

Impact Assessment



Assessment of: Delivery of transport infrastructure to support Plymouth and South Devon Freeport

Service: Climate Change, Environment and Transport

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1. Description of project / service / activity / policy under review

The Plymouth and South Devon Freeport (the Freeport) is a partnership with Plymouth City Council, South Hams District Council, Devon County Council and private sector landowners to invest to bring forward the sites in the Freeport to generate growth and jobs in the area. This includes one site in Plymouth and two in the South Hams, at Sherford and Langage. The Freeport vision is:

To grow the local and regional economy by building on our unique national capabilities in Marine, Defence and Space through a focus on key assets such as the Naval port in Plymouth and the opportunities of growing supply chains around these capabilities, to support the whole of the regional economy.

The Freeport can also support the wider levelling up agenda and stimulate local skills, jobs, and higher wages. The creation of a supportive tax and regulatory environment can foster innovation and develop further strong collaborations from our business base, and Exeter and Plymouth Universities.

The Freeport will attract new investment and provide supply chain opportunities, supporting the commitment to tackle climate change, deliver clean growth and marine decarbonisation.

This impact assessment specifically relates to Devon County Council's role in the delivery of transport infrastructure to support the Freeport. This includes the delivery of a new spine road (delivered in two phases – 1a and 1b) to provide access to the Langage employment site and a new pedestrian/cycle bridge across the A38 at the Deep Lane junction. The

proposals will enable the delivery of the employment development by providing access to the site and will also provide improved walking and cycling connections both to the employment site and also between existing destinations.

2. Proposal, aims and objectives, and reason for change or review

The Freeport will have the potential to transform the local and regional economy. It aims to create 3,584 jobs with 10% of jobs created to be filled by inactive claimants and people registered as unemployed. The Freeport will benefit from 100% relief from business rates and relief from Stamp Duty Land Tax which will attract an estimated five new businesses a year.

The spine road and pedestrian/cycle bridge together will facilitate Freeport-related development on the Langage site. The spine road will provide access for the construction of business units including the customs site. The pedestrian/cycle bridge will provide a safe, active travel connection between Sherford and the Langage site, and onward routes to the north and south, supporting decarbonisation of transport and aligning well with the Vision for Freeport to act as exemplar to achieve net zero significantly ahead of 2050.

3. Risk assessment, limitations and options explored (summary)

A constraint on the delivery of the infrastructure for the Langage Freeport site is the reliance on the provided funding that expires in March 2025. Therefore, it is imperative that the progress of the scheme is not delayed.

Regarding delivery risks, the design teams for the proposed infrastructure (spine road phases and pedestrian/cycle bridge) maintain individual risk registers for their schemes. These risks are reported to the Infrastructure Group that meets on a monthly basis.

The Langage site is a strategic employment allocation in the Plymouth and South West Devon Joint Local Plan (2014-2034) and so it is a fixed position. If the site is not developed as part of the Freeport, the allocation will remain and an alternative development could come forward at a later date. As the development has not come forward to date, there is uncertainty as to whether it would come forward or when. The Freeport will encourage certain businesses and add value to the site. If the site is not developed at the Freeport, there is no guarantee on what alternative development will be attracted. Delivery of the identified infrastructure is facilitated by the Freeport designation and will help facilitate economic growth and development, while also providing attractive sustainable transport connections to mitigate traffic related impacts on the local and strategic road networks.

4. People affected, diversity profile and analysis of needs

The Langage site will provide employment opportunities to the wider Plymouth and South Hams area. The Freeport Board have adopted the Equality, Inclusion and Diversity Policy to ensure the benefits of the Freeport are felt across the region. The diversity profile of the Plymouth and South Hams populations are presented below in comparison with England.

Age

Table 1 shows the percentage of the population broken down by age, in Plymouth and South Hams compared to England.

Location	Total population	Age 0-19	Age 20-64	Age 65+
Plymouth	264,700	22.4%	59.2%	18.4%
South Hams	88,600	19.2%	52.7%	28.1%
England	56,490,000	23%	65.1%	11.9%

Table 1: Age profile (Census, 2021)

This shows that Plymouth and South Hams have a higher proportion of the population that are 65 or older compared to England.

Economic Activity Status

Table 2 shows the percentage of the population that are in employment, unemployed or economically inactive which reasons include retired, long-term sick or disabled or student.

Location	Economically active: In employment	Economically active: Unemployed	Economically inactive
Plymouth	55.4%	3.3%	41.4%
South Hams	54.1%	1.9%	44%
England	57.4%	3.5%	39.1%

Table 2: Economic activity status (Census, 2021)

Plymouth and South Hams have a high proportion of economically inactive residents which could be attributed to the high proportion of over 65s (Table 1), implying more residents are retired. Also due to the university in Plymouth, a proportion of economically inactive

residents can be attributed to students. Both Plymouth and South Hams have lower unemployment rates than England as a whole.

Socio-economic status

Table 3 shows the percentage of households in none, one, two, three or four dimensions of deprivation.

Location	Household is not deprived in any dimension	Household is deprived in one or two dimensions	Household is deprived in three or four dimensions
Plymouth	45.5%	49.9%	4.6%
South Hams	53%	44.8%	2.2%
England	48.4%	47.7%	3.9%

Table 3: Household deprivation (Census, 2021)

Plymouth has higher levels of deprivation across all four dimensions compared to the average in England. South Hams has higher levels of households not deprived compared to England and Plymouth. As stated above, the Freeport is committed to ensuring that 10% of jobs created are directed towards the most deprived areas.

5. Stakeholders, their interest and potential impacts

Key stakeholders involved in the Plymouth and South Devon Freeport are:

- Local businesses
- Landowners
- Plymouth City Council
- South Hams District Council
- National Highways

The delivery of the Freeport infrastructure will unlock positive impacts such as the provision of employment and sustainable travel opportunities. The pedestrian/cycle bridge will provide a safe, designated route for active travel modes, alleviating the pressure from the existing highway. Additionally, phase 1b of the spine road proposes to provide pedestrian/cycle access from the south of the Langage Freeport site to tie in with the existing active travel network including the proposed pedestrian/cycle bridge, which will help alleviate pressure on the local and strategic road network. The construction period of the infrastructure will generate temporary noise impacts and traffic generation. The Freeport will also cause an increase in vehicular traffic generation in the area due to the

location of new businesses, however as stated, the provision of sustainable transport opportunities are increasing and improving.

6. Additional relevant research used to inform this assessment

Demographic data for the geographies affected by the proposal has been sourced from the 2021 Census, using the Office for National Statistics website¹.

7. Description of consultation process and outcomes

As part of the design process, design teams have had informal consultation with landowners and interested parties.

A public consultation was conducted in December 2021 to present three option routes for the pedestrian/cycle bridge. The most popular choice for the bridge location is that which is currently being pursued and a planning application has been submitted.

The development of the spine road and pedestrian/cycle bridge will go through the planning process. This includes a consultation process, and the acceptability of the proposals are considered as part of this. The planning process includes direct consultation with statutory consultees as well as site notices; however, the principle of the spine road has been established through the outline planning permission for the phase 1a land.

Background information

8. Equality analysis

Under the Equality Act 2010, the local authority must consider how people will be affected by a service, policy or practice. In so doing we must give due regard to the need to: eliminate unlawful discrimination, harassment and victimisation; advance equality of opportunity and foster good relations across protected characteristics of age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership (for work), sex, sexual orientation, race, and religion and belief. The Equality Act 2010 and other relevant legislation does not prevent the Council from taking difficult decisions which result in service reductions or closures for example, it does however require the Council to ensure that such decisions are: informed and properly considered with a rigorous, conscious approach and open mind, taking due regard of the effects on the protected characteristics and the general duty to eliminate discrimination, advance equality and foster good relations; proportionate (negative impacts are proportionate to the aims of the

¹ [Build a custom area profile - Census 2021, ONS](#)

policy decision); fair, necessary, reasonable, and those affected have been adequately consulted.

- a) Is this group negatively or potentially negatively impacted, and in what way?
- b) What could be done or has been done to remove the potential for direct or indirect discrimination, harassment or disadvantage and inequalities?
- c) In what way do you consider any negative consequences to be reasonable and proportionate in order to achieve a legitimate aim?
- d) What can be done to advance equality further? This could include meeting specific needs, ensuring equality of opportunity and access, encouraging participation, empowering people, making adjustments for disabled people and action to reduce disparities and inequalities.
- e) Is there a need to foster good relations between groups (tackled prejudice and promote understanding) and help people to be safe and protected from harm? What can be done?

All residents by geographic area

Construction works may cause noise and impact the wider traffic in the area for a short period of time.

The Freeport will provide extensive employment and education opportunities. As mentioned, at least 10% of the jobs created will be directed towards the most deprived areas.

The addition of a pedestrian/cycle bridge will create sustainable travel opportunities, promoting healthy living, and improving the choice of travel options for accessing the Freeport employment area.

Age

It is anticipated that there will not be any negative impact or consequences on any specific groups. An active travel route will provide access to the Freeport site, expected to benefit working age adults.

Disability (includes sensory, mobility, mental health, learning disability, neurodiversity, long term ill health) and carers of disabled people

Improvements to the pedestrian and cycle network will improve access for all users, with safer crossings of busy road networks.

The Freeport's Equality, Inclusion and Diversity Policy encourages representation from underrepresented groups and will promote businesses to sign up to initiatives such as Disability Confident to improve how they recruit, retain, and develop disabled people.

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.

Race and culture: nationality/national origin, ethnic origin, skin colour, religion and belief, asylum seeker and refugee status, language needs

It is anticipated that there will not be any negative impact or consequences on any specific ethnicity groups. Black and Asian people, people from mixed/multiple ethnic groups and people of other ethnicities make a greater proportion of trips by walking and cycling and so may benefit from the active travel infrastructure improvements.

Sex and gender identity and reassignment (including men, women, non-binary and transgender people), and pregnancy and maternity (including women's right to breastfeed)

The Freeport will provide opportunities for females to gain experience in science, technology, engineering and mathematics (STEM) through apprenticeships, internships, and jobs. It is important to encourage female representation in STEM based careers as in 2020 women only made up 29.4% of the STEM workforce in the UK as stated by the Government Equalities Office (2023)².

Women make a smaller proportion of trips by cycle than men; however, delivering better quality, safer infrastructure may encourage increased participation in active travel.

Sexual orientation, and marriage/civil partnership if work related

This includes, where relevant: income, housing, education and skills, language and literacy skills, family background (size/single people/lone parents), sub-cultures, rural isolation, access to services and transport, access to ICT/Broadband, children in care and care experienced people, social connectivity, and refugee status/no recourse to public funds. Also consider intersectionality with other characteristics.

It is anticipated that there will not be any negative impact or consequences on any specific groups. Other relevant socio-economic factors and intersectionality

As mentioned above, the Freeport are committed to providing at least 10% of the jobs created to the most deprived groups. As highlighted in Table 3, Plymouth has a higher proportion of household deprivation compared to England and the improvement of the highway network, particularly for active travel will improve access to employment.

² [More women to be supported back into STEM jobs in Government-backed training - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/more-women-to-be-supported-back-into-stem-jobs-in-government-backed-training)

9. Human rights considerations:

We need to ensure that human rights are protected. In particular, that people have:

- A reasonable level of choice in where and how they live their life and interact with others (this is an aspect of the human right to 'private and family life').
- An appropriate level of care which results in dignity and respect (the protection to a private and family life, protection from torture and the freedom of thought, belief and religion within the Human Rights Act and elimination of discrimination and the promotion of good relations under the Equality Act 2010).
- A right to life (ensuring that nothing we do results in unlawful or unnecessary/avoidable death).

It is not considered that there are any relevant human rights considerations.

10. Environmental analysis

An impact assessment should give due regard to the following activities in order to ensure we meet a range of environmental legal duties. The policy or practice does not require the identification of environmental impacts using this Impact Assessment process because it is subject to (please mark X in the relevant box below and proceed to the 11, otherwise complete the environmental analysis information below):

Devon County Council's Environmental Review Process	
Planning Permission	X
Environmental Impact Assessment	
Strategic Environmental Assessment	

- a) Description of any actual or potential negative consequences and consider how to mitigate against these.
- b) Description of any actual or potential neutral or positive outcomes and consider how to improve as far as possible.

Reduce, reuse, recycle and compost

The construction processes for the site will require the submission of Waste Audit Statements as part of the planning application process which will ensure as much re-use, recycling, and recovery of waste materials as possible.

Conserve and enhance wildlife

As the site is allocated in the Plymouth JLP, loss of greenfield has already been considered. Decisions about environmental mitigation will be discussed as part of the planning

application process as the site has potential to offer a biodiversity area on the eastern edge of the site. Biodiversity Net Gain has been achieved as part of the planning application proposal for the pedestrian/cycle bridge. Phase 1b of the spine road will also contribute to biodiversity net gain, in line with government guidelines.

Safeguard the distinctive characteristics, features and special qualities of Devon's landscape

This will be considered as part of the planning application.

Conserve and enhance Devon's cultural and historic heritage

Archaeology is considered as part of the planning application process and impacts and mitigation will be demonstrated.

Minimise greenhouse gas emissions

Throughout the design process, opportunities to reduce carbon are considered at every stage.

As the site develops, there will be an increase in carbon emissions compared to its previous greenfield use.

The pedestrian/cycle bridge will connect Sherford and Langage which will enable and encourage active travel routes to reduce reliance on cars and efforts to improve bus priority are also being explored in relation to access on the approaches to Langage Business Park. A mobility hub is being considered at the Langage site which will provide electric charging points for cars and cycles.

Minimise pollution (including air, land, water, light and noise)

There will be increased noise and transport emissions due to the additional volumes of business occupancy. Construction phases will cause an increase in noise and emissions temporarily. Any impacts would be safeguarded through the planning process.

The pedestrian/cycle bridge will provide an opportunity to increase active travel and decrease traffic emissions.

Within the Freeport, a combination of electric and hydrogen powered vehicles are expected to be used to move cargo between the port and customs sites.

Contribute to reducing water consumption

The Freeport net zero aims and planning/building regulations aim to minimise water consumption from new growth.

Ensure resilience to the future effects of climate change (warmer, wetter winters; drier, hotter summers; more intense storms; and rising sea level)

The Freeport has an aim to minimise the environmental impact from development and contribute to net zero targets.

11. Economic analysis

- a) Description of any actual or potential negative consequences and consider how to mitigate against these.
- b) Description of any actual or potential neutral or positive outcomes and consider how to improve as far as possible.

Impact on knowledge and skills

No negative consequences identified. The Freeport has a skills plan and tax incentives from government to generate significant training and apprenticeship opportunities.

Impact on employment levels

The Freeport sites in Plymouth, Sherford and Langage combined will increase employment opportunities with an overall aim to increase around 3,584 jobs.

Impact on local business

The Freeport will increase business opportunities in the area. There is a risk of displacement from businesses moving into the Freeport and benefitting from the tax incentives. To mitigate this potential impact, the Freeport will implement a Gateway Policy which requires local businesses requesting to move into the Freeport area to clearly demonstrate the need to move into the Freeport area from their existing location. The purpose of the Freeport is to attract new high value investment within the target sectors (advanced manufacturing and engineering).