

# EQUALITY IMPACT ASSESSMENT

Plymouth and South Devon Freeport



## STAGE I: WHAT IS BEING ASSESSED AND BY WHOM?

<p><b>What is being assessed - including a brief description of aims and objectives?</b></p>	<p><b>Introduction</b></p> <p>The Plymouth and South Devon Freeport is committed to equality and diversity and to ensuring that residents feel the benefit of this initiative. This high-level equality impact assessment explores the potential impacts for people with protected characteristics as well as other disadvantaged groups (e.g., those from deprived areas). The equality impact assessment (EIA) has also considered the wider social impacts which the Freeport may have in the Plymouth, South Hams and Devon areas.</p> <p>The shadow board have adopted the Equality and Diversity Statement and are committed to ensuring that residents and local people, especially those from deprived areas and marginalised groups, are able to reap the benefits of the Freeport. This EIA builds upon the commitment made by the shadow Freeport board to mainstream equality and diversity within the Plymouth and South Devon Freeport.</p> <p>This EIA will be periodically reviewed and monitored within the wider Plymouth and South Devon Freeport monitoring and evaluation framework.</p> <p>To minimise risks from the Freeport, a security and illicit risk assessment has been carried out separately to this EIA. The security and illicit risk assessment will be monitored separately and covers potential issues such as modern slavery and human trafficking.</p> <p>Where additional formal decisions are required to inform the delivery and development of the Plymouth and South Devon Freeport, an EIA will be completed where required in line with the Council's usual EIA process.</p> <p>The data and commitments included within this EIA will be reviewed before final publication.</p>
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<p><b>Date of assessment</b></p>	<p>August 2021</p>

**STAGE 2: EVIDENCE AND IMPACT**

Protected characteristics (Equality Act)	Evidence and information	Any adverse impact	Actions	Positive impacts
<b>Age</b>	<p><b>Plymouth</b> The population of Plymouth in 2020 was 262,800, of which 165,900 were aged between 16 and 64. The average age in Plymouth (39 years) is about the same as the rest of England (39.3 years) but less than the Southwest (41.6 years).</p> <p><b>Devon</b> The average age in Devon (43.7 years) is higher the rest of England (39.3 years) and older than the Southwest (41.6 years).</p>	<p><b>Noise and disturbance – impacts</b> Evidence has shown that both younger and older people are likely to have their physical and mental wellbeing negatively impacted by increased noise. For young people, for example, increased noise may impact on their ability to meet their educational potential. For older people noise disturbances can cause increased anxiety and exacerbate conditions such as dementia and tinnitus.</p> <p><b>Noise and disturbance – Plymouth Port</b> The Freeport will increase the number of ships using the Plymouth Port and it is likely that this will increase noise and disturbance.</p> <p><b>Noise and disturbance – Increased traffic</b> The Freeport will increase the amount of traffic on Plymouth roads, especially on roads near to the Freeport and within the Freeport itself. A new link road is planned in response to increased demand - spine roads are going to connect to the A38 to improve connectivity.</p> <p><b>Noise and disturbance – construction</b> It is likely that the Freeport will result in an increase in noise from both construction and business as usual. Increases in noise have been linked to poorer health outcomes</p>	<p><b>Noise and disturbance – Plymouth Port</b> As the port needs to operate at the time that the tide allows, it is not possible to mitigate against this impact given its nature. Although there is the potential for the increase in freight traffic to increase noise and disturbance for local residents, the parts of the Port that will be used are largely away from residential areas. The additional tax/customs sites will be on under-developed land, thus minimising impact to the extent that is possible. Langage, the largest site, is partly greenfield and is not directly near housing.</p> <p><b>Noise and disturbance – Increased traffic</b> Consider the potential to issue fixed penalty notices to reduce 'idling' in the areas neighbouring the Freeport and Plymouth</p>	<p>The Freeport will provide extensive employment and educational opportunities.</p>

		<p>including negatively effecting both mental and physical health.</p> <p><b>Emissions</b>                  Poor air quality and pollution has negative consequences for health and the local environment. In particular, a high quantity of particulate matter is linked to poorer health outcomes including negatively effecting both mental and physical health. This negative impact is more likely to effect young people as their lungs are still developing.</p> <p><b>Emissions – Plymouth Port</b>                  The Freeport aims to significantly increase the volume of freight through the Port of Plymouth. Increasing the volume of freight brought in through the Port of Plymouth, rather than more distant UK ports, will reduce national emissions from the transport sector, as well as reducing congestion on trunk roads elsewhere.</p> <p><b>Emissions – Freeport (onsite)</b>                  The increase in freight traffic and associated traffic within the Freeport will likely increase local traffic and thus local emissions.</p>	<p>Port. Consider the possibility to explore noise monitoring and reduction initiatives in the vicinity. Any noise complaints will be monitored for trends.</p> <p><b>Noise and disturbance – construction</b>                  Buildings on our sites will exceed basic building regulations and aim to be zero carbon. Our approach will require buildings to be built using sustainable materials, be well insulated and have renewables (such as solar or heat pumps) integrated. All construction will be delivered in line with local guidance to ensure minimal disruption to the local area.</p> <p><b>Increased emissions – Plymouth Port</b>                  The Plymouth Port is committed to high air quality and has a Port Air Quality Strategy and action plan in place.</p> <p><b>Emissions – Freeport (onsite)</b>                  Within the Freeport we will use a combination of</p>	
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			<p>electric and hydrogen powered vehicles to move cargo between the port and customs sites (funded through the Green Energy Fund). There is already an EV charge point at Oceansgate and by 2025, all support vehicles will be low carbon. Charging infrastructure will also be put in place to encourage wider port users (including RORO traffic) to use low carbon fuels. Emissions from commuter transport will be minimised through a Green Transport Plan, which will include public transport options (including park and ride) as well as walking and cycling, which build on existing infrastructure such as cycle ways.</p> <p>The Freeport will establish an Environmental Management System to provide a framework for managing compliance with environmental legislation. An Environmental Impact Assessment will be used to identify the environmental risks to be managed through the EMS. Key proposals include the development of an Air</p>	
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			<p>Quality Plan to reduce emissions from diesel engines. Measures may include the introduction of an Air Quality Management Area within Plymouth Sound (linked to Smart Sound) in which vessels are required to switch to clean propulsion systems when they enter and adoption of low carbon freight in the landside operation. This work may also include site specific air quality monitoring and subsequent data analysis to monitor pollution levels.</p>	
<p><b>Disability</b></p>	<p><b>Plymouth</b> 10 per cent of the Plymouth population have their day-to-day activities limited a lot by a long-term health problem or disability (2011 Census).</p> <p><b>Devon</b> One in five (20 per cent) people are disabled. 8.6 per cent of people say their day-to-day activities are limited a lot. While 10.9 per cent of people say their day-to-day activities are limited a little.</p>	<p><b>Noise and disturbance – impacts</b> Evidence has shown that people with disabilities and underlying health conditions are more likely to have their physical and mental wellbeing negatively impacted by increased noise. For example, one study found that people living in areas with high levels of traffic noise were 25 per cent more likely than those living in quieter areas to develop depression.</p> <p><b>Noise and disturbance – Plymouth Port</b> The Freeport will increase the number of ships using the Plymouth Port and it is likely that this will increase noise and disturbance.</p> <p><b>Noise and disturbance – Increased traffic</b> The Freeport will increase the amount of traffic on Plymouth roads, especially on roads near to the Freeport and within the Freeport itself.</p>	<p><b>Noise and disturbance – Plymouth Port</b> As the port needs to operate at the time that the tide allows, it is not possible to mitigate against this impact given its nature. Although there is the potential for the increase in freight traffic to increase noise and disturbance for local residents, the parts of the Port that will be used are largely away from residential areas. The additional tax/customs sites will be on under-developed land, thus minimising impact to the extent that is possible. Langage, the</p>	<p>The sites are the optimal choice for the area and offer the best value for money because they:</p> <ul style="list-style-type: none"> <li>Are located in identified growth areas.</li> <li>Are already fully or partially serviced, thus reducing infrastructure costs. Langage also has discounted hot water, high pressure gas and electricity from the adjacent power station and green energy from the adjoining solar park.</li> <li>Have excellent road connectivity, minimising the</li> </ul>

		<p>A new link road is planned in response to increased demand - spine roads are going to connect to the A38 to improve connectivity.</p> <p><b>Noise and disturbance – construction</b> It is likely that the Freeport will result in an increase in noise from both construction and business as usual. Increases in noise have been linked to poorer health outcomes including negatively effecting both mental and physical health. This negative impact is more likely to be felt by people with disabilities, however this is not limited to this cohort</p> <p><b>Emissions</b> Poor air quality and pollution has negative consequences for health and the local environment. In particularly, a high quantity of particulate matter is linked to poorer health outcomes including negatively effecting both mental and physical health. This negative impact is more likely for people with disabilities due to the increased likelihood that they may have an underlying health condition related to their breathing or lungs.</p> <p><b>Emissions – Plymouth Port</b> The Freeport aims to significantly increase the volume of freight through the Port of Plymouth. Increasing the volume of freight brought in through the Port of Plymouth, rather than more distant UK ports, will reduce national emissions from the transport sector, as well as reducing congestion on trunk roads elsewhere.</p> <p><b>Emissions – Freeport (onsite)</b></p>	<p>largest site, is partly greenfield and is not directly near housing.</p> <p><b>Noise and disturbance – Increased traffic</b> TBC</p> <p><b>Noise and disturbance – construction</b> Buildings on our sites will exceed basic building regulations and aim to be zero carbon. Our approach will require buildings to be built using sustainable materials, be well insulated and have renewables (such as solar or heat pumps) integrated. All construction will be delivered in line with local guidance to ensure minimal disruption to the local area.</p> <p><b>Increased emissions – Plymouth Port</b> The Plymouth Port is committed to high air quality and has a Port Air Quality Strategy and action plan in place.</p> <p><b>Emissions – Freeport (onsite)</b></p>	<p>need for large-scale transport costs. Enable us to deliver the Freeport at pace.</p> <p>The Freeport will use the gateway criteria to encourage businesses operating in the Freeport to sign-up to initiatives such as Disability Confident Employer. The employment and skills plan will include engagement with the Department for Work and Pensions and other partners working with people with disabilities to ensure they are able to access the benefits of the Freeport. Engagement will also take place with local voluntary and community sector partners working with people with disabilities to raise awareness of the employment and education offer available.</p>
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			<p>managed through the EMS. Key proposals include the development of an Air Quality Plan to reduce emissions from diesel engines. Measures may include the introduction of an Air Quality Management Area within Plymouth Sound (linked to Smart Sound) in which vessels are required to switch to clean propulsion systems when they enter and adoption of low carbon freight in the landside operation.</p>	
<p><b>Religion or belief</b></p>	<p><b>Plymouth</b>                  Christianity is the biggest faith in the city with more than 58 per cent of the population (148,917). 32.9 per cent (84,326) of the Plymouth population stated they had no religion (2011 Census).                  Those who identified as Muslim was just under 1 per cent while Hindu, Buddhist, Jewish or Sikh combined totalled less than 1 per cent (2011 Census).</p> <p><b>Devon</b>                  61.5 per cent of the population identified their religion as Christian making it the biggest faith. 1.6 per cent identified as having another religion including Buddhists, Muslims,</p>	<p>No adverse impacts are anticipated.</p>	<p>Not applicable</p>	<p>Not applicable</p>

	<p>Hindus and Jews. 28.5 per cent of people stated that they have no religion or belief.</p>			
<p><b>Sex - including marriage, pregnancy and maternity</b></p>	<p><b>Plymouth</b>                      50.2 per cent of the population are women and 49.8 per cent are men.                       The proportion of men working in the manufacturing sector in Plymouth is currently higher than the proportion of women (19.1 per cent, compared to 6.9 per cent).   <b>Devon</b>                      51.4 per cent of the population are women and 48.6 per cent are men.   <b>Nationally</b>                      According the recent UCAS data provided by HESA, 35 per cent of STEM students in higher education in the UK are women.                       The science, technology, engineering and mathematics (STEM) sector is continuing to grow; however, females continue to be underrepresented in STEM at both employment and education level. Nationally, 23 per cent of the people working in science, technology, engineering and mathematics</p>		<p>The Freeport will use the gateway criteria to encourage businesses operating in the Freeport to sign-up to initiatives which encourage women to participate in STEM employment and education. The employment and skills plan will include engagement with the Department for Work and Pensions, universities, schools and other partners working with young women and girls to promote STEM career and education pathways. Engagement will also take place with local voluntary and community sector partners working with women and girls to raise awareness of the employment and education offer available and communication materials will be shared. The Freeport will use the Gateway Criteria to encourage businesses to increase the proportion of females working in STEM sectors. We will also work</p>	<p>The Freeport will provide extensive opportunities for females to gain experience in STEM subjects through apprenticeships, internships and jobs. Encouraging female representation in STEM subjects (and employment in high paying jobs) will likely positively impact any gender pay gaps within companies.</p>

	roles in the UK were female, while only 15.8 per cent of the current generation of engineering and technology graduates were female (PWC Women in Technology 2017).		with our education and skills partners to encourage females to participate in STEM education and employment.	
<b>Gender reassignment</b>	There are no official estimates for gender reassignment. However, the Gender Identity Research and Education Service (GIRES) estimate around 1 per cent of the population has some form of gender variance and about 0.2 per cent may undergo gender reassignment.	No adverse impacts are anticipated.	Not applicable	Not applicable
<b>Race</b>	<p><b>Plymouth</b></p> <p>92.9 per cent of Plymouth's population identify as White British. 7.1 per cent identify themselves as Black, Asian or Minority Ethnic (BAME) with White.</p> <p><b>Devon</b></p> <p>94.9 per cent of Devon's population identify as White British. 2.5 per cent identify as White Other and 2.6 per cent identify as Black, Asian, or another minority ethnic group.</p>		The Freeport will use the gateway criteria to encourage businesses operating in the Freeport to sign-up to initiatives to people from Black, Asian and Minority Ethnic backgrounds have access to the benefits of the Freeport to participate in STEM employment and education. The employment and skills plan will include engagement with the Department for Work and Pensions, universities, schools and other partners working with people from black, Asian and minority ethnic backgrounds to	It is anticipated that the Freeport will increase the size of the catering sector in Plymouth due to increased demand from local businesses. If this were to happen it is likely that this will disproportionately benefit people from Black, Asian and Minority Ethnic backgrounds due to their overrepresentation in the catering and hospitality industries.

			<p>promote career and education pathways.</p> <p>Engagement will also take place with local voluntary and community sector partners working with this cohort and in particular refugees and asylum seekers to raise awareness of the employment and education offer available.</p> <p>Key information within the Freeport will be available in different languages, recognising the diversity of people using and passing through the Freeport.</p> <p>Staff employed by the Freeport will be trained in cultural awareness and cultural accessibility.</p>	
<b>Sexual orientation - including civil partnership</b>	There are no official estimates for sexual orientation at a local level.	No adverse impacts are anticipated.	Not applicable	Not applicable

**SOCIO AND ECONOMIC IMPACTS**

	<b>Evidence and information</b>	<b>Any negative impact</b>	<b>Actions (including timescale and lead)</b>	<b>Positive impacts</b>
<b>Deprivation</b>	<p><b>Plymouth</b></p> <p>According to the IMD 2019 Plymouth has two local super output areas</p>	Due to the skills gap in Plymouth, which is more evident in deprived areas, there is a risk that people from deprived areas may not feel the benefits of the Freeport	An employment and skills plan will help to ensure that people from protected and disadvantaged groups are able to access all opportunities within the	We are keen to ensure that people from Plymouth's most deprived areas benefit from the Freeport. Businesses will be

	<p>(LSOAs) (1.2 per cent) in the most deprived 1 per cent in England. These LSOAs have a combined population of 3,617 (1.4 per cent of Plymouth’s population). In total, 28 LSOAs (17.4 per cent) are in the most deprived 10 per cent in England. These LSOAs have a combined population of 46,075 (17.6 per cent of Plymouth’s population).</p> <p>Of the 151 upper-tier local authorities in England Plymouth ranks the 50th most deprived when looking at the average score summary measure.</p> <p><b>Devon</b></p> <p>There is only one area within Devon included in the most deprived 20 per cent nationally.</p> <p><i>Additional data to follow</i></p>	<p>due to a lack of education and opportunity.</p>	<p>Freeport. This will include a targeted skills/jobs brokerage programme to link people from deprived communities with opportunities. The Marine Academy will assist with the development of apprenticeship and internship opportunities through and during construction phases. A local job club will be developed in Devonport in partnership with local communities to ensure that local residents have access to new employment opportunities. Communications and engagement plans will be shared to raise awareness of these initiatives.</p>	<p>encouraged to sign up via the gateway criteria to initiatives which enhance social mobility.</p> <p>Devonport, the location of the Freeport has one of the lowest cohesion scores in the city. There is strong evidence which shows that reducing deprivation through employment and education can improve cohesion. It is thus likely that the Freeport will indirectly improve the cohesion score in Devonport and in doing so, contribute towards meeting one of Plymouth City Councils equality objectives - Plymouth is a city where people from different backgrounds get along well.</p>
<p><b>Employment</b></p>	<p><b>Plymouth</b></p> <p>With an economy of £5.56bn and supporting 111,500 jobs in 2019, Plymouth is the most significant urban agglomeration on the South West Peninsular. Compared to other city economies, Plymouth has a relatively large public sector as</p>	<p><b>Workers' rights</b></p> <p>Although there are concerns for workers' rights within the Freeport, there are no differences between employment rights between those employed within the Freeport and those outside of it. There is one exception as employers within the Freeport are given a national insurance holiday for three years employed within the Freeport. We have spoken to</p>	<p><b>Employment and skills</b></p> <p>An employment and skills plan will help to ensure that people from protected and disadvantaged groups are able to access all opportunities within the Freeport. This will include a targeted skills/jobs brokerage programme to link people from deprived communities with</p>	<p><b>Employment and skills</b></p> <p>The Freeport will increase the number of high-quality well-paid jobs in the city.</p> <p>In total the Freeport is expected to create more than 1,000 new jobs. Jobs will be created at all levels (e.g. from warehouse operatives through to</p>

	<p>well as healthcare and manufacturing sectors.</p> <p>The latest ONS Annual Population Survey data shows Plymouth as having the same rate of economic activity as nationally as well those in employment. However, the rate of unemployment is higher than both the South West average and national average.</p> <p><i>Additional data to follow</i></p> <p><b>Plymouth</b></p> <p>Gross weekly pay for full-time workers in Plymouth for 2021 stood at £542.4. This is lower than both the gross weekly pay for Great Britain (£612.8) and the South West (£572.5) (NOMIS, 2021).</p> <p><b>Devon</b></p> <p>Gross weekly full-time pay for Devon (as a whole) was £566.9 (NOMIS, 2021).</p>	<p>stakeholders including trade union representatives who are happy with this approach.</p> <p><b>Displacement</b></p> <p>There is little risk within the city from economic displacement and this includes movement from wealthier areas to more deprived areas and from business moving into the Freeport from outside of its boundaries. This is because there are few benefits for businesses moving into the Freeport from outside the Freeport boundary area.</p>	<p>opportunities. The Marine Academy will assist with the development of apprenticeship and internship opportunities through and during construction phases.</p> <p><b>Displacement</b></p> <p>To mitigate any potential negative impacts the Freeport has a clear policy on moving into the Freeport if not in local area (including wider geography and outer boundary). For example, the Freeport gateway criteria means that businesses cannot relocate to the Freeport purely to get tax/tariff exemptions.</p> <p>We will further mitigate any potential displacement by putting in place a gateway policy at all our tax sites. Businesses that express interest in the Freeport will need to demonstrate their status/plans, ensuring that the sites attract foreign direct investment and/or enable the expansion of companies (either foreign or UK owned) rather than the simple relocation of local businesses.</p> <p>Businesses will also be required to demonstrate additionality when applying for the benefits on offer. We will create an index to</p>	<p>management and technical specialists), of which 400 will be high value jobs. This will help to address Plymouth’s lower than average wage profile. Through aligned activity, 600 people will be up-skilled to take advantage of those jobs. Working with our educational providers we will establish a Marine Skills Academy and by 2027 will also create at least 60 new apprentices and 10 internships annually. There is a possibility that this may include targeted skills development work with the local refugee and asylum seeker population.</p>
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			<p>qualify new Freeport businesses to ensure they are making high use of the incentives and monitor them during their stay. Equally, by implementing the tax measures proposed by Government, we will minimise displacement, as the measures have been designed to do so. More than 70 local businesses are anticipated to benefit from the Freeport, which is forecast to bring in over £100m investment in the next six years.</p>	
<b>Local Services</b>	<p>Plymouth City Council and Devon County Council deliver a range of services to local people.</p>	<p>It is not possible to indicate potential impacts on local services until the modelling is complete.</p> <p>It is not anticipated that the Freeport will negatively affect housing availability and it is unlikely that the Freeport will increase demand for local social housing (dependent on modelling). Dependent on the numbers of people relocating to Plymouth there may be increased demand for local services such as dentists, primary care services and housing. It is not possible to quantify these figures until modelling has been confirmed.</p>	<p>The Plymouth Plan topic paper 'Housing need and supply' sets out the strategy for housing provision in the city. The plan works towards supporting the ambitions within the Plymouth Plan of a 'growing city'. The Freeport is one component of the plan to grow the city and its economies.</p>	<p>The Freeport will help to accelerate the Sherford housing development, further enhancing the availability of good quality private housing stock.</p>