



Awel y Môr Offshore Wind Farm

Equalities Impact Report

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Contents

1	Introduction.....	5
1.1	Background.....	5
1.2	Purpose of the EQIR.....	5
1.3	Project description.....	6
2	Legislation, policy and guidance	8
2.1	Key legislation	8
2.1.1	Planning Act 2008	8
2.1.2	Equality Act 2010.....	8
	The Equality Act and the Public Sector Duty	8
2.1.3	Well-being of Future Generations (Wales) Act 2015	10
2.2	Key policy	11
2.3	Guidance	11
3	Scope and methodology	12
3.1	Scope of the EQIR	12
3.2	Assessment approach	13
3.3	Key aspects of Awel y Môr for consideration	13
3.4	Relevant key equality effects	14
3.5	General measures to mitigate potential equality effects.....	20
3.5.1	Management plans.....	20
3.5.2	Skills and employment strategy	21
3.5.3	Community consultation.....	21
3.6	Limitations	23
4	Equalities Impact Statement.....	24
5	Conclusion	47
6	References	48

Tables

Table 1: Key Equality Effects Screening..... 15
Table 2: EQIR..... 24

1 Introduction

1.1 Background

- 1 Awel y Môr Offshore Wind Farm Limited (the Applicant) submitted an application for an Order granting development consent to the Secretary of State (SoS) for the Awel y Môr Offshore Wind Farm (AyM) on 20 April 2022.
- 2 AyM is located off the coast of North Wales and comprises both offshore infrastructure in the Irish Sea and onshore infrastructure within the administrative area of Denbighshire County Council (DCC).
- 3 This Equalities Impact Report (EQIR) has been produced during the examination phase of AyM, and is provided as part of the Applicant's submission at Deadline 3 in order to assist the Examining Authority in preparing a recommendation and Secretary of State in their decision making.

1.2 Purpose of the EQIR

- 4 The purpose of this EQIR is to identify and address equality issues that may arise as a result of AyM, with the purpose of:
 - ▲ Responding to a question from the Examining Authority (ExQ1.3.44), and
 - ▲ To assist the SoS in documenting active compliance with its legal duties under the Public Sector Equality Duty (PSED) (as set out in the Equalities Act 2010) during determination of the application for a Development Consent Order (DCO) in respect of AyM.
- 5 The First Written Questions by the Examining Authority (ExAQ1) included a question (ExQ1.3.44) on how AyM has had regard to the Equality Act 2010 in relation to the powers sought.
- 6 This EQIR has been produced in response to that question, to demonstrate that AyM has had regard to the requirements under the Equality Act 2010, and that there will be no differentiated or disproportionate impacts on groups with protected characteristics as a result of AyM.

- 7 This EQIR also sets out relevant effects of AyM and its delivery associated with AyM in order to assist the SoS in its consideration of the Public Sector Equality Duty (PSED) as set out in the Equalities Act 2010 (further information is provided in Section 2.1.3).

1.3 Project description

- 8 AyM is located off the coast of North Wales. It comprises up to 50 wind turbine generators and associated onshore and offshore infrastructure. The offshore elements of AyM will be located within Welsh inshore waters and the onshore infrastructure located within the administrative area of DCC.
- 9 AyM is a proposed sister project to the operational Gwynt y Môr Offshore Wind Farm (GyM). At its closest point AyM's array area will be located approximately 10.5 km off the North Wales coast. The offshore export cable corridor will be approximately 21 km in length. The onshore export cable corridor will be approximately 12 km in length running from the landfall (located between Rhyl and Prestatyn), and a grid connection point to the south of St Asaph Business Park.
- 10 Development consent is required to the extent that development is or forms part of a Nationally Significant Infrastructure Project (NSIP) pursuant to sections 14(1)(a) and 15(3B) of the 2008 Act. As AyM will have an overall capacity greater than 350 megawatts (MW) and is located in Welsh inshore waters, it is an NSIP for the purposes of the 2008 Act. It is for this reason that AyM falls within the remit of the Secretary of State.
- 11 The development also contains associated development under section 115 of the 2008 Act, including the infrastructure necessary to connect AyM to the National Grid. Further explanation on the approach to associated development is contained within the Explanatory Memorandum (REP1-017).
- 12 Details of the activities and infrastructure are fully set out in the Environmental Statement (ES) Volume 3, Chapter 1: Onshore Project Description (APP-062) and ES Volume 2, Chapter 1: Offshore Project Description (APP-047).

- 13 Typically, it is the onshore elements of a project that are considered in greater detail within an EQIR as it is onshore infrastructure and works that have greater potential to impact on people and/or groups that have protected characteristics. In summary, the onshore elements of AyM will comprise of:
- ▲ The construction of up to two transition joint bays at landfall connecting the offshore cables to the onshore cables
 - ▲ The installation of up to two underground onshore export cable circuits, which connect to:
 - ▲ The proposed onshore substation (OnSS) to the west of St Asaph Business Park (to allow the power to be transferred to the National Grid via the existing National Grid Bodelwyddan substation).
- 14 In addition, there will be a number of temporary construction compounds (TCCs) along the onshore export cable circuit for the duration of the preliminary and installation works.

2 Legislation, policy and guidance

2.1 Key legislation

2.1.1 Planning Act 2008

- 16 The Planning Act 2008 (PA 2008) is the primary legislation that established the legal framework for applying for, examining and determining applications for NSIPs in England and Wales. It sets out the consenting system for all NSIPs, taking account of the guidance in the National Policy Statements (NPSs).
- 17 The PA 2008 sets out thresholds above which certain types of development are classified as NSIPs and therefore require a DCO in England and Wales. For offshore energy developments in Welsh waters (including offshore wind), projects are classed as NSIPs if they have a generating capacity of over 350 megawatts (MW) under section 15(3B) of the PA 2008. AyM will exceed this generating capacity and therefore is classed as an NSIP.

2.1.2 Equality Act 2010

The Equality Act and the Public Sector Duty

- 18 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 person 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.
- 19 This EQIR uses the term 'protected characteristic groups' to refer to groups of people who share a particular protected characteristic. The Act (as it applies in Wales) does not specify socio-economic status as a protected characteristic.
- 20 The Act 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.
- 21 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.

- 22 To support the general duty, the Equality Act 2010 allows for the enactment of specific duties which authority to make secondary legislation is devolved to the Welsh Government. In Wales, the PSED and the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 contain express provisions about engagement (Regulation 5) and equality impact assessments (Regulation 8) which are not present in the English PSED. These provisions have accordingly been considered in this EQIR.
- 23 While the Applicant is not a public body and is not bound by the PSED requirements of the Equality Act 2010 and the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011, this EQIR has been undertaken to provide the SoS with relevant information to assist in their determination.

2.1.3 Well-being of Future Generations (Wales) Act 2015

- 24 The Well-being of Future Generations (Wales) Act 2015 seeks to improve the economic, social and cultural well-being of Wales. Under this Act, public bodies have a duty to carry out sustainable development, including the identification of well-being objectives and taking reasonable steps to meet them. Public bodies must work towards achieving the seven well-being goals identified under the Act and demonstrate progress towards them. The goals must include a shared culture with a thriving Welsh language. Public bodies must take the provisions of the Well-being of Future Generations (Wales) Act 2015 into account when making decisions.
- 25 The duty introduced by the Well-being of Future Generations (Wales) Act 2015 Act, to take steps to contribute to the achievement of the well-being goals, does not apply directly to the Applicant and AyM project as it is not a specified public body. However, by undertaking an EQIR there is consideration of how AyM would contribute towards the objectives of the Well-being of Future Generations (Wales) Act 2015 of being 'a more equal Wales', and 'a Wales of cohesive communities'.
- 26 Further detail on how the seven well-being goals are considered with regard to AyM are provided in a response to a question from the Examining Authority (ExQ1.18.1).

2.2 Key policy

27 Key policy documents that provide context to equality objectives nationally and within Wales include:

- ▲ National Policy Statements EN-1, EN-3 and EN-5;
- ▲ Future Wales – The National Plan 2040;
- ▲ Planning Policy Wales 2021;
- ▲ Strategic Equality Plan 2020-2024
- ▲ Getting on Together – a Community Cohesion Strategy for Wales (2009);
- ▲ Community Cohesion National Delivery Plan 2016-17; and
- ▲ The Strategy for Older People in Wales 2013-2023.

2.3 Guidance

28 There is a limited range of guidance available that is specific to the practical application of EQIR, and none of which is statutory guidance. 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: Wales;
- ▲ Government Equalities Office, Equality Act 2010: Public Sector Equality Duty What Do I Need To Know? A Quick Start Guide for Public Sector Organisations; and
- ▲ Assessing Impact and the Equality Duty: A Guide for listed public authorities in Wales.

3 Scope and methodology

3.1 Scope of the EQIR

- 29 The scope of the EQIR is to present the assessment of likely equality effects arising from a wide range of environmental impacts as identified within the AyM ES including, for example, noise, traffic and transport and socio-economic.
- 30 This EQIR considers the equality effects of AyM, based on the design, information and assessment provided within the AyM ES.
- 31 It is a predictive assessment, considering in advance of implementation the potential impacts arising from the construction and operation of AyM, and the likely or possible effects of these impacts for protected characteristic groups.
- 32 The EQIR draws on information reported in the ES, however, it does not use the same assessment process or significance criteria to judge equality effects. The 'test' the EQIR uses is whether or not there is potential for a differential or disproportionate effect on protected characteristic groups. The spatial scope of this EQIR is guided by the assessments reported in the ES, which vary depending on the assessment topic.
- 33 The EQIR considers potential equality effects arising during the construction phase (anticipated to start in 2026), the operational phase (fully operational and commissioned by 2030), and the decommissioning phase of AyM.
- 34 The EQIR assesses whether any of the significant effects identified in relevant ES assessments (refer to Section 4) could have disproportionate or differential effects on groups with protected characteristics.
- 35 In some instances, effects not reported as significant in the ES may still give rise to equality effects for people with needs or recognised sensitivities associated with their protected characteristic. These have also been considered in the assessment.

3.2 Assessment approach

- 36 The scope of this EQIR reflects the requirements of the PSED and draws on professional experience of the Applicant and a review of other EQIR's prepared for infrastructure projects.
- 37 The approach that has been taken for this EQIR has been to:
- ▲ Identify the key project aspects of AyM for consideration;
 - ▲ Screen the relevance of significant effects within the ES per topic, to determine whether it should be subject to the EQIR;
 - ▲ Identify other non-significant effects that may result in equality effects; and
 - ▲ Assess whether the effects are likely to have a differential or disproportional impact on groups of people on the grounds of their protected characteristics.
- 38 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 in a particular location.
- 39 For the purposes of this EQIR, disproportionality can arise in two main ways, either:
- ▲ Where an impact is predicted on a residential area or property and there is the potential for protected characteristic groups to make up a greater proportion of the affected resident population than their representation in the wider community (local authority (LA) district and/or county/region); or
 - ▲ Where an impact is predicted on a community resource that may be predominantly or heavily used by protected characteristic groups (e.g. primary schools attended by children; care homes catering for older people).
- 40 A differential equality effect is one that affects members of a protected characteristic group differently from the rest of the general population because of specific needs, or a recognised sensitivity associated with their protected characteristic.

3.3 Key aspects of Awel y Môr for consideration

- 41 The EQIR considers effects on protected characteristic groups during construction, operation and the decommissioning of AyM.

42 The following aspects of each of the phases being particularly relevant to the EQIR:

▲ Construction

- The use of land for construction that precludes its current use, 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;
- Mitigation, including air, noise and vibration control measures, visual screening and traffic management.

▲ Operation

- The presence of physical structures, 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.

▲ Decommissioning

- Decommissioning activities, including preparation works, construction traffic and heavy goods vehicles (HGVs), and employment generation (decommissioning activities will be very similar to construction activities).

3.4 Relevant key equality effects

43 To identify the relevant key equality effects, a screening process has been undertaken whereby the potential aspects of AyM (as detailed in Section 3.2) have been considered per ES topic and where there are effects that may specifically impact on people or groups of people, these have been drawn out. This has included a review of the ES, post-Application representations, and ExQ1s.

44 Topics where the effects do not have a pathway to impact on people and/or groups of people with a protected characteristic (i.e. purely ecological and physical topics) have not been included in the screening.

45 The screening has focussed on identifying where there are significant residual effects within the ES however, other non-significant effects have also been captured where there is the potential to impact on groups with protected characteristics. Where the topic does not present any significant residual effects and/or the effects are unlikely to impact on protected characteristic groups, these topics have been screened out and have not been taken forward into the assessment.

46 The outcome of a screening process is presented in Table 1.

Table 1: Key Equality Effects Screening.

ES TOPIC	KEY EFFECTS SCREENING
Commercial Fisheries	<ul style="list-style-type: none"> ➤ Potential impacts to fishing activities from reduced access; exclusion from fishing grounds, or disturbance to fish resources ➤ The ES did not identify any significant residual effects on potting, netting and dredging fleets during construction, operation or decommissioning of AyM. ➤ The residual effects are unlikely to impact specifically on protected characteristic groups. ➤ This topic is not considered further.
Shipping and Navigation	<ul style="list-style-type: none"> ➤ Collision risk and increased incident rates ➤ The ES did not identify any significant residual effects on shipping and navigation operations during the construction, operation or decommissioning of AyM. ➤ The residual effects are unlikely to impact specifically on protected characteristic groups. ➤ This topic is not considered further.
Seascape, Landscape and Visual Impact	<ul style="list-style-type: none"> ➤ Direct impacts on Seascape character include Moderate adverse (significant) in the eastern part of the North-east of Anglesey Seascape Character Area (SCA) 28in and around the AyM array area and southwards towards the Great Orme and Puffin Island. Impacts resulting from visibility of AyM within the seascape include Significant impacts identified for a number of viewpoint locations. ➤ However, landscape effects are on the landscape as a resource in its own right and are not an impact that is experienced by people.

ES TOPIC	KEY EFFECTS SCREENING
	<ul style="list-style-type: none"> ▲ An assessment on people's views, visual amenity and night-time effects was also carried out and significant visual effects are contained within the areas of Isle of Anglesey, Gwynedd, Snowdonia National Park (SNP), and Conwy. ▲ Landscape and seascape effects are not considered further. Likely visual effects are assessed further in the EQIR in Section 4.
Offshore Archaeology and Cultural Heritage	<ul style="list-style-type: none"> ▲ Significant effects from direct and indirect impacts to known and unknown archaeological receptors as a result of construction, operation and decommissioning activities. ▲ Although there is the potential for a significant effect on the setting of a heritage asset, there will be no disproportionate equality effect for any of the protected characteristic groups, therefore, this topic is not considered further.
Other Marine Users and Activities	<ul style="list-style-type: none"> ▲ No significant effects on recreational users during construction, operation or decommissioning. ▲ The residual effects are unlikely to impact specifically on protected characteristic groups. ▲ This topic is not considered further
Landscape and Visual Impact	<ul style="list-style-type: none"> ▲ Significant landscape character effects are likely from the OnSS during operation however, landscape effects are on the landscape as a resource in its own right and are not an impact that is experienced by people ▲ Significant visual effects from the construction of the cable route and land fall during construction. ▲ Significant visual effects are predicted to occur for a number of visual receptors, including several properties, as a result of the cable and landfall construction works. Operational effects are also predicted for visual receptors in the first year of operation of the substation, with long term effects predicted for users of the bridlepath near Faenol-Bropor. ▲ Landscape effects are not considered further. Likely visual effects are assessed further in the EQIR in Section 4.

ES TOPIC	KEY EFFECTS SCREENING
Socio-Economics	<ul style="list-style-type: none"> ▲ During construction, operation and decommissioning there is likely to be a minor beneficial effect on employment, the local and regional economy. ▲ No significant effects have been identified during construction on Community Facilities Local Area of influence (LAI) and Healthcare Services Local Study Area (LSA). ▲ Although the socio-economic status of people is not a protected characteristic group, there is still the potential for socio-economic effects to impact on people. This topic is assessed further in EQIR Section 4.
Tourism and Recreation	<ul style="list-style-type: none"> ▲ During construction and operation there will be short term moderate adverse effects for Great Orme and Llandudno from an impact on volume and value of the tourism economy of up to 2 years. ▲ Minor adverse effects (not significant) on all onshore and offshore recreation receptors during construction including public rights of way (PRoW), bridleways and cycleways. ▲ Generally negligible/ minor adverse (not significant), increasing to moderate adverse (temporarily significant) on local (i.e. affected) onshore recreation receptors if repairs are needed during operation on onshore infrastructure. ▲ Minor adverse effect for Mostyn, Rhyl, Conwy, Port Penrhyn and Holyhead from displacement of tourism visitors during construction. ▲ This topic is assessed further in EQIR Section 4.
Ground Conditions and Land Use	<ul style="list-style-type: none"> ▲ No significant residual effects are identified for Ground Conditions and Land Use. ▲ The residual effects are unlikely to impact specifically on protected characteristic groups. ▲ This topic is not considered further.
Hydrology, Hydrogeology and Flood Risk	<ul style="list-style-type: none"> ▲ No significant residual effects are identified for hydrology, hydrogeology and flood risk. ▲ The residual effects are unlikely to impact specifically on protected characteristic groups. ▲ This topic is not considered further.

ES TOPIC	KEY EFFECTS SCREENING
Onshore Archaeology and Cultural Heritage	<ul style="list-style-type: none"> ▲ There is likely to be a moderate adverse (significant) indirect effect on the setting of Llandudno Pier. ▲ The residual effects are unlikely to impact on protected characteristic groups. ▲ Although there is the potential for a significant effect on the setting of a heritage asset, there will be no disproportionate equality effect for any of the protected characteristic groups, therefore, this topic is not considered further.
Traffic and Transport	<ul style="list-style-type: none"> ▲ No significant residual effects are identified for Traffic and Transport. ▲ Minor adverse residual effects are identified for community severance; vulnerable road users and road safety; dust and dirt; users of Active Travel Routes (ATRs) and PRowWs during construction only. ▲ This topic is assessed further in EQIR Section 4.
Noise and Vibration	<ul style="list-style-type: none"> ▲ No significant residual effects are identified for Airborne Noise and Vibration following the implementation of mitigation measures. ▲ Minor adverse residual effects are identified on noise sensitive receptors for construction activities and operational activities (onshore and offshore), including but not limited to landfall construction, HDD drilling, excavation, construction of the array. ▲ Minor adverse residual effects are identified from the operation of the OnSS on residential and commercial receptors. ▲ This topic is assessed further in EQIR Section 4.
Air Quality	<ul style="list-style-type: none"> ▲ No significant residual effects are identified for Air Quality ▲ In relation to human receptors, maximum developmental flows generated by all potential scenarios are not projected to exceed the IAQM & EPUK screening criteria (EPUK & IAQM, 2017). As such, impacts on human receptors are not considered to be significant.

ES TOPIC	KEY EFFECTS SCREENING
	<ul style="list-style-type: none"> ▲ Although there are negligible impacts predicted, because of the potential to impact protected characteristic groups disproportionately Air Quality has been included in the EQIR in Section 4.
Public Health	<ul style="list-style-type: none"> ▲ No significant residual effects are identified for Public Health. ▲ The Public Health assessed the potential for effects to human health caused by air quality, water quality, soil contamination, noise emissions, vibration, disruption to local road, and electromagnetic radiation. All but electromagnetic radiation effects are considered in the individual topic ES assessments and the screening assessments in this table, therefore only electromagnetic radiation is taken forward under Public Health in Section 4 of the EQIR. ▲ The Public Health assessment considers potential electromagnetic radiation effects only in EQIR Section 4.

47 On the basis of the findings of the ES submitted with the DCO application it is anticipated that potential equality effects will be captured under the following topics, which are then carried forward for assessment:

- ▲ Seascape, Landscape and Visual Impact;
- ▲ Landscape and Visual Impact;
- ▲ Socio-Economics;
- ▲ Tourism and Recreation;
- ▲ Traffic and Transport;
- ▲ Noise and Vibration;
- ▲ Air Quality; and
- ▲ Public Health.

48 In order to assess whether the effects have the potential to impact on a protected characteristic group, impacts to the following receptors have been considered:

- ▲ Residential properties;
- ▲ Schools and educational facilities;
- ▲ Places to practice religion or belief;

- ▲ Community centres;
- ▲ Health and social care centres;
- ▲ Recreational facilities, including PRow;
- ▲ Open spaces and play spaces;
- ▲ Other community facilities; and
- ▲ Business and employment.

3.5 General measures to mitigate potential equality effects

3.5.1 Management plans

49 A range of general measures have been put in place, which will serve to reduce potential negative equality effects and support the delivery of potential positive equality effects of AyM during construction and operation. These are presented throughout the ES and most notably captured in outline management plans provided as appendices to the Outline Code of Construction Practice (CoCP). These outline plans will be updated by the Applicant to final versions of each document and will be submitted to DCC for approval under a requirement of the DCO before construction commences. The relevant outline plans to the EQIR are:

- ▲ Outline Construction Method Statement(s) (oCMS) (REP2-018)
- ▲ Outline Traffic Management Plan (oTMP) (REP2-039)
- ▲ Outline Air Quality Management Plan (oAQMP) (REP2-031)
- ▲ Outline Noise and Vibration Management Plan (oNVMP) (REP2-020)
- ▲ Outline Soil Management Plan (oSMP) (REP2-033)
- ▲ Outline Pollution Prevention and Emergency Incident Response Plan (oPPEIRP) (REP2-037)
- ▲ Outline Site Waste Management Plan (oSWMP) (REP2-035)
- ▲ Outline Construction Traffic Management Plan (oCTMP) (REP2-039)
- ▲ Outline Public Access Management Plan (oPAMP) (REP2-041)
- ▲ Outline Landscape and Ecology Management Plan (oLEMP) (REP2-010)
- ▲ Outline Construction Communications Plan (oCCP) (REP2-049)
- ▲ Outline Travel Plan (TP) (APP-321)

3.5.2 Skills and employment strategy

- 50 The Applicant has a long history of investment within the region, including through project community benefit funds. RWE has a history of local training and has sought to upskill the future generation through the creation of its Wind Turbine Apprenticeship programme at Grŵp Llandrillo Menai. The course has trained 30 new apprentices producing high-quality technicians who are primarily deployed on offshore and onshore wind farms, both locally (North Wales) and across the United Kingdom (UK).
- 51 As confirmed within the response to ExQ1.18.11, the Applicant is currently preparing an outline Skills and Employment Strategy, with a full strategy to be developed with the local authorities to embed the commitments to local training and development opportunities.
- 52 The Applicant is currently engaging with relevant Interested Parties and other bodies on the content of the outline Skills and Employment Strategy and will submit the outline strategy into the DCO examination once suitably advanced. The final Strategy will be approved by the relevant Local Planning Authority (LPA) (DCC) in accordance with the outline Skills and Employment Strategy.
- 53 In addition to the employment and training opportunities outlined above, the AyM project is undertaking community consultation with a view to providing a community benefit fund that, whilst likely to be different in nature and not associated with the planning process, will offer the opportunity for the community to continue to benefit. Opportunities to maximise local socio-economic benefits will be presented in more detail post-consent. The Supply Chain Plan (required under the Contracts for Difference (CfD) supply chain process that must be approved by the SoS) will consider the skills and training requirements of AyM, supporting the Act's goal of a more equal Wales which enables people to fulfil their potential, through a legacy of skills and training benefits.

3.5.3 Community consultation

- 54 Stakeholder engagement and public consultation have been an integral and ongoing part of the process of designing and assessing AyM.

- 55 Pre-application consultation is a legal obligation for NSIP's, and RWE believes in early engagement with stakeholders on all of its projects. Consultation has been undertaken with people living in the vicinity of the land and who may be affected by AyM. In order to identify the best means of consulting effectively, the project team has developed a Statement of Community Consultation (SoCC) in discussion with Denbighshire County Council. Although not a statutory requirement, discussions on the draft SoCC were extended to include the coastal authorities (Flintshire County Council, Conwy County Borough Council, Isle of Anglesey County Council and Gwynedd Council), plus Snowdonia National Park Authority (as the largest national park authority in Wales within sight of the Project) and Wrexham County Borough Council (as North Wales' largest city).
- 56 During construction an identified member of the Applicant's project team will be responsible for communication with local residents, businesses, local councils and highways authorities.
- 57 A Local Liaison Committee will be established comprising representatives of the local community, the selection of which will be undertaken in consultation with DCC, and AyM team. Regular meetings will discuss coming activity and arrange appropriate means and timescales to communicate information to the wider community.
- 58 Drop-in sessions will be arranged ahead of construction activity to keep local communities and businesses informed of activity. These will be repeated at intervals if required. There will be an information line with a single point of contact and similarly the Applicant will have an email address for single point of contact. Both the telephone number and email address will be widely communicated on newsletters, press releases and signs along the cable route both ahead of and throughout construction activity.
- 59 These measures will ensure that there is ongoing liaison with statutory and non-statutory consultees, stakeholders and the general public.
- 60 A hotline will be made available to members of the public. The hotline number will be published using appropriate channels for the area, so that the general public can voice their queries or complaints.

3.6 Limitations

- 61 This EQIR reports on potential differential and disproportionate equality effects that may arise as a result of the construction, operation and decommissioning of AyM. Environmental effects referred to in this report are drawn from the ES, and further information can be found within the relevant topic chapters of Volume 2 and 3 of the ES.
- 62 The identification of potential key equality effects is targeted at those that are relevant to protected characteristic groups. The assessment has considered the effects on receptors that may potentially be used by protected characteristic groups.
- 63 It is recognised that such a list can never be exhaustive and that stakeholders may have a different perception of an impact and effect from that characterised in an ES.
- 64 The production of this EQIR has had consideration of matters that have been raised by interested parties through pre-application process – these have been considered in the Consultation Report submitted with the application (APP-025) 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 (REP1-001).

4 Equalities Impact Statement

65 Table 2 provides the assessment of effects on potential protected characteristic groups, signposting to relevant documents from the AyM DCO application which provide the basis for the judgements reached.

Table 2: EQIR.

EFFECTS	ASSESSMENT AND APPLICATION REFERENCES
Seascape, Landscape and Visual Impact	
Visual effect of AyM on selected viewpoints and receptors	<p>Visual effects have the potential to affect residents who have particular needs or sensitivities to change in the visual environment. Volume 2, Chapter 10: Seascape, Landscape and Visual Impact Assessment (AS-027) has considered the potential effects that the offshore elements of AyM may have on the seascape, landscape and visual resource within the offshore areas.</p> <p>The visual amenity of the study area was surveyed including both static and sequential views, from receptors representative of the range of views and viewer types likely to experience the offshore elements of AyM. Receptor types include settlement; main transport routes; main visitor locations; areas of cultural significance and a range of landscape character areas within the study area.</p> <p>The site selection process and project design, including the reduction of the number of turbines and the array area, has sought to reduce the visual impacts on receptors.</p>

EFFECTS	ASSESSMENT AND APPLICATION REFERENCES
	<p>Significant visual effects are contained within the areas of Isle of Anglesey (IoA), Gwynedd, Snowdonia National Park, and Conwy. Significant night-time effects are also likely within the IoA AONB in the vicinity of the coastal locations around Point Lynas (Viewpoint 2; Moelfe Headland (Viewpoint 4); The beach and parking areas around Traeth Lligwy to the north-east of Rhôs Lligwy; Traeth Bychan and Penrhyn; Red Wharf Bay (Viewpoint 5); Penmon Point (Viewpoint 7); and Trwyn y Pnrhyn parking (Viewpoint 28). In addition, there may be significant, adverse, long term, reversible night-time effects in Conwy from the summit and north-eastern parts of the Great Orme.</p> <p>Although significant effects are expected, the visual effects on people within these areas and/or using the viewpoints is not considered to be disproportionate or differential to protected characteristic groups.</p>
Landscape and Visual Impact	
Visual effects from onshore ECC and landfall	<p>ES Volume 3, Chapter 2: Landscape and Visual Impact Assessment (LVIA) (AS-029) has considered the potential effects that the onshore elements of AyM may have on the the visual amenity of its receptors.</p> <p>The AyM site selection process considered constraints relating to physical landscape elements (such as woodlands, trees and hedgerows), landscape character and visual amenity, together with other environmental and technical constraints. The sensitivity of the surrounding landscape and of residents, road-users, workers and recreational users of the landscape was also a key consideration.</p>

EFFECTS	ASSESSMENT AND APPLICATION REFERENCES
	<p>The onshore elements of AyM will give rise to significant construction effects. For the onshore cable route these significant construction effects are limited to localised areas within close proximity of receptors or as a result of the physical disruption caused by the construction activities or vegetation removal.</p> <p>Significant visual effects as a result of the construction activities associated with the cable route and landfall are found on localised sections of the B5381, Glascoed Road, the Wales Coast Path, the bridlepath immediately north of the OnSS (PRoW 201/9) and the PRoW south of Rhyl (PRoW 206/18, 206/44 and 206/20).</p> <p>Significant visual effects are also found for properties at Cwybr Bach, Plas Lorna, Cwybr Fawr and Faenol Bropor.</p> <p>Viewpoints 1 (Bridlepath nr Faenol-Bropor), 3 (Glascoed Road) and 5 (Minor Road nr Groesfford) are also found to have significant visual effects during construction from cable route construction activities.</p> <p>Mitigation opportunities during the construction phase of works will be limited and primarily relate to the restrictions imposed on the working areas and measures identified in the CoCP however, the LVIA has assessed that there would be no residual significant effects to the landscape and visual resource as a result of the onshore ECC.</p> <p>Care home Plas Lorna has been identified as potentially having a group of people with protected characteristics. The care home will experience significant temporary visual effects as a result of the construction of the ECC. Construction works and equipment will</p>

EFFECTS	ASSESSMENT AND APPLICATION REFERENCES
	<p>be visible. This may give rise to differential effects for residents with autism or learning difficulties, who may be more likely to be sensitive to changes in the visual environment.</p> <p>The LVIA identifies Plas Lorna's status as a care home and assigns a medium to high sensitivity. The trenchless crossing compound for the A525 cable crossing would be located to the north of Plas Lorna. Due to the planting and fencing along the northern boundary of the property, views of the trenchless crossing compound are restricted. However, the property would have clear views towards the TCC to the south. Taking this into account the magnitude of change for Plas Lorna during construction is considered to be high resulting in a major and significant effect that would be adverse, short term and reversible. As such, an effect at the upper level of severity is identified within the ES.</p> <p>The outline Construction Communications Plan (oCCP) (REP2-049) sets out how the Applicant will undertake early communications with businesses, including Plas Lorna, to let sensitive receptors know that works will be taking place, when, where and for how long as well as any impact the works will have. Early communication will seek to minimise any potential disruptive impacts from construction of AyM, for example by keeping staff informed of forthcoming activity so they are aware when impacts may occur. In addition, the Applicant has provided an outline Noise and Vibration Management Plan (oNVMP) (REP2-020) that includes measures to mitigate construction impacts that include acoustic screens that would also reduce the visibility of construction works areas.</p> <p>With the application of the mitigation and the management plans detailed above (including management plans during construction and ongoing communication), it is</p>

EFFECTS	ASSESSMENT AND APPLICATION REFERENCES
	<p>anticipated that there will be no disproportionate or differential impacts on protected characteristic groups.</p>
<p>Visual effects from OnSS</p>	<p>Volume 3, Chapter 2: Landscape and Visual Impact Assessment (LVIA) (AS-029) has considered the potential construction and operational effects that the OnSS may have on the existing landscape resource of the onshore LVIA study area and the visual amenity of its receptors.</p> <p>The proposed OnSS may intrude into existing views experienced by receptors within the onshore LVIA study area, changing their view. Substantial tree vegetation and existing built development in the closely surrounding landscape restrict and limit the degree to which the OnSS is visible.</p> <p>For the onshore OnSS the significant construction effects tend to occur for receptors at close proximity although significant visual effects have been found at distances of up to 1 km from the settled elevated ridgeline to the south of the OnSS site.</p> <p>Viewpoints 1 (Bridlepath nr Faenol-Bropor), 3 (Glascoed Road) and 5 (Minor Road nr Groesfford), as well as from the Denbighshire Memorial Park and Crematorium, are found to have significant visual effects during construction as a result of the OnSS construction activities.</p> <p>Significant visual effects are also found during operation in year 1 once construction activity is completed, for viewpoints 1, 3, 5 and from the Denbighshire Memorial Park and Crematorium (visual effects would be significant for both road user and residential receptors at viewpoint 3). In year 15 once mitigation planting has matured, residual</p>

EFFECTS	ASSESSMENT AND APPLICATION REFERENCES
	<p>significant effects are limited to the recreational receptors at viewpoint 1. This is largely due to the close proximity of these receptors, and the limited opportunities for planting mitigation in areas occupied by the Onshore ECC itself.</p> <p>Whilst the onshore elements of AyM will give rise to significant residual visual effects as a result of the proposed onshore OnSS, this has been mitigated through the siting of the OnSS and the planting proposed within the oLEMP. Additionally, in the short-term during construction, the oCCP (REP2-049) includes provisions to let sensitive receptors know that works will be taking place, when, where and for how long as well as any impact the works will have.</p> <p>It is anticipated that with the employment of the oLEMP and oCCP and there are unlikely to be differential or disproportionate impacts to protected characteristic groups.</p>
Visual effects during decommissioning	<p>Volume 3, Chapter 2: Landscape and Visual Impact Assessment (LVIA) (AS-029) states that no decision has been made regarding the final decommissioning policy for the onshore cables, as it is recognised that industry best practice, rules and legislation change over time. It is likely the onshore cables would be pulled through the ducts and removed, with the ducts themselves left in situ in order to minimise further ground disturbance.</p> <p>Whilst details regarding the decommissioning of the OnSS are currently unknown, considering the worst-case assumption (which would be the removal and reinstatement of the current land use at the OnSS site) it is anticipated that the impacts would be similar to or less than those assessed during construction. The difference at the decommissioning</p>

EFFECTS	ASSESSMENT AND APPLICATION REFERENCES
	<p>phase would be that mitigation planting would have matured over the operational life of the onshore elements of AyM and would therefore screen the decommissioning works from many of the surrounding landscape and visual receptors.</p> <p>It is anticipated that with appropriate mitigation (to be determined at the time of decommissioning) there are unlikely to be predicted differential or disproportionate impact to protected characteristic groups, due to the temporary nature of the activities.</p>
Socio-Economics	
<p>Direct and indirect employment effects</p>	<p>The socio-economics assessment (AS-034) shows that the installation and commissioning related to AyM has potential to support 150 full-time equivalent (FTE) jobs per annum. Of these 30 FTE jobs will be related to onshore installation and commissioning, and the rest (i.e. 120 FTE jobs) involved in offshore construction. A further 210 FTE jobs are likely to be required to support offshore construction, and which are likely to be held by non-UK based workers. It is assumed that onshore construction will take up to five years from start to finish.</p> <p>The Applicant will produce an Outline Employment and Skills plan, which will be drafted to be inclusive of protected characteristic groups, including the design of any agreed skills programmed or employment initiatives. This would enable engagement and therefore participation in any socio-economic benefits resulting from AyM. The Skills and Employment Plan will be drafted in consultation with Denbighshire Council.</p> <p>With this Strategy in place, there are no predicted negative differential or disproportionate impact to protected characteristic groups. There is the potential for</p>

EFFECTS	ASSESSMENT AND APPLICATION REFERENCES
	positive/beneficial impacts to protected characteristic groups through the development of the Skills and Employment Strategy.
Increased demand on healthcare services	<p>An assessment of the increased demand on healthcare services is provided in the socio-economics assessment (AS-034). This assessment concludes that the increase in demand of healthcare services (nominally GP) will not tip the number of registered patients per GP to over the recommended benchmark (of 1,800 patients per GP).</p> <p>As per common (and best) practice, the Applicant will seek to implement the highest levels of health and safety for the duration of construction, operations and decommissioning phases of AyM. This will seek to reduce the risk of accidents occurring in the first place. Where accidents happen, individuals trained in dealing with emergencies will be present and/ or brought onsite to reduce the overall impact on emergency health services.</p> <p>As the recommended benchmark is not surpassed, it is expected that there will be no predicted differential or disproportionate impact to protected characteristic groups due to increases in demand on healthcare services.</p>
Disruption to community facilities within the Local Area of Influence (LAI)	The site selection process (as presented in ES Volume 1, Chapter 4: Site Selection and Alternatives (APP-044)) provides the methodology for the identification of the Landfall Area of Search, the onshore cable and substation zone. 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.

EFFECTS	ASSESSMENT AND APPLICATION REFERENCES
	<p>The socio-economic baseline analysis (ES Volume 3, Chapter 3: Socio-economics (AS-034)) has identified 10 community facilities located within a 500 m buffer from the AyM Order Limits (OL) (defined as the Local Area of Influence (LAI)), which includes six churches, two education facilities, three health facilities and two leisure facilities.</p> <p>No significant effects were identified on these community receptors. Any effect on community facilities sustained during AyM's development and construction phase is direct and temporary in nature.</p> <p>Therefore, no predicted differential or disproportionate impact to protected characteristic groups is predicted as a result of impacts on community facilities and services.</p>
<p>Tourism and Recreation</p>	
<p>Impact on the volume and value of the tourism economy</p>	<p>ES Volume 3, Chapter 4: Tourism and Recreation (APP-065) includes an assessment of effects to the volume and value of the tourism economy. Receptors that have been identified as being sensitive to changes in the tourism economy at the local level include:</p> <ul style="list-style-type: none"> ▲ Rhyl, Prestatyn, Kinnel Bay and Abergele ▲ Abergele to Rhos-on-Sea, and ▲ Great Orme and Llandudno

EFFECTS	ASSESSMENT AND APPLICATION REFERENCES
	<p>During construction and operation there are predicted to be minor adverse effects that are not significant in EIA terms upon Rhyl, Prestatyn, Kinmel Bay, Abergele and the area Abergele to Rhos-on-Sea.</p> <p>During operation, the AyM WTGs will be visible from both the Great Orme and along the Llandudno waterfront, adding WTGs to the area's current seascape rather than changing it. Whilst the majority of the body of evidence suggests that offshore wind farms do not impact recreational users and tourists, the scale and proximity of AyM to Llandudno, suggests that for a short period of time (up to 2 years) at the end of construction and the start of operation there is the risk that some holiday and day visitors being discouraged from visiting.</p> <p>Overall, it is not anticipated that the addition of AyM on the local horizon will impact on overall visitor numbers, but due to some potential for change in the mix of visitors in the short term (up to two years) there is predicted to be a moderate adverse effects for Great Orme and Llandudno. In the longer term, as the sector and market adapt, the impact is expected to reduce to minor adverse (not significant).</p> <p>The likely impact on the volume and value of the tourism (due to the moderate adverse effects for Great Orme and Llandudno) is unlikely to negatively effect protected characteristic groups in differential or disproportionate way in comparison to the rest of the general population.</p>

EFFECTS	ASSESSMENT AND APPLICATION REFERENCES
<p>Disruption to onshore and offshore recreation receptors</p>	<p>ES Volume 3, Chapter 4: Tourism and Recreation (APP-065) includes an assessment of effects to onshore and offshore recreational sensitive receptors. This assessment considers the users of each of the resources identified in the baseline analysis.</p> <p>General and specific mitigation measures are provided in Section 4.9 of the chapter (APP-065) and include consideration of recreational receptors in the site selection process; development of a Public Access Management Plan (PAMP) that would form part of the CoCP; trenchless crossing techniques at landfall and under the River Clwyd; construction traffic management plan; rolling construction and management measures such as fencing and signage. For offshore effects measures include notice to mariners; safety zones, diver safety measures; and minimal inspection and maintenance operations where possible.</p> <p>The significance of effect on the onshore receptors from construction activities (which include Ffrith Beach; Ffrith Park; paths and footpaths; bridleways; cycleways; and parks) is concluded to be minor adverse (not significant) for each receptor. It is assumed that the effect of construction activity of AyM is direct and temporary in nature (up to ten months) during construction works on Ffrith Beach.</p> <p>During the operational phase, if repairs are required, the significance of the residual effect at the area impacted can rise to moderate adverse significance. In this case, the impact on the affected onshore receptors has potential to be of Significance in EIA terms (but only for receptors with a high sensitivity (i.e. NCN5, Wales Coast Path, Bruton Park, Footpath 206/30 & 206/29, NCN84 and parts of the North Wales Path). In such cases, the overall nature of the impact will be localised (to the area of repair),</p>

EFFECTS	ASSESSMENT AND APPLICATION REFERENCES
	<p>temporary and short-term as it would be limited to no more than a few months until the necessary repairs have taken place.</p> <p>The significance of effect on the offshore receptors from construction activities (which include bathing; water sports; scuba diving; and recreational sailing) is concluded to be minor adverse (not significant) for each receptor. The assessment of construction activity on AyM is not anticipated to have any significant residual effects on offshore recreation receptors. It is assumed that the effect of construction activity of AyM is direct and temporary in nature. Negligible effects are expected on offshore receptors during the operational phase of AyM.</p> <p>With the implementation of mitigation and management measures (as highlighted above) and in consideration of the temporary nature of the majority of minor adverse (not significant) effects during construction and operation, it is unlikely that there will be differential and/or disproportionate impacts on protected characteristic groups.</p>
Impacts to tourism and visitor attractions	<p>ES Volume 3, Chapter 4: Tourism and Recreation (APP-065) includes an assessment of effects to onshore and offshore tourism and visitor attractions that have been identified within 500 m of the OL. Minor adverse (not significant) effects are likely from construction activities for North Wales Bowls Centre; Pirate Island Golf at Lyons Robin Hood Park; Rhuddlan Castle; and Rhuddlan Golf Club. Negligible effects are predicted for all other receptors.</p> <p>Of note is the Pirate Island Golf at Lyons Robin Hood Park which is located within AyM's OL, however, cables will be installed beneath the caravan park using trenchless</p>

EFFECTS	ASSESSMENT AND APPLICATION REFERENCES
	<p>installation techniques. The potential for impacts related to noise and vibration, increased traffic and the visual landscape have been identified. However, the use of trenchless installation techniques will remove any direct impacts of construction activity</p> <p>General and specific mitigation measures are provided within Section 4.9 of the chapter (APP-065) and include a number of outline management plans under the CoCP which which will mitigate potential impacts during construction to the public, including tourist visitors.</p> <p>Given that the onshore infrastructure is being designed to require no repairs, the operational phase of AyM is therefore anticipated to have a residual effect of up to minor adverse on visitor receptors, which is not significant in EIA term. It is therefore unlikely that there will be differential and/or disproportionate impacts on protected characteristic groups.</p>
<p>Landfall - partial, temporary obstruction of beach</p>	<p>Impacts on recreation and public rights of way including access to Ffrith beach are considered in ES Volume 3, Chapter 4: Tourism and Recreation (APP-065).</p> <p>Up to 3 export cable ducts will be installed underneath Ffrith beach using trenchless installation techniques, most likely Horizontal Directional Drilling (HDD), with separate exit pits required for each trenchless installation crossing. During construction, the trenchless installation exit pit area will be cordoned off to accommodate up to 3 working areas, each 75 m x 10 m. The trenchless installation and duct installation works will require up to 10 months on-site works. Access to the landfall area (beach) will require a maximum 22 HGV two-way vehicle movements per day.</p>

EFFECTS	ASSESSMENT AND APPLICATION REFERENCES
	<p>During the works at Landfall, public access will be maintained on the beach, wherever possible, (outside of the two 150 m x w100 m works areas) with suitable means made available for the public to pass around the works area.</p> <p>A final Public Access Management Plan (PAMP) will include measures to minimise adverse effects on users of the beach and promenade and will be prepared based on the outline PAMP (REP2-037) and in consultation with DCC. The final PAMP will be approved by DCC prior to construction commencing.</p> <p>There is no other area along the OL where there will be a closure of community accessible land.</p> <p>Therefore, no differential or disproportionate impact on a protected characteristic group is predicted as a result of impacts on the beach (community accessible land).</p>
<p>Interruption of PRow for vehicle movements</p> <p>Temporary closure and/or diversion of PRow</p>	<p>Impacts on recreation and public rights of way including are considered in ES Volume 3, Chapter 4: Tourism and Recreation (APP-065) and ES Volume 3, Chapter 9: Traffic and Transport (APP-070).</p> <p>As a worst case, individual PRow may need to be temporarily diverted for generally no more than four months during cable duct installation across the path, however, it may be up to 18-months before the original (or better) conditions are reinstated and the path fully restored. There will be no permanent diversions of PRow and ATRs. Temporary restrictions have been tabled in the outline Public Access Management Plan (PAMP)(REP2-037) which includes further measures to manage and mitigate the impacts to PRow and ATRs. Diversions will be as close as practical to the original route and will</p>

EFFECTS	ASSESSMENT AND APPLICATION REFERENCES
	<p>not materially increase the length of any journey and will be determined and agreed with DCC during construction.</p> <p>Due to the temporary nature of the effects and with the proposed management measures in place (most notably the PAMP), there is no predicted differential or disproportionate impact to protected characteristic groups.</p>
<p>Presence of construction activities and workforce and displacement of tourism</p>	<p>There is potential for some temporary relocation of workers during the construction period, which creates demand for local accommodation and which may lead to competition for accommodation with tourist visitors. The number of workers required to support onshore construction activity is generated as part of the socioeconomics assessment (ES Volume 3, Chapter 3: Socio-Economics).</p> <p>The Tourism and Recreation assessment (Volume 3, Chapter 4: Tourism and Recreation (AS-034)) includes an assessment of the construction and decommissioning on the displacement of visitor tourists locally. Minor adverse (not significant) effects were identified for all locations considered by the assessment (Mostyn, Rhyl, Conwy, Port Penrhyn and Holyhead) and it is assumed that the effect of construction activity of AyM is direct and temporary in nature.</p> <p>There is no predicted differential or disproportionate impact to protected characteristic groups that may be displaced as a result of the presence of construction activities and workforce.</p>

Traffic and Transport

EFFECTS	ASSESSMENT AND APPLICATION REFERENCES
<p>Community severance during construction due to road closures</p>	<p>Road closures have the potential to impact on protected characteristic groups where routes to community, health, subsistence and economic facilities are blocked or a diversion creates a considerable delay. ES Volume 3, Chapter 9: Traffic and Transport (APP-070) presents an assessment of the likely road closures required during construction.</p> <p>Open trenching will be used for installing the cable under some public roads, which could require either a temporary lane closure or a full temporary road closure whilst these works are undertaken. Where feasible, for the road crossings where the open trenching method is to be used, the roads are to remain open at all times to minimise disruption.</p> <p>There are no planned permanent changes to public road or pedestrian networks at this stage. For roads where it is not possible to keep one lane open in order to maintain a safe separation between the construction works and travelling public, there will be a requirement for a temporary closure to through traffic. Any planned temporary closures will be communicated at the earliest opportunity, as set out in the communication strategy in the Outline CoCP and agreed with DCC via approval of the final CTMP.</p> <p>Mitigation for closure of roads is also secured in the oCTMP (REP2-039) and the oPAMP (REP2-037) which will ensure any potential impacts of vulnerable road users and road safety would be considered fully. The final CTMP will be agreed in consultation with DCC.</p> <p>The final design of any temporary road closure would be developed by the appointed contractor and agreed with DCC as the local highway authority.</p>

EFFECTS	ASSESSMENT AND APPLICATION REFERENCES
	<p>Due to the temporary nature of the effects and with the proposed management measures in place, there is no predicted differential or disproportionate impact to protected characteristic groups.</p>
<p>Vulnerable road users and road safety</p>	<p>The assessment within the ES includes consideration of vulnerable road users and road safety in line with Institute of Environmental Management and Assessment (IEMA), Guidelines for Environmental Assessment of Road Traffic (GEART), 1993.</p> <p>The change in traffic flow of between 0.9% and 3.1% (as set out in paragraph 181 of ES Volume 3, Chapter 9: Traffic and Transport (APP-070)) is considered to represent a negligible adverse magnitude of impact for the B5119 and Bodelwyddan Road that both have high sensitivity. The resulting adverse effect on vulnerable road users i.e. walkers, cyclists and horse-riders (WCH) and road safety on these highway links would be minor in significance which is not significant in terms of the EIA Regulations.</p> <p>Mitigation including general road safety measures are also presented in the oCTMP (REP2-039) and Appendix 7 of the oCoCP (REP2-051), which will ensure any potential impacts of vulnerable road users and road safety would be considered fully. The final CTMP will be agreed in consultation with DCC.</p> <p>On this basis, there is no predicted differential or disproportionate impact predicted on protected characteristic groups.</p>
<p>Dust and dirt</p>	<p>The effect of dust and dirt during construction on protected characteristic groups is captured within the Air Quality assessment within this table.</p>

EFFECTS	ASSESSMENT AND APPLICATION REFERENCES
Users of ATRs and PRoWs	The effect of impacts to ATRs and PRoWs during construction on protected characteristic groups is captured within the Tourism and Recreation assessment within this table.
Noise and Vibration	
Noise and vibration effects from onshore construction activities	<p>The assessment of noise effects on noise sensitive receptors (NSR) is provided in ES Volume 3, Chapter 10: Noise and Vibration (APP-071) has concluded that with the implementation of relevant mitigation measures, minor adverse (not significant) noise and vibration effects will arise from AyM during onshore construction activities (including HDD drilling and pilling) from the landfall, ECC, ORAR and OnSS construction.</p> <p>Routing of the onshore cable route and locations of the TCCs and OnSS have been selected to avoid key areas of sensitivity.</p> <p>Measures to minimise noise impacts (including the provision of temporary hoarding/fencing) have also been identified within the oNVMP (REP2-020) that forms part of the overall CoCP and which will be applied across AyM.</p> <p>Approval of the final NVMP by DCC is secured as a requirement of the DCO. The outline version of the NVMP (REP2-020) sets out the principles to be followed when the final NVMP is finalised.</p> <p>The noise assessment identifies the potential for unmitigated significant (major and moderate adverse) effects to occur at the Plas Lorna care home which would be temporary. This may give rise to differential effects for residents with autism or learning difficulties, who may be more likely to be sensitive to noise from construction activity. As</p>

EFFECTS	ASSESSMENT AND APPLICATION REFERENCES
	<p>with other noise sensitive receptors, the effects of construction noise will be mitigated through measures in the NVMP which include acoustic barriers. These mitigation measures would be determined once the exact construction details and methods have been confirmed. Final mitigation measures would be informed by detailed design post consent and included within the final NVMP which would be submitted for approval by DCC as part of the final CoCP that is secured within the DCO. The programme for works will also be communicated to the community, including Plas Lorna, in line with the approved Construction Communications Plan (CCP) in order to provide notice of potential periods of noise.</p> <p>The mitigation and management measures that will be employed to manage potential noise impacts are sufficient to determine that no predicted differential or disproportionate impact on protected characteristic groups is predicted.</p>
<p>Noise and vibration effects from the construction of offshore activities</p>	<p>The assessment of noise effects on noise sensitive receptors (NSR) is provided in ES Volume 3, Chapter 10: Noise and Vibration (APP-071) has concluded that with the implementation of relevant mitigation measures, minor adverse (not significant) noise and vibration effects will arise from AyM during offshore construction activities (including pilling operations) from the array and cofferdam construction.</p> <p>During pilling for the array there will be the implementation of relevant planning conditions specifying noise limits in neutral weather conditions only. Measures to minimise noise impacts have also been identified within the oNVMP (REP2-020) that forms part of the overall CoCP and which will be applied across AyM.</p>

EFFECTS	ASSESSMENT AND APPLICATION REFERENCES
	<p>Approval of the final NVMP by DCC is secured as a requirement of the DCO. The outline version of the NVMP (REP2-020) sets out the principles to be followed when the final NVMP is finalised.</p> <p>The mitigation and management measures that will be employed to manage potential noise impacts are sufficient to determine that no predicted differential or disproportionate impact on protected characteristic groups is predicted.</p>
Residual noise effects from construction traffic	<p>The level of effect at the nearest NSRs from noise levels generated by construction related traffic (both local roads and off-route) with the implementation of relevant mitigation measures would be temporary minor adverse, which is not significant in terms of the EIA Regulations.</p> <p>Measures to minimise noise impacts have also been identified within the oNVMP (REP2-020), which will be applied across AyM.</p> <p>Therefore, with the implementation of these plans no differential or disproportionate impact to protected characteristic groups is predicted.</p>
Noise impacts from the operation of the OnSS	<p>An assessment of the noise generated from the operational OnSS and whether the noise levels would lead to adverse impacts at the nearest NCRS and on the crematorium is presented in Volume 3, Chapter 10: Noise and Vibration (APP-071).</p> <p>The OnSS has been sited at a location to avoid key areas of sensitivity. Further detail on site selection is provided in Chapter 10 and Volume 1, Chapter 4: Site Selection</p>

EFFECTS	ASSESSMENT AND APPLICATION REFERENCES
	<p>Alternatives (APP-044). The operational noise from the OnSS is controlled via a DCO Requirement for operational noise not to exceed specified noise levels.</p> <p>It is considered that the mitigation measures available (which could include noise enclosure around equipment, equipment covered/screened, equipment covered/screened) would be sufficient to reduce the noise from the OnSS so a negligible magnitude of impact would be experienced upon all the high sensitivity receptors considered (including the crematorium), resulting in a level of effect of a permanent minor adverse, which is not considered significant in terms of the EIA Regulations.</p> <p>Therefore, with the implementation of the proposed mitigation measures no differential or disproportionate impact to protected characteristic groups is predicted.</p>
Air Quality	
<p>Temporary construction generated road traffic volumes on human receptors</p>	<p>The air quality assessment in ES Volume 3, Chapter 11: Air Quality (AS-030) takes into consideration the sensitivity of the area which is informed by several parameters such as the proximity and number of receptors in relation to construction activities, as well as their individual sensitivity. The criteria for defining sensitive receptors includes the potential health effects of particulate matter (PM10). Indicative examples include residential properties. Hospitals, schools and residential care homes should also be considered as having equal sensitivity to residential areas for the purposes of this assessment.</p> <p>Road traffic impacts associated with onshore construction activities on air quality can be considered as having an insignificant/ neutral effect on human health. Effects are</p>

EFFECTS	ASSESSMENT AND APPLICATION REFERENCES
	<p>concluded to be not significant in terms of the EIA Regulations. Mitigation and management measures designed to reduce dust and emissions from construction traffic are also captured within the oAQMP (REP2-031).</p> <p>Onshore construction works are expected to last up to 27 months in one location (for the OnSS), and as such any consequential impacts onto local road traffic flows are believed to be temporary, with no long-term deterioration of conditions.</p> <p>Although there are negligible impacts predicted, because of the potential to impact protected characteristic groups disproportionately Air Quality has been included in the EQIR. With the implementation of the relevant mitigation measures and management plans, it is anticipated that there will be no differential or disproportionate impact to protected characteristic groups is predicted.</p>
Public Health	
<p>Impacts to human health caused by electromagnetic radiation.</p>	<p>Volume 3, Chapter 12: Public Health (APP-073) investigated the potential effects on public health receptors arising from AyM. The sensitivity of receptors to electromagnetic radiation are provided within the chapter which includes the consideration of vulnerable groups.</p> <p>The range of potential impacts and associated effects considered has been informed by Scoping responses and responses from Statutory Consultation as well as reference to existing policy and guidance. The impact considered exposure to electromagnetic radiation during operation and decommissioning. Electromagnetic radiation is emitted from cables which are operational. Therefore, no assessment can be conducted on the</p>

EFFECTS	ASSESSMENT AND APPLICATION REFERENCES
	<p>impacts of construction on public health with regards to electromagnetic radiation. The outcome of the assessment deems this impact to be of Negligible adverse significance, which is not significance in EIA terms.</p> <p>With consideration of the assessment outcome no differential or disproportional health impacts on protected characteristic groups are predicted from electromagnetic radiation.</p>

5 Conclusion

- 66 The EQIR has been undertaken through a review of the potential effects identified within the AyM ES that have the potential to impact on groups with characteristics under the Equality Act 2010.
- 67 A screening process was undertaken to identify the key equality effects. The screening considered topics where the effects have a pathway to people and/or groups of people, and the following topics were included in the EQIR: Seascape, Landscape and Visual Impact; Landscape and Visual Impact; Socio-Economics; Tourism and Recreation; Traffic and Transport; Noise and Vibration; Air Quality; and Public Health.
- 68 Where there is the potential for likely significant effects, the Applicant has committed to a number of mitigation and management measures to reduce effects to acceptable levels. These measures are also likely to reduce potential negative equality effects on protected characteristic groups.
- 69 Key outline management plans have been developed (Section 3.5.1) that include specific and targeted measures to manage impacts on people, sensitive receptors and vulnerable groups to an acceptable level. Those that are specific to managing onshore effects will continue to be developed in consultation with DCC (who themselves are subject to PSED).
- 70 Additionally, the Applicant has undertaken significant consultation to ensure that interested parties, stakeholders and people living in the vicinity of the land and who may be affected by AyM have been consulted with and will continue to be informed of AyM activities going forward.
- 71 In summary, as a result of the application of site selection; embedded mitigation; and proposed management plans; no differentiated or disproportionate impacts on groups with protected characteristics are predicted as a result of any aspect of AyM.

6 References

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