


# FEQUALITY IMPACT ASSESSMENT – [FREEPORT PROJECT BUSINESS CASE EXECUTIVE DECISION]

## SECTION ONE: INFORMATION ABOUT THE PROPOSAL

<b>Author(s):</b> This is the person completing the EIA template.	Cath Parnall	<b>Department and service:</b>	Economic Development	<b>Date of assessment:</b>	10/09/24
<b>Lead Officer:</b> Please note that a Head of Service, Service Director, or Strategic Director must approve the EIA.	Amanda Ratsey	<b>Signature:</b>		<b>Approval date:</b>	10/09/24
<b>Overview:</b>	<p>Plymouth City Council is the Accountable Body for the Freeport and will receive and allocate the Seed Capital to support the delivery of the Freeport Annual Plan.</p> <p>The Accountable Body is responsible for the effective programme management of the Seed capital programme pipeline, including appraisal of individual business cases for Seed Capital projects.</p> <p>This decision is necessary in order to meet timeframes set by Department for Levelling Up, Housing &amp; Communities (DLUHC) in order to deliver the proposed activities as set out in the Business Case and spend the funds accordingly and in time.</p> <p><b>Business Case Summary</b></p> <p>The core objective of the project is to deliver the construction of an adoptable road of approx. 290m. It will join onto the existing Holland Road and will continue through Plot 2, ending up connecting to Plot 5. It will provide two way access and will be constructed to an adoptable standard, with the intention of it being adopted by the relevant Council in the future. Plot 2 is one of the prime developable sites at Langage at the current time and Plot 5 is restricted by a narrow section of road that would require the removal of traditional Devon hedgerows before further developments could take place so this is the best option to open up access at this time.</p> <p>The project primarily supports two Freeport policy objectives:</p>				

	<ul style="list-style-type: none"> <li>• <b>Establishing a national hub for global trade and investment</b> – by accelerating the development of employment land with the aim of enabling a key local employer to create a new Logistics Facility onsite.</li> <li>• <b>Promoting regeneration and job creation</b> – by creating the conditions to support the development of new jobs.</li> </ul> <p>It also, less directly, supports the long-term sustainability of the Freeport’s hotbed for innovation because the end user of the site will have a significant supply chain, creating demand and opportunity for collaboration and development.</p> <p>The project itself is a straightforward transaction. It will use the seed capital allocation of £800,000, in order to deliver 290m of two way access road to open up Plots 2 and 5 ahead of the DCC Spine Road build. The road will contain water, drainage and electricity conduits to both Plots , further supporting the development , which is otherwise affected by high and rising construction costs.</p>
<b>Decision required:</b>	<ol style="list-style-type: none"> <li>1. To agree to allocate £800,000 of Freeport Seed Capital Funding into the Capital Programme to be used for power installation at Langage Energy Park Ltd.</li> <li>2. To authorise the Section 151 Officer to approve relevant funding claims up the total Seed Capital amount of £800,000 as listed above.</li> </ol>

## SECTION TWO: EQUALITY IMPACT ASSESSMENT SCREENING TOOL

<b>Potential external impacts:</b> Does the proposal have the potential to negatively impact service users, communities or residents with protected characteristics?	<b>Yes</b>		<b>No</b>	x
<b>Potential internal impacts:</b> Does the proposal have the potential to negatively impact Plymouth City Council employees?	<b>Yes</b>		<b>No</b>	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)	<b>Yes</b>		<b>No</b>	x
If you do not agree that a full equality impact assessment is required, please set out your justification for why not.	A full EIA has been completed below despite the answers above.			

## SECTION THREE: FULL EQUALITY IMPACT ASSESSMENT

Protected characteristics (Equality Act, 2010)	Evidence and information (e.g. data and consultation feedback)	Adverse impact	Mitigation activities	Timescale and responsible department
<b>Age</b>	<p>Plymouth</p> <ul style="list-style-type: none"> <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> <p>South West</p> <ul style="list-style-type: none"> <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> <p>England</p> <ul style="list-style-type: none"> <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> </ul>	<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> 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></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. South Yard is in close proximity to a local school and the Sherford employment zone is part of the wider Sherford village development. Langage, the largest site where most of the construction is going to take place, is greenfield and is not directly adjacent to residential area.</p>	<p>March 2026</p> <p>Economic Development</p>

	<ul style="list-style-type: none"> <li>18.4 per cent of people are aged 65 and over.</li> </ul> <p>(2021 Census)</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>                  Poor air quality and pollution has negative consequences for health and the local environment. In particular, a high quantity of particulate matter is linked to poorer health outcomes including negatively effecting both mental and physical health. This negative impact is more likely to affect young people as their lungs are still developing.</p> <p><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><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.</p> <p>All construction will be delivered in line with local guidance to ensure minimal disruption to the local area.</p> <p>Within the Freeport we will use a combination of electric and hydrogen powered vehicles to move cargo between the Port and customs sites. There is already and EV charge point at Oceansgate and by 2025, all support vehicles will be low carbon. Charging infrastructure will also be put in place to encourage wider port users (including RORO traffic) to use low carbon fuels. Emissions from commuter transport will be minimised through green transport initiatives, which will include public transport options (including park and ride) as well</p>	
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			as walking and cycling, which build on existing infrastructure such as cycle ways.	
<p><b>Care experienced individuals</b></p> <p>(Note that as per the Independent Review of Children’s Social Care recommendations, Plymouth City Council is treating care experience as though it is a protected characteristic).</p>	<p>It is estimated that 26 per cent of the homeless population in the UK have care experience. 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>	No adverse impact anticipated.	Not applicable.	March 2026 Economic Development
<b>Disability</b>	9.4 per cent of residents in Plymouth have their activities limited ‘a lot’ because of a physical or mental health problem.	<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</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</p>	March 2026 Economic Development

	<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>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. 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</p>	<p>not possible to mitigate against this impact given its nature.</p> <p>Although there is the potential for the increase in freight traffic to increase noise and disturbance for local residents, the parts of the Port that will be used are largely away from residential areas. The additional tax/customs sites will be on under-developed land, thus minimising impact to the extent that is possible. South Yard is in close proximity to a local school and the Sherford employment zone is part of the wider Sherford village development.</p> <p>Langage, the largest site where most of the construction is going to take place, is greenfield and is not directly adjacent to residential area.</p> <p><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</p>	
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		<p>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> The increase in freight traffic and associated traffic within the Freeport will likely increase local traffic and thus local emissions.</p> <p><b>Accessibility</b> The large majority of buildings within the Freeport will be closed to members of the public, however we recognise that accessibility is still important. Where buildings are older, guidance will be taken from the appropriate colleagues and heritage organisation when appropriate</p>	<p>(such as solar or heat pumps) integrated.</p> <p>All construction will be delivered in line with local guidance to ensure minimal disruption to the local area.</p> <p>Within the Freeport we will use a combination of electric and hydrogen powered vehicles to move cargo between the Port and customs sites. There is already 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 green transport initiatives, which will include public transport options (including park and ride) as well as walking and cycling, which build on existing infrastructure such as cycle ways.</p>	
<p><b>Gender reassignment</b></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 woman (2021 Census).</p>	<p>No adverse impacts are anticipated.</p>	<p>Not applicable.</p>	<p>March 2026 Economic Development</p>

<b>Marriage and civil partnership</b>	<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>	No adverse impacts are anticipated.	<p>The employment and skills plan will include engagement with the Department for Work and Pensions, universities, schools and other partners working with young women and girls to promote 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>March 2026</p> <p>Economic Development</p>
<b>Pregnancy and maternity</b>	<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>	No adverse impacts are anticipated.	<p>The employment and skills plan will include engagement with the Department for Work and Pensions, universities, schools and other partners working with young women and girls to promote 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>March 2026</p> <p>Economic Development</p>



<b>Race</b>	<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>	No adverse impacts are anticipated.	<p>The employment and skills plan will include engagement with the Department for Work and Pensions, universities, schools and other partners working with 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>	March 2026 Economic Development
<b>Religion or belief</b>	<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,</p>	Not applicable	Not applicable	March 2026 Economic Development

	Jewish or Sikh combined totalled less than 1 per cent (2021 Census).			
<b>Sex</b>	51 per cent of our population are women and 49 per cent are men (2021 Census).	No adverse impacts are anticipated.	The employment and skills plan will include engagement with the Department for Work and Pensions, universities, schools and other partners working with young women and girls to promote STEM career and education pathways.  Engagement will also take place with local voluntary and community sector partners working with women and girls to raise awareness of the employment and education offer available and communication materials will be shared.	March 2026 Economic Development
<b>Sexual orientation</b>	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 impacts are anticipated.	Not applicable	March 2026 Economic Development

**SECTION FOUR: HUMAN RIGHTS IMPLICATIONS**

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

**SECTION FIVE: OUR EQUALITY OBJECTIVES**

<b>Equality objectives</b>	<b>Implications</b>	<b>Mitigation Actions</b>	<b>Timescale and responsible department</b>
<b>Work together in partnership to:</b> <ul style="list-style-type: none"> <li>▪ promote equality, diversity and inclusion</li> <li>▪ facilitate community cohesion</li> </ul> <b>support people with different backgrounds and lived experiences to get on well together</b>	There are no anticipated direct negative implications to this objective.	Not applicable. This will be reviewed if in the case that any adverse impacts should arise during delivery.	March 2026. Economic Development
<b>Give specific consideration to care experienced people to improve their life outcomes, including access to training, employment and housing</b>	There are no anticipated direct negative implications to this objective.	Not applicable. This will be reviewed if in the case that any adverse impacts should arise during delivery.	March 2026. Economic Development
<b>Build and develop a diverse workforce that represents the community and citizens it serves.</b>	There are no anticipated direct negative implications to this objective.	Not applicable. This will be reviewed if in the case that any adverse impacts should arise during delivery.	March 2026. Economic Development

<b>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</b>	There are no anticipated direct negative implications to this objective.	Not applicable. This will be reviewed if in the case that any adverse impacts should arise during delivery.	March 2026. Economic Development
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