given that these often transcend current and potentially new local government boundaries.

13. Agree to the cancellation of the Plymouth and South West Devon Statement of Community Involvement for the purposes of community engagement in planning in Plymouth, with community engagement being undertaken in accordance with the Council's Engagement and Consultation Framework and the statutory requirements of the Local Plan Regulations.

Reason: To ensure that the preparation of the new Plymouth Local Plan reflects the philosophy and approach to community engagement set out in the City Council's Engagement and Consultation Framework and also complies with the emerging new local plan regulations.

Alternative options considered and rejected

As the preparation of the new Local Plan is a statutory requirement, the only alternative relates to the timing of when the Local Plan is commenced. The latest which we could formally commence the Local Plan is 6 months later than proposed in the preferred option. This is because the government has set a backstop date for commencement of 31 December 2026, with the first statutory Gateway point being reached by 30 April 2027. From that point is locked into a statutory timetable. Were the plan commencement to be delayed to the latest possible time, the Local Government Reorganisation (LGR) process and the Spatial Development Strategy (SDS) process would be further advanced.

However, this option was rejected for a number of reasons, including:

- The pressing need for the Local Plan to be in place to support wider strategic initiatives, deliver much needed housing given the city's absence of a Five Year Housing Land Supply.
- The opportunity to seek government grant funding by committing to commencement by 30 June 2026, having regard to the fact that we would have been legally required to start by December in any case.
- The fact that our current published local plan timetable identified our start date as January 2026, and we are only later because of the government's delay in publishing the new Local Plan Regulations.
- With regard to the LGR process, the government has been clear that this should not delay the preparation of local plans and during the early stages of the process we should know what the government's LGR proposal is and be able to adapt accordingly. The new local plan process requires regular updates to the timetable to enable adjustments to be made when needed.

- With regard to SDS process, there is no proposal in place for our part of the south-west region, but as for LGR we will have the opportunity to adapt if and when needed.
- To improve our resilience for LGR and SDS, and because it is good strategic planning practice, our evidence base work is considering the broader sub-regional context that Plymouth fits within as well as the city itself. We will therefore be in a good place to expand the scope of the local plan during the process if need be.

Relevance to the Corporate Plan and/or the Plymouth Plan

As the statutory development plan and spatial strategy for the city, the Plymouth Local Plan has a role to play in supporting each of the six priorities set out in the Corporate Plan and the three strategic objectives of the Plymouth Plan (healthy city; growing city; international city). In essence, the Plymouth Local Plan will represent the spatial strategy of the Plymouth Plan.

Implications for the Medium Term Financial Plan and Resource Implications:

There are costs associated with the delivery of a local plan, including particularly in relation to the need for evidence base studies, legal support, digital plan development, consultation and engagement and the holding of an Independent Examination.

The total cost of the preparation and independent examination of the current Plymouth and South West Devon Joint Local Plan (JLP) was c£480,000, with Plymouth City Council's share of this cost being c£224,000.

Although the City Council will need to meet the full costs of the new local plan, as a result of its reduced scope (it's not a joint plan covering a large rural area) and changes to the national local planning system (in particular around reducing the evidence base requirements and a shorter process and independent examination), it is anticipated that the new plan might be delivered for a sum of up to c£300,000.

Additionally, evidence base costs are able to be phased over the period to summer 2028, we are able to use evidence that already exists or which others are leading on, and the financing of an independent examination will not be needed until 2028/29.

On the invitation of the Ministry of Homes Communities and Local Government, we have submitted an application for a grant of in the region of £120,000 which is being made available for local planning authorities who commit to commence local plan preparation by 30 June 2026 and publish a Gateway 1 self assessment by 31 October 2026. With this grant, we anticipate being able to cover any costs for 2026/27 and 2027/28 from existing budgets and provision we have made through the JLP Partnership, and therefore there is no immediate pressure on the Medium Term Financial Plan. Depending on the cost of the independent examination in 2028/29, some additional provision might be needed at that point, but we won't have sufficient data to understand what the likely costs will be until later in the local plan process, probably during 2027/28.

Financial Risks

The primary risk to the revenue budget would arise if the Council was not to breach its statutory requirement to prepare a local plan against the prescribed backstop date. In these circumstances, the government could intervene with the Council picking up the full cost.

With regard to the capital programme, the local plan plays a crucial role in helping to derisk development and infrastructure projects. It is therefore an important risk management measure in relation to any projects in that programme require planning permission.

Legal Implications

Although the enactment of the Local Plan Regulations is still awaited, the government has published an 'explainer' setting out what it will be included in these Regulations. It has also made available grant funding for local planning authorities who commit to commencing their plans by 30 June 2026, and this is only possible once the Regulations are enacted.

The report is written in response to the government's Local Plan Regulations explainer and a whole suite of guidance, all published in November 2025, on how the new local plan system will operate and what the requirements of the new system will be.

Carbon Footprint (Environmental) Implications:

It is too early to be able to advise on the carbon and environmental implications of the new local plan, as we are not at the stage of having a draft plan yet. Therefore, no meaningful Climate Impact Assessment could be prepared. However, it is clear that a local plan has a major role to play in managing the environmental implications of development and growth and putting in place positive measures for natural infrastructure, climate mitigation and climate adaptation.

Other Implications: e.g. Health and Safety, Risk Management, Child Poverty:

* When considering these proposals members have a responsibility to ensure they give 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.

Other implications will be able to be identified once there is a draft local plan being considered.

Appendices

*Add rows as required to box below

Ref.	Title of Appendix	Exemption Paragraph Number (if applicable) <i>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.</i>						
		1	2	3	4	5	6	7
A	Plymouth Local Plan Background Report							
B	EIA							

Background papers:

*Add rows as required to box below

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.

Title of any background paper(s)	Exemption Paragraph Number (if applicable) <i>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.</i>						
	1	2	3	4	5	6	7

Sign off:

Fin	DN.25. 26.020 OW.2 5.26.13 4	Leg	LS/296 0(77)/J P/1702 26	Mon Off	N/A	HR	N/A	Asset s	N/A	Strat Proc	N/A
Originating Senior Leadership Team member: Paul Barnard											
Please confirm the Strategic Director(s) has agreed the report? Yes Date agreed: 09/02/2026											
Cabinet Member approval: <i>Councillor John Stephens approved by email</i> Date approved: 16/02/2026											

PLYMOUTH LOCAL PLAN BACKGROUND REPORT

Cabinet - 09 March 2026



I. INTRODUCTION

- 1.1. The Plymouth and South West Devon Joint Local Plan (JLP) is the current statutory development plan for the city. It was adopted by Plymouth City Council on 26 March 2019 and by South Hams District Council on 21 March 2019, and by West Devon Borough Council on 26 March 2019.
- 1.2. On 16 January 2025, the JLP Partnership Board agreed a public statement setting out the intentions of the three councils in relation to the next iteration of plan making in the area. This included the statement that: *'That the next iteration of local plan making for the JLP area will not be as a joint local plan covering Plymouth, South Hams and West Devon. Instead, Plymouth City Council will work on a new local plan based on the city's administrative boundaries'*.
- 1.3. On 3 December 2025, the Natural Infrastructure and Growth Scrutiny Panel received and noted a report on potential scope and timetable of the Plymouth Local Plan.

2. HISTORICAL CONTEXT

- 2.1. Plymouth has a long and proud history of preparing visionary local plans that have played a crucial role in guiding the future development and regeneration of the city for over 80 years.
- 2.2. The inspirational 1943 Plan for Plymouth, produced by Sir Patrick Abercrombie and Paton Watson, provided a positive vision and transformational plan not only for the city but its wider rural hinterland which drove the post war regeneration of the city. A Town Map was approved in 1956 which covered the city as it existed then. This was followed by three Comprehensive Development Area Maps also approved in 1956 for the central areas of the city, Prince Rock and Devonport. A Town Map Amendment was approved in 1960 covering the development of the Eastover industrial estate. Then in 1970, a Town Map Review covering the Plympton and Plymstock areas was prepared following those areas being included within the administrative area of Plymouth after a boundary review in 1967.
- 2.3. The City of Plymouth Local Plan covering the period 1982-1991 was adopted in 1987 and was unique at the time as planning for the whole of the city when the prevailing government opinion was to plan for only parts a local authority area.
- 2.4. In 1996, the City of Plymouth Local Plan First Alteration was adopted and was unique in providing for over 1,000 homes more than the then Devon Structure Plan required from the city: effectively commencing the growth agenda for the city.
- 2.5. In 2001, the City Council published the City of Plymouth Local Plan First Deposit which extended the ambition for a growth-led agenda for the city promoting radical and innovative approaches to the planning of the city building upon the innovative Community Planning Studies published for all parts of the city in 2000, delivering more employment and housing land than the Devon Structure Plan required.
- 2.6. However, with the advent of the Planning and Compulsory Purchase Act 2004, once again the City Council made a bold and brave decision to adopt the new Local Development Framework approach to plan-making to further drive growth and regeneration, building upon the challenges set out in the 2003 Vision for Plymouth produced by David Mackay. This eventually led to the adoption of the first and fastest Core Strategy for a major city in the country in 2007, which embedded the aspirations of the "Mackay vision" for Plymouth. This

was followed by the adoption of six delivery-focussed Area Action Plans for Central Park, City Centre/University, Devonport, Millbay/Stonehouse, North Plymstock and Sutton Harbour by 2010.

- 2.7. Then in 2019, the Plymouth and South West Devon Joint Local Plan was adopted, one of very few such plans in the country, having been produced in around 15 months, and which unlike most plans of its era, fully met the employment, retail and housing needs of the whole area.
- 2.8. Over the years, Plymouth City Council has been recognised for its innovation and creativity on plan-making winning many international, national, and regional awards, including still being the only authority to have won the prestigious Royal Town Planning Silver Jubilee Cup on three occasions.
- 2.9. What has been particularly notable in the City Council's historical approach to local plans is not only the setting of an ambitious vision for Plymouth, but the strong delivery focus of the plans. Many of the large scale expansions of new housing and industrial estates to the north and east of the city, and transport and community infrastructure projects that we see throughout the city, exist today because they were first conceived or promoted through past local plans. These plans have been successful in safeguarding the regional role of the city centre against out of centre retail and office developments, provided new parks and local community facilities, opened up new access to expanded port facilities and provided protection to important green spaces in the city.
- 2.10. More recent examples include a number of city centre regeneration projects, including Drakes Circus and the Barcode, as well as support for the regeneration programmes of the Barbican, Sutton Harbour, Devonport, Millbay, Stonehouse, Royal William Yard, North Prospect, and Barne Barton. Local Plans have helped to secure millions of pounds of grants and other funding to deliver the Derriford district centre, the Derriford Community Park; the Forder Valley link road (Platinum Way) and Forder Valley Interchange, the Derriford transport scheme, the Saltram countryside park and for Central Park. Much needed land for new housing has been allocated in local plans including at Manadon, Sherford, Morley Park, Seaton, and Woolwell; with existing employment land being protected alongside new land brought forward in Estover, Darklake View, Southway, Belliver, Coxside and Marsh Mills.
- 2.11. The preparation of a new local plan, looking ahead to future decades, presents the opportunity to plan for an exciting new chapter in Plymouth's transformation, which will bring a new wave of development projects, environmental improvements and infrastructure.

3. NATIONAL CONTEXT

- 3.1. The previous government launched a process on national planning reform, which included amongst other things the Levelling-up and Regeneration Act 2023 as well as proposals to introduce National Development Management Policies (NDMPs) and set in place a new system for preparing local plans.
- 3.2. The current government has continued the process of planning reform, most particularly through major revisions to the National Planning Policy Framework (NPPF), the standard method for calculating local housing need, and the total reform of the strategic and local planning system.
- 3.3. In November and December 2025, the government published a raft of documents and statements that are of fundamental importance to development planning within the city. These include:

Written Ministerial Statement (WMS) of the Minister of State for Housing and Planning – 'Reforming Local Plan-Making', 27 November 2025

- Local planning authorities (LPAs) are encouraged to bring plans forward as soon as possible following the commencement of the new local plan regulations early in the New Year.
- 3.4. Regulations will set out final ‘backstop’ dates for when plan-making must legally have commenced, with those that have a plan that is already over five years old being required commence by 30 April 2027
- 3.5. A minimum of £14 million of funding will be made available this financial year to support local plan-making. Since the WMS, this grant funding opportunity has been announced for LPAs that commit to serve notice of commencement by 30 June 2026 and complete Gateway 1 which triggers the formal start of the plan by 31 October 2026. Up to £120,000 is available per LPA.
- The government is committed to taking tough action to ensure local authorities have up-to-date local plans in place, and it is prepared to make full use of available intervention powers – including taking over a local authority’s plan making directly – if local plans are not progressed as required.
 - The new system will rely on revised national policy and the new tier of strategic planning to ensure effective co-operation between plan-making authorities rather than a Duty to Cooperate. LPAs should continue to collaborate across their boundaries.

MHCLG Guidance: Plan-making regulations explainer. 27 November 2025

- Published to help LPAs advance their local plan processes ahead of the publication of the new Local Plan Regulations in the New Year.
- 3.6. The purpose of the explainer document is to describe what the government intend to set out in the regulations.

MHCLG Guidance: 30-month local plan process: an overview. 27 November 2025

- Requires LPAs to prepare a single local plan and adopt it within 30 months.
- Sets out a proposed plan-making sequencing.

National Planning Policy Framework, Draft. 16 December 2025

- 3.7. Delivers fundamental changes to how national planning policy is structured, by having clearly structured policies for both plan-making and decision-making.
- 3.8. The plan-making policies cover the full spectrum of plan-making from spatial development strategies (sub-regional focus), to local plans (local focus), to neighbourhood plans (led by local communities), to supplementary plans (enabling greater focus on sites or areas).
- 3.9. The provisions significantly change the nature, content and process of local plan-making, with greater focus on vision, strategy and sites. The development management policies that local plans have traditionally prepared will now substantially be covered by the decision-making policies included in the NPPF.
- 3.10. The changes made to the NPPF in effect replace the commitment made by the previous government to produce NDMPs.

Other plan-making guidance

- Multiple other guidance documents were published covering every aspect of the plan-making process, including for example: the core elements of a local plan timetable and the required 30 month period from Gateway 1 to adoption; prescriptive guidance on putting together a local plan vision; guidance on collecting and reporting on baseline evidence; identifying, assessing and selecting sites; preparing Minerals and Waste Plans.
- 3.11. Some key points to note from the published statements and guidance are as follows:
- 3.12. Substantial emphasis is being given to the preparation of local plans as a crucial element of the government's commitment to economic growth and addressing the housing crisis. Funding is being made to enable the earliest possible start and there is a stated commitment to enforce the back-stop dates.
- 3.13. The timescale for completing the plan-making process will be 30 months plus a 4 month (minimum) scoping period at the outset.
- 3.14. The new plan-making process is much more prescriptive than previously, which will ensure a high level of consistency nationally and should help keep LPAs on track.
- 3.15. The content of the new style plans will be quite different to previous local plans. There will be much more focus on vision and outcomes, and policies will be primary site and area-specific rather than thematic and about development management.
- 3.16. Spatial development strategies, when in place, will be key to identifying how the housing requirement will be distributed over a wider spatial area, but the absence of SDSs should not delay an LPA working on its local plan now. Neither should the fact that an area is currently undergoing local government reorganisation.

4. THE PLYMOUTH LOCAL PLAN

- 4.1. Plymouth's new Local Plan will, when adopted, be the primary development plan document for the city. It will cover the administrative area of Plymouth and set a clear vision and planning strategy for the city moving forward. This is all the more crucial at a time when there is a generational opportunity for the city, with major strategic partnerships relating to defence-related investment and growth, Plymouth's designation as a National Centre for Marine Autonomy, housing delivery and the transformation of the City Centre. Local plans are always critical documents to ensure that the development needs of an area are met and that this is done so in the most sustainable way. However, as Plymouth is recognised not just for its strategic role in the region but also for its national security role, there is something particularly vital about this next Local Plan for Plymouth. Put simply, the plan must ensure that sufficient land is made available in the right locations so the city is able to fully meet these needs.
- 4.2. To meet the requirements of national policy and guidance, the following timetable is proposed:

Stage of process	Dates
Give notice of plan making	June 2026
Run scoping consultation	July - October 2026
Gateway 1	October 2026
Publish summary of scoping consultation	October 2026

Plan visioning, strategy development and evidence gathering	November 2026 – May 2027
Run consultation on proposed plan content and evidence and publish summary	June – August 2027
Gateway 2	September / October 2027
Evidence gathering and drafting the plan	November 2027 – May 2028
Run consultation on proposed local plan and publish summary	June to August 2028
Gateway 3	August / September 2028
Examination	October 2028 – March 2029
Adoption	April 2029
Finalisation and adoption of digital plan	April 2029

5. RELATIONSHIP TO THE PLYMOUTH PLAN

- 5.1. The Plymouth Plan is the city's overarching strategic plan that sets out the long-term direction of travel. It is owned not just by the Council but by partners and stakeholders in the city. It is an holistic plan that covers all the major social, economic and environmental themes. This plan is currently undergoing review.
- 5.2. The Plymouth Local Plan is legally the responsibility of the City Council as local planning authority. It is concerned with development and growth, and is a spatial plan. The Local Plan will in essence provide spatial representation to the direction of travel set within the Plymouth Plan.
- 5.3. Although these two plans are different, they are strongly related and it will be important that the review of the Plymouth Plan – in particular, the refreshing on the vision for the city included in the plan and the identification of strategic objectives – are followed through to the Local Plan. Otherwise, there would be a danger of there being two separate visions.
- 5.4. To ensure that this relationship is achieved, it is therefore proposed to twin track the early stages of the Local Plan timetable with the Plymouth Plan review timetable.

6. CANCELLATION OF THE PLYMOUTH AND SOUTH WEST DEVON STATEMENT OF COMMUNITY INVOLVEMENT

- 6.1. With the transition to the new plan-making system and a Plymouth (rather than Joint) Local Plan, the framework for local plan engagement will be the Council's Engagement and Consultation Framework and the requirements of the new local plan regulations. No provision is made for Statements of Community Involvement in the new system and therefore this document should be formally cancelled for the purposes of planning engagement.

7. MINERALS AND WASTE PLANS

- 7.1. In addition to Local Plans, minerals and waste planning authorities such as Plymouth are required to prepare Minerals and Waste Plans. By their very nature they function best at a more strategic level. It is therefore proposed to explore with Devon County Council the opportunity for a Joint Minerals and Waste Plan.

- 7.2. In the event that joint planning is not pursued, then the City Council will either need to prepare a separate Minerals and Waste Plan or seek to integrate it into the Local Plan. It should be noted that the same timetable requirements and back stop dates that the government has put in place for Local Plans also apply to Minerals and Waste Plans.
- 7.3. Should a decision be sought to undertake a joint plan or a separate Minerals and Waste Plan, a further report will be brought to Cabinet before the end of 2026. If however, minerals and waste policies become integrated into the Local Plan, then this will be picked up in future reports to Cabinet on the draft plan content and evidence, and on the draft plan itself.

8. NEXT STEPS

8.1. Subject to approval of the Cabinet, the next steps ahead of the publication of the formal 'Notice of Intention to Commence' in June 2026 are:

- Publish the Local Plan timetable
- Establish project management arrangements
- Put in place a strategy for engaging the community and other key stakeholders in the preparation of the plan, set within the context of the Council's Engagement and Consultation Framework
- Initiate implementation of requirement for baseline evidence
- Prepare consultation papers and processes for the Local Plan scoping stage

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EQUALITY IMPACT ASSESSMENT – PLYMOUTH LOCAL PLAN: COMMENCEMENT, PROGRAMME AND DELIVERY ARRANGEMENTS

SECTION ONE: INFORMATION ABOUT THE PROPOSAL

Author(s): The person completing the EIA template.	Jonathan Bell	Department and service:	SP&I	Date of assessment:	26/02/2026
Lead Officer: Head of Service, Service Director, or Strategic Director.	Paul Barnard	Signature:		Approval date:	27.02.2026
Overview:	The report relates to the preparation of a new Local Plan for Plymouth.				
Decision required:	The report seeks authorisation for the formal commencement of a new Local Plan for Plymouth by 30 June 2026, sets out a proposed timetable and programme, and seeks approval for appropriate delegated authorities for the programme moving forward.				

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	No
Potential internal impacts: Does the proposal have the potential to negatively impact Plymouth City Council employees?	Yes		No	No
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	No
If you do not agree that a full equality impact assessment is required, please set out your justification for why not.	An EIA plays no useful purpose at this stage, as the report doesn't relate to the plan itself but to its			

timetable and governance. However, when a decision is needed on the Local Plan itself, this has the potential to have external impacts and so a full EIA will be needed at that stage.

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	<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>	N/A		
Care experienced individuals	<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</p>	N/A		

<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>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 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.</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>N/A</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>N/A</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</p>	<p>N/A</p>		

	<p>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>			
Pregnancy and maternity	<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>	N/A		
Race	<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>	N/A		
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</p>	N/A		

	Hindu, Buddhist, Jewish or Sikh combined totalled less than 1 per cent (2021 Census).			
Sex	51 per cent of our population are women and 49 per cent are men (2021 Census).	N/A		
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).	N/A		

SECTION FOUR: HUMAN RIGHTS IMPLICATIONS

Human Rights	Implications	Mitigation Actions	Timescale and responsible department
	N/A		

SECTION FIVE: OUR EQUALITY OBJECTIVES

Equality objectives	Implications	Mitigation Actions	Timescale and responsible department
Work together in partnership to: promote equality, diversity and inclusion facilitate community cohesion support people with different backgrounds and lived experiences to get on well together	N/A		
Give specific consideration to care experienced people to improve their life outcomes, including access to training, employment and housing.	N/A		

Build and develop a diverse workforce that represents the community and citizens it serves.	N/A		
Support diverse communities to feel confident to report crime and anti-social behaviour, including hate crime and hate incidents, and work with partners to ensure Plymouth is a city where everybody feels safe and welcome.	N/A		