

## Hornsea Project Four

**Equalities Impact Assessment** 

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### **Table of Contents**

1	Introduction	5
1.2	Purpose	5
2	EQIA Scope and Methodology	5
2.1	Introduction	5
2.2	The Equalities Act and the Public Sector Duty	6
2.3	Guidance	7
2.4	The Purpose of the EQIA	7
2.5	Key Aspects of Hornsea Four for Consideration	7
2.6	Scope of Assessment	8
2.7	Assessment Methodology and Reporting	8
2.8	Assessment Criteria	9
2.9	Equality Effects Considered	9
3	EQIA Assessment	10
4	EQIA Conclusion	15
5	References	17
List	of Tables	
Table 1	: EQIA	10



### Glossary

Term	Definition
N/A	

### **Acronyms**

Term	Definition
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
EBI	Energy Balancing Infrastructure
ECC	Export Cable Corridor
EHRC	Equality and Human Rights Commission
EIA	Environmental impact Assessment
ERYC	East Riding of Yorkshire Council
EQIA	Equalities Impact Assessment
HCC	Hull City Council
HGV	Heavy Goods Vehicle
NGET	National Grid Electricity Transmission
OnSS	Onshore Substation
PRoW	Public Right of Way
PSED	Public Sector Equality Duty
SoS	Secretary of State



#### 1 Introduction

- 1.1.1.1 Orsted Hornsea Project Four Limited (the 'Applicant') is proposing to develop the Hornsea Project Four Offshore Wind Farm (hereafter 'Hornsea Four'). Hornsea Four will be located approximately 69 km offshore the East Riding of Yorkshire in the southern North Sea and will be the fourth project to be developed in the former Hornsea Zone. Hornsea Four will include both offshore and onshore infrastructure including an offshore generating station (wind farm), export cables to landfall, and on to an onshore substation (OnSS) with energy balancing infrastructure (EBI), and connection to the electricity transmission network.
- 1.1.1.2 Details of the activities and infrastructure associated with Hornsea Four are fully set out in A1.4: Project Description (APP-010). In summary, the onshore elements of Hornsea Four will comprise of:
  - Landfall including transition joint bays connecting the offshore export cable corridor (ECC) and onshore ECC, one temporary landfall compound and temporary access tracks;
  - Onshore ECC including the onshore export cables, eight temporary logistics compounds, joint bays and link boxes, and temporary access tracks;
  - OnSS and EBI including the temporary working area, temporary and permanent access tracks, the permanent working area (inclusive of the OnSS, EBI and associated landscaping and attenuation feature); and,
  - 400 kV National Grid Electricity Transmission (NGET) connection area the area within which a 400 kV section of the onshore ECC will connect to the existing NGET substation at Creyke Beck.

#### 1.2 Purpose

- 1.2.1.1 This Equalities Impact Assessment (EQIA) sets out relevant parameters of the project and its delivery associated with Hornsea Four 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. It has been prepared in response to the examining authorities first written questions (question ref. CA.1.15, in PD-006).
- 1.2.1.2 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

#### 2.1 Introduction

2.1.1.1 This section sets out the scope and methodology for the assessment of potential equality effects associated with the construction and operation of Hornsea Four. 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.



### 2.2 The Equalities Act and the Public Sector Duty

- 2.2.1.1 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 are:
  - 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: people who are married or a civil partner;
  - pregnancy and maternity: in the non-work context, a person is protected against being treated unfavourably because of pregnancy or, during the 26 weeks after giving birth, because the person has given birth (including being treated unfavourably because the persons is breastfeeding);
  - 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; and
  - sexual orientation: whether a person's sexual orientation is towards persons of the same sex, the opposite sex or to either sex.
- 2.2.1.2 This EQIA uses the term 'protected characteristic groups' to refer to groups of people who share a particular protected characteristic. The Equality Act 2010 (as applies in England) does not specify socio-economic status as a protected characteristic.
- 2.2.1.3 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 Act;
  - 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.



#### 2.3 Guidance

- 2.3.1.1 Relevant guidance on fulfilling the PSED includes:
  - Equality and Human Rights Commission (EHRC) The Essential Guide to the Public Sector Equality Duty;
  - EHRC, Equality Act 2010: Technical Guidance on the Public Sector Equality Duty: England; 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.

#### 2.4 The Purpose of the EQIA

- 2.4.1.1 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 Four. It is a predictive assessment, considering in advance of implementation the potential impacts arising from the construction and operation of Hornsea Four, and the likely or possible effects of these impacts for protected characteristic groups.
- 2.4.1.2 The objectives underpinning the EQIA are to:
  - assess the likely effects of construction and operation of Hornsea Four for groups sharing protected characteristics, including how Hornsea Four 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.
- 2.4.1.3 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 Environmental Statement (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.

### 2.5 Key Aspects of Hornsea Four for Consideration

- 2.5.1.1 The EQIA considers effects on protected characteristic groups during both construction and operation of Hornsea Four. The following aspects being particularly relevant to the EQIA:
  - land required temporarily or permanently for the construction or operation of Hornsea Four, 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 Four 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.

### 2.6 Scope of Assessment

- 2.6.1.1 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 Four 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.
- 2.6.1.2 Equality effects are considered at an appropriate spatial level according to the nature of the effect and the aspect of Hornsea Four that gives rise to the effect. The spatial scope is guided by the Environmental Impact Assessment (EIA) reported within the ES submitted with the Application and by professional experience and judgement.
- 2.6.1.3 In terms of temporal scope, equality effects will be considered for the anticipated construction and operation period.

#### 2.7 Assessment Methodology and Reporting

- 2.7.1.1 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.
- 2.7.1.2 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 2.3 of this EQIA.



#### 2.8 Assessment Criteria

- 2.8.1.1 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.
- 2.8.1.2 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.
- 2.8.1.3 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.
- 2.8.1.4 In some cases, protected characteristic groups could be subject to both disproportionate and differential equality effects.
- 2.8.1.5 The EQIA consider impacts on groups of people rather than on individuals.

### 2.9 Equality Effects Considered

- 2.9.1.1 The EQIA considers potential equality effects arising during both the construction and operational phases of Hornsea Four. On the basis of the findings of the ES submitted with the DCO 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;
  - 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.
- 2.9.1.2 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 ES, 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-129) and supporting appendices. 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 (REP1-038). 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

3.1.1.1 **Table 1** provides the assessment, signposting to relevant documents from the Hornsea Four DCO application which provide the basis for the judgements reached.

#### Table 1: EQIA.

#### **Area of Consideration**

**Assessment and application references** 

Community Infrastructure and Open Spaces

facilities Community and services (includes community facilities. places of worship, key services, local high streets, schools, public play spaces. open spaces, recreational facilities)

The Applicant has undertaken an iterative site selection process which has fully considered potential social impacts based on proximity. Co49, a primary commitment, stipulates that above surface and sub-surface infrastructure associated with Hornsea Four must not be located within 110 m and 50 m of residential properties respectively. Additionally, populated areas were avoided, particularly when siting OnSS (A4.3.3: Selection and Refinement of Onshore Infrastructure (APP-038)). As a result, direct impacts on community facilities, places of worship, local high streets, schools, public open spaces, play spaces and recreational facilities have been avoided.

In respect of secondary impacts, where possible, construction traffic access routes have been selected to utilise the A road network and avoid routeing through densely populated areas. Where unavoidable, routeing past a school in Beeford has been restricted to avoid school start and finish times (see the Construction Traffic Management Plan (CTMP), which forms Appendix F of F2.2: Outline Code of Construction Practice (APP-237).

Assessment of recreational assets has been considered in A3.6: Land Use and Agriculture (APP-030), via an inter-related effects assessment as described in A3.6: Land Use and Agriculture (APP-030) bringing together impacts from Air Quality Noise and Vibration and Traffic and Transport. Figure 6.5 to Figure 6.9 of APP-030 identify recreational assets comprising the following categories:

- Recreational (e.g. recreational fisheries, golf courses, leisure centres);
- Tourism (e.g. caravan and holiday parks, holiday cottages, hotels);
- Commercial (e.g. shops, cafés, pubs, restaurants); and
- Community (e.g. religious grounds, village halls, playing fields, allotments).

No likely significant effects were identified for recreational receptors. This approach has been confirmed by ERYC, most recently in the Local Impacts Report (REP1-074). Therefore, no predicted differential or disproportionate impact to protected characteristic groups is predicted as a result of impacts on community facilities and services.

Closure of community accessible land (such as the beach at landfall)

Impacts of Hornsea Four on recreation and public rights of way, including public access to the beach, are considered in A3.6: Land Use and Agriculture (APP-030). A Public Rights of Way Management Plan (outline) will be prepared based on the outline version submitted as Appendix C of F2.2: Outline Code of Construction Practice (APP-237). The plan includes measures seeking to minimise and/or manage any disruption to PRoWs and beach access and will be developed in consultation with ERYC. This includes Co192, which states that the beach at landfall will not be closed for public access during construction,



Area of Consideration	Assessment and application references
	unless an unforeseen and unplanned event occurs during which emergency access i required.
	There is no other area along the Order Limits where there will be a closure of community accessible land. Where a PRoW is temporarily stopped up and diverted, it will be in accordance with Co79, Co165 and Co158 (secured via the Outline Public Rights of Way Management Plan (Appendix C of F2.2: Outline Code of Construction Practice (APP 237))). Therefore, no differential or disproportionate impact on a protected characteristic group is predicted as a result of impacts on community accessible land.
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.	All crossings of the public highway will be undertaken using HDD or other trenchles technologies (Co1). During the HDD operation there is no planned disturbance to othe 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). In the event that any roads are required to be stopped up temporarily (such as in the event of abnormal indivisible loads, upgrades to existing roads, etc.), these will be discussed and agreed with ERYC prior to works commencing.
	With the management measures in place to manage traffic movements associated with the project, particularly at locations where there may be sensitive receptors (such a schools (the avoidance of HGV traffic through Beeford during school start and finish times)), as well as road closures, there is no predicted disproportionate impact of protected characteristic groups.
Diversions of public rights or way	Each Public Right of Way (PRoW) potentially affected by Hornsea Four works has been fully considered in A3.6: Land Use and Agriculture (APP-030) of the ES.
	The Applicant has made a number of commitments to minimise impacts on PRoWs including Co79, Co165 and Co158. These measures are secured via the Outline Public Rights of Way Management Plan (Appendix C of F2.2: Outline Code of Construction Practice (APP-237)).
	Temporary and permanent diversions have been detailed in the outline PRoW Management Plan, with enhancement to PRoWs identified in F2.14: Outline Enhancement Strategy (APP-249).
	With these management measures in place, there is no predicted differential o disproportionate impact to protected characteristic groups.
Project induced traffic congestion	See Traffic, Transport and Physical Accessibility in this table.
Presence of construction activities and workforce	As Hornsea Four 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 (OnSS) have been chosen to avoid disturbance to population centres.



Aver of Constituents	Assessment and annihing reference
Area of Consideration	Assessment and application references
	There is no predicted differential or disproportionate impact to protected characteristic groups as a result of the 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	As the site selection process (as presented in A4.3.3: Selection and Refinement of Onshore Infrastructure (APP-038)) has avoided population centres, all public highways will be crossed by HDD, and a Construction Traffic Management Plan (which forms Appendix For F2.2: Outline Code of Construction Practice (APP-237)) has been made to manage any changes in traffic due to Hornsea Four. 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 or business or charitable organisations providing services or products to protected characteristic groups.
Training and employment opportunities for protected characteristic groups, including construction	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.
and operational employment, indirectly created employment,	Further details are provided on Ørsted's company website <a href="https://orsted.com/en/careers/working-at-orsted">https://orsted.com/en/careers/working-at-orsted</a> (Accessed Mach 2022).
and induced investment.	While the Applicant has limited influence on indirectly created employment and induced investment, the Applicant has produced F2.18: Outline Employment and Skills plan (APP-253), 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 socio-economic benefits resulting from Hornsea Four.
	The Skills and Employment Plan will be drafted in consultation with ERYC.
Traffic, Transport and Phy	I .
Road safety effects for relevant protected characteristic groups (including safe routes to schools) due to construction traffic	The Applicant has worked in close consultation with ERYC and Hull City Council (HCC) to identify and mitigate or manage any potential road safety effects. The Outline CTMF (which forms Appendix F of F2.2: Outline Code of Construction Practice (APP-237)) has considered (paragraph 2.3.2.6) specific measures to avoid impacts on a local school Furthermore, consideration of a local bus stop (and linked footpath) near to the primary Logistics Compound has been considered and partly informed the selection of the southern location of the compound and will be considered as part of traffic management measures at that location. In addition, measures specific to general road safety have been detailed (Section 2.3.5). The final CTMP will be agreed in consultation with ERYC and HCC.
	On this basis, there is no predicted differential or disproportionate impact predicted or protected characteristic groups.
Severance, changes to	There are no planned permanent changes to public road or pedestrian networks at this

stage, over and above potential minor localised road widening or passing places, to be

discussed as part of pre-construction works with ERYC's highways team. It is noted that

local

pedestrian

road

and

networks



Area of Consideration	Assessment and application references
and new transport infrastructure.	the Applicant will extend the layby off the A1079 to facilitate the OnSS access road construction – this has been agreed in consultation with ERYC.
	Any changes will be developed with due consideration to safety and accessibility of the respective networks, and therefore will not have any disproportionate effect on protected characteristic groups.
	The ES assesses the potential effect of construction work on severance and concluded no significant effect (A3.7: Traffic and Transport (APP-031)).
Disruption to public transport relied upon by protected characteristic groups for equal participation in daily living.	The only potential disruption as a result of Hornsea Four is through increased traffic movements on the local road network, which is addressed below in this table.
Severance and/or diversion of PRoW, and other pedestrian routes	Each Public Right of Way (PRoW) potentially affected by Hornsea Four works has been fully considered in A3.6: Land Use and Agriculture (APP-030) of the ES.
relied on by protected characteristic groups for equal participation in daily living	The Applicant has made a number of commitments to minimise impacts on PRoWs, including Co79, Co165 and Co158. These measures are secured via the Outline Public Rights of Way Management Plan (Appendix C of F2.2: Outline Code of Construction Practice (APP-237)).
	Temporary and permanent diversions have been detailed in the outline PRoW Management Plan, with enhancement to PRoWs identified in F2.14: Outline Enhancement Strategy (APP-249).
	The Applicant has not identified any PRoWs as being relied upon by protected characteristic groups. With the proposed PRoW management measures in place, there is no predicted differential or disproportionate impact to protected characteristic groups.
Increased journey times/delay effects for relevant protected groups due to	Although there will be additional traffic movements on the road network, this will be controlled through the principles set out in the Outline CTMP (which forms Appendix F of F2.2: Outline Code of Construction Practice (APP-237)).
groups due to construction traffic, and changes to the local road network.	A3.7: Traffic and Transport (APP-031) considers highway capacity and concludes that the construction of Hornsea Four would not cause significant effects in relation to driver delay as a result of the construction vehicle movements
	On this basis, there is no predicted disproportionate impact predicted on protected characteristic groups.
	As no significant effects 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 characteristic groups.



#### **Area of Consideration** Assessment and application references community As there are no anticipated differential or disproportionate impacts to protected Indirect characteristic groups as a result of traffic, transport or physical accessibility changes, cohesion effects of there are no predicted community cohesion effects. severance, public transport disruption, road safety and impacts.

#### Noise, Air Quality and other Environmental Effects

Residual noise and air from quality effects construction activities, construction traffic and induced road traffic changes on differentially affected protected characteristic groups or disproportionately on affected protected characteristic groups.

The Hornsea Four route has been selected to avoid all population centres (as referenced in Community Infrastructure and Open Space in this table). On this basis, air quality and noise effects have been assessed as not significant. Notwithstanding this, measures to minimise noise and air quality impacts have been identified within F2.2: Outline Code of Construction Practice (APP-237) and will be applied across the project. Therefore, no differential or disproportionate impact to protected characteristic groups is predicted.

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.

A3.8: Noise and Vibration (APP-032) has concluded no significant effects arising from Hornsea Four during construction. Furthermore, as noted above, measures to minimise noise and air quality impacts have been identified within F2.2: Outline Code of Construction Practice (APP-237) and will be applied across the project. Therefore, no predicted differential or disproportionate impact on protected characteristic groups is predicted.

#### 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.

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 Four. The Applicant has acknowledged comments raised by Lockington Parish Council and has subsequent consideration of a local bus stop (and linked footpath) near to the primary Logistics Compound. The safety of users of the footpath and nearby bus stop has been considered and partly informed the selection of the southern location of the compound and will be considered as part of traffic management measures at that location.

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 ECC (Co43, F2.2: Outline Code of Construction Practice (APP-237)).



Area of Consideration	Assessment and application references
	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 5.3.1.4 of F2.2: Outline Code of Construction Practice (APP-237)).
	The final CTMP (based on the outline provided as Appendix F of F2.2: Outline Code of
	Construction Practice (APP-237)) 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.
	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 characteristic groups.
Health related equality ej	ffects
Health related equality	Human health is a key consideration in many technical areas assessed within the ES and is
effects	covered in detail in A4.5.8: Health Impact Assessment (APP-056). This includes
	assessment in respect of the general population and vulnerable groups. No significant
	effects have been identified during construction or operation.
	With consideration of all these factors, no differential or disproportional health impacts
	on protected characteristic groups are predicted.

#### 4 EQIA Conclusion

- 4.1.1.1 No differentiated or disproportionate impacts on groups with protected characteristics under the Equalities Act 2010 are predicted as a result of Hornsea Four.
- 4.1.1.2 Measures (particularly including the Public Rights of Way Management Plan, Outline Construction Traffic Management Plan, Outline Code of Construction Practice and the Outline Employment and Skills Plan) have been developed (and will continue to be developed via the discharge of DCO requirements) through meaningful consultation with ERYC, who themself are subject to Public Sector Equalities Duty.
- 4.1.1.3 The Applicant recognises the potential for protected characteristic 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.
- 4.1.1.4 Where, during construction, impacts do arise, and complaints are received, a Communications Plan as identified in Section 4.2 of F2.2: Outline Code of Construction Practice (APP-237) will be developed to ensure a proactive approach to communication with local stakeholders. The plan will include a complaints procedure.
- 4.1.1.5 Hornsea Four 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, 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.
- 4.1.1.6 Hornsea Four 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.
- 4.1.1.7 And whilst not a material consideration in the determination of the DCO 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 initiatives designed to provide funding to communities located close to the wind farms and other infrastructure. The Applicant will continue to develop its local engagement strategy for Hornsea Four 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.



### 5 References

Equality and Human Rights Commission (2014) The essential guide to the public sector equality duty.

Equality and Human Rights Commission (updated February 2021), Equality Act 2010: Technical guidance on the public sector equality duty: England.

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.