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 Subject: Hornsea Project Three (UK) Ltd response to Deadline 3 (Part 8)
 Date: 14 December 2018 21:56:06
 Attachments: [Image003.png](#)
[D3_HOW03_Appendix 4_Equalities.pdf](#)

Dear Kay, K-J

Please find attached the eighth and the final instalment of documents for Deadline 3 submission.

I also attach below the document register for Deadline 3:

File name	Document Title	Send on 14/12/2018 in e-mail Part <no.>
D3_HOW03_Cover Letter	Covering Letter to Deadline 2 submission	P1
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D3_HOW03_IP_WR	Applicant's Responses to Additional Submissions by Interested Party at Deadline 1 and 2	P1
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D3_HOW03_Appendix 5_Cefas_2011	Appendix 5 to Deadline 3 Submission – Adrian Judd, Cefas 2011	P4
D3_HOW03_Appendix 6_Davies_JNCC 2001	Appendix 6 to Deadline 3 Submission – Marine Monitoring Handbook – Davies et al., JNCC 2001	P4
D3_HOW03_Appendix 7_Gubbay 2007	Appendix 7 to Deadline 3 Submission – S. Gubbay, JNCC 2007	P4
D3_HOW03_Appendix 8_Ware 2011	Appendix 8 to Deadline 3 Submission – Ware, S.J. & Kenny, A.J. 2011	P5
D3_HOW03_Appendix 9_McGregor 2018	Appendix 9 to Deadline 3 Submission – McGregor et al., 2018 Marine Scotland	P6
D3_HOW03_Appendix 10_Parsons_JNCC 2015	Appendix 10 to Deadline 3 Submission – JNCC Report no 548 – Parsons et al. 2015	P6
D3_HOW03_Appendix 11_Wilson_JNCC 2014	Appendix 11 to Deadline 3 Submission – JNCC Report no 500 – Wilson et al. 2014	P6
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D3_HOW03_Appendix 13_Figures to the WQ1.2.46	Appendix 13 to Deadline 3 Submission: Figures to the Applicant's Response to ExA Question Q1.2.46 (REP1-122)	P6
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D3_HOW03_Appendix 17_Age class data	Appendix 17 to Deadline 3 Submission - Age class data	P7
D3_HOW03_Appendix 18_Kuhn et al._CIGRE_2016	Appendix 18 to Deadline 3 Submission – Kuhn O., et al. - 2nd generation DC grid access for offshore wind farms: "HVDC in an AC fashion" (CIGRE 2016)	P7
D3_HOW03_Appendix 19_Order Lim_amend	Appendix 19 to Deadline 3 submission - Indicative Proposed Minor Amendments to Order Limits	P7

Kind regards

Best regards,
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Hornsea Project Three
Offshore Wind Farm



Hornsea Project Three Offshore Wind Farm

Equalities Impact Assessment

Date: 14 December 2018

Hornsea 3
Offshore Wind Farm

Orsted

Document Control			
Document Properties			
Organisation	Ørsted Hornsea Project Three		
Author	Orsted		
Checked by	Orsted		
Approved by	Andrew Guyton		
Title	Equalities impact assessment		
Document Number			
Version History			
Date	Version	Status	Description / Changes
14/12/2018	A	Final	Final for DL3

Ørsted

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London, SW1P 1WG

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1. Introduction

Hornsea Three

- 1.1 Orsted Hornsea Project Three (UK) Ltd., on behalf of Orsted Power (UK) Ltd., is promoting the development of the Hornsea Project Three Offshore Wind Farm (hereafter referred to as Hornsea Three) through the submission of an application for a Development Consent Order (hereafter referred to as “the Application”). Hornsea Three is a proposed offshore wind farm located in the southern North Sea.
- 1.2 The Hornsea Three array area (i.e. the area in which the offshore wind turbine generators (hereafter referred to as turbines) are located) is approximately 696 km², and is located approximately 121 km northeast off the Norfolk coast and 160 km east of the Yorkshire coast. The Hornsea Three offshore cable corridor extends from the Norfolk coast offshore in a north-easterly direction to the western and southern boundary of the Hornsea Three array area. Hornsea Three has a different onshore and offshore cable corridor, as well as grid connection, to Hornsea Project One and Hornsea Project Two.
- 1.3 The electricity generated from Hornsea Three will be transmitted via buried High Voltage (HV) cables using either Direct Current (DC) or Alternating Current (AC), or a combination of the two. From the Norfolk coast, underground onshore cables will connect the offshore wind farm to an onshore High Voltage Alternating Current (HVAC) substation or a High Voltage Direct Current (HVDC) converter substation, which will in turn connect to an existing National Grid substation. Hornsea Three will connect to the Norwich Main National Grid substation, located to the south of Norwich.
- 1.4 Further details on the project can be seen in Volume 1, Chapter 3, Project Description of the Environmental Statement (APP-058).

Purpose of this report

- 1.5 This Equalities Impact Assessment (EQIA) sets out relevant parameters of the project and its delivery associated with Hornsea Three in order to assist the Secretary of State (SoS) in its consideration of the Public Sector Equality Duty (PSED) as set out in the Equalities Act 2010.
- 1.6 This EQIA sets out the overarching methodology for conducting the EQIA and draws on the assessment of likely equality effects arising from a wider range of environmental impacts including, for example, noise, traffic and transport and socio-economic.

2. EQIA Scope and Methodology

Introduction

- 2.1 This section sets out the scope and methodology for the assessment of potential equality effects associated with the construction and operation of Hornsea Three. The EQIA will assist in the fulfilment of the ongoing Public Sector Equality Duty (the PSED) of the SoS when determining the application for the DCO.

The Equality Act 2010 and the Public Sector Equality Duty

2.2 The Equality Act 2010 ('the Act') consolidated previous legislation designed to prohibit discrimination on the grounds of protected characteristics. The Act identifies nine protected characteristics. These are¹:

- 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 sex²;
- 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)³;
- 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);
- sex⁴: 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.

2.3 This EQIA uses the term 'protected characteristic groups' to refer to groups of people who share a particular protected characteristic. The Equality Act 2010 does not specify socio-economic status as a protected characteristic.

¹ Unless otherwise stated, definitions are based on those provided by the Equality and Human Rights Commission (EHRC). EHRC (2017), Protected Characteristics. Available online at: <https://www.equalityhumanrights.com/en/equality-act/protected-characteristics>

² Equality Act 2010. London, HMSO

³ In relation to marriage and civil partnership, a body subject to the duty only needs to comply with the first aim of the duty (eliminate discrimination, harassment, victimisation) and only in relation to work. This is because the parts of the Act covering services and public functions, premises, and education do not apply to that protected characteristic

⁴ Sex is the protected characteristic and not gender

- 2.4 Under section 149 of the Act, a public authority in the exercise of its functions (in this case the SoS when determining the application for a DCO) – or an individual who exercises public functions – is subject to the PSED. The PSED requires public bodies to have due regard to three aims:
- to eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act⁵;
 - to advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it; and
 - to foster good relations between people who share a relevant protected characteristic and those who do not share it.
- 2.5 Relevant guidance on fulfilling the PSED includes:
- Equality and Human Rights Commission⁶ (EHRC) The Essential Guide to the Public Sector Equality Duty⁷;
 - EHRC, Engagement and the Equality Duty and guide for public authorities⁸;
 - EHRC, Equality Act 2010: Technical Guidance on the Public Sector Equality Duty England⁹;
 - EHRC, Meeting the Equality Duty in Policy and Decision-Making England (and non-devolved public authorities in Scotland and Wales)¹⁰; and
 - Government Equalities Office, Equality Act 2010: Public Sector Equality Duty What Do I Need To Know? A Quick Start Guide for Public Sector Organisations¹¹.

The Purpose of the EQIA

- 2.6 The purpose of the EQIA is to assist the SoS in documenting active compliance with its legal duties under the PSED during determination of the application for a DCO in respect of Hornsea Three. It is a predictive assessment, considering in advance of implementation the potential impacts arising from the construction and operation of Hornsea Three, and the likely or possible effects of these impacts for protected characteristic groups.

⁵ For marriage and civil partnership, only the first requirement of the PSED – to eliminate discrimination, harassment and victimisation - applies

⁶ Equality and Human Rights Commission (2012), Public sector equality duty. Available online at: <https://www.equalityhumanrights.com/en/adviceand-guidance/public-sector-equality-duty>

⁷ Equality and Human Rights Commission (2014) The essential guide to the public sector equality duty. Available online at: https://www.equalityhumanrights.com/sites/default/files/pсед_essential_guide_-_guidance_for_english_public_bodies.pdf

⁸ Equality and Human Rights Commission (2011), Engagement and the equality duty. Available online at: <https://www.equalityhumanrights.com/en/publication-download/engagement-and-equality-duty>

⁹ Equality and Human Rights Commission (2014), Equality Act 2010: Technical guidance on the public sector equality duty: England. Available online at: <https://www.equalityhumanrights.com/en/publication-download/technical-guidance-public-sector-equality-duty-england>

¹⁰ Equality and Human Rights Commission (2014). Meeting the equality duty in policy and decision-making England (and non-devolved public authorities in Scotland and Wales). Available online at: <https://www.equalityhumanrights.com/en/publication-download/meeting-equality-duty-policy-and-decision-making-england-and-non-devolved>

¹¹ Government Equalities Office (2011), Equality Act 2010: Public sector equality duty what do I need to know? A quick start guide for public sector organisations. Available online at: <https://www.gov.uk/government/publications/public-sector-quick-start-guide-to-the-public-sector-equality-duty>

- 2.7 The objectives underpinning the EQIA are to:
- assess the likely effects of construction and operation of Hornsea Three for groups sharing protected characteristics, including how Hornsea Three could affect relations between groups;
 - identify measures to avoid, minimise and/or mitigate possible negative equality effects for protected characteristics groups; and
 - identify any relevant and proportionate measures which can further enhance equality, address existing disadvantage or support good relations between protected characteristic groups and other people.

- 2.8 The EQIA considers relevant evidence, including baseline data, and reports potential equality effects and makes an assessment of whether significant effects are identified in the relevant ES assessments (e.g. traffic and transport; air quality; sound, noise and vibration; or landscape and visual) and if they would have disproportionate or differential impacts on groups with protected characteristics.

Key Aspects of Hornsea Three for Consideration

- 2.9 The EQIA considers effects on protected characteristic groups during both construction and operation of Hornsea Three. The following aspects being particularly relevant to the EQIA:
- land required temporarily or permanently for the construction or operation of Hornsea Three, including publicly accessible open space and public right(s) of way (PRoW) and other routes;
 - environmental impacts on residential properties or community resources (e.g. noise, air quality);
 - construction activities, including preparation works, construction traffic and heavy goods vehicles (HGVs), and employment generation;
 - aspects of Hornsea Three once operational, including the presence of physical structures, severance or re-routing of PRoW and other routes, direct and indirect employment and regeneration, and direct and indirect impacts on community facilities and resources; and
 - mitigation, including air, noise and vibration control measures, visual screening and traffic management.

Scope of Assessment

- 2.10 The scope of the EQIA reflects the requirements of the PSED and draws on professional experience of the Applicant. It is anticipated that, given the nature of the Hornsea Three project, potential effects will be limited but may include the following key equality concerns of people sharing particular protected characteristics:
- housing;
 - community infrastructure and open spaces;
 - employment and business;
 - traffic, transport and physical accessibility;
 - noise, air quality and other environmental effects;

- crime, safety and personal security; and
- health related equality effects.

- 2.11 Equality effects are considered at an appropriate spatial level according to the nature of the effect and the aspect of Hornsea Three 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.
- 2.12 In terms of temporal scope, equality effects will be considered for the construction and operation period.

Assessment Methodology and Reporting

- 2.13 The Equality Act 2010 imposes the PSED which requires public bodies and individuals exercising public functions to have due regard for the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people.
- 2.14 There is a limited range of guidance available that is specifically driven by practical application of EQIA, and none of which is statutory guidance. Relevant guidance on fulfilling the PSED is listed in Section 2.5 of this EQIA. Meeting the Equality Duty in Policy and Decision Making¹² states that *'there is no prescribed methodology for assessing the impact on equality'* but recognises that established methods of equality assessment can be useful.

Assessment Criteria

- 2.15 The EQIA does not assess significance of effects. Instead, qualitative descriptive judgments are made regarding the nature of potential equality effects. Equality effects are defined as where an impact is identified as likely to have disproportionate or differential effect on groups of people on the grounds of their protected characteristics.
- 2.16 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.
- 2.17 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.
- 2.18 In some cases, protected characteristic groups could be subject to both disproportionate and differential equality effects.
- 2.19 The EQIA consider impacts on groups of people rather than on individuals.

¹² Equality and Human Rights Commission (2014). Meeting the equality duty in policy and decision-making England (and non-devolved public authorities in Scotland and Wales). Available online at: <https://www.equalityhumanrights.com/en/publication-download/meeting-equality-duty-policy-and-decision-making-england-and-non-devolved>

Equality Effects Considered

2.20 The EQIA considers potential equality effects arising during both the construction and operational phases of the proposed scheme. On the basis of the findings of the ES submitted with the application it is anticipated that potential equality effects will include the following matters. It is these matters which are then carried forward for assessment:

- community infrastructure and open spaces:
 - effects on protected characteristic groups' access to community facilities and services that facilitate their equal participation or that meet their specific needs (includes community facilities, places of worship, key services, local high streets, schools, public open spaces, play spaces, recreational facilities) arising from closure of community accessible land (such as the beach at landfall), road closures, diversions of public rights of way, project induced traffic congestion, presence of construction activities and workforce;
- employment and business:
 - effects due to disruption from construction activity on businesses or charitable organisations providing a service or product aimed specifically at one or more protected characteristic groups; and
 - training and employment opportunities for protected characteristic groups, including construction and operational employment, indirectly created employment, and induced investment;
- traffic, transport and physical accessibility:
 - 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;
 - disruption to public transport relied upon by protected characteristic groups for equal participation in daily living;
 - severance and/or diversion of PRow, and other pedestrian routes relied on by protected characteristic groups for equal participation in daily living;
 - increased journey times/delay effects for relevant protected groups due to construction traffic, and changes to the local road network; and
 - indirect community cohesion effects of severance, public transport disruption, and road safety impacts.
- noise, air quality and other environmental effects:
 - residual noise and air quality effects from construction activities, construction traffic and induced road traffic changes on differentially affected protected characteristic groups or on disproportionately affected protected characteristic groups; and

- residual noise and air quality effects on schools, colleges, residential care homes, places of worship or other community facilities of particular importance for protected characteristic groups.
- crime, safety and personal security:
 - changes in actual safety or feelings of safety at, for example, bus stops suspended or relocated by construction-related disruption, for differentially affected protected characteristic groups.
- health related equality effects arising from:
 - impacts of exposure to noise and air emissions during construction; and
 - any changes in the local visual environment.

2.21 It is recognised that such a list can never be exhaustive as all stakeholders may have a different perception of an impact from that characterised in an Environmental Statement, but only seek to capture potential equality effects that other stakeholders in the community may identify. Where matters have been raised by interested parties through pre-application process – these have been considered in the Consultation Report submitted with the application (APP-034) and supporting appendices (APP-035 to APP-050). Where matters are raised by interested parties during the examination (primarily through the relevant representations) – the Applicant has had due regard to these in the Applicant’s response to relevant representations (REP1-131). Responses to these matters are not duplicated in this assessment but can be drawn on in order to assist the Secretary of State (SoS) in its consideration of the Public Sector Equality Duty (PSED) as set out in the Equalities Act 2010.

3. EQIA Assessment

Area of Consideration	Assessment	Application Reference
Community Infrastructure and Open Spaces		
<p>Community facilities and services (includes community facilities, places of worship, key services, local high streets, schools, public open spaces, play spaces, recreational facilities)</p>	<p>The Applicant has engaged in an iterative site selection process which fully considered potential social impacts.</p> <p>A number of fundamental principles have been inherently applied to the decision-making process for site selection, which includes the “<i>minimisation of disruption to populated areas thereby lowering effects</i>”. As community facilities are overwhelmingly in population centres, this principle has avoided disruption. Where the onshore cable route passes community assets, such as Norwich Sports Ground and Crusaders Rugby Club (Beckhithe Little Melton), the route selection has avoided direct impact on such clubs and premises.</p> <p>Where possible, construction site access routes have been selected with the key principle of keeping to existing access routes and roads wherever viable (paragraph 4.12.8.1 of APP-059).</p> <p>Impacts on recreational assets are assessed in Volume 3, Chapter 6: Land Use and Recreation. This notes that many recreational resources are avoided by the onshore cable corridor through the use of HDD (e.g. major watercourses and North Norfolk Railway – see paragraph 6.11.1.30 and 6.11.1.31). Those recreational facilities that lie outside but proximate would remain open to visitors and thus disruption of their use is minimised.</p>	<p>Volume 1, Chapter 4: Site Selection of the Environmental Statement [APP-059]</p> <p>Volume 3, Chapter 6: Land Use and Recreation of the Environmental Statement [APP-078]</p>

Area of Consideration	Assessment	Application Reference
<p>Closure of community accessible land (such as the beach at landfall)</p>	<p>Impacts of the maximum design scenario on recreation and public rights of way, including public access to the beach, are assessed in the Land Use and Recreation Chapter of the Environmental Statement. A Public Rights of Way Management Plan (Table 6.28 of Land Use and Recreation) will include measures seeking to minimise and/or manage any disruption to beach access, and will be developed in consultation with the relevant public rights of way officer at North Norfolk District Council. It is noted that whilst there could be localised disruption at landfall during a temporary period, the wider asset of the beach, in particular more sensitive areas closer to facilities (such as Weybourne Beach Car Park) have been avoided.</p> <p>There is no other area along the project where there will be a closure of community accessible land. Where a Public Right of Way (PRoW) is temporarily stopped up and diverted, the alternative route will be of comparable accessibility and therefore will not have a disproportional impact on a protected group.</p> <p>Therefore, no differential or disproportionate impact on a protected group is predicted as a result of impacts on community accessible land.</p>	<p>Volume 3, Chapter 6: Land Use and Recreation of the Environmental Statement [APP-078]</p>

Area of Consideration	Assessment	Application Reference
<p>Road closures have the potential to impact on protected groups where routes to community, health, subsistence and economic are blocked or a diversion create a considerable delay.</p>	<p>All crossings of the public highway will be undertaken using HDD. During the HDD operation there is no planned disturbance (i.e. no shuttle working nor road closures) to other users of the road. There will be some additional traffic movements on the road network, which will be controlled through the principles set out in the Outline Construction Traffic Management Plan (see Traffic, Transport and Physical Accessibility of this table), and has sought to avoid peak network periods through the implementation of extended working hours (see Outline CoCP).</p> <p>Temporary road closures may be required for abnormal indivisible load deliveries and where haul roads connect into the public highway based on safety considerations. However, as noted in paragraph 4.2.1.2 of REP1-146 <i>“Any temporary road closures... and any diversions will be advertised in advance and alternative routes indicated through signage.”</i> Abnormal loads may also be route limited and time limited.</p> <p>With the management measures in place to manage traffic movements associated with the project, particularly at locations where there may be sensitive receptors (such as community facilities and schools), as well as road closures, there is no predicted disproportionate impact on protected groups.</p>	<p>Outline Construction Traffic Management Plan [REP1-146] Outline Code of Construction Practice [REP1-142]</p>

Area of Consideration	Assessment	Application Reference
<p>Diversions of public rights of way,</p>	<p>Each Public Right of Way (PRoW) potentially affected by Hornsea Three works has been fully considered in Volume 3, Chapter 6: Land Use and Recreation of the Environmental Statement.</p> <p>The Applicant has committed to HDD crossings of a minimum 50% of PRoW to minimise disruption to Non-Motorised Users. Where PRoWs are diverted, a PRoW Management Plan will be prepared in consultation with the relevant public rights of way officer at each local authority. This plan will be under the umbrella of, and secured through, the CoCP. This will include specific measures to mitigate the temporary impacts of construction works including the following (Table 6.28 of Land Use and Recreation):</p> <ul style="list-style-type: none"> • The maintenance of non-motorised user access along PRoWs crossed by the Hornsea Three onshore cable corridor or the provision of a temporary diversion; • Provision of signage to inform and direct NMUs; • The widths of crossing points and temporary diversions will generally be between 2m and 4m wide; and • Following completion of construction activities all public access will be reinstated to a standard commensurate to that existing prior to the commencement of construction works. <p>With these management measures in place, there is no predicted differential or disproportionate impact to protected groups.</p>	<p>Volume 3, Chapter 6: Land Use and Recreation of the Environmental Statement [APP-078]</p>
<p>Project induced traffic congestion</p>	<p>See Traffic, Transport and Physical Accessibility in this table.</p>	

Area of Consideration	Assessment	Application Reference
Presence of construction activities and workforce	<p>As Hornsea Three is a linear project, the majority of construction work will move along the cable corridor and therefore not disproportionately impact one area. The sites selected for the locations of longer construction activity (landfall, HVAC Booster Station, HVDC converter/HVAC substation) have been chosen to avoid disturbance to population centres.</p> <p>There is no predicted differential or disproportionate impact to protected groups as a result of the presence of construction activities and workforce.</p>	Volume 1, Chapter 4: Site Selection of the Environmental Statement [APP-059]
Employment and Business		
Effects due to disruption from construction activity on businesses or charitable organisations providing a service or product aimed specifically at one or more protected characteristic groups	<p>As the site selection process has avoided population centres, all public highways will be crossed by HDD (and therefore not closed), and a Construction Traffic Management Plan has been made to manage any changes in traffic due to Hornsea Three. Further the site selection process has not identified any charitable organisations that have a special interest in a parcel of land (either within the Order Limits or immediately adjacent to). There is no anticipated disruption on business or charitable organisations providing services or products to protected groups.</p>	<p>Volume 1, Chapter 4: Site Selection of the Environmental Statement [APP-059]</p> <p>Outline Construction Traffic Management Plan [REP1-146]</p>

Area of Consideration	Assessment	Application Reference
<p>Training and employment opportunities for protected characteristic groups, including construction and operational employment, indirectly created employment, and induced investment.</p>	<p>Ørsted's policy is that diversity creates stronger results, better products and more innovative solutions. All employment decisions, including contractor selection, are made without regard to race, religion, ethnic origin, gender, sexual orientation, age, disability status or any other protected characteristic. Ørsted considers it a fundamental right to be free from discrimination.</p> <p>While the Applicant has limited influence on indirectly created employment and induced investment, the Applicant has committed to producing a Skills and Employment plan (Requirement 22 of the draft DCO), which will be drafted to be inclusive to protected characteristic groups, including the design of any agreed skills programme or employment initiatives. This would enable engagement and therefore participation in any socioeconomic benefits resulting from Hornsea Three.</p> <p>The Skills and Employment Plan will be drafted in consultation with Norfolk County Council, who themselves are subject to PSED.</p>	<p>Ørsted company website: https://orsted.com/en/Careers/Life-at-orsted Accessed December 2018. Draft Development Consent Order [REP1-133]</p>
<p>Traffic, Transport and Physical Accessibility</p>		
<p>Road safety effects for relevant protected characteristic groups (including safe routes to schools) due to construction traffic</p>	<p>The Applicant has worked in close consultation with district councils and Norfolk County Council to identify and mitigate or manage any potential road safety effects. Where intervention works have been identified as required on particular links, such as at the access to the main construction compound, these have been subject to a Stage 1 Road Safety Audit, and designer's review comments have been integrated into the design (e.g. see Appendix 1 to be submitted at Deadline 3). Furthermore, the Outline CTMP has considered (paragraph 1.2.1.2) "<i>adverse effects on sensitive receptors such as schools, care homes, hospitals and residential areas with poor footway provision</i>" and site specific measures will be identified through the development of the final CTMP post-consent.</p> <p>On this basis, there is no predicted differential or disproportionate impact predicted on protected characteristic groups.</p>	<p>Outline Construction Traffic Management Plan [REP1-146] Appendix 1 to be submitted at Deadline 3.</p>

Area of Consideration	Assessment	Application Reference
<p>Severance, changes to local road and pedestrian networks and new transport infrastructure.</p>	<p>Aside from the road improvements proposed for the Main Construction Compound at Oulton (under discussion with the LPA and Oulton Parish Council), and the proposed improvements to the Peddar's Way and Norfolk Coast Path National Trail, there are no planned permanent changes to public road or pedestrian networks.</p> <p>Changes that are proposed, have been developed with due consideration to safety and accessibility of the respective networks (see above), and therefore will not have any disproportionate effect on protected groups.</p> <p>The ES assesses the potential effect of construction work on severance as of negligible significance (paragraph 7.11.2.32 of Volume 3, Chapter 7: Traffic and Transport of the Environmental Assessment).</p>	<p>Volume 3, Chapter 7: Traffic and Transport of the Environmental Assessment</p>
<p>Disruption to public transport relied upon by protected characteristic groups for equal participation in daily living.</p>	<p>All public transport networks have been considered as part of the transport assessment presented in Volume 3, Chapter 7: Traffic and Transport of the Environmental Assessment. The only potential disruption is through increased traffic movements on the local road network, which is addressed below in this table.</p>	<p>Volume 3, Chapter 7: Traffic and Transport of the Environmental Assessment</p>
<p>Severance and/or diversion of PRow, and other pedestrian routes relied on by protected characteristic groups for equal participation in daily living</p>	<p>As the only PRow with a significant (moderate) effect is the Peddar's Way/Norfolk Coast Path National Trail, and effects on this will be managed through a PRow management plan agreed with local stakeholders, there is no predicted differential or disproportionate effect on protected groups.</p>	<p>Volume 3, Chapter 6: Land Use and Recreation of the Environmental Statement [APP-078]</p>

Area of Consideration	Assessment	Application Reference
<p>Increased journey times/delay effects for relevant protected groups due to construction traffic, and changes to the local road network.</p>	<p>Although there will be additional traffic movements on the road network, this will be controlled through the principles set out in the Outline Construction Traffic Management Plan (see Traffic, Transport and Physical Accessibility of this table), and has sought to avoid peak network periods through the implementation of working hours that commence from 07:00AM (see Outline CoCP).</p> <p>Volume 6, annex 7.1: Transport Assessment (sections 1.65 to 1.68) considers highway capacity and concludes that the construction of Hornsea Three would cause negligible changes arising in relation to driver delay as a result of the construction vehicle movements.</p> <p>The road links assessed are do not typically suffer from congestion and there are a range of similar parallel or alternative routes to the roads. Therefore, the sensitivity of links that are predicted to carry construction traffic, in terms of driver delay, is considered to be low and due to the availability of alternative routes, low value. On this basis, there is no predicted disproportionate impact predicted on protected characteristic groups.</p> <p>As no significant impacts are predicted on traffic, and therefore no significant increase in journey times/delay effects, there are no predicted resulting differential or disproportionate impact to protected groups.</p>	<p>Outline Construction Traffic Management Plan [REP1-146]</p> <p>Outline Code of Construction Practice [REP1-142]</p> <p>Other references in this section.</p>
<p>Indirect community cohesion effects of severance, public transport disruption, and road safety impacts.</p>	<p>As there are no anticipated differential or disproportionate impacts to protected groups as a result of traffic, transport or physical accessibility changes, there are no predicted community cohesion effects.</p>	<p>Other references in this section.</p>
<p>Noise, Air Quality and other Environmental Effects</p>		

Area of Consideration	Assessment	Application Reference
<p>Residual noise and air quality effects from construction activities, construction traffic and induced road traffic changes on differentially affected protected characteristic groups or on disproportionately affected protected characteristic groups.</p>	<p>The Hornsea Three route has been selected to avoid all population centres (as referenced in Community Infrastructure and Open Space in this table) and the construction areas with the longer potential effects (landfall, HVAC Booster Station, HVDC Converter/HVAC Substation, Main Construction Compound) have been sited in areas where there was a reduced potential to cause disturbance. On this basis, air quality effects have been assessed as having negligible significance, and noise effects as having negligible to minor adverse significance. Notwithstanding this, measures to minimise noise and air quality impacts have been identified within the Outline CoCP, and where appropriate the Outline CTMP and will be applied across the project. Therefore, no differential or disproportionate impact to protected groups is predicted.</p>	<p>Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement [APP-080] Volume 3, Chapter 9: Air Quality of the Environmental Statement [APP-081] Outline Construction Traffic Management Plan [REP1-146] Outline Code of Construction Practice [REP1-142]</p>
<p>Residual noise and air quality effects on schools, colleges, residential care homes, places of worship or other community facilities of particular importance for protected characteristic groups.</p>	<p>Noise and vibration sensitive receptors have been identified in paragraph 8.3.1.4 of the Noise and Vibration chapter. Although numerous residential properties have been identified within the Hornsea Three noise and vibration study area –no schools, hospitals, residential care homes or any other particularly noise sensitive class were identified. Furthermore, as noted above, measures to minimise noise and air quality impacts have been identified within the Outline CoCP, and where appropriate the Outline CTMP and will be applied across the project. Therefore, no predicted differential or disproportionate impact on protected groups is predicted.</p>	<p>Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement [APP-080] Outline Construction Traffic Management Plan [REP1-146] Outline Code of Construction Practice [REP1-142]</p>
<p>Crime, Safety and Personal Security</p>		

Area of Consideration	Assessment	Application Reference
<p>Changes in actual safety or feelings of safety at, for example, bus stops suspended or relocated by construction-related disruption, for differentially affected protected characteristic groups.</p>	<p>Due to the predominantly rural nature of the project and the lack of impact on transport infrastructure, there is no anticipated change in actual safety and perception of safety due to Hornsea Three.</p> <p>Construction compounds will be secured to minimise the opportunity for unauthorised entry and any associated crime risk. Temporary fencing will also be provided along the onshore cable corridor (paragraph 4.1.3.1 of the Outline Code of Construction Practice (CoCP)).</p> <p>Where possible, access to construction areas will be limited to specified entry points and all personnel entries/exits will be recorded for security and health and safety reasons (paragraph 4.1.3.4 of the Outline CoCP).</p> <p>The Outline Construction Traffic Management Plan (CTMP) has considered potential adverse effects on pedestrians, including fear and intimidation due to HGV movements. The final CTMP will identify the need for and nature of measures to be implemented to enhance pedestrian safety at locations where HGVs are routed along roads without pedestrian footways.</p> <p>These measures are to protect public, employee and contractor safety through all phases of the project. With the management plans in place, there are no predicted differential or disproportionate impacts on protected groups.</p>	<p>Volume 1, Chapter 4: Site Selection of the Environmental Statement [APP-059]</p> <p>Outline Code of Construction Practice [REP1-142]</p> <p>Outline Construction Traffic Management Plan [REP1-146]</p>
<p>Health related equality effects</p>		

Area of Consideration	Assessment	Application Reference
<p>Health related equality effects</p>	<p>Human health is a key consideration in many technical areas assessed within the Environmental Statement (ES).</p> <p>Potential determinants to human health during construction are considered in the following ES Chapters:</p> <ul style="list-style-type: none"> • Air Quality – exposure to air pollution (dust – not significant, traffic - negligible); • Noise and Vibration – changes in exposure to noise and vibration (negligible to minor adverse); • Traffic and Transport – safety, severance, amenity, delay (negligible to minor adverse); • Socio-economics – income and employment opportunities (minor to major beneficial overall, with minor adverse for coastal/local tourism); and • Land Use and Recreation – changes to access to open space and recreation (negligible to minor adverse, moderate adverse for Peddar’s Way/Norfolk Coast Path). <p>Potential determinants to human health during operation are considered in the following ES Chapters:</p> <ul style="list-style-type: none"> • Noise and Vibration – changes in exposure to noise and vibration (negligible to minor adverse); and • Socio-economics – income and employment opportunities (minor to major beneficial overall, with minor adverse for coastal/local tourism). <p>All these factors have been considered separately in this table, and the only potential significant effects are on the use of Peddar’s Way/Norfolk Coast Path (addressed in Traffic, Transport and Physical Accessibility in this table) and income and employment opportunities (addressed in Employment and Business of this table).</p> <p>With consideration of all these factors, no differential or disproportional health impacts on protected groups are predicted.</p>	<p>Volume 3, Chapter 6: Land Use and Recreation of the Environmental Statement [APP-078]</p> <p>Volume 3, Chapter 7: Traffic and Transport of the Environmental Statement [APP-079]</p> <p>Volume 3, Chapter 8: Noise and Vibration of the Environmental Statement [APP-080]</p> <p>Volume 3, Chapter 9: Air Quality of the Environmental Statement [APP-081]</p> <p>Volume 3, Chapter 10: Socio-economics of the Environmental Statement [APP-082]</p>

4. EQIA Conclusion

- 4.1 No differentiated or disproportionate impacts on groups with protected characteristics under the Equalities Act 2010 are predicted as a result of any phase of Hornsea Three.
- 4.2 Where there are anticipated significant effects in EIA terms, measures (particularly including the Public Rights of Way Management Plan, Outline Construction Traffic Management Plan, Outline Code of Construction Practice and the Skills and Employment Plan) are being developed in meaningful consultation with local planning authorities, who themselves are subject to Public Sector Equalities Duty, and in response to the concerns of local residents.
- 4.3 The Applicant recognises 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 Ørsted's previous experience of constructing offshore wind farms in the UK.
- 4.4 Where, during construction, impacts do arise, and complaints received, Appendix A to the Outline Code of Construction Practice sets out a Communications Plan (outline included in Appendix A) which is to include;
- A framework for engaging stakeholders (i.e. identifying who may be affected by construction impacts, methods of contacting and engaging with affected groups, methods of providing advance notifications);
 - Roles and responsibilities for implementing the communication plan; and
 - Complaints procedure.
- 4.5 The project also embeds important social contribution through the investment in skills and jobs. Whilst the Applicant can't quantitatively state how many jobs will be secured by residents. However, qualitative analysis of the type of employment and the match with the local labour market suggests that this will provide good opportunities. Although it is recognised that there is limited detailed information on the occupations, skills and intentions of the labour market groups within the study area. This would include both opportunities for the unemployed to enter jobs and the currently employed to progress into higher skilled and better paid jobs.
- 4.6 Hornsea Three will also support the development of skills which the offshore wind industry needs to flourish. Ørsted is committed to helping to develop people with the right skills required to the deliver the UK's offshore wind ambitions, specifically within the regions in which we operate. The Applicant has committed to develop and implement a Skills and Employment Plan for Hornsea Project Three, which is secured through Requirement 22 of the draft DCO (submitted for Deadline 1) (see Skills and Employment Plan). The Employment and Skills Plan must consider the ability to match the skills needed for the construction and operation of Hornsea Three to the available local labour skills and identify opportunities for individuals and businesses based in the regions of East Anglia and the Humber to access employment and training opportunities.

- 4.7 And whilst not a material consideration in the determination of the application, it is noted that Ørsted has a strong track record for establishing Community Benefit Funds as part of its community engagement programme for its latest offshore wind farm projects in the UK. Community Benefit Funds are voluntary initiatives¹³ designed to provide funding to communities located close to the wind farms and other infrastructure.
- 4.8 Hornsea Three will continue to develop its local engagement strategy for Hornsea Three and will consider an appropriate way to feed benefits back into the local community. Ørsted recognises the importance of community involvement in shaping any funds to ensure that they are appropriate for the local areas. Prior to allocating funds from Ørsted's existing Community Benefit Funds, a comprehensive local consultation was undertaken to seek local views from all stakeholders on how the funds should be set up. Ørsted's existing funds are managed by an independent, not-for-profit organisation – Grantscape, and are reviewed on an annual basis.

¹³ Any such funding scheme would be subject to Ørsted making a positive Financial Investment Decision (FID) and therefore would be in place post consent. These funds are voluntary and are not therefore intended to be secured through the DCO.