



SUNNICA ENERGY FARM

EN010106

8.45 Equality Impact Assessment

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010



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Sunnica Energy Farm

Equality Impact Assessment

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Executive Summary

Purpose

This Equality Impact Assessment (EqIA) has been prepared on behalf of Sunnica Ltd. (the Applicant) in relation to an application for a Development Consent Order (DCO) for Sunnica Energy Farm (the Scheme).

The purpose of the EqIA is to identify, assess and present any potential effects and issues arising from the Scheme on any groups with 'protected characteristics' as defined by the Equality Act 2010. These protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation (and, in some instances, marriage or civil partnership status).

A public authority must in the exercise of its functions have due regard to the interests and needs of those sharing the protected characteristics under the Public Sector Equality Duty (PSED), which forms section 149 of the Equality Act 2010.

This EqIA demonstrates how the PSED has been considered and taken into account by the Applicant as part of the Application and will support the Examining Authority and Secretary of State in decision-making and having regard to the needs under the PSED on the basis of an informed, evidenced understanding of relevant equality issues.

Baseline evidence

Analysis from the baseline for the study area shows:

1. A higher proportion of people aged 65 and over compared to national and regional levels.
2. A lower proportion of children (those aged under 16) in the study area than regional and national levels. However, Fordham & Isleham ward has a higher proportion of children than regional and national rates.
3. The percentage of people in the study area whose day-to-day activities are limited 'a lot' due to health is slightly lower than the regional and national percentages.
4. There is a higher percentage of residents in the study area identifying as 'White British' and 'White Other' than in the East of England and England.
5. Overall, 2019 deprivation rankings show that the level of deprivation is low.

Inclusive Engagement and Consultation

Inclusive public engagement has been undertaken to develop the Scheme. Consultation and engagement processes have been designed to reach as many people as possible within the Scheme areas. More information on Consultation activities can be found in the Consultation Report [APP-026];

Overall, respondents to consultation showed support for renewable energy generation, and agreed that more renewable energy sources are needed in the UK, however, there was general opposition to the Scheme itself.

A review of the consultation feedback highlighted several potential concerns that could have an impact on equality groups:

Safety - A number of respondents raised safety concerns regarding the increased traffic from construction of the Scheme, with some concerns of increased prevalence of traffic accidents and reduced road safety in the local community.

Health and Wellbeing - Some respondents raised concerns for the wellbeing of local residents during construction and decommissioning of the Scheme. A number of respondents believe that the Scheme may negatively impact residents' physical and mental health through increased noise and dust pollution during construction and through the removal of green space/agricultural land.

Socio- Economic - A high number of respondents raised issues regarding a loss of employment in farming roles due to the removal of agricultural land. Others were concerned about potential impacts on small local businesses and the local horse racing industry.

Accessibility - Several respondents reported issues and concerns regarding accessibility due to the closure of several bridleways and PRowWs, with a small number expressing concern that the views of equestrian users have not been considered. Concerns for accessibility between and around the local area for people living, working or visiting the area were raised by many respondents.

Assessment of Impacts

The EqIA has identified some negative impacts on protected groups through the construction, operation and decommissioning of the Scheme. This includes

1. Potential loss of business and employment through land acquisition. This could potentially affect agricultural workers and landowners. However, due to the limited requirement for compulsory acquisition, the negative equality effects are predicted to be negligible.
2. Increased noise levels for residents during construction, operation and decommissioning. This could have a differential effect on those who are more sensitive to noise impacts such as children and disabled people or those who may spend more time at home such as older people.
3. Temporary closure of PRow – resulting in the need for alternative journeys using the road network and the potential for community severance. This is likely to have a greater effect on those who rely on walking due to lack of access to car to reach community facilities.

However, it is considered that the commitments set out in the Outline Skills, Supply Chain and Employment Plan, and the activities secured through the OEMP plan are sufficient to mitigate any disadvantages.

In addition, the Scheme will provide positive impacts resulting in benefits that can be shared by groups with protected characteristics:

1. The renewable energy generation of the Scheme overall is considered to have a major beneficial effect on the climate. The adverse impacts of climate change are disproportionately expected to affect protected characteristic groups such as children,

older people, disabled people and women. Therefore the Scheme will support in advancing equality of opportunity for these groups.

2. Furthermore, the Scheme's contribution to the generation of renewable energy will provide a more affordable energy source for consumers. This could potentially reduce fuel poverty amongst groups who are disproportionately impacted such as older people, ethnic minority groups and younger people.
3. The construction, operation and decommissioning of the Scheme will provide a range of procurement and employment opportunities including an increase in green jobs. This could have positive impacts on local businesses and groups who are disproportionately represented in unemployment figures.
4. The Scheme will result in new NMU facilities during operation connecting communities through active travel routes.

1 Introduction

1.1 Purpose of this Report

- 1.1.1 This Equality Impact Assessment (EqIA) has been prepared on behalf of Sunnica Ltd. (the Applicant) in relation to an application for a Development Consent Order (DCO) for Sunnica Energy Farm (the Scheme).
- 1.1.2 An EqIA is not a prescribed document or specific requirement for an application for development consent, however it is submitted as part of a range of supplementary documents to support the Application. This is in accordance with regulation 5(2)(q) of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009 (as amended) (APFP 2009).
- 1.1.3 The purpose of the EqIA is to identify, assess and present any potential effects and issues arising from the Scheme on any groups with 'protected characteristics' as defined by the Equality Act 2010. These protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation (and, in some instances, marriage or civil partnership status).
- 1.1.4 A public authority must in the exercise of its functions have due regard to the interests and needs of those sharing the protected characteristics under the Public Sector Equality Duty (PSED), which forms section 149 of the Equality Act 2010. The three limbs of the PSED that a public authority must have due regard to are the need to:
- a. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act;
 - b. Advance equality of opportunity between people who share a relevant protected characteristic and those who do not; and
 - c. Foster good relations between people who share a relevant protected characteristic and those who do not.
- 1.1.5 This EqIA demonstrates how the above limbs of the PSED have been considered and taken into account by the Applicant as part of the Application and will support the Examining Authority and Secretary of State in decision-making and having regard to the needs under the PSED on the basis of an informed, evidenced understanding of relevant equality issues. It is based on professional judgement and considers both the adverse and beneficial impacts associated with the construction, operation and decommissioning of the Scheme.
- 1.1.6 It identifies how due regard has been paid to equality issues and effects, describing any interventions to optimise the potential positive effects of the Scheme and mitigation to minimise or remove negative effects.

1.2 The Scheme

- 1.2.1 The Scheme is a new solar energy farm that will deliver electricity to the national electricity transmission network. Large scale solar generation is expected to make an essential contribution to the UK's renewable energy generating capacity to

meet the UK's legally binding requirements to achieve net zero carbon emissions by 2050. The Scheme therefore provides an opportunity to contribute to renewable energy generation urgently required in Great Britain.

- 1.2.2 The Applicant is proposing to install ground mounted solar photovoltaic (PV) panel arrays to generate electricity energy from the sun and combine these with a Battery Energy Storage System (BESS). The Scheme comprises four sites:
- a. Sunnica East Site A, near Isleham in Cambridgeshire;
 - b. Sunnica East B, near Worlington and Freckenham in Suffolk;
 - c. Sunnica West Site A near Chippenham and Kennett in Cambridgeshire; and
 - d. Sunnica West Site B, near Snailwell in Cambridgeshire.
- 1.2.3 The above sites will connect to the Burwell National Grid Substation, near Burwell in Cambridgeshire. An extension to this substation, Burwell National Grid Substation Option 2, may be required to facilitate the connection with the substation.
- 1.2.4 The Scheme is defined as a Nationally Significant Infrastructure Project (NSIP) and a full description is provided in Chapter 3: Scheme Description of the Environmental Statement [REP2-022] for further information.
- 1.2.5 The indicative timescales for the construction and operation of the Scheme that have been assumed for the purposes of the Environmental Impact Assessment are as follows:
- a. Construction Phase - Construction work will commence, at the earliest, in Summer 2023 and will run for 24 months (subject to the necessary consents being granted). This assumes the Scheme is built in a single phase.
 - b. Operational Phase - It is currently anticipated that the earliest the Scheme will commence commercial operation will be from Summer 2025. Depending on the final construction programme and commencement of construction, operation may overlap with the construction. It is possible that, once the grid connection has been constructed and parts of the Scheme have been connected to the National Grid, these areas could begin operation while other parts are still being constructed and connected; and
 - c. Decommissioning Phase - The operational life of the Scheme has been assessed to be 40 years and decommissioning is therefore estimated to be no earlier than 2065. Some parts of the Scheme may be decommissioned earlier if the landowner requires

1.3 Structure of this Report

- 1.3.1 The remainder of this document is structured as follows:
- a. **Section 2: Methodology** sets out the approach to preparing this EqIA.
 - b. **Section 3: Legislation and Policy** provides context through relevant national, regional and local policy and legislation associated with equality and human rights.;

- c. **Section 4: Equalities baseline** using secondary data sources such as Census 2011 data to form an understanding of the local community as well as feedback and issues raised through consultation;
- d. **Section 5: Consultation** overview of consultation and engagement with stakeholders and the public;
- e. **Section 6: Assessment of potential equality effects** an assessment of impacts and equality effects of the Scheme using the evidence gathered; and
- f. **Section 7: Summary and Conclusion** on how due regard has been paid to the PSED in the construction, operation and decommissioning of the Scheme.

2 Methodology

2.1 Overview

2.1.1 The approach for preparing this EqIA follows a three-stage process:

- a. **Desk based review** - review of relevant national, regional and local policies and legislation and baseline evidence relating to protected characteristic groups; review of relevant documents prepared for the purpose of the DCO application;
- b. **Assessment of potential equality effects** - informed by a consideration of the information reviewed as part of tasks a & b; and
- c. **Conclusions** - concluding how due regard has been paid to the PSED in the proposals for the construction, operation and decommissioning of the Scheme.

2.1.2 The approach is based on our understanding of the Equality Act 2010, particularly section 149 regarding the PSED, and supporting technical guidance produced by the Equality and Human Rights Commission (Ref 1).

2.2 Desk-based Review

2.2.1 In addition to a review of relevant national, regional and local policies and legislation, the desk-based review covered the following:

- a. Review of all relevant documentation submitted for DCO application including the Environmental Statement, Planning Statement, Consultation Report and Outline Skills, Supply Chain and Employment Plan.
- b. Review of national and local datasets to develop an equalities baseline profile of protected characteristic groups living in the study area;
- c. Research and evidence with regards to potential equality impacts of solar energy; and
- d. Review of the engagement and consultation activities to date and feedback in relation to Scheme to identify any issues of relevance to protected characteristic groups.

2.3 Assessment of Equality Effects

2.3.1 The assessment of equality effects takes into account the information gathered through the desktop-review and takes a 'worst case scenario' approach. Both positive and negative impacts experienced during construction, operational and decommissioning phases are assessed. A judgement is made as to how the Scheme would contribute to the PSED for people with protected characteristics as defined in the Equality Act 2010. These protected characteristics are:

- a. **Age:** this refers to persons defined by either a particular age or a range of ages. This can include children (aged under 16), young people (aged 16-25), older people or pensioners (i.e. those aged 65+), the elderly/very old (i.e. those aged 85+);
- b. **Disability:** a disabled person is defined as someone who has a physical or mental impairment that has a substantial and long-term adverse effect on their

ability to carry out normal day-to-day activities. It can also include people who have progressive conditions such as HIV, cancer, or multiple sclerosis (MS) - even where someone is able to carry out day to day activities;

- c. **Gender reassignment:** this refers to people who are proposing to undergo, are undergoing, or have undergone a process for the purpose of reassigning their gender identity;
- d. **Marriage and civil partnership:** marriage or civil partnership can be between a man and a woman or between two people of the same sex;
- e. **Pregnancy and maternity:** pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth;
- f. **Race:** the Equality Act 2010 defines race as encompassing colour, nationality (including citizenship) and ethnic or national origins;
- g. **Religion or belief:** religion means any religion a person follows. Belief means any religious or philosophical belief, and includes those people who have no formal religion or belief;
- h. **Sex:** this refers to a man or to a woman or a group of people of the same sex, while gender refers to the wider social roles and relationships that structure men's and women's, boys' and girls' lives;
- i. **Sexual orientation:** a person's sexual orientation relates to their emotional, physical and/or sexual attraction and the expression of that attraction.

2.3.2 The assessment considers both disproportionate and differential impacts on groups with protected characteristics. A disproportionate equality effect arises when an impact has a proportionately greater effect on protected characteristic groups than on the general population overall at a particular location. For the purposes of this EqlA, disproportionality arises:

- a. where an impact is predicted for the study area, where protected characteristic groups are known to make up a greater proportion of the affected resident population than their representation regionally or nationally; or
- b. where an impact is predicted on a community resource which is predominantly or heavily used by protected characteristic groups (e.g. primary schools attended by children; care homes catering for elderly people).

2.3.3 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 vulnerability associated with their protected characteristic.

2.3.4 In some cases, protected characteristic groups are subject to both disproportionate and differential equality effects. Effects on groups of people and not those on specific individuals are assessed.

2.3.5 The criteria used to determine disproportionate or differential impacts with respect to protected characteristics groups include:

- a. People who share a protected characteristic form a disproportionately large number of those adversely affected by the Scheme;

- b. Amongst the population affected by the Scheme, people who share protected characteristics are particularly vulnerable or sensitive to a possible impact in relation to their possessing a specific protected characteristic;
- c. The Scheme may either worsen or improve existing disadvantage affecting people who share a protected characteristic;
- d. People with shared protected characteristics may not have an equal share in the benefits arising from the Scheme. This can be either due to direct or indirect discrimination or where the groups experience particular barriers to realising such benefits, unless suitable mitigations are proposed to overcome those barriers; and
- e. The Scheme may worsen existing community cohesion amongst the affected local population or exacerbate conflicts with community cohesion policy objectives.

2.3.6 The assessment of effects is set out in a summary table identifying for each impact: The likely effect on protected characteristic groups, mitigation and actions for removing or minimising any negative impacts; and actions for enhancing benefits of the Scheme for those with protected characteristics groups.

2.4 Conclusions

2.4.1 The final section of this report sets out conclusions on the equality effects of the Scheme identified at this stage of the planning process. It sets out how the Applicant has paid due regard to the PSED and highlights appropriate mitigation against adverse impacts and opportunities for enhancing equality of opportunity.

3 Relevant Legislation

3.1 Equality Act 2010 and Public Sector Equality Duty

3.1.1 The Equality Act 2010 (the 'Act') is a major piece of UK legislation which provides the framework to protect the rights of individuals against unlawful discrimination and to advance equal opportunities for all. Section 149 outlines the public sector equality duty (PSED) of public bodies, who in exercising their functions must have due regard to the three aims of PSED:

- a. To eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
- b. To advance equality of opportunity between people who share a relevant protected characteristic and those who do not; and
- c. To foster good relations between people who share a relevant protected characteristic and those who do not.

3.1.2 The Act explains that having due regard for advancing equality involves:

- a. Removing or minimising disadvantages suffered by people due to their protected characteristics;
- b. Taking steps to meet the needs of people from protected groups where these are different from the needs of other people; and
- c. Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

3.1.3 The duty covers the following eight protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation as described Section 2.3.1 of this report.

3.1.4 The Act states that meeting different needs involves taking steps to take account of disabled people's disabilities. It describes fostering good relations as tackling prejudice and promoting understanding between people from different groups. It states that compliance with the duty may involve treating some people more favourably than others.

3.2 Human Rights Act 1998

3.2.1 The Human Rights Act 1998 incorporated into UK law the European Convention on Human Rights (the 'Convention'). The Convention includes provisions in the form of Articles, the aim of which is to protect the rights of the individual. The following Articles of the Convention are relevant to the Secretary of State's decision as to whether the Sunnica DCO should be made so as to include powers of compulsory acquisition.

- a. **Article 1 of the First Protocol to the Convention** - This provides the right of everyone to the peaceful enjoyment of possessions and provides that no one can be deprived of their possessions except in the public interest and subject to the relevant national and international laws and principles.
- b. **Article 6** - This entitles those affected by the powers sought in the Sunnica DCO to a fair and public hearing of any relevant objections they may have to

the granting of those powers. This includes property rights and can include opportunities to be heard in the decision making process.

- c. **Article 8** - This protects private and family life, home and correspondence. No public authority can interfere with these rights except in accordance with the law, and so far as is necessary in the interest of national security, public safety or the economic well-being of the country.

4 Baseline Evidence

4.1 Study Area

- 4.1.1 The equalities socio-demographic baseline provides a profile of residents living in the area around the Scheme. The baseline presents data on equality groups within a study area formed of the wards that intersect with the Scheme. These are Fordham & Isleham ward, Manor (Forest Heath) ward and Burwell ward. Data for the East of England and England has also been analysed for comparison.
- 4.1.2 The baseline also looks at community infrastructure in the area with particular relevance to equality.
- 4.1.3 Data from the Census 2011 and other datasets from the Office for National Statistics (ONS) (Ref 2) were used to identify the level and distribution of population with protected characteristics currently living within the study area. This assists in making a judgement as to whether any particular equality groups are likely to be disproportionately affected by the Scheme.
- 4.1.4 Analysis from the baseline for the study area shows:
- A higher proportion of people aged 65 and over compared to national and regional levels.
 - A lower proportion of children (those aged under 16) in the study area than regional and national levels. However, Fordham & Isleham ward has a higher proportion of children than regional and national rates.
 - The percentage of people in the study area whose day-to-day activities are limited 'a lot' due to health is slightly lower than the regional and national percentages.
 - There is a higher percentage of residents in the study area identifying as 'White British' and 'White Other' than in the East of England and England.
 - Overall, 2019 deprivation rankings show that the level of deprivation is low.

4.2 Protected Characteristic Groups

Table 4-1 Population breakdown by sex and geographical area

Geography	Sex	
	Male	Female
Study Area	49.3%	50.7%
East of England	49.2%	50.8%
England	49.2%	50.8%

- 4.2.1 **Table 4-1** Shows the percentages of males and females in the study area compared to the East of England and England. There is a marginally higher proportion of females (50.7%) than males (49.3%) in the study area, corresponding closely to that of regional and national levels.

Table 4-2 Age profile of residents in the study area

Population	Study Area	East of England	England
Aged under 16 (Children)	18.7%	19.0%	18.9%
Aged 16-24 (Young People)	8.8%	10.9%	11.9%
Aged 65+ (Older People)	17.9%	15.1%	14.1%
Aged 85+ (Older People)	2.5%	2.4%	2.2%

4.2.2 **Table 4-2** shows the percentages of the population of children, young people, older people and older people aged 85 and over, in the study area compared with the East of England and England.

- a. Overall, the study area has a slightly lower proportion of children (People under the age of 16; 18.7%). However, the ward of Fordham & Isleham has a higher than regional and national rate of residents aged under 16 (19.2%).
- b. The study area has a higher proportion of older people aged 65 and over (17.9%) than the regional and national percentages. The ward of Burwell has the highest proportion of older people aged 65 and over (18.3%).
- c. The study area has a higher percentage of people aged 85 and over (2.5%) compared to regional and national levels. On the ward level, Burwell has the highest proportion of people aged over 85 (3.1%) compared to Manor (1.9%) and Fordham & Isleham (2.1%).

Table 4-3 Population breakdown by ethnic group and geographical area

Ethnic Group	Study Area	East of England	England
White	96.6%	90.8%	85.4%
White: English/Welsh/Scottish/Northern Irish/British	90.8%	85.3%	79.8%
White: Irish	0.5%	1.0%	1.0%
White: Gypsy or Irish Traveller	0.3%	0.1%	0.1%
White: Other White	5.1%	4.5%	4.6%
Mixed	1.5%	1.9%	2.3%
Mixed/multiple ethnic group: White and Black Caribbean	0.3%	0.6%	0.8%
Mixed/multiple ethnic group: White and Black African	0.1%	0.3%	0.3%
Mixed/multiple ethnic group: White and Asian	0.5%	0.6%	0.6%
Mixed/multiple ethnic group: Other Mixed	0.6%	0.5%	0.5%
Asian	0.9%	4.8%	7.8%
Asian/Asian British: Indian	0.2%	1.5%	2.6%
Asian/Asian British: Pakistani	0.0%	1.1%	2.1%
Asian/Asian British: Bangladeshi	0.0%	0.6%	0.8%
Asian/Asian British: Chinese	0.3%	0.6%	0.7%
Asian/Asian British: Other Asian	0.4%	1.0%	1.5%
Black	0.7%	2.0%	3.5%
Black/African/Caribbean/Black British: African	0.2%	1.2%	1.8%
Black/African/Caribbean/Black British: Caribbean	0.1%	0.6%	1.1%
Black/African/Caribbean/Black British: Other Black	0.4%	0.2%	0.5%
Other	0.3%	0.5%	1.0%
Other ethnic group: Arab	0.0%	0.2%	0.4%
Other ethnic group: Any other ethnic group	0.2%	0.3%	0.6%

4.2.3 **Table 4-3** shows the percentages of people identifying as certain ethnicities in the study area, compared with the East of England and England.

- a. There is a higher percentage of residents in the study area identifying as White British (90.8%) than in the East of England (85.3%) and England (79.8%).
- b. There is a higher proportion of those identifying as White ‘Gypsy or Irish Traveller’ in the study area (0.3%) compared to the East of England and England (0.1%).

Table 4-4 Population breakdown by religion or belief and geographical area

Religion	Study Area	East of England	England
Christian	64.7%	59.7%	59.4%
Buddhist	0.2%	0.4%	0.5%
Hindu	0.1%	0.9%	1.5%
Jewish	0.1%	0.6%	0.5%
Muslim	0.2%	2.5%	5.0%
Sikh	0.1%	0.3%	0.8%
Other	0.4%	0.4%	0.4%
No religion	26.7%	27.9%	24.7%
Religion not stated	7.5%	7.3%	7.2%

4.2.4 **Table 4-4** shows the percentages of people identifying as a certain religion in the study area, compared with the East of England and England.

4.2.5 The largest proportion of residents within the study area identify as Christian (64.7%), which is higher than the proportion of residents in the East of England and England.

4.2.6 At the ward level, Burwell has a higher proportion of people identifying as Muslim than the other wards (0.3%), which is lower than the East of England (2.5%) and England (5.0%).

Table 4-5 Population breakdown by limited long term illness or disability and geographical area

Geography	Day-to-day activities limited a lot	Day-to-day activities limited a little	Day-to-day activities not limited
Study Area	6.3%	9.2%	84.6%
East of England	7.4%	9.3%	83.3%
England	8.3%	9.3%	82.4%

4.2.7 **Table 4-5** shows the percentage of the population who are limited by day-to-day activities by ‘a lot’, ‘a little’, and those who are ‘not limited’.

- a. The study area has a higher percentage of people who are ‘not limited’ in their day-to-day activities at 84.6%, compared to the East of England (83.3%) and England (82.4%).
- b. At the ward level, Manor (Forest Heath) has the highest proportion of those limited ‘a lot’ by day-to-day activities (6.6%), followed by Fordham & Isleham (6.4%) and then Burwell (6.1%).

4.3 Deprivation

- 4.3.1 Deprivation is measured by the 2019 English Indices of Deprivation¹. This provides an overall deprivation score for Lower Super Output Areas (LSOAs) across England by building upon seven distinct 'domains' of deprivation. These domains include health, income, employment, education, exposure to crime, barriers to housing and services, and living environment; and are seen as the key indicators which influence a person's level of deprivation.
- 4.3.2 These statistics provide a measure of 'relative deprivation', not affluence. As such, it is important to recognise that not every person in a highly deprived area will themselves be deprived and likewise, that there will be some deprived people living in the least deprived areas.
- 4.3.3 People belonging to protected characteristic groups are also more likely to experience deprivation, as they may experience poor health, have lower levels of income (e.g. if they are unable to work full time), or experience barriers to accessible housing, and access to services. This can lead to poor health and wellbeing outcomes, and detrimentally affect the equality of opportunity a person experiences.
- 4.3.4 Based on the 2019 Indices of Multiple Deprivation (Ref 3) West Suffolk is the 176th most deprived borough out of 326 districts in England (where 1 is the most deprived), and the 20th most deprived out of 47 districts in the East of England. East Cambridgeshire is less deprived in comparison with a rank of 272nd most deprived borough out of 326 districts and 38th most deprived out of 47 districts in the East of England. No lower layer super output areas (LSOAs) in East Cambridgeshire or West Suffolk are ranked in the top 10% most deprived parts of the country.

4.4 Employment

- 4.4.1 According to the Annual Population Survey (Ref 4), the unemployment rate among working age residents in the study area in 2019 was 4.2%, significantly higher than East of England (3.2%) and England and Wales (3.9%). Residents of working age residing in the study area in 2019, had an economic activity rate of 71.8%. This rate is lower than recorded for England and Wales (78.9%) and the East of England 80.6%. This is shown in Table 4-6.

Table 4-6 Economic Activity and Unemployment Rates

Economic Indicator	Study Area	East of England	England and Wales
Economic activity rate (for residents aged 16-64)	71.8%	80.6%	78.9%
Unemployment rate (for residents aged 16-64)	4.2%	3.2%	3.9%

¹ Ministry for Housing, Communities and Local Government (2019) English indices of deprivation 2019
<https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

4.5 Equalities Receptors

4.5.1 There are a number of residential properties and facilities and resources identified as sensitive receptors in the study area with regards to equalities. These are outlined below.

Residential Properties

4.5.2 The closest residential properties to Sunnica East Site A are a small group of properties located 500m to the north in Isleham. The closest residential areas to Sunnica East Site B are a small group of properties located immediately north of the site in Worlington.

4.5.3 There is one residential property on Dane Hill Road, located approximately 100m away from Sunnica West Site A, as well as some residential properties within the La Hogue Farm shop, located 120m from Sunnica West Site A.

4.5.4 The closest residential properties to Burwell Substation Option 2 are located in the village of Burwell, located 350m to the east.

Community Resources

4.5.5 There are two churches (The Ark Church Isleham and Isleham Church of England) located approximately 600m north west of Sunnica East Site A. There is also a community centre (The Beeches Isleham Community Centre) which is located approximately 800m away.

4.5.6 There is a golf club (Royal Worlington and Newmarket Golf Club) approximately 300m north from Sunnica East Site B. There is also a church (All Saints Church) located approximately 500m to the north in Worlington.

4.5.7 The closest community resource to Sunnica West Site A is a farm shop and café (La Hogue Farm) located adjacent to the site. There is also an outdoor activity park (Wild Tracks Outdoor Activity Park), located 100m to the north and a karting centre (Red Lodge Karting) located approximately 700m to the north.

4.5.8 A public house (The George and Dragon) is located 500m away from Sunnica West Site B and a church (St. Peter's Church) is located 700m away, both in Snailwell.

4.5.9 There are two primary schools in Isleham, two primary schools in Red Lodge, and two primary schools and a secondary school in Mildenhall. These are all located within 2km of the order limits.

Healthcare Facilities

4.5.10 The following healthcare facilities are located within 3km of the Scheme:

- a. Reynard Surgery in Red Lodge (500m south of the Scheme)
- b. Hopkinson DR GP, Red Lodge (1.8km from the Order limits)
- c. The Whitehouse Surgery, Mildenhall (2km from the Order limits)
- d. Market Cross Surgery (2km from the Order limits)

- e. Orchard House Surgery (2.5km from the Order limits)
- f. DR NS Arthur Oakfield Surgery (2.8km from the Order limits)
- g. The Mildenhall Health Centre (Medical Clinic, located approximately 3km from the Scheme).

4.5.11 The nearest hospital is the Newmarket Community Hospital, located approximately 3.5km away from the Scheme.

Public Rights of Way (PRoWs)

- 4.5.12 The Scheme will be located on agricultural land where there are several public rights of way (PRoWs) on or abutting the Scheme. There are three ProWs located within the boundary of Sunnica East Site A, running between Mortimer Lane in the south to Beck Road in the north.
- 4.5.13 There is one PRoW located adjacent to the boundary of Sunnica East Site B, running along the south-western boundary from Turnpike Road at Red Lodge in the southeast to Badlingham Manor in the northwest. An unclassified road, which is a publicly accessible route, including for equestrians, extends northwards from Elms Road to Worlington.
- 4.5.14 There is a bridleway (PRoW 204/5) which runs adjacent to the south-west boundary of Sunnica West Site A. There is also Snailwell 1 footpath which crosses the land to the north-west of the Sunnica West Site A boundary.
- 4.5.15 There is a footpath that intersects Grid Connection Route A, located to the south of Sunnica West Site B, used for access between Chippenham and Red Lodge.
- 4.5.16 There are six PRoWs that intersect with Grid Connection Route B. PRoW 204/1 connects Snailwell with Chippenham Park. Heading west from Sunnica West Site B, a footpath runs through agricultural fields between Fordham and Snailwell. Footpaths 35/10 and 35/11 run between Wicken and Burwell and pass through several agricultural fields. There are also two PRoWs between Burwell and Reach, through agricultural land.

5 Engagement and Consultation

5.1 Overview

5.1.1 This section presents a summary of consultation activities undertaken to date in relation to the Scheme, with particular regard to demonstrating the inclusive approach to preparing activities and consultation materials.

5.1.2 It also provides a summary of feedback from stakeholders and the public pertinent to equalities. More detail on the consultation for the Scheme and feedback can be found in the Consultation report **[APP-026]** and Consultation Report appendices **[APP-027 to APP-031]**.

Non-Statutory Stakeholder Consultation (June and July 2019)

5.1.3 Non-statutory public consultation regarding the design development and EIA process of the Scheme took place in June and July 2019.

5.1.4 This included a series of targeted and public consultation events held at nine different venues within and around the Scheme location, including local villages. Copies of the consultation booklet and a response questionnaire were made available at the consultation events and online on the Scheme website as well as at public information points at locations in the vicinity of the Scheme, for those without internet access.

5.1.5 As well as emails and the Scheme website, Freephone numbers and Freepost addresses were available for communication with consultees that were less familiar with using websites or who preferred communication by phone.

Statutory Consultation (September – December 2020)

5.1.6 Statutory consultation was undertaken on the Scheme plans and the Preliminary Environmental Report (PEI report) from September to December 2020.

5.1.7 Due to COVID-19 restrictions, virtual consultation platforms were used in the place of face-to-face events. These included:

- a. Fifteen online webinars were held, including presentations about the Scheme and opportunities for consultees to ask questions. These were held on a range of days and at varying times of day to suit those with different lifestyles and time commitments.
- b. Virtual exhibitions for the duration of the consultation period, setting out information about the Scheme and how to take part in consultation.
- c. Copies of the consultation booklet, including an overview of the Scheme, a plan showing the Order limits and a copy of response questionnaire were distributed to consultees by post and made available online on the Scheme website. A section 48 notice was also enclosed in the letters.
- d. Copies of the PEI report and the Statement of Community Consultation were also made available on the Scheme website.

- e. Telephone appointments could be booked, for those without internet access or who are unfamiliar with using websites, to discuss the Scheme and ask questions.
- f. Community organisations, including schools, were provided with a consultation information pack to support the promotion of consultation through their own channel of communications.

5.1.8 The Applicant also carried out an exercise to identify seldom heard audiences in the area to make sure consultation activities were reaching these groups. Seldom heard audiences were identified as including those without internet access, young people, older people, Gypsies and Travellers, the time poor, the economically challenged, ethnic minorities, and LGBT+ people.

5.1.8 —

Additional Consultation with s42(1)(d) Consultees (June - November 2021)

- 5.1.9 Following statutory consultation in Autumn 2020 and engagement with the consultation feedback, minor amendments were made to the Scheme's Order limits. These changes represented new or different impacts for the affected land interests.
- 5.1.10 Each s42 consultee received a letter including the plan of the Order limits with all changes. Copies of the consultation letter, consultation booklet and questionnaire were also provided and made available online on the Scheme website. All consultation materials, including the PEI Report and virtual exhibition were also made available on the Scheme website.
- 5.1.11 Consultees could provide feedback using email or by Freepost for those without email or internet access.

Non-statutory Consultation and Engagement with Relevant Parties on Proposed Changes to the Application (June – July 2022)

- 5.1.12 In addition, since the Application was submitted, updated information was received from National Grid Electricity Transmission (NGET), regarding connecting the Scheme to the national electricity transmission system at Burwell National Grid Substation. The Applicant therefore proposed changes to the technical options for the grid connection included in the Application to take account of this new information:
 - a. Change 1 (NMC-01) – Removal of Option 1. Removal of the Burwell National Grid Substation Extension Option 1 from the Scheme.
 - b. Change 2 (NMC-02) – 400kV cabling. Change to 400kV cabling within the grid connection routes (Cabe Routes A and B) to facilitate grid connection Option 3 (described in Paragraph 2.17 below).
 - c. Change 3 (NMC-03) – 33/400kV Transformers. The onsite substations at Sunnica East A, Sunnica East B and Sunnica West A would require a change to the electrical configuration and therefore their general arrangement and layout due to the introduction of a 33kV/400kV transformer in place of the 33kV/132kV transformers, with a shunt reactor introduced at Sunnica East Site B. In addition, NMC-03 includes the transportation of the 33kV/400kV

transformer and shunt reactor (Sunnica East Site B only) from the Strategic Road Network (SRN) to each of the onsite substations.

- 5.1.13 The above proposed changes were consulted on between 6 June and 6 July 2022. In developing its approach to consultation, the Applicant considered Planning Inspectorate Advice Note 16: How to request a change that might be material.
- 5.1.14 A consultation document was prepared summarising the proposed changes and how to take part in the consultation. The consultation document was available on the Scheme website, and hard copies were deposited at Burwell Library, Red Lodge Sports Pavilion or on request.
- 5.1.15 The Applicant also wrote directly to persons or bodies notified of the application under Section 56 of the Planning Act 2008 as well as members of the local residents living within a half mile radius of the substations affected by Options 1, 2 and 3.
- 5.1.16 A note of the proposed changes and how to respond to the consultation was placed in the Ely Standard and Newmarket Journal. Consultees were invited to provide comments in writing to at info@sunnica.co.uk or by post. The Freephone number and email address already put in place by the Applicant during pre-application consultation also remained available for enquiries.

Other Activities

- 5.1.17 As well as the statutory and non-statutory consultation activities outlined above, further engagement took place with the public and other stakeholders through:
 - a. Technical meetings with local authority contacts
 - b. Technical meetings with residents and the project team
 - c. Technical working groups with local authority contacts
 - d. Meetings with landowners
 - e. Meetings with local MPs and councillors
 - f. Meetings with statutory and non-statutory environmental bodies
 - g. Newsletters with updates on design changes made as a result of consultation feedback
 - h. Workshops to discuss different aspects of the EIA
 - i. Site visits
- 5.1.18 To ensure underrepresented groups were encouraged to get involved with the consultation, the materials were prepared to be accessible and clear. All public information events were advertised to the public via a range of channels including advertisements in local newspapers, on social media, on the Scheme website and through regional and local broadcasters.
- 5.1.19 The contact telephone (Freephone) number, email address and Freepost address for the Scheme were evident on all published material and on the Scheme website.

- 5.1.20 Copies of consultation materials were available in alternative formats on request and a review of the Scheme's website was conducted to check accessibility standards.

5.2 Consultation Feedback

- 5.2.1 Overall, respondents showed support for renewable energy generation, and agreed that more renewable energy sources are needed in the UK, however, there was general opposition to the Scheme itself.

- 5.2.2 A review of the consultation feedback highlighted several potential concerns that could have an impact on equality groups. These are summarised below:

Safety

- 5.2.3 A number of respondents raised safety concerns regarding the increased traffic from construction of the Scheme, with some concerns of increased prevalence of traffic accidents and reduced road safety in the local community.
- 5.2.4 A high number of respondents were concerned about the fire risk posed by the Battery Energy Storage System (BESS), with many residents believing that the batteries are too close to local primary schools and residential areas.

Health and Wellbeing

- 5.2.5 Some respondents raised concerns for the wellbeing of local residents during construction and decommissioning of the Scheme. A number of respondents believe that the Scheme may negatively impact residents' physical and mental health through increased noise and dust pollution during construction and through the removal of green space/agricultural land.
- 5.2.6 Some respondents reported concerns for the health and safety of the community, regarding air pollution and poor air quality during the construction and operation of the Scheme. Some residents reported being concerned that the Scheme will increase dust and pollution in the area, raising concerns about those with existing poor health conditions.
- 5.2.7 A range of responses raised issues regarding the closure of Public Rights of Way routes, with concerns that closure of these routes will have negative impacts on residents physical and mental health.

Socio- Economic

- 5.2.8 A high number of respondents raised issues regarding a loss of employment in farming roles due to the removal of agricultural land. Others were concerned about potential impacts on small local businesses and the local horse racing industry.
- 5.2.9 Many respondents raised concerns about the loss of agricultural land resulting in increased food exports and a reduction in food security.

Accessibility

- 5.2.10 Several respondents reported issues and concerns regarding accessibility due to the closure of several bridleways and PRowS, with a small number expressing concern that the views of equestrian users have not been considered. Concerns for accessibility between and around the local area for people living, working or visiting the area were raised by many respondents.

6 Assessment of Impacts

6.1 Overview

6.1.1 The assessment of impacts considers the potential impacts arising from the proposed Scheme on affected people sharing protected characteristics. It considers direct and indirect adverse and beneficial effects on protected characteristic groups during the construction, operation and decommissioning phases.

6.1.2 A judgement has been made as to the likely effects on protected characteristic groups using available DCO documents, wider evidence, and consultation feedback. In particular the assessment draws upon evidence from the following sources:

- a. The Environmental Statement for the Scheme including information from the chapters on Human Health [APP-047], Noise and Vibration [APP-043], Air Quality [APP-046], Socio-Economics & Land Use [APP-044] and Transport and Access [APP-045].
- b. The Consultation report [APP-026]
- c. The Outline Skills, Supply Chain and Employment Plan [EN010106/APP/7.7]
- d. Framework Construction Traffic Management Plan and Travel Plan [EN010106/APP/6.2]
- e. Framework Construction Environmental Management Plan [EN010106/APP/6.2]

6.1.3 Equality effects have been assessed under a set of key equality themes. These themes provide a framework that can be used for ongoing assessment and monitoring of equality impacts throughout the further development of the Scheme including through construction, operation and decommissioning phases.

- a. Local business, skills and employment – impacts on local businesses and those working in the area
- b. Community impacts – impacts affecting those living in the area
- c. Wider impacts – assessment of the wider impact associated with the contribution to the generation of renewable energy

6.2 Local Business, Skills and Employment

Positive effect: Employment generation during construction and decommissioning phases

6.2.1 The Scheme will generate substantial economic benefits including new jobs, as established in Chapter 12: Socio Economics and Land Use of the Environmental Statement [APP-044]. It is estimated that during the construction phase the Scheme will support 1,685 total net jobs per annum, and the decommissioning phase will also support over 242 total net jobs per annum. The majority of these are likely to be taken up by the local workforce.

- 6.2.2 The creation of new jobs is likely to have a positive effect on those in the local community who are disproportionately represented in unemployment figures for example young people, ethnic minority groups and disabled people.
- 6.2.3 As part of the application an Outline Skills, Supply Chain and Employment Plan (OSSCEP) [EN010106/APP/7.7] has been developed setting out initiatives the Applicant will introduce to maximise the diversity of the workforce. Groups which could be the target of this measure include workers of a certain gender, ethnicity or age (e.g. 16-24 year olds or older workers); disadvantaged or under-represented groups, for example, long-term unemployed, ex-offenders or disabled people. The most relevant target groups for this measure would be identified through consultation and research post-consent.
- 6.2.4 Examples of specific measures to maximise equality of opportunity may include (but are not limited to) ensuring that jobs are communicated to target groups by identifying and working with specialist job brokerage agencies; and working with job support and training providers who operate programmes aimed at getting people into work (for example, young people who are Not in Education, Employment or Training may require pre-employment, basic skills training and work placements).
- 6.2.5 A Skills, Supply Chain and Employment Plan (SSCEP) is to be developed to maximise the benefits of employment generation for the local economy. The approval of this Plan by the relevant planning authority and its implementation are secured by a requirement in Schedule 2 of the DCO [REP-2-012]. The commitments, actions and measures within the SSCEP will result in the benefits of employment generated through the project being accessible to protected characteristic groups.

Positive effect: Local expenditure during construction, operation and decommissioning phases

- 6.2.6 The Scheme will generate substantial economic benefits including expenditure, as established in Chapter 12: Socio Economics and Land Use of the Environmental Statement [APP-044].
- 6.2.7 The Applicant will take measures to maximise benefits to local businesses from spending on goods and services during each phase of the Scheme. This is a benefit that can be shared by diverse and minority owned businesses within the local area.
- 6.2.8 The OSSCEP states that the Applicant will work with local partners to communicate opportunities for purchasing and contracts arising from the Scheme to local businesses. This will include building on existing relationships with local Chamber of Commerce, Orbis Energy (a unit within Suffolk Council focused on promoting the interests of clean energy growth in the East of England Energy Zone) and other potential partners including the Local Authorities.
- 6.2.9 The Applicant will also arrange ‘meet the buyer’ events to reach out to potential suppliers to boost the local content within the Scheme. The Applicant also intends to join the East of England Energy Group. This will allow for communication with other members and individuals interested in the energy sector in the region.

Positive effect: Employment generation during operation phase

- 6.2.10 During the operation phase, 17 jobs will be required on site as well as some additional part-time workers required to perform maintenance and engineering works.
- 6.2.11 There is a potential for local people to benefit from these opportunities including those with protected characteristics. This includes those who are disproportionately represented in unemployment figures such as young people, ethnic minority groups and disabled people.
- 6.2.12 A Skills, Supply Chain and Employment Plan (SSCEP) is to be developed to maximise the benefits of employment generation for the local economy and through this the Applicant will introduce initiatives to maximise the diversity of the workforce. The approval of this Plan by the relevant planning authority and its implementation are secured by a requirement in Schedule 2 of the DCO **[REP2-012]**.

Negative effect: Potential risk of unemployment and loss of business as a result of land acquisition

- 6.2.13 The Scheme would involve the Applicant seeks powers of compulsory acquisition of land and rights to construct the Scheme. Whilst there is no requirement to acquire residential property for construction of the Scheme, there is a need to acquire land used by businesses which includes agricultural land.
- 6.2.14 Business owners, employees and self-employed workers at affected businesses may experience temporary or permanent loss of income and/or employment until relocated and/or where the employer closes/downsizes/relocates elsewhere. Equality effects may be experienced where the pattern of affected employees affects a protected characteristic (e.g. race) disproportionately or have other protected characteristics which make them more sensitive than others (e.g age). In particular, compulsory acquisition required for the Scheme may adversely affect vulnerable migrant agricultural workers or older males as these groups are dominant in the agricultural sector.
- 6.2.15 The Applicant continues to try to reach agreement with landowners. Where compulsory acquisition powers may be exercised along the cable corridor, this would relate to the acquisition of rights rather than land, and the risk of impact on business operation is therefore considered to be low with no negative equality effects. With respect to the impact of the exercise of powers of compulsory acquisition on agricultural land, the Socio-Economics & Land Use **[APP-044]** assessment undertaken for the Scheme identified that agricultural land use will change from intensive arable to livestock grazing with diversified enterprise of renewable generation for duration of solar farm. This will assist with diversified income and allowed continued agriculture on remaining land.
- 6.2.16 The Applicant has reached agreement with the freehold owners of part of the Sites for a lease of them for the lifetime of the Scheme. Negotiations with all other main freehold owners of the Sites are at an advanced stage. It is anticipated that voluntary agreements with more of these landowners will be entered into, minimising the amount of land subject to compulsory acquisition without an agreement in place. It has not been possible to date to negotiate the voluntary

acquisition of the necessary rights and without acquiring these rights compulsorily it would mean that Scheme could not be constructed, operated and maintained.

- 6.2.17 The Sunnica DCO has the potential to infringe the human rights of persons who own property or have rights in the land proposed to be acquired pursuant to the Sunnica DCO. The Applicant considers that there would be very significant public benefit arising from the making of the Sunnica DCO. That benefit can only be realised if the Sunnica DCO includes compulsory acquisition powers, and the purpose for which the land is sought (to build and operate the Scheme) is legitimate. The Applicant considers that there is a compelling case in the public interest for the exercise of such powers of compulsory acquisition. The Applicant considers that it would, therefore, be appropriate and proportionate for the Secretary of State to make the Sunnica DCO, including the compulsory acquisition powers sought.
- 6.2.18 In relation to Article 6 of the First Protocol to the Human Rights Convention, there has been opportunity to make representations regarding the preparation of the Application (and these opportunities are ongoing throughout the Examination of the Application). In accordance with Part 5 of the PA 2008, the Applicant has consulted with persons set out in the categories contained in section 44 of the Planning Act 2008 ('PA 2008'), which includes owners of land affected and those who may be able to make claims under sections 7 and 10 of the Compulsory Purchase Act 1965 in respect of injurious affection or under Part 1 of the Land Compensation Act 1973 or under section 152(3) of the PA 2008. The beneficiaries of rights overridden by the exercise of powers in the Sunnica DCO can make claims under section 10 of the Compulsory Purchase Act 1965.
- 6.2.19 Following acceptance of the Application, there was the opportunity to make 'relevant representations' in response to the notice which the Applicant was obliged to give pursuant to section 56 of the PA 2008. These will be considered during the examination of the Application by the examining authority, in any written representations procedure which the examining authority decides to hold or at any compulsory acquisition hearing held under section 92 of the PA 2008. There are further opportunities for affected persons to be involved in the examination process, including submitting detailed written representations (which has occurred at Deadline 2), responding to matters raised by the examining authority and at other types of hearings that may be held.
- 6.2.20 Should the Sunnica DCO be made, any person aggrieved may challenge the Sunnica DCO in the High Court if they consider that the grounds for doing so are made out, pursuant to section 118 of the PA 2008.
- 6.2.21 In relation to matters of compensation for land to be acquired, affected persons have the right to apply to the Upper Tribunal (Lands Chamber) to determine the compensation payable. The Funding Statement [**APP-023**] confirms that the Applicant has the ability to procure the financial resources required for the Scheme, including the cost of acquiring any land and rights and the payment of compensation, as applicable. The Applicant therefore considers that the Secretary of State can be satisfied that the requisite funds for payment of compensation will be available at the appropriate time.

6.2.22 The Applicant's Statement of Reasons [REP2-018], section 10, includes consideration of how the compulsory acquisition powers sought in the Application interact with the rights protected by the Human Rights Convention, concluding that, on balance, the significant public benefits outweigh the effects on persons who own interests in relevant land or who may be affected by the Scheme.

6.3 Community Impacts

Positive effect: Additional Non-Motorised User (NMU) facilities during operation

6.3.1 During the operational phase, the Scheme will provide additional walking, cycling and horse riding facilities which will improve safety and reduce journey times for some NMUs.

6.3.2 New permissive routes will be provided in both the Sunnica East Sites A and B to provide a safe route for the use of local residents in the area. To the north-west of Sunnica East Site A there will be a new permissive route on Beck Road, as well as three new permissive routes off unadopted bridleway U6006 within Sunnica East Site B. These routes will improve connectivity between the villages of Worlingham, Isleham and Snailwell. They will provide a safe route for NMUs to use to travel between the sites without the presence of road traffic. The Scheme is therefore expected to lead to a positive health impact during the operational phase due to a potential increase in active travel.

6.3.3 This is a benefit of the scheme that can be shared by protected characteristic groups. For example:

- a. Those who are more likely to benefit from the positive differential health effects of increased activity such as older people (who are disproportionately represented in the area) may benefit from additional facilities for active travel; and
- b. Those who are less likely to have access to a car for local journeys such as younger people and older people may have a disproportionate need for local NMU routes and benefit from improved walking connectivity to services.

Positive effect: Inclusive community engagement

6.3.4 At this stage of the planning process, a wide range of engagement and consultation activities have been undertaken with the public and stakeholders. Equality legislation emphasises the importance of supporting positive relations between different groups, whilst local community cohesion policy supports group interaction, fair treatment, equal opportunity, and a sense of common belonging, including empowering local communities to shape decisions affecting their lives.

6.3.5 The Applicant has developed a range of ways for consultees to find out more about the proposals and respond without use of the internet, including sending consultation booklets and questionnaires to all addresses in consultation zone 1, offering telephone surgeries, advertising in print media and accepting responses to the consultation by Freepost. This is has been done recognising the fact that some consultees may not be able to or comfortable with accessing consultation materials online.

6.3.6 As part of the statutory consultation, the applicant also sought to identify any groups with protected characteristics disproportionately represented within the area or who may be indirectly or directly impacted by the Scheme. This included liaison with various relevant local authorities to identify any groups of key concern or seldom heard audiences. The Applicant identified seldom heard audiences in the area as including those without internet access, young people, older people, Gypsies and Travellers, the time poor, the economically challenged, ethnic minorities, and LGBT+ people.

6.3.7 Targeted activities included contacting Suffolk County Council and Cambridgeshire County Council Gypsy and Traveller liaison services in September 2020 to help with identifying the presence of sites used by the Gypsy and Traveller community in the vicinity of the Scheme. The Applicant was not advised at this time of the presence of any sites.

6.3.8 However, in October 2021 the Applicant was contacted by West Suffolk Council to make it aware of a caravan site used by the Gypsy and Traveller community adjacent to the Order limits at Elms Road, Red Lodge. The Council requested that the Applicant check whether this site had received consultation materials.

6.3.9 Having checked the Royal Mail Postcode Address File used to deliver consultation materials to consultation zone 1, the Applicant identified that no address was held by Royal Mail for this location. The Applicant conducted a site visit which identified that there was no post box and direct access was not possible due to the gate to the site being locked. However, the Applicant wished to ensure residents were aware of the Scheme and therefore erected a notice with details of the Scheme in the vicinity of the site on 25 October 2021. The Gypsy and Traveller liaison officer at Suffolk County Council was also contacted to requesting support in engaging with the Gypsy and Traveller community on the site. However, no responses to the statutory consultation were received by members of the Gypsy and Traveller community or their representatives.

~~The extent to which the benefits of the Scheme would be shared amongst the local population, including groups with protected characteristics, depends in part on engagement efforts to include their views in the design and delivery.~~

6.3.10 Effective community engagement during construction and decommissioning would need to ~~continue be undertaken~~ with affected parties going forward. Equality effects may be experienced during engagement activities. For example, young people, ethnic minority groups and those from the LGBTQ+ community can face barriers to taking part in engagement processes effectively and therefore be underrepresented in such activities. Therefore, it important to use a variety of engagement methods to reach different groups.

6.3.11 The extent to which the benefits of the Scheme would be shared amongst the local population, including groups with protected characteristics, depends in part on engagement efforts to include their views in the design and delivery.

Negative effect: Closure of PRow during construction and decommissioning phases

6.3.46.3.12 During the construction phase, the Scheme will result in temporary impacts on a number of NMU facilities in the study area due to the closure of PRow for up to 3 weeks. The decommissioning phase would also be expected to result in the temporary closures of PRows, as well as potentially removing the permissive paths following the operation phase.

6.3.56.3.13 The existence of alternative routes will however continue to allow movement between communities and disruption will be limited to periods of closure. However, longer diversions using the road network may have differential adverse impacts on those with restricted mobility including older people (who are also disproportionately represented in the study area), disabled people and people with pushchairs. Additionally, those who are less likely to have access to a car for local journeys may have a disproportionate need for local NMU routes and be disproportionately affected by diversions, especially where used to access essential services.

6.3.66.3.14 The temporary closures where possible will be planned and programmed to minimise disruption to users. Temporary closures of each PRow would last no longer than three weeks.

6.3.76.3.15 A Framework DEMP has been prepared and provided in Appendix 16E of the Environmental Statement **[REP2-028]** which provides the outline mitigation measures to be adhered to during decommissioning.. The DEMP will be prepared and approved prior to the decommissioning phase, and its implementation is secured by a Requirement in Schedule 2 of the DCO.

Negative effect: Safety and environmental impacts during construction and decommissioning phases

6.3.86.3.16 During the construction and decommissioning phase, there are assessed to be negative impacts due to impacts arising from the presence of HGV movements for some residents.

6.3.96.3.17 This includes noise impacts for residents on Wells Grove and Hythe Lane in Burwell, Cambridgeshire during both the construction and decommissioning, phases.

6.3.106.3.18 There is clear evidence of that some protected characteristic groups such as children, older people and disabled people are more vulnerable to adverse health effects of traffic related noise. Therefore, local residents from these groups could experience differential adverse effects.

6.3.116.3.19 The additional HGV movements could result in severance and safety issues for pedestrians or perceptions of reduced safety affecting journeys for some groups. This is likely to be a disproportionate effect on those who are most likely to walk for journeys and those who are most vulnerable to road safety issues such as older people and children.

6.3.126.3.20 The Framework Construction Traffic Management Plan and Travel Plan **[EN010106/APP/6.2]** details the mitigation measures required to reduce the

impacts of increased traffic flows including HGVs on the roads. This includes a requirement for the appointed contractor to undertake such monitoring as is necessary with a Travel Plan Co-ordinator overseeing the management, monitoring and implementation of the individual measures within the CTMP.

~~6.3.136~~6.3.21 The Framework CEMP which is Appendix 16C of the Environmental Statement [EN010106/APP/6.2] sets out a package of measures to mitigate against construction related noise and vibration impacts. This includes measures such as ensuring that, where reasonably practicable, noise and vibration is controlled at source (e.g. the selection of inherently quiet plant and low vibration equipment); review of the construction programme and methodology to consider quieter methods and consideration of the location of equipment on-site and control of working hours. A Framework DEMP has been prepared and provided in Appendix 16E of the Environmental Statement [REP2-028]. This provides the outline mitigation measures to be adhered to during decommissioning.. The DEMP will be prepared and approved prior to the decommissioning phase, and its implementation is secured by a Requirement in Schedule 2 of the DCO.

Negative effect: Operation related noise impacts

~~6.3.146~~6.3.22 An assessment of the impact of operation of the Scheme on noise levels is provided in Chapter 11: Noise and Vibration of the Environmental Statement [APP-043]. During the operational phase, noise impacts arising from operation of the Burwell Substation Extension during the night is predicted to exceed the background levels for residents of properties on Weirs Grove and Hythe Lane in Burwell, Cambridgeshire. The adverse impacts on residents of properties are expected to occur over the entire operational phase (40 years) prior to the Scheme being decommissioned.

~~6.3.156~~6.3.23 The absolute levels of operational noise at these receptors are assessed as limited to a minor adverse effect which is not significant. However, some residents would be more sensitive than others. For example, those who spend more time at home would be subjected to longer periods of adverse noise impacts and experience disproportionate effects. These residents are likely to include older people, disabled people and those with long-term limiting illnesses and pregnant women/ women on maternity or those caring for small children.

~~6.3.166~~6.3.24 Some groups with protected characteristics also have differential sensitivity to noise. For example, children are susceptible to increased noise levels, particularly with regards to cognitive impairment (Ref 5). Night-time exposure can be associated with sleep disturbance, with regard to both quality and quantity. Sleep disturbance and sleep problems may affect behavior in children (Ref 6). People with dementia also have an increased sensitivity to both noise and light (Ref 7).

~~6.3.176~~6.3.25 The Framework Operation Environmental Management Plan [APP-126] sets out mitigation requirements for operation noise and vibration to be considered in the OEMP. The OEMP will also set out how the scheme design and operational plant levels have been developed to mitigate and reduce effects to a minimum. This will include consideration of sound output levels, the noise from inverters and cooling fans during lower modes of operation, positioning of plant and, if necessary and practicable, implementation of acoustic barriers. Site staff will carry out regular monitoring and maintenance of equipment. This will include

identifying any changes in sound pitches or volume early and carrying out the relevant maintenance.

6.4 Wider impacts

Positive contribution to climate change

6.4.1 As set out Chapter 6: Climate Change of the Environmental Statement [APP-038] as the operational Greenhouse Gas (GHG) intensity is considerably lower than the current grid energy mix, and remains well below projected grid average over the lifetime of the Scheme, the beneficial impact of the Scheme in relation to the UK meeting its carbon reduction targets is considered to be of high magnitude. Therefore, the renewable energy generation of the Scheme overall is considered to have a major beneficial effect on the climate.

6.4.2 People who share protected characteristics are more vulnerable to the impacts of climate change, including:

- a. More variable and extreme weather to the spread of pests and diseases. This would **increase the cost and quality of agricultural output and household food**. This could disproportionately negatively impact protected groups who are more likely to face relative poverty and experience health conditions.
- b. **Availability and quality of water** - Changing rainfall patterns and warming temperatures may result in increased competition for water between households, agriculture, industry and the natural environment. Droughts may become more frequent and severe causing problems for water quality and supply. The intersectionality between protected characteristics and socio-economic disadvantage could mean decreased access to water.
- c. **Increased risk of flooding** - With climate change likely to alter rainfall patterns and bring more heavy downpours, flood risk is expected to increase in the future. This could impact on properties and infrastructure – with serious consequences for people, heritage, businesses and communities. Many protected groups are economically less resilient. Flooding could affect where people live and could displace protected groups in communities.
- d. **Business reliance** - extreme weather caused by climate change may disrupt transport, energy and communication networks. This could impact on markets, affect supply chains and raise insurance costs, which could disproportionately impact protected groups.
- e. **Health and well-being** - A warming climate could affect patterns of disease and other health issues. Climate change and associated extreme weather may disrupt the lives of individuals and communities, limiting access to vital services and impacting on people's physical and mental health. This could disproportionately impact protected groups by exacerbating existing health conditions as well as reducing access to health care.
- f. **Infrastructure network connectivity and interdependencies** - Energy, transport, water, and ICT networks support services are vital to health and well-being and economic prosperity. The effect of climate change on these infrastructure systems will be varied. They are likely to be impacted by an increase in disruptive events such as flooding, landslides, drought, and heatwaves. The national infrastructure is closely inter-linked and failure in any

area can lead to wider disruption across these networks. It is likely that disruption would disproportionately affect people who share protected characteristics.

- 6.4.3 Therefore, the positive impact of the Scheme on the climate is likely to have a disproportionality positive effect on protected characteristic groups.

Positive effect: Generation of more affordable energy supply

- 6.4.4 Solar generation can be provided at a large scale for a relatively low cost which, relative to other electricity generation infrastructure, provides value for money for end-use consumers. (REF3)

- 6.4.5 This is a benefit that can be shared by protected characteristic groups who disproportionality experience socio-economic advantage. This includes older people, women, disabled people, younger people and ethnic minority groups. In turn, this could have additional positive effects for health and well-being by helping to secure affordable supplies of energy.

Potential Impact	Disproportionately/Differentially Affected Protected Characteristic Groups ²										Overview of Potential Equality Effects	Mitigation measures	
	Age			Sex	Race	Religion/Belief	Disability	Trans People	Sexual Orientation	Pregnancy/ /Maternity			
	Children	Young People	Older People										
Business, Employment and Skills													
Employment generation during construction and decommissioning phases		✓			✓		✓					Young people, especially those from ethnic minority groups who experience disproportionately higher levels of unemployment may experience positive effects.	A Skills, Supply Chain and Employment Plan (SSCEP) is to be developed to maximise the benefits of employment generation for the local economy. The approval of this Plan by the relevant planning authority and its implementation are secured by a requirement in Schedule 2 of the DCO.
Local expenditure during construction, operation and decommissioning phases				✓	✓		✓					Minority owned businesses such as those owned by women, ethnic minority groups and disabled people may benefit from meet the buyer and targeted supplier activities.	
Employment generation during operation phase		✓			✓		✓					Young people, especially those from ethnic minority groups who experience disproportionately higher levels of unemployment may experience positive effects.	
Risk of unemployment as a result of land acquisition			x		x							Groups who are more likely to be employed in agriculture include migrant workers and older males may experience negative effects of unemployment.	

² As there are no disproportionate or differential effects identified for marriage/civil partnership this protected characteristic has not been included in the table.

Potential Impact	Disproportionately/Differentially Affected Protected Characteristic Groups ²										Overview of Potential Equality Effects	Mitigation measures
	Age			Sex	Race	Religion/Belief	Disability	Trans People	Sexual Orientation	Pregnancy/ /Maternity		
	Children	Young People	Older People									
Potential loss of business due to compulsory acquisition			x				x				Equality effects can be experienced where business owners or employees disproportionately affects a single ethnic group, or other patterns in terms of protected characteristics. It can also result in adverse effects where those with certain groups such as older people and disabled people may find it more difficult to relocate due to their protected characteristic.	The Funding Statement [APP-023] confirms that the Applicant has the ability to procure the financial resources required for the Scheme, including the cost of acquiring any land and rights and the payment of compensation, as applicable.
Community impacts												
Additional Non-Motorised User (NMU) facilities during operation			✓				✓			✓	Positive effects are likely for those with mobility issues such as older people, disabled people and people with young children/pushchairs.	
Inclusive Community Engagement	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	All groups including those with protected characteristics who are traditionally under-represented in terms of engagement. This can include young people and ethnic minority groups.	
Diversions to PRow during construction and decommissioning phases	x		x				x			x	Some groups could experience differential effects which make extended journeys more difficult, for example those with mobility issues such as older people,	Temporary closures will be supported clearly signed alternative routes. This will be secured in the detailed Construction Environmental Management Plan (CEMP). A

Potential Impact	Disproportionately/Differentially Affected Protected Characteristic Groups ²										Overview of Potential Equality Effects	Mitigation measures
	Age			Sex	Race	Religion/Belief	Disability	Trans People	Sexual Orientation	Pregnancy/ /Maternity		
	Children	Young People	Older People									
											disabled people and people with young children/pushchairs.	Framework CEMP has been submitted with the DCO application. A Framework DEMP has been prepared which provides the outline mitigation measures to be adhered to during decommissioning
Safety and environmental impacts during construction and decommissioning phases	x		x				x				Children are more vulnerable to the effects of increased noise than the population overall and exposure at home may result in more adverse impacts than exposure at school. Older people and disabled people may also be more vulnerable to noise exposure due to spending more time at home than the population overall.	The Framework CEMP sets out a package of measures to mitigate construction phase noise and vibration impacts.
Operation Related Noise Impacts	x		x				x				Children are more vulnerable to the effects of increased noise than the population overall and exposure at home may result in more adverse impacts than exposure at school. Older people and disabled people may also be more vulnerable to noise exposure due to spending more time at home than the population overall.	Tonal/impulsive/intermittent acoustic features will be carefully considered in detailed design Specific noise control/mitigation measures to be incorporated.
Wider impacts												

Potential Impact	Disproportionately/Differentially Affected Protected Characteristic Groups ²										Overview of Potential Equality Effects	Mitigation measures
	Age			Sex	Race	Religion/Belief	Disability	Trans People	Sexual Orientation	Pregnancy/ /Maternity		
	Children	Young People	Older People									
Positive contribution to climate	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	Those from protected characteristic groups are disproportionately at risk from the negative impacts of climate change. The positive contribution of the Scheme to climate is likely to have positive effects for all groups	
Generation of affordable energy supplies	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	Those from protected characteristic groups are disproportionately likely to be on low incomes and experience socio-economic disadvantage. More affordable energy supplies will have positive effects on all groups.	

7 Summary and conclusions

7.1 Summary

7.1.1 This EqIA has identified the key issues and impacts relating to protected characteristics groups with regards to Scheme. This section summarises the key impacts in relation to the three limbs of the PSED.

7.2 PSED Aim 1: To eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act

7.2.1 No direct discrimination, harassment and victimisation of any protected characteristic groups has been identified as a result of the Scheme.

7.2.2 However, there is potential for the Scheme to result in disadvantage for some protected groups through the following:

- a. Potential loss of business and employment through land acquisition. This could potentially affect agricultural workers and landowners. However, where compulsory acquisition powers may be exercised along the cable corridor, this would relate to the acquisition of rights rather than land, and the risk of impact on business operation is therefore considered to be low with no negative equality effects.
- b. Increased noise levels for residents during construction, operation and decommissioning. This could have a differential effect on those who are more sensitive to noise impacts such as children and disabled people or those who may spend more time at home such as older people.
- c. Closure of PRow – resulting in alternative journeys using the road network and the potential for community severance. This is likely to have a greater effect on those who rely on walking due to lack of access to car to reach community facilities.

7.2.3 Current and planned mitigation measures for the above negative impacts are included within the Construction Environmental Management Plan [EN010106/APP/6.2] and Decommissioning Environmental Management Plan [REP2-028] and compensation agreements as set out in the Funding Statement [APP-023].

7.3 PSED Aim 2: To advance equality of opportunity between people who share a protected characteristic and those who do not

7.3.1 The EqIA has highlighted a number of benefits of the Scheme that will help to reduce inequalities and advance equality of opportunity between people who share a protected characteristic and those who do not. These are summarised below.

- a. The renewable energy generation of the Scheme overall is considered to have a major beneficial effect on the climate. The adverse impacts of climate change are disproportionately expected to affect protected characteristic

groups such as children, older people, disabled people and women. Therefore the Scheme will support in advancing equality of opportunity for these groups.

- b. Furthermore, the Scheme's contribution to the generation of renewable energy will provide a more affordable energy source for consumers. This could potentially reduce fuel poverty amongst groups who are disproportionately impacted such as older people, ethnic minority groups and younger people.
- c. The construction, operation and decommissioning of the Scheme will provide a range of procurement and employment opportunities including an increase in green jobs.

7.4 PSED Aim 3: To foster good relations between people who share a protected characteristic and those who do not

7.4.1 The EqIA has highlighted how the Scheme can help to foster good relations between people who share a protected characteristic and those who do not, for example:

- a. Inclusive public engagement has been undertaken to develop the Scheme. Consultation and engagement processes have been designed to reach as many people as possible within the Scheme areas. More information on Consultation activities can be found in the Consultation Report [APP-026];
- b. The Scheme will result in new NMU facilities during operation connecting communities through active travel routes.

7.5 Conclusions

7.5.1 This EqIA has identified some negative impacts on protected groups through the construction, operation and decommissioning of the Scheme. This includes:

- a. Potential loss of business and employment through land acquisition. This could potentially affect agricultural workers and landowners. However, due to the limited requirement for compulsory acquisition, the negative equality effects are predicted to be negligible.
- b. Increased noise levels for residents during construction, operation and decommissioning. This could have a differential effect on those who are more sensitive to noise impacts such as children and disabled people or those who may spend more time at home such as older people.
- c. Closure of PRow – resulting in alternative journeys using the road network and the potential for community severance. This is likely to have a greater effect on those who rely on walking due to lack of access to car to reach community facilities.

7.5.2 However, it is considered that the commitments set out in the Outline Skills, Supply Chain and Employment Plan, and the activities secured through the OEMP plan are sufficient to mitigate any disadvantages.

7.5.3 In addition, the Scheme will provide positive impacts resulting in benefits that can be shared by groups with protected characteristics.

8 References

Ref 1 Equality and Human Rights Commission (2014) Technical Guidance on the Public Sector Equality Duty: England

Ref 2 Mid-Year Population Estimates 2018. ONS.

Ref 3 Ministry of Housing, Community and Local Government (MHCLG), (2019); Indices of Multiple Deprivation. MHCLG.

Ref 4 Annual Population Survey (January 2019-December 2019). ONS

Ref 5 World Health Organisation (2010) Noise Factsheet

Ref 6 Hjortebjerg D et al (2015) Exposure to Road Traffic Noise and Behavioral Problems in 7-Year-Old Children: A Cohort Study in Environ Health Perspect. Feb 2016

Ref 7 Social Care Institute for Excellence (2011) Dementia Friendly Environments