



The Sizewell C Project

5.14 Equality Statement Update

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1 INTRODUCTION

1.1 Context

The **Equality Statement** [[APP-158](#)] was submitted alongside the application for development consent. It covered the construction and operation of the proposed Sizewell C power station, and construction, operation, and removal/reinstatement (where relevant) of the associated development.

It considered the potential for the effects of the proposed works to be felt differentially or disproportionately by people with particular protected characteristics as defined by the Equality Act 2010. These protected characteristics are:

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion or belief;
- sex; and
- sexual orientation.

1.2 Purpose of this update

1.2.1 The purpose of this update is to bring together information relevant to the consideration of equality, arising since submission of the application for development consent and resulting from:

- changes to the scheme;
- additional mitigation details agreed during the course of the examination; and
- additional information or assessment carried out during the course of the examination.

- 1.2.2 This update does not provide new information on these three aspects, but considers the material already submitted to the Examining Authority during the course of the examination up to and including Deadline 10, in the context of equality.
- 1.2.3 It is not a reassessment, it does not replace the Equality Statement, but should be read alongside it, and together they provide information to enable due regard to be given to equality.
- 1.2.4 This **Equality Statement Update** (5.14(A)) is structured around those three updates – scheme changes, mitigation, and additional assessment / information.

2 SCHEME CHANGES

2.1 Description of changes

- 2.1.1 A total of 19 changes have been proposed to the scheme and accepted by the Examining Authority (including the main development site and associated development) since submission of the application for development consent. These are summarised in Table 2.1, drawn from the **First Environmental Statement (ES) Addendum** [[AS-179](#)], **Second ES Addendum** [[REP5-062](#)] and **Fourth ES Addendum** [[REP7-029](#)].
- 2.1.2 The table highlights those changes considered to have potential differential or disproportionate effects (beneficial or adverse) on people with respect to their protected characteristics.

Table 2.1 Scheme Changes

Change	Description	Equality effects to consider
1	Potential to increase the frequency of freight train movements to facilitate bulk material imports by rail.	Potential to affect equality through changes to noise, traffic and air quality as a result of fewer HGVs (beneficial) and more trains (adverse).
2	Enhanced permanent beach landing facility and a new, temporary facility.	Potential to affect equality through changes to access and accessibility to recreation and amenity, and changes in exposure to

NOT PROTECTIVELY MARKED

Change	Description	Equality effects to consider
		noise, traffic and air quality as a result of fewer HGVs.
3	Greater flexibility as to where certain Sizewell B facilities are relocated.	Changes within the site, not considered likely to give rise to equality effects.
4	Change to certain parameter heights and activities on the main development site.	Changes within the site, not considered likely to give rise to equality effects.
5	Change to the location of the water resource storage area and the addition of flood mitigation measures.	Changes within the site, not considered likely to give rise to equality effects.
6	Change to the SSSI crossing design to a single span bridge with embankments.	Changes within the site, not considered likely to give rise to equality effects.
7	Revisions to tree retention on the main development site.	Changes within the site, not considered likely to give rise to equality effects.
8	Surface water removed early in the construction process to be discharged to the foreshore via a temporary outfall.	Change not considered likely to give rise to equality effects.
9	Change to the sea defence to make the scheme more efficient and resilient to climate change.	Change not considered likely to give rise to equality effects.
10	Extension of landscaped bund, other minor changes at the southern park and ride, including a minor reduction of the Order Limits.	Change not considered likely to give rise to equality effects.
11	Extension of the Order Limits to provide for additional fen meadow habitat at Pakenham as mitigation for fen meadow loss.	Change not considered likely to give rise to equality effects.

Change	Description	Equality effects to consider
12	Extensions and reductions of the Order Limits for works on the two village bypass, Sizewell link road and Yoxford roundabout as well as minor changes to the public right of way proposals at these sites.	Change not considered likely to give rise to equality effects.
13	Minor extensions and reductions of the Order Limits for works on the main development site and related sites (fen meadow mitigation sites and marsh harrier improvement sites).	Change not considered likely to give rise to equality effects.
14	Minor reductions to the Order Limits of the northern park and ride, the A12/B1119 junction at Saxmundham and the A1094/B1069 south of Knodishall.	Change not considered likely to give rise to equality effects.
15	A new bridleway link between Aldhurst Farm and Kenton Hills.	Potential for equality effects through beneficial changes to access and amenity.
16	Changes to the Bridleway 19 alignment. Repositioning of the proposed mammal culvert south of the Leiston Drain watercourse. The mammal culvert would be in closer proximity to the Leiston Drain watercourse.	Potential for equality effects through changes to access and amenity.
17	Flood relief culvert changes. PRow changes.	Potential for equality effects through changes to access and amenity.
18	Change to Pretty Road bridge. PRow changes. Additional drainage land. Road layout and site boundary changes.	Potential for equality effects through changes to access and amenity.

Change	Description	Equality effects to consider
19	Temporary desalination plant.	Changes within the site, not considered likely to give rise to equality effects.

2.2 Effect of changes

2.2.1 The majority of these 19 changes are not considered likely to have material effects with respect to equality – most are either contained within the main development site, or are minor changes to the boundaries or detail of associated development.

a) Change 1 and 2

2.2.2 These changes allow increased freight movement by rail and by sea during construction and therefore reduce HGV movements on roads.

2.2.3 Traffic may give rise to noise, air quality or transport impacts (delays, safety, severance, amenity, fear and intimidation from traffic). The **Equality Statement** [APP-158] identified that there was potential for these to differentially or disproportionately affect those with a number of different protected characteristics.

2.2.4 Reduced HGV movements resulting from Changes 1 and 2 therefore reduces some of these potential equality effects.

2.2.5 Additional rail movements as a result of Change 1 will increase the frequency of noise effects from rail, but not the magnitude, nor the number of properties affected. The assessment of the additional trains was presented in section 9.3(e) of **Volume 1** of the **First ES Addendum** [AS-188, electronic page 26]. Paragraph 9.3.114 in **Volume 1** of the **First ES Addendum** [AS-188, electronic page 31] confirms that the additional trains will not affect the assessment outcomes, in particular the increase from three trains per day to four does not affect assessments of sleep disturbance.

2.2.6 The use of night-time trains remains a potential equality effect as identified in the **Equality Statement** [APP-158], with affected properties falling under the provision of the Noise Mitigation Scheme (**Deed of Obligation**, Annex W (Doc Ref. 10.4)), which has been significantly enhanced (see Section 3.2 of this update) and is geared to precluding any adverse health outcomes including those with relevant protected characteristics.

2.2.7 Physical changes on the beach due to Change 2 are designed not to interfere with the ability to access and use the beach, and are not predicted to lead to any changes in effects, as assessed in **Volume 2, Chapter 15** (amenity and recreation) of the **ES** [APP-267]. In addition, because recreational trips are discretionary, and different locations are available as a matter of personal choice, it is not considered likely that Change 2 would have differential or disproportionate effects on these in relation to protected characteristics.

b) Changes 15, 16, 17 and 18

2.2.8 Some of the changes affect Public Rights of Way, Bridleways or road crossings, and therefore need to be considered for their potential to affect access and amenity.

2.2.9 Accessibility can have differential effects on those with certain protected characteristics that may affect their mobility, including age, disability, pregnancy and maternity. These effects are less significant where they affect discretionary travel (such as recreational routes, which may have suitable alternatives), than where they may affect necessary travel.

2.2.10 The effects on access resulting from changes 15 to 18 are mainly recreational routes, or minor changes that would not represent a significant or permanent loss of access to amenities or facilities for the public. They include some improvements to access, such as crossings. Taking this into consideration, overall the changes are not considered likely to have significant differential or disproportionate effects with respect to protected characteristics.

3 MITIGATION

3.1 Mitigation context

3.1.1 Development will always affect people differently, in many cases this can be mitigated, although not all disproportionate or differential effects can be eliminated.

3.1.2 The **Equality Statement** [APP-158] noted that in many cases mitigation for effects with potential equality implications is the same as the general mitigation required for those effects irrespective of the equality implications – general mitigation for noise, for example, will benefit those groups most affected.

3.1.3 The complex nature of equality effects means that the exact effect of mitigation may be determined by the detail of how it is implemented in future

by the applicant, the councils and other partners working together. Appropriate funds and control documents can be agreed to enable mitigation to be managed, while the future implementation of that mitigation must then respond to issues as they arise.

3.1.4 Since the application was submitted extensive engagement has taken place with stakeholders and the scale and granularity of the mitigation measures set out at the time of the application has developed and been agreed with many affected parties and with East Suffolk Council and Suffolk County Council. Further detail of proposed mitigation has been set out in the **Mitigation Route Map** (Doc Ref. 8.12(F)), the **Response to Request for Further Information – Appendix A: Project Enhancements** [REP9-021], the **Code of Construction Practice (CoCP)** (Doc Ref. 10.2) and the finalised **Deed of Obligation** (Doc Ref. 10.4). In some cases this is additional detail, in others it is confirmation of how mitigation is to be secured.

3.1.5 This section highlights details of most relevance to equality, under the five broad categories of effect identified in the **Equality Statement** [APP-158]. It is not intended to duplicate or reproduce all the mitigation proposed in the documents set out in paragraph 3.1.4 above but signposts key elements of relevance to equality.

3.2 Noise and air quality

3.2.1 The **Equality Statement** [APP-158] noted that noise and air quality may differentially affect people as a result of their protected characteristics, including those who may spend more time at home than average, or users of particular services.

3.2.2 The Noise Mitigation Scheme (Annex W of the **Deed of Obligation** (Doc Ref. 10.4) has been amended in the following ways:

- To provide mitigation at lower levels of railway noise than is required by planning policy, increasing the number of properties that will benefit from improved insulation through secondary glazing and ventilation provision.
- To provide mitigation at lower levels of construction noise from the main development site than is required by planning policy, increasing the number of properties that will benefit from improved insulation through secondary glazing and ventilation provision.
- To provide mitigation, in the form of improved insulation (through secondary glazing and ventilation provision), in a flexible manner where

affected parties suffer from medical, clinical or disability needs that makes them susceptible to noise effects.

- To provide a reduced specification of mitigation, including ventilation only, for properties that are subject to the lowest band of noise levels that is considered to have the potential to lead to an adverse effect, so that windows can be kept closed to reduce noise effects.
- To make it clear that the recipient of any mitigation will not be expected to carry any costs associated with the installation of the mitigation.

3.2.3 In addition:

- A specific package of mitigation measures has been agreed with Pro Corda Trust, that will provide improvements to the sound insulation of their residential accommodation (Schedule 12, **Deed of Obligation** (Doc Ref. 10.4)). In addition, the Pro Corda Resilience Fund (Schedule 13, **Deed of Obligation** (Doc Ref. 10.4)) provides a contribution for indoor and outdoor sensory spaces suitable for children with autism and other special educational needs and disabilities.
- Improvements to the sound insulation of properties fronting the B1122 will be provided via Schedule 12 of the **Deed of Obligation** (Doc Ref. 10.4), irrespective of whether the properties meet the noise eligibility tests.
- A **Rail Noise Mitigation Plan** (Doc Ref. 10.9) (formerly the Rail Noise Mitigation Strategy) has been issued to set out both committed mitigation measures to reduce railway noise and vibration, and mechanisms for further engagement to deliver mitigation that has yet to be agreed, including the potential for acoustic barriers to screen the railway line, track improvements to the East Suffolk line and noise reductions for level crossings alarms.
- Residual noise impacts on Leiston Old Abbey care home are likely to be addressed with acoustic barriers, and potentially improvements to insulation, secured by the Noise Mitigation Scheme (Annex W, **Deed of Obligation** (Doc Ref. 10.4)), subject to the application of the relevant eligibility tests.

3.2.4 Such mitigation, extending beyond the regulatory requirements affords greater protection for local communities including any individual that might be affected differently as a result of a protected characteristic.

- The **Equality Statement** [APP-158] reported a high potential for combined effects from noise, vibration, air quality or visual intrusion at Sai Grace Ashram and Sizewell Sports and Social Club. Noise and vibration mitigation for these receptors during the construction works will be applied through the **CoCP** (Doc Ref. 10.2) and the Noise Monitoring and Management Plans that form part of the CoCP controls.
 - The Noise Monitoring and Management Plans (secured by the **CoCP** (Doc Ref. 10.2)) require SZC Co. to agree specific measures with East Suffolk Council to control and reduce noise levels from the works at daytime, evening and night-time thresholds that are below the levels at which significant adverse effects are considered to occur. A similar process is required to control vibration levels, but the threshold identified for vibration where this process must be implemented is equal to the level at which a significant adverse effect is considered to occur.
 - The draft Noise Monitoring and Management Plan for the main development site is included in the **CoCP** (Doc Ref 10.2) (Appendix B to Part B), as is an example Noise Monitoring and Management Plan for an Associated Development site (Appendix A to Part C).
- 3.2.5 Air quality is assessed to be within national air quality standards and objectives, protective of the environment and health, and not requiring additional mitigation. However, a number of precautionary measures have been additionally proposed, including use of Euro VI engine vehicles.
- 3.2.6 In addition, monitoring to ensure compliance (including NO_x, PM₁₀ and PM_{2.5}) will be carried out in accordance with the Dust Monitoring and Management Plan as committed to in the **CoCP** (Doc Ref. 10.2), and secured by Requirement 2 of the **draft Development Consent Order (dDCO)** (Doc Ref. 3.1(J)).
- 3.3 **Traffic, transport and access**
- 3.3.1 The **Equality Statement** [APP-158] identified that transport changes can have potential equality effects, particularly due to the differential impact on those with protected characteristics that affect their mobility. Impacts including pedestrian severance, delay, amenity, and fear and intimidation from traffic were considered.
- 3.3.2 Primary mitigation inherent to the design includes significant associated development that aims to reduce traffic impacts. Additions to this are set out in Section 2 of this update, particularly Changes 1 and 2, which reduce HGV movements.

3.3.3 A number of additional details have been agreed for secondary / additional transport mitigation. These are secured in Schedule 16 of the **Deed of Obligation** (Doc Ref. 10.4) and include:

- a Leiston Scheme to fund pedestrian, cycle and public realm improvements in Leiston;
- a Wickham Market Scheme to fund pedestrian, cycle and public realm improvements in Wickham Market;
- a Little Glemham and Marlesford Scheme to fund improvements for vulnerable road users in Little Glemham and Marlesford;
- a B1122 Early Years Scheme to fund improvements for pedestrians as well as road safety improvements;
- a B1122 Corridor Repurposing Scheme to fund improvements for walk and cycling once the Sizewell link road is operational;
- a B1125 Scheme to fund pedestrian improvements and road safety along the B1125 corridor;
- a Leiston Walk and Cycle Contribution to fund enhancements to the local walk and cycle network to encourage construction workers to cycle to work; and
- a Public Right of Way Fund to fund improvements to the existing public rights of way network.

3.3.4 These mitigations and enhancements are beneficial to pedestrian safety, comfort and accessibility, and therefore are likely to benefit less mobile pedestrians the most, including a number of protected characteristics, as set out in the **Equality Statement** [\[APP-158\]](#).

3.3.5 An updated **Rights of Way and Access Strategy** (Doc Ref. 10.26) has been submitted. This sets out the principles which the public rights of way implementation plans must accord with and stipulates that they must be approved by Suffolk County Council before development of any new or diverted public rights of way on the main development site and associated development sites can be carried out. This is secured by Requirement 10 of the **dDCO** (Doc Ref. 3.1(J)), which states that plans must:

“Comply with the legal requirements of the Equality Act 2010 and the Countryside and Rights of Way Act 2000 in terms of temporary access infrastructure and management, by ensuring that there are no physical

barriers to access without lawful authority and that reasonable adjustments are made to facilitate participation by all”.

3.4 Access to community infrastructure and services

3.4.1 The **Equality Statement** [APP-158] identified the potential for equality effects if demand from construction workers, their families and dependents affects users of education, health or social services, which could affect users with certain protected characteristics disproportionately or differentially.

3.4.2 Primary mitigation included within the scheme includes the "Sizewell Health" occupational healthcare centre to be provided on site for all construction workers (secured in Schedule 6 of the **Deed of Obligation** (Doc Ref. 10.4)). This internalises likely demand, removing and reducing any significant impact on local health care capacity from the non-home-based workforce, while offering complementary care to home based workers (further reducing demand and freeing up capacity).

3.4.3 In addition, the **Deed of Obligation** (Doc Ref. 10.4) includes a number of further proposed mitigations:

- A Residual Healthcare Contribution towards the cost of mitigating the impact of the Project on local health and wellbeing services, including non-home-based workers and their dependants (Schedule 6).
- Establishment of a Health and Wellbeing Working Group; funding for a health and wellbeing officer within the Ipswich and East Suffolk Clinical Commissioning Group; funding for GP attendance at the Health and Wellbeing Working Group, all to help align the Project with local health and wellbeing promotion initiatives (Schedule 6).
- School and Early Years – funding for capacity measures and resilience (Schedule 5).
- Funding for adult social care resilience measures – including specific support for those who may experience differential or disproportionate effects as a result of their protected characteristics (Schedule 5).
- Funding for children and young people’s social care resilience measures – including specific support for those who may experience differential or disproportionate effects as a result of their protected characteristics (Schedule 5).

3.5 Employment and skills

3.5.1 The construction and operation of the power station and associated development creates a large number of employment opportunities, with significant direct benefits for those involved. The **Equality Statement** [[APP-158](#)] recognised that willingness or ability to participate in these employment opportunities may vary between people with different protected characteristics.

3.5.2 The **Employment, Skills and Education Strategy** and **Supply Chain Strategy** ([APP-611](#)), appendices to the **Economic Statement** [[APP-610](#)], include proposed measures now secured in Schedule 7 of the **Deed of Obligation** (Doc Ref. 10.4). Such initiatives are inclusive and can widen participation, improving equality, and include:

- Sizewell C Bursary Scheme – supporting wider access to skills.
- Apprenticeship Strategy – providing access to learning particularly for young people.
- Education and Inspiration activities – which can broaden awareness and interest amongst different groups.
- Sizewell C Outreach Fund and initiatives – to broaden the pool of potential employees and support people into employment by overcoming barriers.
- Young Sizewell C – a programme to engage younger people in the opportunities, bringing new people into the sector.
- Funding for a Business Support Service – to support local businesses to access opportunities on the Project where they may otherwise be differentially or disproportionately unable to access them.

3.5.3 An Employment, Skills and Education Working Group (ESEWG), also secured through Schedule 7 of the **Deed of Obligation** (Doc Ref. 10.4) will monitor available information such as demographic characteristics of those residents which may be practicably and reasonably collected and is considered to provide relevant information on social mobility and social value (to be determined by the ESEWG for each Annual Skills Implementation Plan (ASIP)) in order to refresh ASIPs and ensure the measures above are effective in reaching people who may otherwise be affected differentially or disproportionately as a result of their protected characteristics.

- 3.6 Social cohesion (including community safety and access to housing)
- 3.6.1 The **Equality Statement** [APP-158] considered the potential for a temporary increase in population during construction to give rise to additional crime, anti-social behaviour or fear of crime. It recognised that some people’s vulnerability to crime or fear of crime relates to a protected characteristic.
- 3.6.2 The **Deed of Obligation** (Doc Ref. 10.4) includes:
- Emergency services contributions and resilience funding – to support the police, fire and rescue and ambulance services to provide the net additional resourcing needed to respond to the Project and to continue to provide an appropriate level of service to the existing community (Schedule 4).
 - Local community safety measures – including funding for community safety initiatives specifically aimed at protecting those vulnerable as a result of their protected characteristic, as well as broader initiatives to promote community cohesion (Schedule 5).
 - A requirement that each member of the Sizewell C construction workforce shall sign the Worker Code of Conduct (Schedule 5).
 - Sizewell C Community Fund, which will mitigate intangible and residual impacts, through the Suffolk Community Foundation, with specific reference to ensuring measures funded are *"inclusive and non-discriminatory, fostering equality in line with the Equality Act 2010 (or as amended)"* (Schedule 14).
- 3.6.3 The **Equality Statement** [APP-158] also considered the potential for demand for housing from the construction workforce to differentially or disproportionately affect people with respect to their protected characteristics.
- 3.6.4 The primary mitigation for this is the provision of the Project Accommodation (Accommodation Campus and LEEIE Caravan Park - see Schedule 3 of the **Deed of Obligation** (Doc Ref. 10.4)).
- 3.6.5 In addition, the **Deed of Obligation** (Doc Ref. 10.4) provides for:
- A Housing Fund, and Housing Contingency Fund to support housing mitigation measures (Schedule 3).

- An Accommodation Management System – to connect construction workers to registered properties (Schedule 3).
- Housing and Homelessness Service Resilience Measures – supporting homelessness prevention and Suffolk County Council’s duty of care to support some older people in care homes that may be affected by the Project if they close as a direct result of it (Schedule 3).
- A contribution to Suffolk Fire and Rescue Service towards provision of off-site community safety and fire safety services, which will include home safety checks and advice (Schedule 4).

4 ADDITIONAL INFORMATION

4.1 Additional information – Context

4.1.1 As well as scheme changes, and further development of mitigation details, other additional information is now available since the completion of the **Equality Statement** [APP-158]. Elements of this relevant to consideration of equality are summarised here.

4.1.2 These cover updated impact assessments, information arising from the ongoing land and CPO negotiations, and information provided over the course of the examination, including in response to questions raised.

4.2 Updated assessments

4.2.1 Several parts of the scheme assessment have been updated since the **Equality Statement** [APP-158] was submitted – either to reflect the scheme changes, mitigation, or improved detail. The **Fourth ES Addendum** [REP7-030] sets these out and summarised below are updates relevant to the consideration of equality.

a) Transport

4.2.2 As a consequence of the changes, a revised **Freight Management Strategy** [AS-280] was developed that considered the scale and scope of proposed changes to the effect of rail, HGV and marine movements.

4.2.3 The assessment of transport effects (not including the consequence of those effects on noise and air quality, which are summarised below) was updated in the **First ES Addendum** [AS-181], **Second ES Addendum** [REP5-064] and **Third ES Addendum**. [REP6-017].

- 4.2.4 Regarding changes 1 and 2, the transport environmental impact assessment (**Volume 2, Chapter 10** of the **ES** [APP-198]) was updated to account for the additional information on the refined strategic traffic model, micro-simulation of journey times, a new ‘typical-day’ scenario during peak construction and sensitivity testing.
- 4.2.5 The following changes to the conclusions of the assessment presented within **Volume 2, Chapter 10** of the **ES** [APP-198] were identified (note also (note additional mitigation provided as set out in 3.3.3 of this update above):
- The effects during the busiest day of peak construction on the severance and amenity of the eastbound Main Road and the amenity of B1069 are predicted to reduce to not significant.
 - The effects on fear and intimidation on the A12 at Marlesford become significant during the busiest day of peak construction, however, these effects would be not significant during a typical day of peak construction;
 - The effects on fear and intimidation on the A12 south of Wickham Market, and the southbound and northbound A12, which are significant during the busiest day of peak construction, would be not significant during a typical day of the peak construction period .
- 4.2.6 Whilst there are minor changes to the effects on some other road links, the significance of these effects would remain as reported within **Volume 2, Chapter 10** of the **ES** [APP-198].
- 4.2.7 Additional road links were screened into the transport environmental assessment, however, none of these would experience significant transport environmental effects.
- 4.2.8 The reduction in HGV numbers as a result of the increased rail (Change 1) and vessel movements by sea (Change 2) would reduce the significant effect on the amenity of B1122 and various sections of the A12 to not significant. In addition, the effect on fear and intimidation on A12 at Marlesford would be reduced to not significant during the busiest day of peak construction.
- 4.2.9 The effect on severance of A12 at Lowestoft and the effect on journey time on the southbound and northbound A12 would also be reduced slightly. However, these effects would continue to be not significant, as reported within the assessment updated with the additional information.
- 4.2.10 Regarding changes 17 and 18, as set out in the **Second ES Addendum** [REP5-064], it was concluded that these would not affect the technical

assessments reported within the ES, as updated by **Volume 1, Chapter 6** of the **First ES Addendum** [AS-185]. The proposed changes comprised a relatively minor set of design changes aimed at enhancing the safety and amenity of the existing proposals, and to respond to the comments raised by stakeholders.

4.2.11 Overall in equality terms the outcomes are not materially changed from the position set out in the original application and in some cases represent improvements.

b) Noise

4.2.12 The assessment of road traffic noise was updated in the **Third ES Addendum** [REP6-017]. The changes in significance of the outcomes are summarised in the following locations:

- Table 2.1 for the two village bypass [REP6-017, electronic page 7], which confirms that four effects will be not significant, when they were previously significant, and one becomes significant when it was not previously.
- Table 2.2 for the Sizewell link road [REP6-017, electronic page 10], which confirms that four effects will be not significant, when they were previously significant, and four become significant when they were not previously.
- Paragraphs 2.3.13 and 2.3.14 for Yoxford roundabout and other highway improvements [REP6-017, electronic page 14], where it is confirmed that the updated assessment has not changed the significance of any of the previously-identified outcomes.

4.2.13 The assessment of railway noise was updated in section 9.3 of **Volume 1** of the **First ES Addendum** [AS-188, electronic page 8] plus its associated appendices in **Volume 3, Appendices 9.3.A to 9.3.E** [AS-257 and AS-258]. Paragraph 9.3.61 in **Volume 1** of the **First ES Addendum** [AS-188, electronic page 21] confirms that there would be no changes to the assessment of airborne railway noise as a result of the updated assessment. Paragraph 9.3.84 in **Volume 1** of the **First ES Addendum** [AS-188, electronic page 26] confirms that there would be fewer adverse effects as a result of groundborne and low frequency airborne railway noise as a result of the updated assessment.

4.2.14 Overall in equality terms the outcomes are not materially changed from the position set out in the original application, but the noise mitigation is now far more detailed, extends beyond the regulatory requirement and affords

- greater protection for all communities and individuals with protected characteristics. In addition, the **Noise Mitigation Scheme** (Annex W of the **Deed of Obligation** (Doc Ref. 10.4) makes specific provision for those with a proven medical, clinical or disability need involving a particular sensitivity to noise.
- c) **Air Quality**
- 4.2.15 The updates to the air quality assessment, including updated baseline traffic emissions modelling and traffic emissions modelling of proposed changes 1 and 2 (**First ES Addendum** [[AS-127](#)]), do not show any additional significant impacts of relevance to equality. The increased use of trains and the Beach Landing Facility will reduce air pollution from HGVs (and slightly increase emissions from trains), but the effects are assessed as remaining within national air quality standards and objectives, protective of the environment and health, and are not significant (see **First ES Addendum** [[AS-181](#)] [[AS-188](#)]).
- 4.2.16 Mitigation is focused on sources rather than receptors, and therefore does not distinguish by protected characteristic; it aims to keep emissions at an acceptable level for everyone. A number of control measures are now proposed, including monitoring, as highlighted in Section 3.2 of this update.
- d) **Health and Wellbeing**
- 4.2.17 The Health and Wellbeing assessment (**Volume 2, Chapter 28** of the **ES** [[APP-346](#)] considers all tangible environmental and socio-economic changes with the potential to influence health and wellbeing, and has considered the changes to all supporting technical disciplines (including air quality, noise, transport, socio-economics).
- 4.2.18 The updated health and wellbeing assessments in the **First ES Addendum** [[AS-181](#)] and **Third ES Addendum** [[REP6-017](#)] concludes that the health impacts are not materially changed from those in the original Health and Wellbeing chapter (**Volume 2, Chapter 28** of the **ES**) [[APP-346](#)].
- 4.2.19 On this basis there are not considered likely to be additional implications for equality, beyond those already considered in the **Equality Statement** [[APP-158](#)].
- e) **Rights of way (Amenity and Recreation)**
- 4.2.20 In terms of additional information, the assessment for amenity and recreation considered changes to effects as a result of corrections to Access and Rights

of Way Plans and updates to the transport, noise and vibration and air quality assessments to account for additional information.

- 4.2.21 Though the changes (particularly 2 , but also 15, 16) have the potential to lead to different outcomes in terms of the approach to mitigation, that mitigation is focused on the ability to divert footpaths if necessary, and in this case, diversions would be subject to Requirement 10 in the **dDCO** (Doc Ref. 3.1(J)) to be determined through governance, with publicity, and ensure compliance with the Equality Act (2010).
- 4.2.22 Overall, the updates and changes were found to result in no change to the assessments presented within the **ES** and on this basis there are not considered likely to be additional implications for equality, beyond those already considered in the **Equality Statement** [[APP-158](#)].
- 4.2.23 Regarding Changes 17 and 18, these comprise a relatively minor set of design changes aimed at enhancing the safety and amenity of the existing proposals, and to respond to the comments raised by stakeholders.

f) **Socio-Economics**

- 4.2.24 A review of the additional information and the proposed changes has been undertaken with regard to socio-economics, and has concluded that these updates, whilst they may be related, are not of sufficient scale to result in new or different effects from the original Socio-economic assessment (**Volume 2, Chapter 9** of the **ES**) [[APP-195](#)].

4.3 **Additional information relating to land acquisition**

- 4.3.1 Land acquisition will affect those with an interest in that land, and the process is intended to ensure that the acquisition is only done where necessary and is fairly compensated. That reduces disruption to people irrespective of their protected characteristics.
- 4.3.2 All people have some protected characteristics (including age, sex, race etc), and this becomes an equality consideration where the land acquisition affects them differently as a result of those characteristics.
- 4.3.3 Ways in which that could happen include:
- Personal characteristics that make it harder for an affected person to understand or engage with the process (for example language, or disability).

NOT PROTECTIVELY MARKED

- Characteristics which make alternatives less suitable – for example the occupier of a house that has been specially adapted for a disability, for whom compensation to buy an alternative, non-adapted home, would not be sufficient.
- Characteristics which make an affected person more vulnerable than normal to the effects of disruption from being required to move home (for example age or disability).

4.3.4 The nature of the land acquisition process, dealing with affected individual people, means that general discussion of protected characteristics becomes specific and personal, and may be confidential. It is, therefore, not possible to detail in this update the specific nature of any issues identified, but rather to describe the process and broader considerations.

4.3.5 In general, the land being acquired is agricultural, garden or other open land, not residential homes, and no dwellings are required to be demolished to deliver the Project. In one case a residential property is covered but it is used as a holiday let not a home. Therefore some potential equality issues relating to people's homes are not relevant. The focus therefore is on ensuring that protected characteristics do not adversely affect an individual's ability to understand or engage with the process, and that they have proper opportunity to raise any personal circumstances.

4.3.6 SZC Co.'s approach to consultation is set out in the **Consultation Report [APP-068]**. Organisations representing hard-to-reach groups were engaged to help understand how to make consultation and other materials accessible – options included screen reader friendly, audio, or large print or easy read options.

4.3.7 The nature of land acquisition negotiations is more direct and individual than wider consultation, which has enabled specific protected characteristics to be considered individually. In addition, affected persons are given support to engage in the process (including funding for professional advice), which ensures they have a full opportunity to highlight and explain the ways in which they personally may be affected by the acquisition process.

4.3.8 Through this process, no affected persons within the Order Limits have been identified for whom protected characteristics differentially affect their ability to understand or engage in the land acquisition process, or how they will be affected by it.

4.3.9 In addition SZC Co. has introduced the discretionary Property Price Support Scheme (PPSS) to ensure that owners of properties most immediately impacted by the Project (but outside of the Order limits) can sell their property

and relocate if they so choose to do. The PPSS boundary covers the areas adjacent to the main development site, as well as relevant associated developments.

4.3.10 The PPSS ensures that the homeowner would not suffer any financial loss in respect of the value of the property in consequence of the Sizewell C proposals on the sale of their property. Supporting property prices is not a policy requirement but is considered by SZC Co. to be socially responsible.

4.3.11 Although it has been appropriate to apply a boundary for the PPSS, SZC Co. has considered particular concerns of residents outside of the scheme limits and has worked with residents to ensure that individual circumstances are considered alongside the Project proposals, and has worked to identify means of addressing concerns on a case by case basis.

4.4 Additional information provided during examination

4.4.1 Further information relevant to equality has been provided by the applicant and others during the course of the examination, in response to the Examining Authority's written questions. This is summarised here as part of the update to the Equality Statement.

a) [Response to the Examining Authority's First Written Questions \(ExQ1\)](#)
[\[REP2-100\]](#) [\[REP3-046\]](#) [\[REP5-121\]](#)

AQ.1.73 and AR.1.26

4.4.2 These ask about the effects of the Northern Park and Ride on the Sai Grace Ashram. The responses consider in more detail the relative sensitivity of religious vs residential uses, and the mitigation that is planned, including landscaping. It confirms that significant air quality, noise or vibration effects are not likely.

AR.1.27

4.4.3 Asks whether sufficient consideration has been given to equality, and whether further work or mitigation might be needed.

4.4.4 East Suffolk Council noted the difficulty in identify additional mitigation at this point and emphasised the use of the Public Services Resilience Fund to deal with this (as now set out in the Draft Deed of Obligation).

4.4.5 The response from Suffolk County Council suggests assessment and mitigation should be more focused on those with specific protected

characteristics, and that further equality impact assessment should be carried out on implementation.

- 4.4.6 SZC Co. has responded by noting that all people have protected characteristics, and that in general mitigation is not usually specific to those characteristics (someone differentially affected by noise, for example, will differentially benefit from general noise-reducing mitigation). Where mitigation takes the form of additional funding for council services, those services will already as a matter of course be subject to the public sector equality duty.

CA.1.42

- 4.4.7 This asks, in relation to Compulsory Acquisition of land, how due regard has been given to equality, and whether any affected persons have been identified as having protected characteristics.

- 4.4.8 The response confirms that due regard has been given to the public sector equality duty (further information is given in section 4.3 of this update). All people have protected characteristics, the issue for consideration is whether they are affected differently because of those characteristics. SZC Co. has been ready to make reasonable adjustments where this is the case, but in practice no request for, or need for such adjustments have arisen.

CI.1.12

- 4.4.9 This asks whether the equality assessment adequately assesses effects on vulnerable groups, and whether effects on care homes and their residents have been fully assessed.

- 4.4.10 The response notes that the Equality Statement is not formally the assessment or due consideration of equality required under the Public Sector Equality Duty, as that duty rests with the Examining Authority and cannot be delegated. The Equality Statement aims to provide information to assist the Examining Authority in performing that duty.

- 4.4.11 On care homes, the assessment of effects is integrated across the relevant ES topics (with signposting in the Equality Statement in relation to age as a protected characteristic). The response explains the approach taken in transport, noise and health to ensure these impacts are properly covered.

- 4.4.12 Residual noise impacts on Leiston Old Abbey care home are noted, with mitigation likely to be addressed with acoustic barriers.

HW.1.2

- 4.4.13 This asks about the severance effect of transport, and whether the effect on vulnerable users has been taken into account.
- 4.4.14 The response notes that the new roads proposed reduce traffic within communities and overall reduce the severance effects. It also highlights the measures taken in relation to public rights of way, to maintain connections.

HW.1.6

- 4.4.15 Noted an error in Table A1.2 in the appendix of the Equality Statement. This was a transcription error that did not affect the assessment, and the rest of the table is correct. The updated correct table is included in Appendix A of this document

HW.1.7

- 4.4.16 Asks why effects on recreation routes are less likely to have equality effects than changes to the road network. The response explains that the distinction here is not the characteristic of the user, but the nature of the use, with recreational use likely to be discretionary, and substitutable with alternative routes, whereas use of the road network may be necessary to reach a specific destination.

HW.1.8

- 4.4.17 Asks about securing mitigation in relation to effects on the A12 (in relation to the Equality Statement Paragraph 1.6.31). This is now addressed with additional mitigation agreed at Little Glemham and Marlesford, as described in section 3.3 of this update.

HW.1.10

- 4.4.18 Asks about mitigation of recruitment effects on public services. This is addressed through the Public Services Resilience Fund, set out in the Deed of Obligation, alongside other measures that contribute including the Jobs Service to support backfilling.

HW.1.9

- 4.4.19 Asks about transport mitigation in relation to sensitive facilities. The response by Essex County Council notes a number next to roads with construction traffic:

- A12 Woodbridge; including in near proximity to a High School.
- B1125 through Westleton; including adjacent to a village hall, church and public house.
- A1120 through Yoxford; including adjacent to a primary school, public house and convenience store.
- A12 through Yoxford: public house
- A1120 at Peasenhall / Sibton; including adjacent to a nursery, a church, convenience stores, and in near proximity to another church
- B1122 through Theberton; including adjacent to a church and public house.
- B1069 at Coldfair Green / Knodishall, including adjacent to public houses and in close proximity to a primary school, church, village hall and a residential home.
- A12 Little Glemham; including adjacent to a public house and on route to a church.
- A12 Marlesford; including adjacent to a farm shop and café.
- A12 Blythburgh: convenience store and public house and in close proximity to the church.

4.4.20 Further changes and mitigation have been introduced, including Change 1 and Change 2 to reduce construction HGV traffic (as set out in Section 2 of this update), as well as specific local mitigation such as that in Glemham and Marlesford (summarised in Section 3 of this update).

HW.1.14-HW.1.17

4.4.21 Asks about the effects on vulnerable groups. The response from SZC Co. sets out the assessments of effects and mitigations proposed, including the Community Safety Management Plan, and financial contributions including the Community Fund, Public Services Resilience Fund, and funding for Suffolk Constabulary.

b) Response to the Examining Authority’s Second Written Questions (ExQ2)

AR.2.3 [\[REP7-050\]](#) [\[REP8-115\]](#)

4.4.22 Asks about consideration of community safety and community cohesion. The response by SZC Co. notes that the purpose of the Equality Statement is not, in itself, to fulfil the public sector equality duty to give due regard to equality, but to summarise and point to the various elements of the application that provide the Examining Authorities with the information needed to fulfil the public sector equality duty. This includes signposting where in the application consideration of, and mitigation for impacts on community safety and community cohesion. Since the Equality Statement the mitigation is now given in more detail in the Draft Deed of Obligation, as set out in Section 3 of this update.

CI.2.3 [\[REP7-052\]](#) [\[REP8-115\]](#)

4.4.23 Asks about safeguarding vulnerable people in the housing market. The response by SZC Co. summarises the wider housing support proposed in the Draft Deed of Obligation, as well as measures of most relevance to vulnerable people, including the Homelessness Service Resilience element of the Housing Fund.

CA.2.27 [\[REP7-052\]](#)

4.4.24 Asks about adjustments, consideration and engagement with affected persons with respect to equality. The response from SZC Co. sets out how equality was considered in designing and implementing the consultation process. For affected persons, reasonable costs of professional advice was underwritten by SZC Co. as part of engagement that intended to identify any pertinent issues. Further detail is given in Section 4.3 of this update.

c) Response to the Examining Authority’s Third Written Questions (ExQ3) [\[REP8-116\]](#) (Doc Ref. 9.125)

AR.3.0

4.4.25 Asks about the safety of elderly and disabled horse riders crossing the permanent beach landing facility. The SZC Co. response explains dismounting is not needed when following the Coast Path across the access road.

CI.3.0 (iii)

4.4.26 Asks about safeguarding of vulnerable people in relation to accommodation provision. The SZC Co. response notes that the overall approach to accommodation has been to avoid adverse effects in general (through measures such as provision of the campus), which will therefore also include avoiding effects on vulnerable groups.

4.4.27 As a precautionary measure, the Housing Fund and other provision are a mechanism to address adverse effects should they arise, responding to issues identified by East Suffolk Council, as the body best-placed to recognise vulnerable people’s housing needs.

HW.3.4

4.4.28 Considers severance and local communities. The SZC Co. response notes that significant effects identified across pedestrian severance pedestrian delay, amenity, and fear and intimidation are either mitigated, or not considered relevant to equality. It also notes that the Rights of Way Working Group will be tasked with ensuring new or altered rights of way appropriately comply with accessibility requirements.

HW.3.5

4.4.29 Asks for an update on potential impacts on care homes, their residents and staff. The SZC Co. response notes that no likely significant effects have been identified on care home residents and staff, but highlights a range of mitigation proposed to support resilience.

APPENDIX A: UPDATED TABLE

Updated Equality Statement Table A1.2: Population and age statistics at ward, regional and national level (ONS, Census 2011) – updated cells highlighted

Area	Usual Residents	(0–15)	%	(16–64)	%	(65+)	%
Ward							
Leiston	6,360	1,167	18.3%	3,819	60.1%	1,374	21.6%
Saxmundham	4,913	894	18.2%	2,765	56.28%	1,254	25.52%
Snape	1,911	271	14.18%	1,126	58.9%	514	26.9%
Yoxford	1,901	215	11.31%	1,022	53.8%	664	34.93%
Aldeburgh	3,225	329	10.2%	1,519	47.1%	1,377	42.70%
Districts							
Great Yarmouth	97,277	17,529	18.02%	59,377	61.04%	20,371	20.94%
South Norfolk	124,012	22,295	17.98%	75,194	60.63%	26,523	21.39%
East Suffolk	239,552	41,782	17.44%	141,472	59.06%	56,298	23.50%
Mid Suffolk	96,731	17,824	18.43%	59,436	61.44%	19,471	20.13%
Ipswich	133,384	25,988	19.48%	87,566	65.65%	19,830	14.87%
Babergh	87,740	15,919	18.14%	53,065	60.48%	18,756	21.38%
Wider Scales							
Norfolk	857,888	144,985	16.90%	527,672	61.51%	185,231	21.59%
Suffolk	728,163	132,902	18.25%	450,222	61.83%	145,039	19.92%
East England	5,846,965	1,108,632	18.96%	3,714,151	63.52%	1,024,182	17.52%
England	53,012,456	10,022,836	18.91%	34,329,091	64.76%	8,660,529	16.34%
Study Areas							
60 minute travel distance	308,222	54,771	17.77%	182,684	59.26%	70,787	22.97%
90 minute travel distance	1,672,301	295,971	17.70%	1,037,903	62.06%	338,427	20.24%