



**AQUIND Limited**

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# **AQUIND INTERCONNECTOR**

## **Equality Statement**

The Planning Act 2008

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**AQUIND Limited**

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# 1. INTRODUCTION

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- 1.1.1.1. This Equality Statement considers the potential effects of the UK elements of AQUIND Interconnector (the 'Proposed Development'). The aim of this Equality Statement is to assist the Secretary of State ('SoS') in its decision making process.
- 1.1.1.2. The effects of the Proposed Development have been assessed as part of the application across a number of submission documents. This Equality Statement draws together the relevant parts of these assessment to consider the identified effects in relation to equality.

## 2. THE PROJECT

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- 2.1.1.1. This Equality Statement relates to an application by AQUIND Limited (the 'Applicant') to the SoS under the Planning Act 2008 (as amended) for the AQUIND Interconnector Order (the 'Order') (the 'Application').
- 2.1.1.2. AQUIND Interconnector (the 'Project') is a new 2,000 MW subsea and underground High Voltage Direct Current ('HVDC') bi-directional electric power transmission link between the South Coast of England and Normandy in France.
- 2.1.1.3. The Application seeks development consent for the Proposed Development, being those elements of the Project located in the UK and the UK Marine Area.
- 2.1.1.4. The components of the Proposed Development that have been considered in terms of their potential effects on equality include:
- The newly constructed Converter Station and associated works;
  - Works at the existing Lovedean Substation in Hampshire to facilitate the connection of the Project to the National Electricity Transmission System;
  - The laying of two pairs of underground Onshore HVDC Cables and Fibre-Optic Cables from the Converter Station to the Landfall site in Eastney. This route is approximately 20 km in length;
  - Works at the Landfall at Eastney to construct the Transmission Joint Bay and the Optical Regeneration Stations
- 2.1.1.5. The potential effects on equality have been considered in relation to both the construction of the Proposed Development, its operational phase and the decommissioning phase.

## 3. LEGISLATIVE CONTEXT

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- 3.1.1.1. The Equality Act 2010 (the 'Act') forms the basis of anti-discrimination law within Great Britain. The Act prohibits discrimination on the grounds of protected characteristics.
- 3.1.1.2. Section 4 of the Act sets out the list of protected characteristics, which are:
- Age;
  - Disability;
  - Gender reassignment;
  - Marriage and civil partnership;
  - Pregnancy and maternity;
  - Race;
  - Religion or belief;
  - Sex; and
  - Sexual orientation.
- 3.1.1.3. Section 149 of the Act requires public authorities to have due regard to a number of equality considerations when exercising their functions through the Public Sector Equality Duty (the 'PSED'). The Public Sector Equality Duty requires public authorities to have due regard to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
  - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
  - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 3.1.1.4. The need to advance equality of opportunity includes the need to (as set out in Section 149 (3) of the Act):
- Remove or minimise disadvantage suffered by persons who share a relevant protected characteristic that are not connected to that characteristic;
  - Take steps to meet the needs of people who share a relevant protected characteristic that are different from the needs of persons who do not share it; and
  - Encourage people from protected groups to participate in public life or in any other activities where their participation is disproportionately low.

3.1.1.5.

The Act does not specifically require an Equality Impact Assessment nor define how the PSED should be carried out. The PSED is to have due regard to the requirements of the Act.



## 4. THE PURPOSE OF THE EQUALITY STATEMENT

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- 4.1.1.1. The Applicant is not a public body subject to the PSED, but the SoS is subject to the PSED when deciding whether to grant the Application. This Equality Statement is submitted in order to inform the consideration of the Application by the SoS and to facilitate the fulfilment of the PSED.
- 4.1.1.2. The Equality Statement aims to:
- Identify and assess any likely effects of the Proposed Development on protected characteristic groups;
  - Identify measures to remove or minimise any adverse effects on persons who share a relevant protected characteristic; and
  - Identify any relevant and proportionate measures to further enhance any beneficial effects on persons who share a relevant protected characteristic.
- 4.1.1.3. The Equality Statement considers the effects of the development identified in Application documents, in particular, the findings of the following;
- Environmental Statement (APP-116 – AP506(a)) and subsequent Addendum (REP1-139 – REP1-158)
  - Onshore Outline Construction Environmental Management Plan (OOCEMP) (REP5-019)
  - Access to Properties and Car Parking and Communication Strategy set out in Appendix 1 of the Framework Traffic Management Strategy (REP1-068); and
  - Consultation Report (APP-025)

## 5. METHODOLOGY

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- 5.1.1.1. Everyone affected by a development will have some protected characteristics as defined under the Act (such as age, race and sex), and they will not all be equally affected. That does not, however, necessarily constitute an equality effect.
- 5.1.1.2. There is a limited range of guidance on fulfilling the PSED that is directly applicable to this Equality Statement. The guidance Meeting the Equality Duty in Policy and Decision Making (2014) states that ‘there is no prescribed methodology for assessing the impact on equality’ but recognises that established methods of equality assessment can be useful.
- 5.1.1.3. To identify which effects are relevant to equality, a growing body of practice in equality assessment has distinguished equality impacts as those that have either disproportionate or differential effects, as explained below:
- Disproportionate effect: there may be a disproportionate equality effect where people with a particular protected characteristic make up a significantly greater proportion of those affected than in the wider population;
  - Differential effect: there may be a differential equality effect where people with a protected characteristic are affected differentially from the general population as a result of vulnerabilities or restrictions they face because of that protected characteristic.
- 5.1.1.4. The scale and significance of such impacts cannot always be quantified. Therefore, this Equality Statement provides a descriptive analysis of impacts.
- 5.1.1.5. In the context of development, some impacts are inherently more difficult to quantify, or for a planning consent to directly control. For example, some effects may depend on how people respond to various effects in future (e.g. effects of traffic), which can only be modelled and forecast, not directly measured in advance. For this reason, the Equality Statement can only consider effects that can reasonably be foreseen as likely and significant.
- 5.1.1.6. Any decision taken by a public body may involve a need to consider and balance a range of both positive and negative effects of different types. There may be reasonable mitigation measures that can eliminate or reduce some disproportionate or differential equality impacts, but such impacts may not always be avoidable. Consideration can be given to whether there are any alternative approaches that could alleviate or mitigate the impact of a decision. The PSED is to give due regard to all equality considerations, in accordance with the Act, and attribute appropriate weight to such considerations. Equality impacts should be a consideration in the balance when determining the application, alongside the benefits arising from the Proposed Development (and more broadly the Project).

- 5.1.1.7. This Equality Statement considers the findings of the Environmental Statement submitted with the Application to identify potential equality effects along with the proposed mitigation strategies set out throughout the Application to address any relevant adverse impacts on equality.
- 5.1.1.8. A description with justification is made regarding the potential for a protected characteristic to be impacted by the effect in a disproportionate or different way to the general population. Where any equality effects are identified, mitigation of adverse effects and enhancement of beneficial effects are considered.

## 6. ASSUMPTIONS AND LIMITATIONS

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- 6.1.1.1. This Equality Statement is limited to the consideration of potential equality effects of the Proposed Development that affect people. This Equality Statement considers impacts on relevant protected characteristics by their nature, rather than specific individual cases.
- 6.1.1.2. The incidence of the effects of the Project, as set out in the Environmental Statement and other application documents will differ between individuals in ways that can give rise to equality effects. However these differences are not always predictable and depend greatly on individual circumstances.
- 6.1.1.3. The nature of the protected characteristics considered by the Equality Statement means that some equality effects are sensitive and personal in nature, and in some cases public data does not exist at a local level to predict them with certainty.

## 7. SCOPE

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7.1.1.1. The scope of the assessment has been informed by a review of the effects identified in the Application documents. The potential effects of the Proposed Development that are considered relevant to the assessment of equality include:

- Changes to landscape and visual amenity;
- Noise;
- Air Quality;
- Temporary loss of recreational areas;
- Diversions of public rights of way;
- Access to property;
- Traffic and transport effects; and
- Consultation and engagement;

## 8. ASSESSMENT

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- 8.1.1.1. This assessment considers eight key aspects of the Project that could have an equality effect in turn. Each section below explains how each of these aspects could have an effect on people, and then goes on to consider whether this could have a differential or disproportionate effect on persons who share a protected characteristic.
- 8.1.1.2. The Proposed Development can be considered in three components: the Landfall location at Eastney where the cable comes onshore, Onshore Cable Corridor (the linear route where the cables will be laid underground) and the Converter Station Area where the cables connect to the substation and onto the wider network.
- 8.1.1.3. The operational effects that are relevant in relation to potential equality impacts are limited to the Converter Station Area and the construction of the Optical Regeneration Station (ORS) buildings at the Landfall site at Eastney. The potential equality effects along the Onshore Cable Corridor and the works at the Landfall location are limited to the construction phase. Any potential effects on equality related to the decommissioning phase would be similar to those identified during the construction phase and therefore are not considered separately.
- 8.1.1.4. Table 8.1 summaries these potential effects, identifying which protected characteristic the effect could relate to and provides information on the mitigation strategy proposed to remove or minimise these impacts.

**Table 8.1 - Summary of Potential Effects**

Type of Effect	Assessment	Equality effect	Mitigation or enhancement
<p><b>Changes to landscape and visual amenity</b></p>	<p>The Proposed Development may cause changes to landscape and visual amenity in a number of areas. The construction of the Proposed Development will cause disruption to landscape and visual amenity at all three locations (the Landfall, Onshore Cable Corridor and Converter Station Area). This will include impacts on open space, areas of recreation, and views from residential properties.</p> <p>Environmental Statement Volume 1 Chapter 15: Landscape and Visual Amenity (APP-130) provides a detailed assessment of these impacts. The effects identified do include some significant adverse impacts. Mitigation measures are identified within this chapter of the Environmental Statement and set out in the Onshore Outline CEMP (REP5-109).</p> <p>The most significant impacts will be around the Converter Station Area and the ORS Buildings, where the construction of the new infrastructure will alter the views in the surrounding area. This includes views from recreation areas, residential properties, and roads in the local area.</p> <p>Impacts along the route are generally temporary and short term in nature.</p> <p>Changes to views are not considered to have any disproportionate effects on people with protected characteristics, however there could be differential effects on some people who share protected characteristics. For example, older people (age) or people with certain types of disabilities may be more sensitive to changes in landscape. These protected characteristics may have a higher level of sensitivity to change due to reasons such as spending more time within their homes or relying on visual cues for memory aids or wayfinding.</p>	<p>Age Disability</p>	<p>Mitigation measures have been designed to screen the site through planting. Some of this mitigation (planting) may take a number of years to mature.</p> <p>Detailed mitigation measures set out in the Onshore Outline CEMP (REP5-019).</p>
<p><b>Noise during construction and operational stages of Proposed Development.</b></p>	<p>Noise effects vary by location, but even within the same location some people may be differentially affected. People with some protected characteristics may be on average likely to spend more time at home than others and therefore, may be more exposed to noise effects.</p> <p>Some community facilities or services may be disproportionately used by people with protected characteristics. Environmental Statement Volume 1 Chapter 25: Socio-economics (APP-140) provides baseline information on community facilities likely to be affected by the Project and an assessment of the disruption to users of community facilities.</p>	<p>Age Religion Disability Pregnancy and Maternity Religion</p>	<p>The working hours for construction activity are to be limited to minimise the noise impacts. There are some locations where construction activity may be required outside of adopted working hours. Where this is the case, the activities which may take place during sensitive periods are restricted to minimise noise impacts.</p> <p>Additional measures to avoid disturbance to young people in schools adjacent to the areas of installation will be adopted and</p>

Type of Effect	Assessment	Equality effect	Mitigation or enhancement
	<p>The construction of the Onshore Cable Corridor and associated noise impacts could affect the following community facilities that serve a range of people with protected characteristics, including:</p> <ul style="list-style-type: none"> <li>○ <b>Emergency Services:</b> Waterlooville Fire Station, Portsmouth Ambulance Station, RNLI Portsmouth Lifeboat Station.</li> <li>○ <b>Medical and other Services:</b> Portsmouth Day Services, ANA Treatment Centre Vine Medical Group, Forest End Surgery.</li> <li>○ <b>Schools, Education and Children’s Services:</b> Hillcrest Children’s Services, Mill Hill Primary School, Solent Infant School, Rocking Horse Nursery and Preschool, Deverell Hall Pre-School, Little Acorns Nursery, Solent Junior School, Little Star, Preschool and 70th Portsmouth Scout Hut, University of Portsmouth Langstone Student Village, Langstone Church Centre Pre-School, Moorings Way Infant School.</li> <li>○ <b>Homes for the Aged:</b> Easterlea Rest Home, Alexander Rose Residential Care Home.</li> <li>○ <b>Religious Buildings:</b> Christ Church, Langstone Church.</li> </ul> <p>In considering noise effects in relation to potential equality effects, the noise related potential impacts on human health are most relevant.</p> <p>The key health outcomes relevant to noise are cardiovascular health, mental health (including annoyance, stress, anxiety or depression) and cognitive impairment. People with protected characteristics can have increased sensitivity to these health impacts, such as age, disability, pregnancy and maternity.</p> <p>Environmental Statement Volume 1 Chapter 26: Human Health (APP-141) provides a full assessment of the potential health outcomes arising from the Project.</p> <p>Overall, the assessment of the noise impacts associated with the construction and operation of the Project range from negligible to moderate adverse and are temporary.</p>		<p>installation of the onshore cable near the schools will only take place during school holidays.</p> <p>Community liaison activities will provide affected communities with information on the construction programme and contact details of the relevant person to answer questions or handle complaints.</p> <p>Detailed mitigation measures are set out in the Onshore Outline CEMP (REP5-019).</p>
<p><b>Air quality during construction</b></p>	<p>In a similar way to noise, air quality effects can vary by location, but even within the same location some people may be differentially affected. People with some protected characteristics may be more sensitive to reduction in air quality.</p> <p>Poor air quality and increased exposure to air pollutants can result in human health impacts such as respiratory conditions. Dust from construction works can cause respiratory conditions but also eye and airway irritation and nuisance.</p> <p>People with protected characteristics can have increased sensitivity to these health impacts, due to age, disability, pregnancy and maternity.</p> <p>Impacts on air quality from construction of the Proposed Development are assessed in the Environmental Statement Volume 1 Chapter 23: Air Quality (APP -128) and Chapter 26: Human Health (APP-141)</p> <p>Health effects from emissions are assessed as negligible to minor adverse (not significant).</p>	<p>Age Disability Pregnancy and Maternity</p>	<p>Community liaison activities will provide affected communities with information on the construction works programme and contact details of the relevant person to answer questions or handle complaints.</p> <p>Dust associated with the construction activity will be closely monitored and a Dust Management Plan will be put in place.</p> <p>Detailed mitigation measures are set out in the Onshore Outline CEMP (REP5-019).</p>



Type of Effect	Assessment	Equality effect	Mitigation or enhancement
<b>Temporary loss of recreational areas</b>	<p>The construction of the Proposed Development will result in the temporary disruption to access to and loss of area in respect of a number of recreational areas. These are assessed in detail within the Environmental Statement Volume 1 Chapter 25: Socio-economics (APP-140).</p> <p>These impacts could result in equality effects where users affected by the disruption have protected characteristics.</p> <p>Young people may be disproportionately affected by reduced access to recreation and sport pitch provision during the construction phase (age).</p> <p>In some cases, parking facilities associated with recreation areas will be reduced as they are needed temporarily for worksites during construction. This could have a differential effect on people who may have restricted mobility and changes to parking may result in persons needed to walk longer distances (age, disability and, pregnancy and maternity).</p>	Age Disability Pregnancy and maternity	<p>Community groups affected by the loss of recreational areas will be provided with information on the nature, timing and duration of the construction activities. Where alternative provision or routes need to be utilised, directions would be clearly communicated.</p> <p>Areas of open space will be restored to the same condition as they were prior to construction.</p> <p>Mitigation measures are set out in the Onshore Outline CEMP (REP5-019) and Environmental Statement Addendum – Appendix 13 – Framework Management Plan for Recreational Impacts (REP4-026).</p>
<b>Diversions of public rights of way</b>	<p>The construction of the Proposed Development requires diversions to a number of Public Rights of Way. The various routes affected are assessed in detail within the Environmental Statement Volume 1 Chapter 15: Landscape and Visual Amenity (APP-130), Chapter 25: Socio-economics (APP-140) and Chapter 26: Human Health (APP-141).</p> <p>The proposed diversions are not considered to add substantial distances to the journey time for people using these routes. Most of the diversions will only be in place for a short period of time.</p> <p>These impacts could result in equality effects where some users affected by the disruption may have protected characteristics, particularly those with limited mobility or for whom changes to routes could have greater impact (age, disability and, pregnancy and maternity).</p>	Age Disability Pregnancy and maternity Sex	<p>Where Public Rights of Way need to be closed, an alternative route and signage will be provided in advance of the temporary closure.</p> <p>Particular attention will also be paid to the needs of people with mobility and visual impairments to ensure that their safety and free movement is retained.</p> <p>Detailed mitigation measures are set out in the Onshore Outline CEMP (REP5-019) and Environmental Statement Addendum – Appendix 14 Note on PRow, Long Distance Walking Paths and Cycle Route Diversions (REP1-145).</p>
<b>Access to Property</b>	<p>The construction of the Onshore Cable Route will have an impact on access to a number of different types of properties along the route, including residential, car parks, community facilities and commercial properties.</p> <p>Construction works and trenching will be rolled out along the route at a rate of approximately 100 m per week in the urban areas. Therefore, it is estimated that access to the 5-10 properties within each such section will be affected for an average of 1 – 2 weeks per circuit.</p> <p>Disruption caused by these works will be mitigated by ensuring that arrangements are in place to maintain access to all affected properties.</p> <p>These impacts could result in an equality effect where some residents, business owners (or their customers) or community facility users may have protected characteristics. Those with limited mobility could be differentially affected compared to</p>	Age Disability Pregnancy and Maternity	<p>Information on the proposed programme of works will be provided to affected properties in advance of the work commencing. This will include details of the disruption to the access to their property, the likely duration, what access arrangements will be made and the contact details of a liaison officer to answer any questions or handle any complaints.</p> <p>Pedestrian access to residential properties will be maintained at all times. Road plates will be available to ensure access is possible when needed. In some areas road or footway closures will be required to allow for the</p>

Type of Effect	Assessment	Equality effect	Mitigation or enhancement
	<p>the general population (age, disability, and pregnancy and maternity). In addition, the worry and anxiety caused by disruption and ability to access information on the construction programme may be challenging for some people with protected characteristics (age and disability).</p>		<p>construction works. Safe alternative routes, as well as ramps and footway boards will be provided.</p> <p>Detailed mitigation measures are set out in the Onshore Outline CEMP (REP5-019) and the Environmental Statement Appendix 22.1A: Framework Traffic Management Strategy Appendix 1: Access to Properties and Car Parking and Communication Strategy set out in Appendix 1 of the (REP1-068).</p>
<p><b>Traffic and transport effects</b></p>	<p>The traffic and transport effects associated with the Proposed Development will cause some disruption to some routes during the construction phase that may cause longer journey times and delays. These delays are unlikely to cause disproportionate effects on those with protected characteristics compared to the general population.</p> <p>However, some people with protected characteristics may experience differential effects due to disruption caused by traffic and transport impacts. People with limited mobility may experience differential effects compared to others, where reduced parking, delays/ longer journey times or the alternative routes provided are more challenging (age, disability and, pregnancy and maternity).</p> <p>Environmental Statement Volume 1 Chapter 22: Traffic and Transport (APP-137) provides a detailed assessment of the potential impacts.</p>	<p>Disability Age Pregnancy and maternity</p>	<p>Where footways need to be closed alternative routes and temporary pedestrian crossings will be provided. Where existing bus stops need to be closed, temporary bus stops will be provided as close as practicable to the original location.</p> <p>It is expected that there will be a programme of community liaison to ensure that the potentially affected receptors are provided with early warning of construction activities (including targeted leafleting at affected properties and community facilities).</p> <p>Signage and advanced warning will be provided in advance of any temporary closure.</p> <p>Any diversions will be suitable to accommodate all users.</p> <p>Detailed mitigation measures are set out in the Onshore Outline CEMP (REP5-019), the Framework Construction Traffic Management Plan (REP1-071) and the Framework Traffic Management Strategy (REP1-068).</p>
<p><b>Consultation and Engagement</b></p>	<p>A significant level of consultation and community engagement has been undertaken to support this Application. Consultation is an important tool to provide the communities and stakeholders potentially affected by the Proposed Development with information and an opportunity to feedback.</p> <p>An important part of the Act and the PSED is to advance equality of opportunity and to encourage people from protected groups to participate in public life. It is important that the needs of people with protected characteristics have been taken into account throughout the consultation process to ensure that these people are able to engage, share their views and that potential equality impacts can be feedback.</p>	<p>Disability Age Pregnancy and maternity Sex Race</p>	<p>A Public Relations Officer will be responsible for liaising with appropriate individuals across the project teams to address any potential complaints or concerns received from the public or stakeholders. Contact information will be provided on site notice boards.</p> <p>Correspondence will be sent to occupiers of any sensitive receptors likely to be affected</p>

Type of Effect	Assessment	Equality effect	Mitigation or enhancement
	<p>The Planning Act 2008 requires applications to carry out pre-application consultation and engage with the community about the Project. Evidence of the consultation process and how the responses received have influenced the Project are set out within the Consultation Report (APP-025).</p> <p>The consultation process included both statutory and non-statutory pre-application consultation along with a significant amount of engagement with relevant stakeholders and consultees. Consultation spanned various stages the Project design and was comprised of a range of activities and events.</p> <p>Locations for and timings of the public exhibitions were carefully planned to encourage maximum participation from the local community. All venues had disabled access. Project teams were provided with language sheets at each public event to enable the team to arrange for a translator to provide the relevant information to any attendee for whom English was not their first language. In preparing consultation material consideration was given the use of red and green colourings which could cause issues for individuals who are colour blind. Consultation material was available in hard copy for anyone without internet access or the ability to access material electronically.</p> <p>Additional consideration was given to the consultation process design for 'hard to reach' and 'seldom heard' groups. Various methods were used to inform local communities, including 'hard to reach' and 'seldom heard' groups of opportunities to engage with the consultations undertaken. Briefings were offered to elderly residents unable to attend the public exhibitions.</p>		<p>by the construction activities well in advance of the construction activities taking place.</p> <p>Details of the community liaison mitigation measures are set out within the Onshore Outline CEMP (REP5-019).</p>

## 9. CONCLUSION

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- 9.1.1.1. This Equality Statement has considered the activities that will be carried out as part of the Proposed Development. The effects that could affect human receptors have been assessed to determine whether they may affect protected characteristic groups differently to the general population.
- 9.1.1.2. A number of potential equality effects have been identified upon the following protected characteristics;
- Age;
  - Disability;
  - Pregnancy and maternity;
  - Race;
  - Religion or belief; and
  - Sex;
- 9.1.1.3. The effects upon these protected characteristics are mostly temporary in nature as they relate to the construction phase of the Proposed Development. Mitigation measures have been considered and will be implemented to remove or minimise these effects were possible.
- 9.1.1.4. The SoS should take into consideration the effects set out in Table 8.1 when discharging their PSED when determining this Application. These effects should be considered on balance, alongside the benefits arising from the Proposed Development (and more broadly the Project).
- 9.1.1.5. There are a number of other protected characteristics under the Act where potential effects have not been identified. These include;
- Gender reassignment;
  - Marriage and civil partnership;
  - Sexual orientation.

