

# EQUALITY IMPACT ASSESSMENT

Plymouth and South Devon Freeport



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

**What is being assessed - including a brief description of aims and objectives?**

### Introduction

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.

The Equality Impact Assessment (EIA) also considers wider social impact and inequality such as access to employment and skills development in areas of deprivation. The Freeport is committed to ensuring that a minimum of 10 per cent of the jobs created by the Freeport are directed towards our most deprived areas. The EIA has also considered the wider social impacts which the Freeport may have in the Plymouth, South Hams and Devon areas.

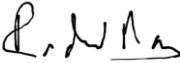
The shadow board have adopted the Equality and Diversity Statement and are committed to ensuring that residents and local people, especially those from deprived areas and marginalised communities, are able to reap the benefits of the Freeport. This EIA builds upon the commitment made by the shadow Freeport board to mainstream equality and diversity within the Plymouth and South Devon Freeport.

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.

Adverse environmental impacts such as reduced air quality and noise and disturbance identified in this equality impact assessment will be fed into our Freeport environmental impact assessment to ensure that impacts that we have identified which may adversely affect groups with protected characteristics will be appropriately mitigated.

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.

This EIA will be periodically reviewed and monitored within the wider Plymouth and South Devon Freeport monitoring and evaluation framework.

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<b>Approved by</b>	Richard May – SRO, Plymouth and South Devon Freeport 
<b>Date of approval</b>	15 March 2022

## 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 63.1 per cent were aged between 16 and 64.</p> <p><b>Devon</b> The population of Devon County Council area in 2020 was 810,700, of which 470,900 (58.1 per cent) were aged between 16 and 64.</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 wellbeing and ability to meet their educational potential. For older people noise disturbances can cause increased anxiety and exacerbate conditions such as dementia and tinnitus.</p> <p><b>Noise and disturbance – Plymouth Port</b> The Freeport may increase the number of ships using the Plymouth Port and it is likely that this will increase noise and disturbance.</p> <p><b>Noise and disturbance – Increased traffic</b></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</p>	The Freeport will provide extensive employment and educational opportunities.

		<p>The Freeport will increase the amount of traffic on Plymouth roads, especially on roads near to the Freeport and within the Freeport itself.</p> <p>A new road link is planned in response to increased demand - spine roads are going to connect to the A38 to improve connectivity.</p> <p><b>Noise and disturbance – construction</b></p> <p>It is likely that the Freeport will result in an increase in noise from both construction and business as usual. Increases in noise have been linked to poorer health outcomes including negatively effecting both mental and physical health.</p> <p><b>Emissions</b></p> <p>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></p> <p>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>possible. South Yard is in close proximity to a local school and the Sherford employment zone is part of the wider Sherford village development. Langage, the largest site where most of the construction is going to take place, is greenfield and is not directly adjacent to residential area.</p> <p><b>Noise and disturbance – Increased traffic</b></p> <p>We will consider the possibility to explore noise monitoring and reduction initiatives in the vicinity if required. Any noise complaints will be monitored for trends.</p> <p>Our approach will require buildings to be built using sustainable materials, be well insulated and have renewables (such as solar or heat pumps) integrated.</p> <p>All construction will be delivered in line with local guidance to ensure minimal disruption to the local area.</p> <p>Within the Freeport we will use a combination of electric and hydrogen powered vehicles to move cargo between the port and</p>	
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<p><b>Disability</b></p>	<p><b>Plymouth</b></p> <p>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>The gap in the employment rate between those with long term health conditions and the overall employment rate was 13.7 per cent in Plymouth compared to 10.6 per cent for England.</p> <p><b>Devon</b></p>	<p><b>Noise and disturbance</b></p> <p>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></p> <p>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></p>	<p><b>Noise and disturbance – Plymouth Port</b></p> <p>As the port needs to operate at the time that the tide allows, it is not possible to mitigate against this impact given its nature. 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</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> </ul>

	<p>8.6 per cent of people in the Devon County Council area say their day-to-day activities are limited a lot by a long-term health problem or disability (2011 Census).</p> <p>The Gap in the employment rate between those with long term health conditions and the overall employment rate was 7.2 per cent in Devon. The value for England is 10.6 per cent.</p>	<p>The Freeport will increase the amount of traffic on Plymouth roads, especially on roads near to the Freeport and within the Freeport itself. A new road link is planned in response to increased demand - spine roads are going to connect to the A38 to improve connectivity.</p> <p><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 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 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>to the extent that is possible. South Yard is in close proximity to a local school and the Sherford employment zone is part of the wider Sherford village development.</p> <p>Langage, the largest site where most of the construction is going to take place, is greenfield and is not directly adjacent to residential area.</p> <p><b>Noise and disturbance – Increased traffic</b> We will consider the possibility to explore noise monitoring and reduction initiatives in the vicinity if required. Any noise complaints will be monitored for trends.</p> <p>Our approach will require buildings to be built using sustainable materials, be well insulated and have renewables (such as solar or heat pumps) integrated. All construction will be delivered in line with local guidance to ensure minimal disruption to the local area. Within the Freeport we will use a combination of electric and hydrogen</p>	<ul style="list-style-type: none"> <li>▪ Have excellent road connectivity, minimising the need for large-scale transport costs.</li> <li>▪ Enable us to deliver the Freeport at pace.</li> </ul> <p>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><b>Religion or belief</b></p>	<p><b>Plymouth</b></p> <p>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).</p> <p>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></p>	<p>No adverse impacts are anticipated.</p>	<p>Not applicable</p>	<p>Not applicable</p>

	<p>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, 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>50.2 per cent of the population in Plymouth are women and 49.8 per cent are men. 51.4 per cent of the population in Devon are women and 48.6 per cent are men.</p> <p>The employment rate in Plymouth shows that 83 per cent of working-age males are employed whereas 72 percent of working-age females are employed.</p> <p>The employment rate in Devon shows that 77.9 per cent of working-age males are employed compared to 73.4 per cent of working-age females.</p> <p>The rate for the whole of the UK shows a similar pattern with a higher working-age employment rate for males than females.</p> <p>The proportion of men working in the manufacturing sector in Plymouth is currently</p>	<p>No adverse impacts are anticipated.</p>	<p>The employment and skills plan will include engagement with the Department for Work and Pensions, universities, schools and other partners working with young women and girls to promote STEM career and education pathways.</p> <p>Engagement will also take place with local voluntary and community sector partners working with women and girls to raise awareness of the employment and education offer available and communication materials will be shared.</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>

	<p>higher than the proportion of women (19.1 per cent, compared to 6.9 per cent).</p> <p>According to recent UCAS data provided by HESA, 35 per cent of STEM students in higher education in the UK are women.</p> <p>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 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).</p>			
<b>Gender reassignment</b>	<p>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.</p>	No adverse impacts are anticipated.	Not applicable.	Not applicable
<b>Race</b>	<b>Plymouth</b>	No adverse impacts are anticipated.	The employment and skills plan will include	The Freeport Gateway Policy requires a commitment to our



	<p>92.9 per cent of Plymouth's population identify as White British. 7.1 per cent identify as Black, Asian or Minority Ethnic (BAME).</p> <p>The employment rate of working-age people who identify as being from an ethnic minority background in Plymouth is 73.3 per cent. This is higher than the rate for the whole of the UK at 66.8 per cent.</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> <p>The employment rate of working-age people who identify as being from an ethnic minority background in Devon is 80.6 per cent.</p>		<p>engagement with the Department for Work and Pensions, universities, schools and other partners working with people from Black, Asian and minority ethnic backgrounds to promote career and education pathways.</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>	<p>Freeport vision which encompasses a commit to promote good employment practices.</p>
<b>Sexual orientation - including civil partnership</b>	<p>There are no official estimates for sexual orientation at a local level.</p>	<p>No adverse impacts are anticipated.</p>	<p>Not applicable</p>	<p>Not applicable</p>

**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>Plymouth remains within the 20 per cent most deprived local authority districts in England on the Index of Multiple Deprivation (IMD) with:</p> <ul style="list-style-type: none"> <li>▪ 28 Lower Super Output Areas (LSOAs) in the most deprived 10 per cent in England</li> <li>▪ Three LSOAs within the most deprived 3 per cent in England; and,</li> <li>▪ Two LSOAs within the most deprived 1 per cent in England.</li> </ul> <p>Plymouth's most deprived LSOAs (which are amongst the most 1 per cent deprived in England) are located in the wards of St Peter and the Waterfront and Devonport. These areas represent some of the city's most entrenched pockets of deprivation and have consistently been amongst the most deprived neighbourhoods in England since 2007.</p> <p>Dartmouth Townstall area is the one area within South Hams that is included in the</p>	<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 due to a lack of education and opportunity.</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 opportunities. The Marine Skills Academy will assist with the development of apprenticeship and internship opportunities through and during construction phases. A local job club will be developed in the vicinity of South Yard in partnership with local communities to ensure that local residents have access to new skills and employment opportunities. Communications and engagement plans will be developed to raise awareness of these initiatives.</p>	<p>We are keen to ensure that people from Plymouth's most deprived areas benefit from the Freeport. Businesses will be 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>most deprived 20 per cent of areas nationally for overall deprivation. In addition, within South Hams South Brent is within the most deprived 20 per cent of areas nationally for income deprivation affecting children.</p>			
<p><b>Employment</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>Gross weekly full-time pay for Devon (as a whole) was £566.9. This is lower than both the gross weekly pay for Great Britain (£613.1) and the South West (£577.3) (NOMIS, 2021).</p> <p>Unemployment in Plymouth has been higher than the national average for the last five years (Annual Population Survey) and in Devonport adjacent to the South yard tax site it is double the City average.</p> <p>Claimant numbers remain higher than pre pandemic across the Freeport Area. The employment prospects of both younger and older people in our area have been negatively impacted by the pandemic. The Universal Credit claimant</p>	<p><b>Workers' rights</b> 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 regularly engaged with trade union representatives.</p> <p><b>Displacement</b> 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><b>Employment and skills</b> 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 opportunities. The Marine Academy will assist with the development of apprenticeship and internship opportunities through and during construction phases.</p> <p><b>Displacement</b> To mitigate any potential negative impacts the Freeport gateway criteria 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</p>	<p><b>Employment and skills</b> The Freeport will increase the number of high-quality well-paid jobs in the city and will provide numerous skills development opportunities.</p>

	<p>count rose by 81 per cent for under 25s and 92 per cent for over 50s from March 2020 to April 2021.</p> <p>In the South Hams the rise was 204 per cent for under 25s and 152 per cent for over 50s in the same period.</p> <p>As the economy begins to recover many will return to work or find new jobs but will face longer term challenges.</p>		<p>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 compliance with the gateway policy.</p>	
<p><b>Local Services</b></p>	<p>Plymouth City Council, South Hams District 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 housing. However, the Joint Local Plan identifies housing need until 2030 and based on the assumption of the sites which are being included in the Freeport being developed as employment spaces.</p> <p>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.</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>