



SCOTTISHPOWER
RENEWABLES

East Anglia ONE North and East Anglia TWO Offshore Windfarms

Public Sector Equality Statement

Applicants: East Anglia ONE North Limited and East Anglia TWO Limited
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Author: Royal HaskoningDHV

Applicable to East Anglia ONE North and East Anglia TWO



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Glossary of Acronyms

AMP	Access Management Plan
CoCP	Code of Construction Practice
CTP	Construction Traffic Plan
DCO	Development Consent Order
EHRC	Equality and Human Rights Commission
EIA	Environmental Impact Assessment
EQIA	Equality Impact Assessment
ExA	Examining Authority
HGV	Heavy Goods Vehicle
LPA	Local Planning Authority
MoU	Memorandum of Understanding
OAMP	Outline Access Management Plan
OCoCP	Outline Code of Construction Practice
OCTMP	Outline Construction Traffic Management Plan
OPRoWS	Outline Public Rights of Way Strategy
OTP	Outline Travel Plan
PRoW	Public Right of Way
PSED	Public Sector Equality Duty



Glossary of Terminology

Applicants	East Anglia ONE North and East Anglia TWO
East Anglia ONE North	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.



1 Introduction

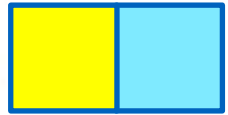
1. This note has been prepared by East Anglia TWO Limited and East Anglia ONE North Limited (the Applicants) in relation to the East Anglia TWO and East Anglia ONE North Development Consent Order (DCO) applications (the Applications).
2. At a previous Examination hearing the Examining Authority (ExA) requested that the Applicants prepare a statement addressing how the Secretary of State can discharge its Public Sector Equality Duty (PSED) in respect of these Applications. The purpose of this submission is therefore to assist the Secretary of State in discharging its PSED by summarising the relevant baseline information and impact assessment conclusions in respect of East Anglia TWO project and the East Anglia ONE North project (the Projects) and putting these in the context of the relevant Equality Act 2010 requirements and objectives.
3. This document is applicable to both the East Anglia ONE North and East Anglia TWO DCO applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's procedural decisions on document management of 23rd December 2019 (PD-004). Whilst this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it for the other project submission.



2 The Public Sector Equality Duty

2.1 The Equality Act 2010 and the Public Sector Equality Duty

4. The Equality Act 2010 ('the Act') harmonised, consolidated and extended previous legislation designed to prohibit discrimination on the grounds of protected characteristics. The Act identifies nine protected characteristics. Unless otherwise stated, the below definitions are based on those provided by the Equality and Human Rights Commission (EHRC) (EHRC, 2017):
 - Age: this refers to a person belonging to a particular age or range of ages;
 - Disability: a person has a disability if she or he has a physical or mental impairment that has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities;
 - Gender reassignment: people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) for the purpose of reassigning their sex;
 - Marriage and civil partnership: marriage can be between a man and a woman or between two people of the same sex. Same-sex couples can also have a civil partnership. Civil partners must not be treated less favourably than married couples (except where permitted by the Equality Act);
 - Pregnancy and maternity: pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth;
 - Race: refers to a group of people defined by their colour, nationality (including citizenship) ethnic or national origins;
 - Religion or belief: religion refers to any religion, including a lack of religion. Belief refers to any religious or philosophical beliefs including lack of belief (such as Atheism);
 - Sex: this refers to a man or to a woman, or to a group of people of the same sex;
 - Sexual orientation: whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes.
5. Section 149 of the Act places a public sector equality duty on public authorities when exercising their functions. In the current context that duty will apply to the Secretary of State when making a decision in respect of the Applications for Development Consent Orders. The equality duty requires public bodies to have due regard to the need to:



- “(a) *eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under [the] Act;*
(b) *advance equality of opportunity between persons who share a relevant protected characteristic and people who do not share it;*
(c) *foster good relations between persons who share a relevant protected characteristic and those who do not share it.*”¹

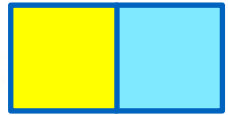
2.2 Guidance

6. In preparing this assessment we have had due regard to relevant guidance including the following:
- Equality and Human Rights Commission (EHRC) The Essential Guide to the Public Sector Equality Duty;
 - EHRC, Engagement and the Equality Duty and guide for public authorities;
 - EHRC, Equality Act 2010: Technical Guidance on the Public Sector Equality Duty England;
 - EHRC, Meeting the Equality Duty in Policy and Decision-Making England (and non-devolved public authorities in Scotland and Wales); and
 - Government Equalities Office, Equality Act 2010: Public Sector Equality Duty What Do I Need To Know? A Quick Start Guide for Public Sector Organisations.
7. Meeting the Equality Duty in Policy and Decision Making notes that ‘*there is no prescribed methodology for assessing the impact on equality*’ - the key is that the method works and allows the public body to meet their legal obligations.

2.3 Scope and Approach to Assessment

8. The purpose of this equality impact assessment (EQIA) is to inform, give confidence and assist the Secretary of State in documenting compliance with its legal obligations in respect of the Public Sector Equality Duty when determining the Applications.
9. This assessment draws upon and summarises baseline data and a number of other impact assessments already before the Examinations. It identifies impacts which are predicted to result from the implementation of the Projects if consented and provides a qualitative appraisal of the likely or possible effects of these potential impacts on members of the protected characteristic groups. That assessment includes a consideration of:
- a. How the Projects could interact with and affect protected characteristic groups including:

¹ Section 149(1) of the Equality Act 2010



- i. If they are likely to affect people with particular protected characteristics differently or disproportionately;
 - ii. If they are likely to affect relations between persons within a particular protected characteristic group and others;
 - b. where required: measures to mitigate possible negative equality effects and if proportionate measures to promote and enhance positive equality effects.
10. A disproportionate equality effect arises when an impact has a proportionately greater effect on protected characteristic groups than on other members of the general population at a particular location.
11. A differential equality effect is one which affects members of a protected characteristic group differently from the rest of the general population because of specific needs, or a recognised sensitivity or vulnerability associated with their protected characteristic, irrespective of the number of people affected.
12. In some cases, protected characteristic groups could be subject to both disproportionate and differential equality effects.
13. The EQIA consider impacts on groups of people rather than on individuals. Equality effects are considered at an appropriate spatial level according to the nature of the effect and the aspect of the Projects that gives rise to the effect. The spatial scope is guided by the EIA reported within the Environmental Statement submitted with the Application and by professional experience and judgement.

2.3.1 Effects considered

14. The effects considered in this assessment are based upon the receptor topics from the EIA and those assessments which were shaped by the responses to pre-Application consultation with both technical and public consultation (as reflected in the consultation tables accompanying each receptor topic). The effects considered in this assessment reflect the requirements of the PSED and draw on professional experience of the Applicants and their consultant team and take into account post-Application representations (as summarised in Applicant's Comments on Relevant Representations - Volume 2: Individual Stakeholders (AS-035) and Applicant's Comments on Relevant Representations - Volume 3: Technical Stakeholders (AS-036). It is anticipated that, given the nature of the Projects, potential effects will be limited. Effects upon the physical, ecological and offshore human environment are not considered to have pathways for equality effects. Only effects upon the onshore human environment are considered, with the topics listed in **Table 1**.



Table 1 Effects Screening

Topic	Effect(s) considered in assessment
Ground Conditions and Contamination	Given that no significant impacts were predicted and there are no outstanding disagreements around the conclusions, this topic is not considered further.
Air Quality	Construction effects upon protected characteristic groups or assets (e.g. schools or community facilities) Operational effects were scoped out of the EIA and are not considered to have any potential equality effects.
Water Resources and Flood Risk	Construction or operational effects upon protected characteristic groups or assets (e.g. schools or community facilities)
Land Use	Given that no significant impacts were predicted and that any mitigation measures will be agreed via consultation with affected landowners (and therefore be bespoke to each case), this topic is not considered further. Note the effects on Public rights of way (PRoW) are considered under Tourism, Recreation and Socio-Economics below
Archaeology and Cultural Heritage	Although there is potential for some residual significant impacts (i.e. upon the setting of some heritage assets), there is no pathway for a disproportionate equality effect for any of the protected characteristic groups This topic is not considered further.
Noise and Vibration	Construction or operational effects upon protected characteristic groups or assets (e.g. schools or community facilities)
Traffic and Transport	Disruption to public transport relied upon by protected characteristic groups; Increased journey times/delay effects for relevant protected groups due to construction traffic, and changes to the local road network; Road safety effects for relevant protected characteristic groups (including safe routes to schools) due to construction traffic, severance,



Topic	Effect(s) considered in assessment
	<p>changes to local road and pedestrian networks and new transport infrastructure;</p> <p>Operational effects were scoped out of the EIA and are not considered to have any potential equality effects.</p>
Human Health	<p>Health impacts from air quality, noise, flood risk effects</p> <p>Safety and personal security</p>
Offshore Seascape, Landscape and Visual Amenity	<p>Although there is potential for some residual significant impacts (i.e. upon both landscape and visual receptors), there is no pathway for a disproportionate equality effect for any of the protected characteristic groups</p> <p>This topic is not considered further.</p>
Landscape and Visual Impact	
Tourism, Recreation and Socio-Economics	<p>Construction or operational effects upon community facilities</p> <p>Construction or operational effects upon any organisation providing a service or product aimed specifically at one or more protected characteristic groups;</p> <p>Training and employment opportunities for protected characteristic groups, including construction and operational employment, indirectly created employment, and induced investment;</p>



3 Assessment

15. **Table 2** provides the assessment, signposting the reader to relevant documents from the Applications (or subsequent revisions submitted into the examination) which provide the basis for the judgements reached.

Table 2 EQIA

Effects	Assessment	Reference document
Air Quality		
Construction effects upon protected characteristic groups or assets (e.g. schools or community facilities)	<p>The Projects have undergone an extensive site selection process which involved incorporating environmental considerations in collaboration with the engineering design requirements. Key design principles relevant to this include:</p> <ul style="list-style-type: none"> • Avoiding proximity to residential dwellings; and • Minimising impacts to local residents in relation to access to services and road usage <p>The Projects have been located in areas where there was a reduced potential to cause disturbance. On this basis, air quality effects have been assessed as not significant.</p> <p>Notwithstanding this, measures to minimise air quality impacts have been identified within the Outline CoCP and will be applied across the Projects. An Air Quality Management Plan will be prepared which describes control measures to manage dust and emission during construction works. The plan will detail air quality baseline conditions, and describe mitigation to minimise adverse impacts which will be followed for enabling works and construction activities at the landfall, the onshore cable route, onshore substation and National Grid infrastructure, and any monitoring and reporting which may be required</p> <p>With these management measures in place for each of these effects, there is no predicted differential or disproportionate impact to protected groups</p>	<p>Chapter 19 - Air Quality (APP-067)</p> <p>Outline Code of Construction Practice (Clean) - Version 02 (REP3-022)</p>
Water Resources and Flood Risk		
Construction or operational effects upon protected characteristic groups or assets (e.g. schools or community facilities)	<p>The Projects have undergone an extensive site selection process which involved incorporating environmental considerations in collaboration with the engineering design requirements. Key design principles relevant to this include:</p> <ul style="list-style-type: none"> • Avoiding proximity to residential dwellings; and • Minimising impacts to local residents in relation to access to services and road usage 	<p>Chapter 20 - Water Resources and Flood Risk (APP-068)</p> <p>Outline Code of Construction Practice (Clean) -</p>



Effects	Assessment	Reference document
	<p>The Projects have been sited in areas where there was a reduced potential to cause impact. On this basis, water and flood risk effects have been assessed as not significant.</p> <p>Notwithstanding this, measures to minimise impacts have been identified within the Outline CoCP and further detailed in the Outline Operational Drainage Management Plan.</p> <p>A Surface Water and Drainage Management Plan will be prepared which describes the approach to surface water and foul water drainage, and water supply during construction and details of existing drainage within the construction areas. A Flood Management Plan will be prepared which describes the control measures designed to manage flood risk during construction. The plan will include details of flood warning and evacuation procedures, key contacts, emergency contacts and insurance details.</p> <p>The Outline Operational Drainage Management Plan identifies the different elements of the surface water and foul water arising from the operation of the onshore substations and National Grid infrastructure. In considering and outlining how these will be managed and controlled, it addresses the location of the development, the hydrology and hydrogeological setting and considers the ways in which the potential impacts of water from the onshore substations and National Grid infrastructure once operational will be minimised. The overall strategy adopted must therefore be able to ensure that, through the introduction and implementation of suitable control measures, there will be no measurable impacts on the receiving water catchment.</p> <p>With these management measures in place for each of these effects, there is no predicted differential or disproportionate impact to protected groups</p>	<p>Version 02 (REP3-022)</p> <p>Outline Operational Drainage Management Plan - Version 01 (REP3-046)</p>
Noise and Vibration		
Construction or operational effects upon protected characteristic groups or assets (e.g. schools or community facilities)	<p>The Projects have undergone an extensive site selection process which involved incorporating environmental considerations in collaboration with the engineering design requirements. Key design principles relevant to this include:</p> <ul style="list-style-type: none"> Avoiding proximity to residential dwellings; and Minimising impacts to local residents in relation to access to services and road usage <p>The Projects have been located in areas where there was a reduced potential to cause disturbance. On this basis, noise effects have been assessed as not significant.</p> <p>Notwithstanding this, measures to minimise impacts have been identified within the Outline CoCP and will be applied</p>	<p>Chapter 25 - Noise and Vibration (APP-073)</p> <p>Outline Code of Construction Practice (Clean) - Version 02 (REP3-022)</p> <p>Deadline 4 Project Update Note (ExA.AS-2.D4.V1)</p>



Effects	Assessment	Reference document
	<p>across the Projects. A Construction Phase Noise and Vibration Management Plan will be prepared which describes measures to minimise noise and vibration impacts on sensitive receptors and comply with relevant legislation, requirements, standards and best practice relating to construction noise. The plan will detail noise and vibration baseline conditions and assessments, and describe mitigation to minimise adverse impacts which will be followed for construction activities at the landfall, the onshore cable route, onshore substation and National Grid infrastructure. The plan will also specify the procedures to be followed in the event of a noise or vibration environmental incident, alongside any monitoring or reporting which may be required.</p> <p>The operational noise emissions from the onshore substation will be governed by a noise restriction (with the proposed permitted noise level having been reduced by the Applicants from that proposed in the Applications – see Project Update Note submitted at Deadline 4.²). Industry standard noise mitigation schemes (including consideration of design) around the substation will ensure that noise emissions from the onshore substation does not exceed the levels stated in the noise requirement.</p> <p>With these management measures in place for each of these effects, there is no predicted differential or disproportionate impact to protected groups</p>	
Traffic and Transport		
<p>Disruption to public transport relied upon by protected characteristic groups</p> <p>Increased journey times/delay effects for relevant protected groups due to construction traffic, and changes to the local road network</p>	<p>The Projects have undergone an extensive site selection process which involved incorporating environmental considerations in collaboration with the engineering design requirements. Key design principles relevant to this include:</p> <ul style="list-style-type: none"> • Avoiding proximity to residential dwellings; and • Minimising impacts to local residents in relation to access to services and road usage <p>Additional embedded mitigation (as listed in Table 26.4 of Chapter 26 Traffic and Transport) is provided to reduce or avoid potential impacts, such as the selection of routes for access, avoidance of certain roads and the commitment to have no full road closures. Free or managed access will be maintained at all time for properties and businesses. There will be temporary roadworks associated with off-site highway works, highway access construction or cable</p>	<p>Chapter 26 - Traffic and Transport (APP-074)</p> <p>Outline Construction Traffic Management Plan (Clean) - Version 02 (REP3-032)</p> <p>Outline Access Management Plan (Clean) -</p>

² Requirements 26 and 27 of **draft DCO** will be updated at Deadline 5 to reflect this change.



Effects	Assessment	Reference document
	<p>crossings which will require short-term traffic management (e.g. traffic signals, diversions) which will cause minor inconvenience to the travelling public and insignificant driver delays.</p> <p>Embedded mitigation is secured within the Outline Construction Traffic Management Plan (OCTMP), Outline Access Management Plan (OAMP) and Outline Travel Plan (OTP). Prior to construction commencing, final versions of the CTMP, AMP and CTP will be produced, in consultation with the Local Planning Authority, Highway Authority and Highways England, to discharge requirements of the draft DCO.</p> <p>On this basis, all effects on traffic and transport receptors have been assessed as not significant. Of particular relevance to protected groups Section 26.6. 1.11 and section 26.6.1.12 of Chapter 26 Traffic and Transport assess impacts relating to congestion. This assessment determines that the operation and functionality of the highway network is not significantly impacted by the Projects' traffic and therefore it is implicit that there is not an impact on emergency service response times or public transport. In addition, Section 2.2.7 of the OCTMP contains a 'Network Resilience' strategy to reduce the potential for the construction HGV traffic to have an adverse impact upon the highway network during planned and unplanned events</p> <p>With these management measures in place for each of these effects, there is no predicted differential or disproportionate impact to protected groups</p>	<p>Version 02 (REP3-034)</p> <p>Outline Travel Plan (Clean) - Version 02 (REP3-036)</p>
Road safety effects for relevant protected characteristic groups (including safe routes to schools) due to construction traffic, severance, changes to local road and pedestrian networks and new transport infrastructure	<p>The Applicant has undertaken a detailed review of the highway network to determine the probable routes for traffic, during both construction and operational phases of the Project. The review identified routes that would be unsuitable for HGV traffic (due to constrained highway geometry, weight restrictions/weak structures or the potential for adverse impact on sensitive communities).</p> <p>Chapter 26 - Traffic and Transport Table 26.4 contains the Applicant's commitment to assign HGVs away from unsuitable routes. A desktop exercise augmented by site visits has been undertaken to identify the sensitive receptors in the onshore highway study area. All 15 links within the onshore highway study area have been assessed and assigned a sensitivity defined by the type of user groups that may use it (e.g. schools, community facilities, public houses, designated walking /cycling routes)</p>	



Effects	Assessment	Reference document
	<p>and the level of protection afforded to them by the existing highway environment.</p> <p>The subsequent assessment did not identify significant impacts for pedestrians and cyclists, therefore no road safety mitigation specific to those user groups was identified. Therefore there are not considered to be any potential equality effects</p>	
Human Health		
Health impacts from air quality, noise effects etc	<p>Chapter 27 which brings together the information from the individual receptor assessments and considers each in light of human health and sensitive receptors.</p> <p>Site selection and further embedded and additional mitigation as proposed by the various Outline Management Plans result in not significant effects</p> <p>With these management measures in place for each of these effects, there is no predicted differential or disproportionate impact to protected groups</p> <p>In addition, the assessment covers the perception of risk which highlights the local anxieties. It is noted that Public Health England stated in their consultation response that <i>"in some cases, perception of risk may have a greater impact on health than the hazard itself."</i> Mitigation is proposed by means of strong communication and provision of information by the Applicants. Communication will be on-going throughout the development process through the production of a Stakeholder Communications Plan (which is covered by the OCoCP).</p>	<p>Chapter 19 - Air Quality (APP-067)</p> <p>Chapter 20 - Water Resources and Flood Risk (APP-068)</p> <p>Chapter 25 - Noise and Vibration (APP-073)</p> <p>Chapter 26 - Traffic and Transport (APP-074)</p> <p>Chapter 27 - Human Health (APP-075)</p>
Safety and personal security	<p>Section 2.2. of the OCoCP lists out the overarching health and safety principles for construction which include:</p> <ul style="list-style-type: none"> Site access for members of the public shall be restricted during the construction phase of the project, to ensure public safety. Site access for all parties involved in construction will also be managed through a number of actions, including signing in procedures, exclusion zones and induction certificates. A method statement detailing the safety measures to be imposed on site will be prepared prior to the commencement of the development. Where the onshore development area of the Project interacts with Public Rights of Way, measures will be implemented as set out within the 	<p>Outline Code of Construction Practice (Clean) - Version 02 (REP3-022)</p> <p>Outline Construction Traffic Management Plan (Clean) - Version 02 (REP3-032)</p> <p>Outline Access Management Plan (Clean) -</p>



Effects	Assessment	Reference document
	<p>final Public Rights of Way Strategy which must accord with the Outline Public Rights of Way Strategy (document reference 8.4)</p> <p>In addition to the arrangements under the CoCP, the appointed contractors will be encouraged to register with the Considerate Constructors Scheme which is a voluntary code of practice that seeks to:</p> <ul style="list-style-type: none"> • Enhance the appearance of the site; • Secure everyone's safety; • Respect the community; • Care for the workforce; • Protect the environment. <p>Section 3.5 of the OCoCP discusses site security</p> <ul style="list-style-type: none"> • Adequate security will be provided by contractors working on behalf of the Applicant to protect the public and staff, prevent theft from or damage to the works, and prevent unauthorised entry to or exit from the site. Site gates will be closed and locked when there is no site activity and appropriate security measures shall be implemented. <p>As discussed under Traffic and Transport, general safety, driver delay and effects upon public transport and emergency services have been assessed as not significant. This is due in part to commitments and embedded mitigation secured through the OCTMP, OAMP and OTP. In addition, Section 2.2.7 of the OCTMP contains a 'Network Resilience' strategy to reduce the potential for the construction HGV traffic to have an adverse impact upon the highway network during planned and unplanned events</p> <p>With these management measures in place for each of these effects, there is no predicted differential or disproportionate impact to protected groups</p>	<p>Version 02 (REP3-034)</p> <p>Outline Travel Plan (Clean) - Version 02 (REP3-036)</p>
Tourism, Recreation and Socio-Economics		
Construction or operational effects upon community facilities (includes community facilities, places of worship, key services, local high streets, schools, public	<p>The Projects have undergone an extensive site selection process which involved incorporating environmental considerations in collaboration with the engineering design requirements. Key design principles relevant to this include:</p> <ul style="list-style-type: none"> • Avoiding proximity to residential dwellings; • Avoiding proximity to historic buildings; 	Chapter 4 - Site Selection and Assessment of Alternatives (APP-052)



Effects	Assessment	Reference document
open spaces, PRoW, play spaces, recreational facilities)	<ul style="list-style-type: none"> Avoiding siting permanent operational onshore infrastructure within designated sites (such as common land); and Minimising impacts to local residents in relation to access to services and road usage, including footpath closures <p>Access to services</p> <p>The site selection process has avoided direct effects upon community facilities, places of worship, key services, local high streets, schools, public open spaces, play spaces and recreational facilities.</p> <p>Free or managed access will be maintained at all time for properties and businesses. There will be temporary roadworks associated with off-site highway works, highway access construction or cable crossings which will require short-term traffic management (e.g. traffic signals, diversions) which will cause minor inconvenience to the travelling public and insignificant driver delays.</p> <p>For indirect effects see Air Quality, Water Resources and Flood Risk Noise and Vibration and Traffic and Transport. With these management measures in place for each of these effects, there is no predicted differential or disproportionate impact to protected groups</p> <p>PRoW</p> <p>There are 26 PRoW within the onshore development area which interact with the Projects on a temporary basis during construction and which will require temporary control measures to be put in place during construction. There are three PRoWs within the onshore development area which interact with the Projects on a permanent basis during construction and operation, which will require permanent stopping-up and diversion.</p> <p>The Outline Public Rights of Way Strategy (OPRoWS) (REP3-024) provides the management principles to be adopted in ensuring that PRoW are managed in a safe and appropriate manner during the construction and operational phases of the Projects. A final detailed Public Right of Way Strategy (PRoWS) will be produced post consent, during the detailed design phase of the Projects. The relevant highway authority and LPA will be consulted during preparation of the PRoWS which will be in accordance with this OPRoWS. With these management measures in place, there is no predicted differential or disproportionate impact to protected groups.</p>	<p>Chapter 19 - Air Quality (APP-067)</p> <p>Chapter 20 - Water Resources and Flood Risk (APP-068)</p> <p>Chapter 25 - Noise and Vibration (APP-073)</p> <p>Chapter 26 - Traffic and Transport (APP-074)</p> <p>Chapter 27 - Human Health (APP-075)</p> <p>Chapter 30 - Tourism, Recreation and Socio-Economics (APP-078)</p> <p>Outline Public Rights of Way Strategy (REP3-024)</p> <p>Construction in Proximity to Properties - Version 01 (REP3-058)</p>
Construction or operational effects upon an organisation providing a service or	As above, the site selection has avoided direct effects upon community facilities, which has therefore avoided effects upon any organisation providing a service or product aimed specifically at one or more protected characteristic groups.	

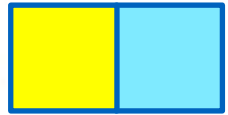


Effects	Assessment	Reference document
product aimed specifically at one or more protected characteristic groups	<p>Table 27.23 of Chapter 27 Human Health lists Health and Community Assets within 1km of the onshore development area.</p> <p>There are no direct effects upon these properties both of which are outwith the Projects' onshore development area. For indirect effects see Air Quality, Water Resources and Flood Risk, Noise and Vibration and Traffic and Transport. The document Construction in Proximity to Properties - Version 01, also summarises key considerations where construction is close to residential properties. With these management measures in place for each of these effects, there is no predicted differential or disproportionate impact to protected groups</p>	
Training and employment opportunities for protected characteristic groups, including construction and operational employment, indirect and induced employment	<p>Whilst separate from the Application processes (and so not a material consideration), the Applicants note that:</p> <ol style="list-style-type: none"> 1. they are guided by the commitments made across ScottishPower with regard to training and employment opportunities (see Appendix 1 for full Policy on Equality and Diversity). <p>From the Scottish Power Policy on Equality & Diversity³</p> <p><i>"ScottishPower recognises the importance of difference and the Company values and respects individuality as part of its ongoing commitment to promoting equality and diversity. ScottishPower also understands that diversity goes beyond legally compliant policies and practices. It also includes a focus on creating an innovative, integrated organisation where people feel valued, inspiring them to perform at their best. This approach is referred to as "inclusion."</i></p> <p><i>ScottishPower is committed to equal opportunities for all, irrespective of age, disability, gender reassignment / identity, race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy, adoption or maternity or other considerations not justified in law which are irrelevant to the performance of the job.</i></p> <p><i>In addition to employees, this Policy [the Equality and Diversity Policy] will apply to the treatment of job applicants, former employees, agency staff, contractor's consultants or any person working on behalf of ScottishPower or any ScottishPower customer or client. The Company expects other</i></p>	

³ https://www.scottishpower.com/pages/inclusion_at_scottishpower.aspx

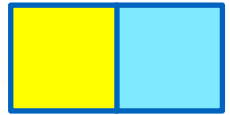


Effects	Assessment	Reference document
	<p><i>persons working for or on behalf of ScottishPower to be aware of and comply with this Policy.”</i></p> <p>2. In addition, ScottishPower Renewables support the Offshore Wind Sector Deal (HM Government, 2019) which commits the industry to becoming more diverse and inclusive with targets for raising the female and BAME representation in particular. The Sector Deal also states:</p> <p><i>“The sector will commit to local initiatives for including people with diverse backgrounds, perspectives and needs, which include age, ethnicity, education and other abilities, including assessing if any systemic issues prevent potential recruits from joining the sector and if so, how these should be tackled.”</i></p> <p>3. The Applicants have agreed a Memorandum of Understanding (MoU) for Employment and Skills with the local authorities to embed the Projects’ commitments to local training and development opportunities.</p>	



4 Conclusions

16. No differentiated or disproportionate impacts on groups with protected characteristics under the Equalities Act 2010 are predicted as a result of any phase of the Projects.
17. No effects on relations between persons within a particular protected characteristic group and others are predicted as a result of any phase of the Projects.
18. Management measures (in the form of management plans submitted into the Projects Examinations as certified documents such as the Outline Code of Construction Practice) are being developed through consultation with local planning authorities, who themselves are subject to Public Sector Equalities Duty, and in response to the concerns of local residents.
19. The Applicants recognise the potential for protected groups to have less access to consultation processes, and therefore has built in protections through appropriate site selection and best practice management of construction and operation processes, informed by ScottishPower Renewables' previous experience of constructing major infrastructure projects.
20. The Applicants will appoint a local community liaison officer as a single point of contact for communications during construction. A project community and public relations procedure will be developed as part of the Stakeholder Communications Plan. This will set out the process for responding to any public concerns, queries or complaints during construction in a professional and diligent manner
21. The Projects will support the development of skills which the offshore wind industry needs to meet the Government's ambitions included within the Offshore Wind Sector Deal. Whilst outside of the Applications and so not a material consideration, ScottishPower Renewables is committed to helping to develop people with the right skills required to the deliver the UK's offshore wind ambitions, specifically within the East of England where development is taking place. The Applicants have agreed a Memorandum of Understanding (MoU) for Employment and Skills with the local authorities to embed the commitments to local training and development opportunities.



5 References

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Appendix 1

Policy on Equality & Diversity

Introduction

ScottishPower recognises the importance of difference and the Company values and respects individuality as part of its ongoing commitment to promoting equality and diversity. ScottishPower also understands that diversity goes beyond legally compliant policies and practices. It also includes a focus on creating an innovative, integrated organisation where people feel valued, inspiring them to perform at their best. This approach is referred to as "inclusion."

Policy Commitment

ScottishPower is committed to equal opportunities for all, irrespective of age, disability, gender reassignment / identity, race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy, adoption or maternity or other considerations not justified in law which are irrelevant to the performance of the job.

In recognition of these values, the Company is committed to raising awareness and understanding of equality and diversity by endorsing and promoting the following principles:-

- Compliance with all legal requirements relating to equality and diversity in the workplace and prevention of harassment and discrimination.
- Focus on fairness and inclusion, ensuring that recognition, capability and potential are the basis for all recruitment and development decisions and that employees have the relevant training and opportunities for career and personal development
- Rewarding employees in a fair and consistent manner and recognition of individual performance and potential
- Recognition of the growing diversity of individual values within the workplace
- Valuing employees' views and perspectives and ensure that everyone is treated with dignity and respect

Policy Scope

In addition to employees, this Policy will apply to the treatment of job applicants, former employees, agency staff, contractor's consultants or any person working on behalf of ScottishPower or any ScottishPower customer or client. The Company expects other persons working for or on behalf of ScottishPower to be aware of and comply with this Policy. It should be noted however that any grievance and disciplinary procedures referred to in this Policy apply to existing ScottishPower employees only.

Implementation

ScottishPower's Policy on Equality & Diversity promotes individual capability and potential of all employees and ScottishPower is committed to taking the following steps to eliminate discrimination and promote equality of opportunity for all during any aspect of the employment relationship:-

- Ensure that this Policy is communicated and understood and that all individual employees fully understand their personal responsibilities;
- Ensure that all agency workers, contractors, consultants and any other persons working for or on behalf of ScottishPower are fully aware of and comply with this Policy;

- Review its recruitment, selection, employment practices and opportunities for training and development to ensure compliance with this Policy; and
- Monitor the effectiveness of this Policy, aiming for continuous improvement in all aspects of equal opportunities in employment.

Protected Characteristics

The Equality Act 2010 protects employees from certain prohibited conduct on the grounds of any of the protected characteristics stated in the Act which are defined as follows:-

Age: A particular age (e.g. 32 year old) or range of ages (e.g. 18 - 30 year olds).

Disability: A physical or mental impairment which has a substantial and long term adverse effect on a person's ability to carry out normal day to day activities.

Gender Reassignment: Where a person is proposing to undergo, are undergoing or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

Race: Colour, race, nationality (including citizenship), ethnic or national origin.

Religion or Belief: Religion or religious belief or similar philosophical belief including lack of belief. This does not include any philosophical or political belief unless it is similar to religious belief.

Sex: Gender, i.e. male or female

Sexual Orientation: A person's sexual orientation towards persons of their own sex, the opposite sex or to both sexes.

Marriage and Civil Partnership: Marriage is defined as a 'union between a man and a woman or between a same sex couple'. Same sex couples can also have their relationships legally recognised as 'civil partnerships'.

Pregnancy or Maternity: Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth.

In addition to the protected characteristics under the Equality Act, ScottishPower also extends protection to:

Gender Identity: A person's innate sense of their own gender, whether male, female or something else, which may or may not correspond to the sex assigned at birth.

Prohibited Conduct

There are four main types of prohibited conduct as defined in the Equality Act 2010 and these are:-

Direct Discrimination - treating someone with a protected characteristic less favourably than others. Direct discrimination also includes discrimination as a result of association or perception of others.

Indirect Discrimination - putting rules or arrangements in place that apply to everyone, but that put someone with a

protected characteristic at an unfair disadvantage.

Harassment - unwanted behaviour linked to a protected characteristic that violates someone's dignity or creates an offensive environment for them.

Harassment includes behaviour that is offensive, frightening or in any way distressing. It may be intentional bullying which is obvious or violent, but it can be unintentional subtle or insidious. It may involve nicknames, teasing, name calling or other behaviour which is not with malicious intent but which is upsetting. It may be about the individual's age (actual or perceived), or it may be about the age of those with whom the individual associates. It may not be targeted at an individual(s) but consist of a general culture which, for instance, appears to tolerate the telling of ageist jokes.

Employees are also protected from harassment because of perception and association, i.e. it's not necessary for the complainant to possess the relevant protected characteristic in order to complain of harassment, nor does the behaviour need to be directed at them.

Victimisation - treating someone unfairly because they've complained about discrimination or harassment.

This is when an individual is treated detrimentally because they have made a complaint or intent to make a complaint about discrimination or harassment or have given evidence relating to a complaint about discrimination or harassment or have given evidence or intent to give evidence relating to a complaint about discrimination or harassment.

Victimisation, harassment and/or discrimination, on the basis of any protected characteristic (unless this is objectively justified), will not be tolerated and may result in disciplinary action.

Making a Complaint

Any unacceptable conduct which could be in breach of this Policy, including discrimination, may lead to action being taken under the Company's Disciplinary Procedure. Allegations relating to breach of this Policy which have not been made in good faith will also be subject to disciplinary action.

Any complaint of breach of the terms of this Policy, including a complaint of discrimination, will be pursued through the Company's Grievance Procedure. Every care will be taken to ensure that, in the event of a complaint, the complainant will not be treated less favourably by any other employee i.e. they are not victimised.

Responsibilities

HR

The Employment Policy Team is responsible for the maintenance and review of this Policy. This Policy will be reviewed to ensure its effectiveness and any changes arising from this review will be communicated to employees, their representatives, suppliers and other parties. 1HR Direct will provide advice and guidance on the application of this Policy.

Managers/Team Leaders

All Managers/Team Leaders have a personal responsibility to ensure that this Policy is consistently and appropriately complied with and to ensure that all individuals for whom they are responsible are aware that they have an obligation at all times to uphold and promote this Policy and to comply with all relevant legislation.

Employees

All employees should ensure that they understand the Policy on Equality and Diversity.

They should treat fellow employees, agency workers, job applicants, contractors, consultants, customers and clients fairly, regardless of age, disability, gender reassignment / identity, race, religion or belief, sex, sexual orientation, marriage or civil partnership, pregnancy, adoption and maternity or other considerations not justified in law which are irrelevant to the performance of the job.

If an employee feels they have been discriminated against they should talk to their Manager who may be able to resolve the complaint informally between the various parties involved. This will be done confidentially and dealt with promptly. If an informal approach is unsuccessful, or inappropriate, the Grievance Procedure should be used, and this process will be treated in strictest confidence and dealt with promptly. The Grievance Procedure is only applicable to ScottishPower employees.

Other Workers

Other persons working for or on behalf of ScottishPower are expected to be aware of and comply with this Policy. It should be noted, however, that the Grievance Procedure referred to in this Policy only applies to employees of ScottishPower. If an agency worker, contractor or consultant feels they have been discriminated against they should talk to their employing agency or company as appropriate.

Third Parties

If an employee alleges discriminatory behaviour or harassment against a ScottishPower customer or client, ScottishPower will investigate the matter and, if appropriate, take reasonable steps to prevent recurrence of the behaviour. If a ScottishPower customer or client alleges discriminatory behaviour or harassment against an employee ScottishPower will investigate the matter and if appropriate will take disciplinary action against the employee.

Further Information & Guidance

Further information and advice can be obtained from:-

- 1HR Direct (147 – internal) (0141 614 9980– external)
- The Equality Act 2010
- Training for employees on “Equality and Diversity in Practice” is available on the Global Employee Portal (GEP)
- Training for managers on “Managing Diversity” is available on the Global Employee Portal (GEP)