


# EQUALITY IMPACT ASSESSMENT – MOUNT BATTEN MAIN WORKS – PLYMOUTH SOUND NATIONAL MARINE PARK

## SECTION ONE: INFORMATION ABOUT THE PROPOSAL

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<b>Lead Officer:</b> Please note that a Head of Service, Service Director, or Strategic Director must approve the EIA.	Kathryn Deeney	<b>Signature:</b>		<b>Approval date:</b>	4 <sup>th</sup> August

**Overview:**

The National Lottery Heritage Fund (NLHF) Round 2 bid was successful, and the full grant applied for was approved by the NLHF Board in Dec 2023. The focus of the project is to support underserved communities in Plymouth to have increased access to the sea and coast through a suite of both capital and revenue interventions.

The delivery stage of the project will catalyse work to deliver the NMP vision over a 5 year period, starting in January 2024 following the discharging of the grant conditions and acceptance of the grant funding.

The project is an integrated, transformative collaborative programme of work to enable a new relationship between the city and sea, which benefits people and nature. The aim of the different areas of the project is to work holistically together to bring the NMP to life. The project includes.

- An inclusive Activity Plan, which will provide different communities with opportunities to engage with the Park, discover and learn more about the NMP and support activities to help enhance and care for the Park.
- Sensitive Capital enhancements to key hubs along the waterfront opening up new places and spaces for communities to enjoy and engage with the NMP.
- Pioneering nature restoration initiatives.
- An innovative Digital Park to ensure the heritage beneath the waves is visible, accessible and inspirational.

- An Interpretation Plan which will highlight the past, present and future, co-designed with our communities and reaching into the heart of our city.

This cohesive programme has been designed to enable a new sustainable relationship with the sea. By removing identified barriers to access, it will enable communities across the city to engage with the NMP in a manner that is relevant and beneficial to them. There will be a focus on working alongside communities that currently have little or no engagement with the NMP. This will deliver significant benefits and ensure that the NMP is inclusive and welcome for all.

The Capital works are a huge enabler to encourage this sustainable relationship with the sea by providing new and engaging access points to the Ocean.

At Mount Batten the capital works include the largescale restoration of the Mountbatten Watersports and Activity Centre (ground floor) and the redesign of the public spaces with increased access to the Mount Batten Tower scheduled monument. The Mount Batten Watersports and Activity Centre ground floor works include new accessible changing facilities, reimagined café and outdoor seating area. Separate but complimentary to this current work the centre's pontoon will be replaced to allow new facilities and public access.

#### **Engagement in Project Design**

To help inform the project design and delivery and, ensure that equality diversity and inclusion is at the centre of our project, we have engaged with local community organisations including ethnic minorities, disability groups, the LGBTQ+ community, and organisations that work with neurodivergent individuals.

During the test and trial phase we have spoken directly to 10,000 people, inspired over 7,000 school children, reached millions through our digital engagement and motivated over 200 people to become volunteers. The project team and partners have worked with our communities to provide genuine engagement and a deep understanding of how this project can drive a very positive transformation for people, the environment and Plymouth.

Over the past 2 years the project has ensured inclusive engagement has enabled communities to shape the project that will be submitted at the next stage, as well as ensuring people had the opportunity to interact with the NMP in new ways.

The Development Phase research and consultation programme clearly established how local people, communities and businesses perceive the area and its heritage. The majority of feeling was overwhelmingly positive, consistent with data from the 2022 City Survey which recorded that 97.8% of respondents said that Plymouth Sound was either Important or Very Important to them. The findings from this research has led to the identification of a set of barriers to engagement which are mitigated by a programme of activities as we have set out in the table below.

Based on desk research, consultation and pilot projects, the priority audiences for this project, i.e. communities that feel disconnected, are confirmed as:

	<ul style="list-style-type: none"> <li>Families with school-age children</li> <li>Adults (55+) from lower income neighbourhoods</li> <li>Plymouth catchment schools (primary, secondary and SEND)</li> <li>Students: Higher and Further education</li> <li>People with health conditions or impairments • People from ethnic minority backgrounds</li> </ul> <p>The research underlined the importance of co-design and co-development with community groups and communities of interest. Co-development is embedded in the Activity Plan methodology, aligned to each priority audience, with input from specialist sector charity.</p> <p>The full Business Case and an Executive Decision to accept the funding and add it to the capital programme was presented to cabinet 12 February and was approved (minute reference 103).</p>
<b>Decision made:</b>	<p><b>Mount Batten Main Works</b></p> <ol style="list-style-type: none"> <li>Approves the Business Case</li> <li>Allocates £908,367 for the project into the Capital Programme funded by Corporate Borrowing</li> <li>Approve any contract modification(s) in relation to Compensation Events provided that the modification(s) do not alter the overall nature of the contract and does not exceed the available project budget, subject to prior agreement with Procurement.</li> </ol>

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

Is a full Equality Impact Assessment required? (if you have answered yes to either of the questions above then a full impact assessment is required, and you must complete section three)	Yes		No	X
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## SECTION TWO: EQUALITY IMPACT ASSESSMENT SCREENING TOOL

If you do not agree that a full equality impact assessment is required, please set out your justification for why not.	It is unlikely the programme will have any negative impacts. However, we have conducted the full EIA assessment in this case to ensure that all members of our community are afforded equality of access to the programme.
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## SECTION THREE: FULL EQUALITY IMPACT ASSESSMENT

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

Age	<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> </ul>	<p>No adverse impact is anticipated from the Mount Batten programme however:</p> <p>Specialist teams such as PCC Youth Services are unable to deliver youth sessions on the shoreline as they lack knowledge about where to go safely, marine science and benefits for young people.</p> <p>A common denominator that restricts engagement for all priority audiences is low income and therefore the need for free activities and free or low-cost travel, and /or events that are walking</p>	<p>Close working with PCC youth workers will build confidence in the youth team and offer benefits to young people of learning from a Ranger.</p> <p>All engagement will be taken place with the PSNMP team (Either the PCC/Street Services Rangers or Mount Batten themselves in line with their collaboration agreement)</p> <p>Central works must integrate an entirely accessible route that</p>	<p>Our Marine citizenship pathway sets out a clear 3 step programme:</p> <p>Step 1 – Experience and Learn</p> <p>Step 2 – Discover and Learn</p> <p>Step 3 – Connect and Act</p> <p>PSNMP will begin targeted work with younger people on Step 1 in 2024 and with over 55s from low income neighbourhoods in 2025.</p> <p>Pontoon installation planned as part of capital works (2025/26). Led by</p>
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	<ul style="list-style-type: none"> <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> <p>(2021 Census)</p> <p>Respondents aged '16-24' were <u>significantly</u> less likely to <b>agree</b> Plymouth's Sound is special to the city (71%) compared with those aged '25+' (89%-97%). (City Survey 2022)</p>	<p>distance from home this is particularly relevant to young people who often cite the cost of public transport as a barrier.</p> <p>Restrictions for the 20% of Plymouth residents who are 60+ years of age risk restriction due to their physical ability to access the works.</p> <p>Very low, or non-attainment in age related tests and formal qualifications is a barrier to transition through school and in job or career.</p> <p>Teaching and learning support for Science Technology, Engineering and Maths (STEM) subjects was in demand by teachers.</p>	<p>allows all to engage with Mount Batten café, when they are unable to engage in physical activities, allowing all age engagement to Mount Batten.</p> <p>Tailored coaching for pupils and young people supports a city-wide approach to unlocking potential for employment in the blue STEM sector for marginalised young people.</p> <p>The addition of a pontoon will enhance water access and offer a more stable, safer means of boarding and disembarking from vessels, particularly supporting older adults and youth groups who may have reduced mobility or coordination.</p>	PSNMP and Plymouth City Council.
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<b>Care experienced individuals.</b>  (Note that as per the Independent Review of	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	No adverse impacts are anticipated from the Mount Batten programme, however:  A common denominator that restricts engagement for all priority audiences is low	Lack of transport and access, together with the cost of activities and cultural differences are all significant barriers that the project aim to	The majority of people with identifiable care experience needs will be younger people. PSNMP will begin targeted work
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<p>Children's Social Care recommendations, Plymouth City Council is treating care experience as though it is a protected characteristic).</p>	<p>those aged 21+) who are in unsuitable accommodation.</p> <p>The Care Review reported that 41 per cent of 19-21 year old care leavers are not in education, employment or training (NEET) compared to 12 per cent of all other young people in the same age group.</p> <p>In Plymouth there are currently 50 per cent of care leavers aged 18-21 Not in Education Training or Employment (54 per cent of all those care leavers aged 18-24 who are open to the service).</p> <p>There are currently 195 care leavers aged 18 to 20 (statutory service) and 58 aged 21 to 24 (extended offer). There are more care leavers aged 21 to 24 who could return for support from services if they wished to.</p>	<p>income and therefore the need for free activities and free or low-cost travel, and /or events that are walking distance from home. These factors are likely to be particularly relevant to Care Experienced individuals.</p> <p>Care experienced individuals are particularly likely to suffer from poor educational attainment and very low, or non-attainment in age related tests and formal qualifications is a barrier to transition through school and in job or career.</p>	<p>overcome and will be a focus for the Activity Plan in collaboration with MBC, a significant budget has been earmarked to support low income groups to overcome these barriers.</p> <p>Further to this the Activity Plan will involve specific engagement to key groups, this will include both communities in and providing care.</p> <p>The project has created 4 supported, paid internship placements every year for four years of the project, and these will be targeting people from our target audiences from year two until year four. We will also consider how these can support internships can support Care Experienced Individuals through the role profiles we develop for them.</p> <p>Mount Batten should be involved in taking on some of these</p>	<p>with younger people on Step 1 in 2024.</p> <p>Pontoon installation planned as part of capital works (2025/26). Led by PSNMP and Plymouth City Council.</p>
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			internships/volunteers to	
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			<p>promote blue career pathways.</p> <p>The addition of a pontoon will directly support inclusive participation by enabling safe, accessible entry to the water for young people who may lack confidence or have not previously had access to structured water-based experiences. It removes physical and psychological barriers to engaging in marine learning and activities, fostering a sense of belonging and opportunity.</p>	
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<b>Disability</b>	<p>9.4 per cent of residents in Plymouth have their activities limited 'a lot' because of a physical or mental health problem.</p> <p>12.2 per cent of residents in Plymouth have their activities limited 'a little' because of a physical or mental health problem (2021 Census)</p> <p>Respondents with 'no limiting disability or health problem' (92%) were <u>significantly</u> more likely to <b>agree</b> with the statement Plymouth's Sound is special to the city than those who were 'limited a lot' (87%).</p>	<p>No adverse impacts are anticipated from the Mount Batten programme, however:</p> <p>There are significant barriers to engagement for people with health conditions and impairments.</p> <p>The capital programme envisages works to a number of buildings on the waterfront which have historically</p>	<p>Consultation during and after the works should take place with a wide range of groups demonstrating that responses must be specific and targeted.</p> <p>Plymouth residents receiving treatment for a mental health illness, and many more who will not be formally diagnosed</p>	<p>PSNMP will begin targeted work with people with a health impairment on Step 1 in 2025</p> <p>Pontoon installation planned as part of capital works (2025/26). Led by PSNMP and Plymouth City Council.</p>
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		<p>suffered from poor physical access.</p>	<p>can utilise Plymouth’s proximity to the ocean and the development of PSNMP for blue social prescribing used within their mental health services</p> <p>Works taken place must focus on improving access in the context of marine heritage buildings (The Mount Batten Tower) where the natural topography is a limiting factor.</p> <p>Reasonable steps must be taken to improve access/allow those physically unable to access The Tower to still feel engaged and connected.</p> <p>All works must also consider the disabilities that are not obvious to the eye such as sight and hearing impairments.</p> <p>Works must involve a hearing loop and accessible access where required for those that need extra support</p>	
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			and/or guide dog guidance.	
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			<p>Staff will be appropriately trained in how to approach and support the public who require extra support without making them feel disconnected or an inconvenience.</p> <p>The inclusion of a new pontoon will enable level access to boats and water-based activities, reducing physical barriers for wheelchair users, those with mobility impairments, and people recovering from injury.</p>	
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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 woman (2021 Census).	No adverse impacts anticipated. However: National and local research highlights that trans and nonbinary individuals often experience discomfort, discrimination, or exclusion in gendered changing or activity spaces, particularly in physically exposed environments such as swimming or outdoor water access.	Training for staff and activity leaders will include gender identity awareness to ensure respectful and supportive environments during pontoon-based sessions. The Activity Plan will review how water-based sessions, including those using the pontoon, can be further adapted to support inclusion of trans and non-binary participants, including	Ongoing engagement with LGBTQ+ communities as part of wider participation strategy.
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			privacy and dignity considerations.	
<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 partnership of the same sex. 0.06 per cent of residents are in a civil partnership with the opposite sex (2021 Census).</p>	No adverse impacts anticipated	Not applicable	Not applicable
<b>Pregnancy and maternity</b>	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 impacts anticipated	Not applicable	Not applicable

<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> <p>Those identifying themselves as 'White' were <u>significantly</u> more likely to <b>agree</b> Plymouth Sound is special to the city (92%) compared</p>	<p>No adverse impacts are anticipated from the programme, however:</p> <p>English language proficiency is a barrier for some people from ethnic minority backgrounds.</p> <p>Significant cultural barriers exist that prevent some people from ethnic minority backgrounds participating in mainstream activities.</p> <p>Many people perceive swimming and water-based sports as dangerous due to lack of open water swimming</p>	<p>Community specific organisations are trusted and will create a gateway to engagement.</p> <p>Co-development of programmes will help mitigate cultural barriers and orientate people to the range of activities available.</p> <p>The PSNMP has developed a collaboration with Hope Plymouth, a group consisting mainly of African and Middle Eastern men, women and</p>	<p>PSNMP will begin targeted work with people from ethnic minority backgrounds on Step 1 at the latest in 2026.</p> <p>In the interim we will build community capacity to engage through our volunteering and ambassador programme.</p> <p>Pontoon installation scheduled for 2025/26. Sessions co-developed with groups like Hope Plymouth will trial pontoon use in 2025–26. Led by PSNMP,</p>
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	with those identifying themselves as ‘Any other ethnic group’ (85%).	confidence and this is especially true for some ethnic minority communities.	<p>children who are primarily refugees awaiting decisions on asylum claims.</p> <p>The Rangers have been co-designing activities as a number of these men particularly have trauma associated with the water and therefore any activities that are suggested need to be carefully considered.</p> <p>The addition of a pontoon provides a stable, gradual, and visibly safe access point to the water, which is less intimidating for people unfamiliar with open water environments. It reduces anxiety around unpredictable or unclear entry points and helps address trauma-related concerns.</p>	with input from community facilitators and accessibility/inclusion advisors.
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<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, Jewish or Sikh combined totalled less than 1 per cent (2021 Census).</p>	<p>No adverse impacts are anticipated from the Mount Batten programme, however:</p> <p>Significant cultural barriers exist that prevent some people from minority faith backgrounds participating in</p>	<p>Co-development of programmes will help mitigate cultural barriers and orientate people to the range of activities available.</p>	<p>The evaluation element of the programme will continue to assess the success of our engagement programme, and should other faith related issues be identified we can ensure that these are addressed in</p>
		<p>mainstream activities, e.g. Muslim women are likely to uncomfortable with mixed swimming sessions.</p>	<p>We are redeveloping the changing facilities at Mount Batten to provide a changing space with 2 door separation between men and women's changing areas.</p>	<p>the activity plan for year four in 2027.</p>
<b>Sex</b>	<p>51 per cent of our population are women and 49 per cent are men (2021 Census).</p>	<p>Women are underrepresented in STEM based occupational groups.</p>	<p>We will ensure that STEM provision is inclusive and promoted to young women and girls.</p>	<p>Addressing the shortfall in women is STEM occupations within the programme context is aligned with our work with children and young people.</p> <p>PSNMP will begin targeted work with younger people on Step 1 in 2024.</p>

		importance of Plymouth Sound.		
<b>Sexual orientation</b>	<p>88.95 per cent of residents aged 16 years and over in Plymouth describe their sexual orientation as straight or heterosexual. 2.06 per cent describe their sexuality as bisexual, 1.97 per cent of people describe their sexual orientation as gay or lesbian. 0.42 per cent of residents describe their sexual orientation using a different term (2021 Census).</p> <p>Respondents identifying as 'Heterosexual / Straight' (92%) were <u>significantly</u> more likely to <b>agree</b> with the statement Plymouth Sound is special to the city than those who identified as Bisexual / Gay / Lesbian (86%).</p>	<p>No adverse impacts are anticipated from the programme, however:</p> <p>The engagement programme to date has included work with LGBTQ+ groups but as yet no specific barriers related to this protected characteristic have been identified that would explain the disparity between LGBTQ+ groups and the wider community in terms of their views about the</p>	<p>Whilst LGBTQ+ groups are not an identified target group we will continue to engage constructively with them as part of wider ongoing engagement programme.</p>	<p>The evaluation element of the programme will continue to assess the success of our engagement programme and should this continue be the case we would take additional steps to enable to engage with this audience.</p>

## SECTION FOUR: HUMAN RIGHTS IMPLICATIONS

Human Rights	Implications	Mitigation Actions	Timescale and responsible department
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	<p>No adverse impacts to human rights are anticipated.</p> <p>Families with school-age children are recognised as a priority target group, however there is nothing in the delivery plan that would give rise to an Article 8 (rights to respect for family life) concern since the delivery programme will seek to encourage rather than compel participation.</p>	Not applicable	<p>2024-2029</p> <p>Place</p>
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## SECTION FIVE: OUR EQUALITY OBJECTIVES

Equality objectives	Implications	Mitigation Actions	Timescale and responsible department
<b>Celebrate diversity and ensure that Plymouth is a welcoming city.</b>	No adverse impacts are anticipated. The Mount Batten project is centred around ensuring that all communities feel welcome and supported to access the sea and the coast through the Centre with a range of activities and access points. The Activity Plan sets out in detail how this will be delivered.	In 2027 our engagement programme will be evaluation led so that any communities or interest or geography who have not been fully engaged will be recognised and included as target communities for the fourth year of the programme.	<p>2024-2029</p> <p>Place</p>
	An engagement plan will help to ensure that both communities of interest and geography are engaged in the project.		

<b>Pay equality for women, and staff with disabilities in our workforce.</b>	Not applicable Post hosted by partner organisations will be subject to their own policies and procedures.	Not applicable	2024-2029
<b>Supporting our workforce through the implementation of Our People Strategy 2020 – 2024</b>	Staff and volunteers' skills will be developed around Equality, Diversity and Inclusion to be able to deliver the range of activities in the activity programme when working with priority audiences.	Not applicable	2024-2029
<b>Supporting victims of hate crime so they feel confident to report incidents, and working with, and through our partner organisations to achieve positive outcomes.</b>	Many of the community organisations we will be co-developing our programme with are designated safe reporting centres. We will respond positively to any reports we receive through these, or other routes, that relate to our staff, service users or programme delivery.	Not applicable	
<b>Plymouth is a city where people from different backgrounds get along well.</b>	No adverse impacts are anticipated. The Activity Plan will offer opportunities for all and will tailor activities and events to meet the needs of all our communities. An engagement plan will help to ensure that both communities of interest and geography are engaged in the project.	Not applicable	2024-2029