

Oversight and Governance
Chief Executive's Department
Plymouth City Council

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## **Delegated Decisions**

## **Delegated Executive/Officer Decisions**

Notice of call-in for non-urgent decisions must be given to the Democratic Support Team by 4.30 pm on 29 May 2025. Please note – urgent decisions and non-key Council Officer decisions cannot be called in. Copies of the decisions together with background reports are available for viewing as follows:

- on the Council's Intranet Site at https://modgov/mgDelegatedDecisions.aspx
- on the Council's website at <a href="https://tinyurl.com/3hwmppzp">https://tinyurl.com/3hwmppzp</a>

The decision detailed below may be implemented on 30 May 2025 if it is not called-in.

# **Delegated Decisions**

- I. Councillor John Stephens (Cabinet Member for Strategic Planning and Transport):
  - I.a. SPT01 25/26 THE CITY OF PLYMOUTH (TRAFFIC MOVEMENT AND SPEED LIMIT REGULATIONS)

    (AMENDMENT ORDER No. 2025.2137336 SALTRAM MEADOWS) ORDER & THE CITY OF PLYMOUTH (TRAFFIC REGULATION ORDERS) (AMENDMENT ORDER No. 2025.2137336 SALTRAM MEADOWS) ORDER

# **EXECUTIVE DECISION**

# made by a Cabinet Member



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

Executive Decision Reference Number - SPT01 25/26

#### **Decision**

- Title of decision: THE CITY OF PLYMOUTH (TRAFFIC MOVEMENT AND SPEED LIMIT REGULATIONS) (AMENDMENT ORDER No. 2025.2137336 SALTRAM MEADOWS) ORDER & THE CITY OF PLYMOUTH (TRAFFIC REGULATION ORDERS) (AMENDMENT ORDER No. 2025.2137336 SALTRAM MEADOWS) ORDER
- **Decision maker:** Councillor John Stephens (Cabinet Member for Strategic Planning and Transport)
- Report author and contact details: Amy Neale, Highway Safety Engineer, email: trafficmanagementinbox@plymouth.gov.uk

#### 4 Decision to be taken:

To implement the following amendments to The City of Plymouth (Traffic Regulation and Street Parking Places) (Consolidation) Order 2004 & The City of Plymouth (Traffic Movement and Speed Limit Regulations) (Consolidation) Order 2022

The effect of the order shall be to:

Add No Waiting restrictions & a Bus lane on lengths of the following roads: Ashbrook Street, Bathampton Way, Broxton Drive, Coscombe Circus, Halecombe Road, Killerton Lane, Kilmar Street, Sourton Square

As set out in the briefing report.

#### 5 Reasons for decision:

For avoiding danger to persons or other traffic using the road or any other road or for preventing the likelihood of any such danger arising, or for facilitating the passage on the road or any other road of any class of traffic. More specifically to ensure the proposed bus route, which is due to open, is kept clear of any obstructive parking.

### 6 Alternative options considered and rejected:

This is a part of a planning obligation and therefore, there were no other options considered for this scheme.

### 7 Financial implications and risks:

The Traffic Regulation Orders (TRO's) and associated works are being funded by the developers who are constructing the development. The cost of the Traffic Order is £9,336.

### **8** Legal Implications: None.

9		a Key Decision? ct <u>Democratic Suppor</u>		Yes	No	Per the Constitution, a key decision is one which:
	for further adv				X	in the case of <b>capital</b> projects and contract awards, results in a new commitment to spend and/or save in excess of <b>£3million</b> in total
					X	in the case of <b>revenue</b> projects when the decision involves entering into new commitments and/or making new savings in excess of <b>£1 million</b> annually
					X	is <b>significant</b> in terms of its effect on communities living or working in an area comprising <b>two or more</b> wards in the area of the local authority.
		publication of the Forward Plan of Key	١	V/A		
10	linked to the Oplan/Plymouth	how this decision is Council's corporate In Plan and/or the York and/or the In all budget:	s	strategi and will	es and <sub>l</sub> I be key	nsport Plan (LTP) details the transport policies that the City Council has adopted in helping the city meet its Corporate and growth agenda.
11	Please specify environmenta decision (carb	l implications of the	1	Vone.		
Urge	ent decisions					
12a	implemented interests of the	n urgent and to be I immediately in the he Council or the	Ye	S		(If yes, please contact Democratic Support ( <a href="mailto:democraticsupport@plymouth.gov.uk">democraticsupport@plymouth.gov.uk</a> ) for advice)
	public?		No		X	(If no, go to section 13a)
I2b	Reason for un	gency:				
12c	Scrutiny Chair Signature:				Date	
	Scrutiny Committee name:					
	Print Name:					
Cons	sultation					
I3a			1	Yes		

		any other Cabinet members' folios affected by the decision?	No	x	(If no go to sectio	n 14)	
I3b		ch other Cabinet member's folio is affected by the decision?	N/A				
I3c	Date	Cabinet member consulted	N/A				
14	Has any Cabinet member declared a conflict of interest in relation to		Yes	Yes If yes, please discus		with the Monitoring	
	the c	lecision?	No	X			
15	Which Corporate Management		Name		David Haley		
	Tear	n member has been consulted?	Job tit	:le	Director of Children	n's Services	
			Date consu	lted	22/04/2025		
Sign	-off						
16	Sign off codes from the relevant departments consulted:		Democratic Support (mandatory)			JS01 25/26	
			Finance (mandatory)			ITG.25.26.004	
			Legal	(mand	atory)	LS/2960(53)/JP/220425	
			Procurement (if applicable)			N/A	
			Corporate property (decisions involving Council owned land or facilities) (if applicable)			N/A	
			Human Resources (if applicable)			N/A	
Арр	endic	es					
17	Ref.	Title of appendix					
	Α	Briefing report for publication					
	В	Equalities Impact Assessment					
Con	fident	ial/exempt information					
18a		ou need to include any dential/exempt information?	Yes	briefing report and		l, confidential ('Part II') cate why it is not for Part 1of Schedule 12A	
			No	X	f the Local Government Act 1972 by ticking the relevant box in <b>18b</b> below.  Keep as much information as possible in the riefing report that will be in the public tomain)		

**Print Name** 

			Exemption Paragraph Number						
			ı	2	3	4	5	6	7
I8b	Confident title:	ial/exempt briefing report							
Back	ground Pa	pers							
19	Please list all unpublished, background papers relevant to the decision in the table below.  Background papers are <u>unpublished</u> works, relied on to a material extent in preparing the report, which disclose facts or matters on which the report or an important part of the work is based. If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part I of Schedule I2A of the Local Government Act 1972 by ticking the relevant box.								
	Title of	background paper(s)		Ex	emptio	n Parag	raph Nu	mber	
			ı	2	3	4	5	6	7
Cabi	inet <b>M</b> embe	er Signature							
20	I agree the decision and confirm that it is not contrary to the Council's policy and budget framework, Corporate Plan or Budget. In taking this decision I have given due regard to the Council's duty to promote equality of opportunity, eliminate unlawful discrimination and promote good relations between people who share protected characteristics under the Equalities Act (2010) and those who do not. For further details please see the EIA attached.								
•			Date o	f decisio	on 2	2/05/202	25		

Councillor John Stephens (Cabinet member for Strategic Planning and Transport)

(viii)

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(x)

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## **SALTRAM MEADOWS**



#### I. INTRODUCTION

This report seeks delegated authority to implement amendments to The City of Plymouth (Traffic Regulation and Street Parking Places) (Consolidation) Order 2004 & The City of Plymouth (Traffic Movement and Speed Limit Regulations) (Consolidation) Order 2022 in association with the Saltram Meadows Traffic Regulation Order.

## 2. TRAFFIC REGULATION ORDERS REQUIRED

2.1 The elements that need a Traffic Regulation Order are as follows:

<b>No Waitir</b> (i)	Ashbrook Street, the north side from a point 174 metres west of its junction with Broxton Drive for a distance of 5 metres in a westerly direction
(ii)	Ashbrook Street, the north side from its junction with Broxton Drive for a distance of 11 metres in a westerly direction
(iii)	Ashbrook Street, the north side from a point 21 metres west of its junction with Broxton Drive for a distance of 5 metres in a westerly direction
(iv)	Ashbrook Street, the north side from a point 64 metres west of its junction with Broxton Drive for a distance of 5 metres in a westerly direction
(v)	Ashbrook Street, the north side from a point 79 metres west of its junction with Broxton Drive for a distance of 14 metres in a westerly direction
(vi)	Ashbrook Street, the north side from a point 103 metres west of its junction with Broxton Drive for a distance of 15 metres in a westerly direction
(vii)	Ashbrook Street, the north side from a point 128 metres west of its junction with Broxton Drive for a distance of 22 metres in a westerly direction

Ashbrook Street, the north side from a point 160 metres west of its junction with

Ashbrook Street, the north side from a point 190 metres west of its junction with

Ashbrook Street, the south side from its junction with Coscombe Circus to a point 6

Ashbrook Street, the south side from a point 2 metres east of its westerly boundary

Ashbrook Street, the south side from a point 18 metres east of its westerly boundary

Ashbrook Street, the south side from a point 32 metres east of its westerly boundary

of 33 Ashbrook Street for a distance of 6 metres in an easterly direction

of 33 Ashbrook Street for a distance of 4 metres in an easterly direction

of 33 Ashbrook Street for a distance of 21.5 metres in an easterly direction

Broxton Drive for a distance of 4 metres in a westerly direction

metres west of its westerly boundary of 33 Ashbrook Street

Broxton Drive to its junction with Coscombe Circus

(xiv)	Ashbrook Street, the south side from a point 63.5 metres east of its westerly boundary of 33 Ashbrook Street for a distance of 4 metres in an easterly direction
(xv)	Ashbrook Street, the south side from a point 77.5 metres east of its westerly boundary of 33 Ashbrook Street for a distance of 17 metres in an easterly direction
(xvi)	Ashbrook Street, the south side from a point 104.5 metres east of its westerly boundary of 33 Ashbrook Street for a distance of 4 metres in an easterly direction
(xvii)	Ashbrook Street, the south side from a point 118.5 metres east of its westerly boundary of 33 Ashbrook Street for a distance of 20 metres in an easterly direction
(xviii)	Ashbrook Street, the south side from a point 148.5 metres east of its westerly boundary of 33 Ashbrook Street for a distance of 13 metres in an easterly direction
(xix)	Ashbrook Street, the south side from a point 171.5 metres east of its westerly boundary of 33 Ashbrook Street to its junction with Broxton Drive
(xx)	Ashbrook Street, the north side from a point 36 metres west of its junction with Broxton Drive for a distance of 18 metres in a westerly direction
(xxi)	Bathampton Way, the south side from its junction with Broxton Drive for a distance of 8 metres in an easterly direction
(xxii)	Bathampton Way, the north side from its junction with Broxton Drive for a distance of 10 metres in an easterly direction
(xxiii)	Broxton Drive, both sides from its junction with Ashbrook Street for a distance of 10
	metres in a northerly direction
(xxiv)	Broxton Drive, the east side from its junction with Bathampton Way to its junction with the industrial estate
(xxv)	Broxton Drive, the west side from its junction with Ashbrook Street for a distance of 74 metres in a southerly direction
(xxvi)	Coscombe Circus, the inner roundabout for its entirety
(xxvii)	Coscombe Circus, the outer side from its junction with Halecombe Road for a distance of 7 metres in a north easterly direction
(xxviii)	Coscombe Circus, the outer side from a point 17 metres north east of its junction with Halecombe Road for a distance of 14 metres in an easterly direction
(xxix)	Coscombe Circus, the outer side from a point 40 metres east of its junction with
	Halecombe Road to its junction with Ashbrook Street
(xxx)	Coscombe Circus, the outer side from its junction with Ashbrook Street to a point 1
	metre south of its boundary of 1 & 3 Coscombe Circus
(xxxi)	Coscombe Circus, the outer side from a point 10 metres south of its boundary of 1 & 3 Coscombe Circus for a distance of 2 metres in a southerly direction
(xxxii)	Coscombe Circus, the outer side from a point 20 metres south of its boundary of 1 $\&$ 3 Coscombe Circus to its junction with Kilmar Street
(xxxiii)	Coscombe Circus, the outer side from its junction with Kilmar Street for a distance of 3 metres in a westerly direction

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(xxx	iv)	Coscombe Circus, the outer side from a point 12 metres west of its junction with Kilmar Street for a distance of 2 metres in a westerly direction
(xxx	v)	Coscombe Circus, the outer side from a point 24 metres north west of its junction with Kilmar Street to its junction with Halecombe Road
(xxx	vi)	Halecombe Road, the north side from its junction with Killerton Lane to its easterly
		property boundary of 18 Halecombe Road
(xxx	vii)	Halecombe Road, the north side from a point 10 metres east of its easterly property boundary of number 18 Halecombe Road for a distance of 7 metres in an easterly direction
(xxx	viii)	Halecombe Road, the north side from a point 32 metres east of its easterly property boundary of number 18 Halecombe Road for a distance of 25 metres in an easterly direction
(xxx	ix)	Halecombe Road, the north side from a point 67 metres east of its easterly property boundary of number 18 Halecombe Road to its junction with Coscombe Circus
(xl)		Halecombe Road, the south side from its junction with Coscombe Circus to a point 2
		metres west of its boundary of 3 & 5 Halecombe Road
(xli)		Halecombe Road, the south side from a point 12 metres west of its boundary of 3 & 5
		Halecombe Road for a distance of 27 metres in a westerly direction
(xlii)	)	Halecombe Road, the south side from a point 54.5 metres west of its boundary of 3 & 5 Halecombe Road for a distance of 4 metres in a westerly direction
(xliii	)	Halecombe Road, the south side from a point 70.5 metres west of its boundary of 3 & 5 Halecombe Road for a distance of 4 metres in a westerly direction
(xliv	)	Halecombe Road, the south side from a point 84.5 metres west of its boundary of 3 & 5 Halecombe Road to its junction with Killerton Lane
(xlv)		Killerton Lane, both sides from its southerly boundary of 24 Killerton Lane to its
		junction with Halecombe Road
(xlvi	)	Kilmar Street, both sides from its junction with Coscombe Circus for a distance of 10
		metres in a southerly direction
(xlvi	i)	Sourton Square, the east & north side from a point 4 metres north of its extended
		northern kerbline of Westleigh Way for a distance of 37 metres in a southerly and easterly direction

## **Bus Lane**

(i) On Killerton Lane

## 3. STATUTORY CONSULTATION

## **Proposals**

The proposals for the Saltram Meadows TRO were advertised on street, in the Herald and on the Plymouth City Council website on  $21^{\text{st}}$  March 2025. Details of the proposals were sent to the Councillors representing the affected wards and statutory consultees on  $17^{\text{th}}$  March 2025.

# There have been 2 representations received relating to the proposals included in the Traffic Regulation Order.

## **Consultation**

I am writing to formally object to the proposed traffic order that seeks to introduce "No Waiting" restrictions and a bus lane on various roads within the Saltram Meadows estate.

Saltram Meadows is a growing family-oriented community where many households rely on onstreet parking due to limited driveway or allocated parking spaces. These proposed restrictions will have a significant negative impact on the daily lives of families living here. Parents with young children, families with multiple cars, and visitors — including relatives, carers, and tradespeople — will all be affected. The lack of suitable parking alternatives will create unnecessary stress and inconvenience.

Furthermore, this estate was designed with the expectation of accessible on-street parking. Removing this will force residents to park further away from their homes, which is not safe or practical for families with young children, elderly residents, or those with mobility issues. It will also likely increase congestion on surrounding roads and potentially create hazards where vehicles are forced into unsuitable parking areas.

I understand the need for traffic management and improved transport links, but I strongly feel that these measures have not fully taken into account the realities of life on a family estate. I urge the council to reconsider this proposal or, at the very least, engage directly with residents to find a solution that balances public transport needs with the needs of the community.

I am writing with ref to a proposed traffic parking order notice that has been put up on a lamppost outside my home. I understand this is an order to stop people parking, including myself right outside my own home! I did not purchase my home with these conditions in place. I would like to object to this. My reasons being I. There is already a serious lack of parking spaces especially since parking spaces were abolished on cuscombe circus., that has now become a playground!

#### Comment

#### **Response sent:**

Thank you for your recent comments towards the proposals – 2025.2137336 Saltram Meadows

Your comments have been logged on our records and will be considered as part of the final decision making process. At the end of the consultation period, a report will be prepared summarising any concerns that have been raised and making recommendations. In line with the statutory process, the decision on whether or not to proceed with these proposals will be made by the Cabinet Member for Transport.

You will be notified if and when the proposals will be implemented

### **Response sent:**

Thank you for your recent comments towards the proposals – 2025.2137336 Saltram Meadows

Your comments have been logged on our records and will be considered as part of the final decision making process. At the end of the consultation period, a report will be prepared summarising any concerns that have been raised and making recommendations. In line

2. A proposed bus lane is insane. The road is not large enough or long enough or even used enough to have a bus lane. I further object to this proposal and this is my official complaint. I wish this to be logged with immediate effect.

with the statutory process, the decision on whether or not to proceed with these proposals will be made by the Cabinet Member for Transport.

You will be notified if and when the proposals will be implemented

#### 4. RECOMMENDATION

It is recommended that the proposals are implemented as advertised.

#### 5. LEGAL CONSIDERATIONS

The lawful implications and consequences of the proposal have been considered and taken into account in the preparation of this report.

When considering whether to make a traffic order it is the Council's responsibility to ensure that all relevant legislation is complied with. This includes Section 122 of the Road Traffic Regulation Act 1984 (as amended) that sets out that it is the duty of a local authority, so far as practicable subject to certain matters, to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off the highway. It is considered that the proposals comply with Section 122 of the Act as they practically secure the safe and expeditious movement of traffic in and around Plymouth and provide for suitable and adequate associated parking facilities.



# **EQUALITY IMPACT ASSESSMENT – [SALTRAM MEADOWS]**

## **SECTION ONE: INFORMATION ABOUT THE PROPOSAL**

Author(s): The person completing the EIA template.	Amy Neale	Department and service:	Plymouth Highways, Traffic Management	Date of assessment:	14/04/2025
Lead Officer: Head of Service, Service Director, or Strategic Director.	Mike Artherton	Signature:	M. Artheria	Approval date:	24/04/2025
Overview:	The Saltram Meadows development requires a Traffic Order for a bus lane & parking restrictions to ensure public transport links are provided within this new development & to ensure the safety of this route.				
Decision required:	To implement the following amendments to The City of Plymouth (Traffic Regulation and Street Parking Places) (Consolidation) Order 2004 & The City of Plymouth (Traffic Movement and Speed Limit Regulations) (Consolidation) Order 2022  The effect of the order shall be to:  Add No Waiting restrictions & a Bus lane on lengths of the following roads: Ashbrook Street, Bathampton Way, Broxton Drive, Coscombe Circus, Halecombe Road, Killerton Lane, Kilmar Street, Sourton Square  As set out in the briefing report.				

## SECTION TWO: EQUALITY IMPACT ASSESSMENT SCREENING TOOL

Potential external impacts:	Yes	No	V
Does the proposal have the potential to negatively impact service users, communities or residents with protected characteristics?			
Potential internal impacts:	Yes	No	
Does the proposal have the potential to negatively impact Plymouth City Council employees?			

three)

justification for why not.

No adverse impact anticipated.				

No

Yes

## **SECTION THREE: FULL EQUALITY IMPACT ASSESSMENT**

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

If you do not agree that a full equality impact assessment is required, please set out your

	Evidence and information (e.g. data and consultation feedback)	Adverse impact	Timescale and responsible department
(Equality Act, 2010)			

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Age	Plymouth	No adverse impact anticipated
	<ul> <li>16.4 per cent of people in Plymouth are children aged under 15.</li> <li>65.1 per cent are adults aged 15 to 64.</li> <li>18.5 percent are adults aged 65 and over.</li> <li>2.4 percent of the resident population are 85 and over.</li> </ul>	
	South West	
	<ul> <li>15.9 per cent of people are aged 0 to 14, 61.8 per cent are aged 15 to 64.</li> <li>22.3 per cent are aged 65 and over.</li> </ul>	
	England	
	<ul> <li>17.4 per cent of people are aged 0 to 14.</li> <li>64.2 per cent of people are aged 15 to 64.</li> <li>18.4 per cent of people are aged 65 and over.</li> </ul>	
	(2021 Census)	

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Care experienced individuals  (Note that as per the Independent Review of Children's Social	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.	No adverse impact anticipated	
Care recommendations, Plymouth City Council is treating care experience	education, employment or training (NEET)		
as though it is a protected characteristic).	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).		
	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.		
Disability	9.4 per cent of residents in Plymouth have their activities limited 'a lot' because of a physical or mental health problem.  12.2 per cent of residents in Plymouth have their activities limited 'a little' because of a physical or mental health problem (2021).	No adverse impact anticipated	
	physical or mental health problem (2021 Census)		

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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).		
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	

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Race	In 2021, 94.9 per cent of Plymouth's population identified their ethnicity as White, 2.3 per cent as Asian and 1.1 per cent as Black (2021 Census)	No adverse impact anticipated	
	People with a mixed ethnic background comprised 1.8 per cent of the population. I per cent of the population use a different term to describe their ethnicity (2021 Census)		
	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).		
Religion or belief	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).	No adverse impact anticipated	
	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).		
Sex	51 per cent of our population are women and 49 per cent are men (2021 Census).	No adverse impact anticipated	
Sexual orientation	88.95 per cent of residents aged 16 years and over in Plymouth describe their sexual orientation as straight or heterosexual. 2.06 per cent describe their sexuality as bisexual, 1.97 per cent of people describe their sexual orientation as gay or lesbian. 0.42 per cent of residents describe their sexual orientation using a different term (2021 Census).	No adverse impact anticipated	

## **SECTION FOUR: HUMAN RIGHTS IMPLICATIONS**

Human Rights	Implications	8	Timescale and responsible department	
	No adverse impact anticipated			

# **SECTION FIVE: OUR EQUALITY OBJECTIVES**

Equality objectives	Implications	Mitigation Actions	Timescale and responsible department
Work together in partnership to:	No adverse impact anticipated		
<ul><li>promote equality, diversity and inclusion</li></ul>			
• facilitate community cohesion			
<ul> <li>support people with different backgrounds and lived experiences to get on well together</li> </ul>			
Give specific consideration to care experienced people to improve their life outcomes, including access to training, employment and housing.	No adverse impact anticipated		
Build and develop a diverse workforce that represents the community and citizens it serves.	No adverse impact anticipated		
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.	No adverse impact anticipated		

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