

# Rosefield Solar Farm

## Equality Impact Assessment

EN010158/APP/7.12  
September 2025  
Rosefield EnergyFarm Ltd

APFP Regulation 5(2)(q)  
Planning Act 2008  
Infrastructure Planning  
(Applications: Prescribed Forms  
and Procedure) Regulations 2009



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# 1. Introduction

## 1.1. Purpose of the document

1.1.1. This Equality Impact Assessment (EqIA) has been prepared on behalf of Rosefield Energyfarm Limited ('the Applicant') in relation to the Development Consent Order (DCO) Application for the construction, operation (including maintenance), and decommissioning of Rosefield Solar Farm ('the Proposed Development'), located within the administrative boundary of Buckinghamshire Council ('the Site') as shown in the **Works Plans [EN010158/APP/2.2]**.

1.1.2. This EqIA has been prepared and submitted as a supporting document to the DCO Application and considers the potential equality impacts related to the DCO Application of a solar photovoltaic (PV) electricity generating and battery storage facility with associated infrastructure on protected characteristics groups identified within the Equality Act 2010 **[Ref. 1]**. The Planning Inspectorate (on behalf of the Secretary of State) and appointed ExA is required to consider potential equality impacts under the Equality Act 2010 **[Ref. 1]** when considering the DCO Application in line with its Public Sector Equality Duty. Further explanation of the Equality Act 2010 **[Ref. 1]** is detailed in **Section 2: Legislation and policy context** of this report.

1.1.3. This EqIA is structured as follows:

- **Section 1: Introduction** – presents a description of the Site context and the Proposed Development;
- **Section 2: Legislation and policy context** – outlines the legislation and policy context relevant to the EqIA, notably the Equality Act 2010 **[Ref. 1]** and Buckinghamshire Council's equality specific policies **[Ref. 2]**, **[Ref. 3]**;
- **Section 3: Methodology** – outlines the methodology used for the assessment of equality impacts;
- **Section 4: Equalities baseline** – presents the baseline conditions in relation to protected characteristics groups at a ward, local authority and national level;
- **Section 5: Consultation and engagement** – provides an overview of consultation and engagement activities undertaken until June 2025;
- **Section 6: Assessment of impacts** – indicates the potential impacts of the Proposed Development on protected characteristics groups;

- **Section 7: Summary of actions secured through the DCO** – sets out a summary of the actions secured through the DCO to avoid, minimise or mitigate negative equality impacts; and
- **Section 8: Summary of impacts** – provides an overview of the equality impacts on the protected characteristics groups affected.

1.1.4. This EqIA was produced in June 2025. A description of the Site and the development proposals is provided in the following sections of this EqIA report.

## 1.2. The Order Limits

1.2.1. The Order Limits, which define the extent of land within which the Proposed Development can be carried out, are shown on the **Location, Order Limits and Grid Coordinate Plans [EN010158/APP/2.1]**, the **Works Plans [EN010158/APP/2.3]** and in **Environmental Statement (ES) Volume 3, Figure 1.2: Order Limits [EN010158/APP/6.3]**. The area covers approximately 675.05 hectares (ha) of land. The Site extends across four parcels of land (Parcels 1, 1a, 2 and 3), which would be connected with underground cables to the new National Grid East Claydon Substation which is located adjacent to Parcel 3. These parcels and cable route are outlined in the **Works Plans [EN010158/APP/2.3]**.

## 1.3. The Proposed Development

- 1.3.1. The Proposed Development comprises the construction, operation (including maintenance), and decommissioning of Solar PV development and energy storage, together with associated infrastructure and an underground cable connection to the new National Grid East Claydon Substation.
- 1.3.2. The Proposed Development would include a generating station with a total exporting capacity exceeding 50 megawatts (MW).
- 1.3.3. The Proposed Development is located within the administrative boundary of Buckinghamshire Council. The settlements of Calvert, Middle Claydon, Botolph Claydon, East Claydon and Hogshaw lie within 1.5km of parts of the Order Limits. Further afield (within 3km of the Order Limits) lie the settlements of Steeple Claydon, Edgecote, Shipton Lee, Quainton, Granborough and Winslow.
- 1.3.4. National Grid East Claydon Substation is the closest existing major infrastructure to the Proposed Development, located within the Order Limits and adjacent to Parcel 3. Traversing from this substation are three overhead power lines (400 Kilovolt (kV) transmission line), carried by pylon structures, that run across Parcel 3 to the east and south.

- 1.3.5. A High Speed Rail (HS2) works area is located in close proximity to the western edge of Parcels 1 and 1a. It is approximately 100m from Parcel 1 and 1a and less than 500m from Parcel 2. This section of HS2 is currently under construction. Permanent HS2 mitigation planting is located directly adjacent to the eastern edge of Parcel 1 and to the north and south of Parcel 1a, with a small section of mitigation planting intersecting Parcel 1a, as outlined in **ES Volume 3, Figure 2.1: Environmental Considerations [EN010158/APP/6.3]**.
- 1.3.6. The East West Rail railway line, which is currently under construction, is located approximately 850m north of Parcel 1 at its closest point and runs west to east.
- 1.3.7. The land within the Order Limits predominantly consists of agricultural fields and pastureland interspersed with hedgerows, ditches, woodland blocks and farm access tracks. The hedgerows within the Site range from dense tall vegetation with sporadic shrubs and trees present. The fields are bordered by a mix of hedgerows, trees and ditches.
- 1.3.8. Each Parcel contains several fields. Each field has been given a unique reference (e.g. Field B1) as shown in **ES Volume 3, Figure 2.4: Field Numbering System [EN010158/APP/6.3]**.
- 1.3.9. A full description of the Proposed Development can be found in **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1]**. The terminology used in this document is defined in **ES Volume 1, Chapter 00: Glossary [EN010158/APP/6.1]**.

## 2. Legislation and policy context

### 2.1. Legislation

2.1.1. The legislation relevant to this EqlA is outlined below.

#### Equality Act 2010

2.1.2. The Equality Act 2010 **[Ref. 1]** sets the legal foundation to protect people from discrimination and to advance equal accessibility and opportunity. The Equality Act 2010 **[Ref. 1]**, which is up to date with all changes known to be in force as of April 2025, first came into force on 1 October 2010 and superseded a range of other legislation regarding discrimination including, but not limited to, the Sex Discrimination Act 1975, Race Relations Act 1976, and the Disability Discrimination Act 1995. The Equality Act 2010 **[Ref. 1]** provides the basic framework of protection against direct and indirect discrimination, harassment and victimisation in services and public functions, work, education, associates and transport. In addition, although the Socio-economic Duty (Part 1 of the Equality Act 2010) is not currently in force in England, it is relevant contextually as it places a duty on certain public bodies to have due regard to reducing inequalities of outcome resulting from socio-economic disadvantage. This is also considered where relevant in **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]**. The Equality Act 2010 **[Ref. 1]** sets out the following nine protected characteristics under which discrimination is unlawful:

- **Age:** this refers to persons defined by either a particular age or a range of ages. This can include children (aged under 16), young people (aged 16-25), older people or pensioners (i.e. those aged 65+), the elderly/very old (i.e. those aged 85+);
- **Gender reassignment:** this refers to people who are proposing to undergo, are undergoing, or have undergone a process for the purpose of reassigning their gender identity;
- **Being married or in a civil partnership:** marriage or civil partnership can be between a man and a woman or between two people of the same sex;
- **Being pregnant or on maternity:** pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after birth. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth;
- **Disability:** a disabled person is defined as someone who has a physical or mental impairment; and this has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. It can also include people who have progressive conditions such as

Human Immunodeficiency Viruses (HIV), cancer, or multiple sclerosis, even where someone is able to carry out day to day activities;

- **Race:** the Equality Act 2010 **[Ref. 1]** defines race as encompassing colour, nationality (including citizenship) and ethnic or national origins;
- **Religion or belief:** religion means any religion a person follows. Belief means any religious or philosophical belief, and includes those people who have no formal religion or belief;
- **Sex:** this refers to a man or to a woman, or a group of people of the same sex, while gender refers to the wider social roles and relationships that structure men's and women's, boys' and girls' lives; and
- **Sexual orientation:** a person's sexual orientation related to their emotional, physical and/or sexual attraction and the expression of that attraction.

2.1.3. Part 11, Chapter 1, Section 149 of the Equality Act 2010 **[Ref. 1]** places a statutory duty on public bodies to have due regard to equality considerations in the decision-making process on planning applications, referred to as the 'Public Sector Equality Duty'. This requires public authorities, in the exercise of their functions, to have regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act 2010 **[Ref. 1]**;
- Advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it; and
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

2.1.4. This also includes having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This involves having due regard, in particular, to the need to:

- Remove or minimise disadvantages suffered by persons who share a relevant protected characteristics that are connected to that characteristic;
- Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it; and
- Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.



- 2.1.5. The objective of this EqlA is to assist the Planning Inspectorate in its assessment of the DCO Application with regard to its statutory duties under the Equality Act 2010 **[Ref. 1]**, and to provide relevant information for equality issues to be fully considered as part of the decision-making process by the relevant Secretary of State. This is achieved by systematically identifying and assessing the potential impacts arising from the design and implementation of the Proposed Development for groups which share one or more protected characteristic.
- 2.1.6. The Equality Act 2010 **[Ref. 1]** does not specifically require an EqlA nor define how it should be carried out. The Public Sector Equality Duty is to have 'due regard' to the requirements of the Equality Act 2010 **[Ref. 1]**.
- 2.1.7. The Government Equalities Office Guidance (December 2023) **[Ref. 4]** for public authorities clarifies that the Equality Act 2010 **[Ref. 1]** does not impose a legal requirement to conduct an EqlA, but it emphasises the importance of consciously considering equality in decision-making. For the purpose of the DCO Application, the Planning Inspectorate (on behalf of the Secretary of State) is required to consider potential equality impacts under the Equality Act 2010 **[Ref. 1]** in line with its Public Sector Equality Duty.

## Equality and Human Rights Commission

- 2.1.8. The Equality and Human Rights Commission **[Ref. 5]** champions equality and human rights for all, working to eliminate discrimination, reduce inequality, protect human rights and to build good relations, ensuring that everyone has a fair chance to participate in society. It is an independent statutory body established under the Equality Act 2006 and it opened on 01 October 2007.
- 2.1.9. It combines the responsibilities and powers of the three previous equality commissions: the Commission for Racial Equality, the Disability Rights Commission and the Equal Opportunities Commission, which had responsibility for promoting racial, disability and sex equality in Britain.
- 2.1.10. The Equality and Human Rights Commission provides details of the duties and responsibilities of public authorities in Britain. It covers the Public Sector Equality Duty and the implications of the Human Rights Act 1998 for all public sector organisations.
- 2.1.11. In preparation of this EqlA, due regard has been given to the following documents:
- Equality and Human Rights Commission, The Essential Guide to the Public Sector Equality Duty (2014a) **[Ref. 6]**;

- Equality and Human Rights Commission, Engagement and the Equality Duty: A Guide for Public Authorities (2014b) **[Ref. 7]**;
- Equality and Human Rights Commission, Equality Act 2010: Technical Guidance on the Public Sector Equality Duty England (2023) **[Ref. 8]**;
- Equality and Human Rights Commission, Meeting the Equality Duty in Policy and Decision-Making England (and non-devolved Public Authorities in Scotland and Wales) (2014c) **[Ref. 9]**; and
- Government Equalities Office, Equality Act 2010: Public Sector Equality Duty What do I need to know? A Quick Start Guide for Public Sector Organisations (2011) **[Ref. 10]**.

## Planning Act 2008

- 2.1.12. The Planning Act 2008 ('the 2008 Act') **[Ref. 11]** established a legal framework for applying for, examining, and determining DCO Applications for Nationally Significant Infrastructure Projects. It sets out the requirement for obtaining development consent as well as thresholds for classifying projects as nationally significant. Under the 2008 Act, the development consent may be granted only if an application is made for it, with the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 **[Ref. 12]** further setting out application requirements.
- 2.1.13. Section 104 of the 2008 Act requires the Secretary of State, when determining DCO Applications, to have regard to the provisions of National Policy Statements where they have effect. National Policy Statements are produced by the UK Government and comprise the Government's objectives for the development of Nationally Significant Infrastructure Projects. This has been included to provide context as to the policy background, with National Policy Statement EN-1 **[Ref. 13]** detailed under **Section 2.2** below.
- 2.1.14. The 2008 Act does not contain any specific guidance relating to protected characteristics and equalities, but it does include a duty to consult with the local community as part of the DCO Application process.

## 2.2. National planning policies

- 2.2.1. There is a range of national policy relevant to the Proposed Development which is discussed in the relevant ES Chapters **[EN010158/APP/6.2]**. In April 2025, the government launched a consultation on proposed updates to National Policy Statements EN-1 **[Ref. 13]**, EN-3 **[Ref. 14]** and EN-5 **[Ref. 15]**. These updates aim to reflect changes in policy and technology to ensure the planning framework remains fit for purpose. The draft revisions are relevant context for the determination of this application and

are cross-referenced within the **Planning Statement [EN010158/APP/5.7]**.

- 2.2.2. This section outlines the relevant National Policy Statements since they include relevant guidance on equality considerations of local planning and is therefore explicitly relevant for the EqIA.

### Overarching National Policy Statement for Energy (NPS EN-1) (2023)

- 2.2.3. The Overarching National Policy Statement (NPS EN-1) (2023) **[Ref. 13]** sets out the national policy for delivery of major energy infrastructure. It had effect in combination with a further five (NPS EN-2 through NPS EN-6) technology-specific National Policy Statements issued by the Secretary of State for Energy and Climate Change. Together, the National Policy Statements were used to inform the decisions made on applications for energy development that fell within the scope of National Policy Statements as defined by the Planning Act 2008.
- 2.2.4. NPS EN-1 **[Ref. 13]** sets out national policy for the delivery of major energy infrastructure. The draft NPS has effect on relevant decisions by the Secretary of State on applications for energy developments that are nationally significant under the Planning Act 2008.
- 2.2.5. Section 4.4 of NPS EN-1 recognises the potential impacts on health and well-being that energy infrastructure can have, in particular the construction, production and distribution related to energy infrastructure and its potential negative impacts. Direct impacts on health identified include increased traffic, air or water pollution, dust and odours, noise, and hazardous waste or substances. NPS EN-1 also recognises that new energy infrastructure may affect the composition and size of the local population, and in doing so have indirect health impacts, for example by affecting access to key public services, transport, and open spaces.

### National Policy Statement for Energy Infrastructure (NPS EN-3) (2023)

- 2.2.6. The National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) **[Ref. 14]**, taken together with NPS EN-1 **[Ref. 13]**, provides the primary basis for decisions on applications for nationally significant renewable energy infrastructure. The updated NPS EN-3 **[Ref. 14]**, published in November 2023 and in force since January 2024, now explicitly includes Solar Photovoltaic projects as part of its scope, recognising advances in technology and capacity. NPS EN-3 **[Ref. 14]** also sets out that potential impacts on human health and well-being should be assessed and, where relevant, mitigated as part of proposals for renewable energy infrastructure. This includes considering issues such as community amenity, noise, traffic and access, all of which are assessed in the ES and considered in this EqIA.

## 2.3. Local planning policies

- 2.3.1. As mentioned in **Section 1: Introduction**, the Site lies within the administrative area of Buckinghamshire Council. The following Buckinghamshire Council local planning policy and guidance documents have been considered:
- Vale of Aylesbury Local Plan (VALP) 2013 – 2033 (Adopted September 2021); **[Ref.16]**
  - Equality Policy 2024 to 2026 **[Ref. 2]**; and
  - Inclusion Policy **[Ref. 3]**.
- 2.3.2. According to the Equality Act 2010 **[Ref. 1]**, public bodies are required to publish one or more specific and measurable equality objectives at least once every four years. The most recent equality objectives published by Buckinghamshire Council (2025) **[Ref. 17]** are outlined below:
- Develop, commission and deliver inclusive and responsive services;
  - Foster strong relationships within our communities so everyone feels safe, supported to live independently, and residents are encouraged to get involved in improving local services;
  - Develop and support a highly skilled workforce who are collaborative and ambitious in the work they do, whilst valuing diverse perspectives; and
  - ensure leadership and organisational commitment to equalities.
- 2.3.3. The 2010 Act does not specifically require an EqlA nor define how it should be carried out. Buckinghamshire Council has published an Equality Impact Assessment Guidance **[Ref. 18]**. This has been considered and followed where applicable when developing this EqlA for the Proposed Development.

## 3. Methodology

3.1.1. Every development has the potential to result in positive and negative equality impacts to protected characteristic groups through construction, operation (including maintenance) and decommissioning. The purpose of this EqlA is to consider how the Proposed Development could affect people with protected characteristics as defined by the Equality Act 2010 **[Ref. 1]**. The assessment process has been carried out as follows:

- Review of relevant local, national and regional policies and legislation documents associated with the Proposed Development and baseline conditions in relation to protected characteristic groups;
- Determine the likely impacts on protected characteristic groups because of the Proposed Development through the review of existing policy documents, and consultation responses and equality baseline data; and
- Assess the magnitude of these impacts on protected characteristic groups and, where possible, identify measures to mitigate negative or enhance positive impacts (for impacts which have the potential for enhancement).

### 3.2. Baseline

3.2.1. The baseline assessment presents the baseline conditions in relation to protected characteristics at a ward, local and national level which could be of relevance to the EqlA. The main study area for this assessment is focused on the local area (i.e. Grendon Underwood Ward and Great Brickhill Ward), including communities in closest proximity to the Order Limits. It also considers the wider-scale area (i.e. Buckinghamshire Council as the statutory body responsible for certain services such as highways and access, and public health), as well as the national level (i.e. England). Where relevant, the EqlA also takes account of the study areas defined within other **ES Chapters [EN010158/APP/6.2]** (for example, Air Quality, Noise, and Population) to ensure that receptor sensitivity and potential impacts are considered consistently.

3.2.2. The geographical areas and years at which data is presented can vary and are often determined by the availability of information. It is usual to find that some statistics relating to equality are unavailable at the local level. This is a common limitation in equality assessments however, in this case, data availability has not limited the assessment. The assessment has drawn on the best available data and professional judgement to present a sufficiently robust baseline to identify potential disproportionate or differential impacts in the context of this DCO Application.

- 3.2.3. Baseline analysis has been informed by nationally recognised demographic datasets from the Office of National Statistics, including:
- Nomis Census 2021 [Ref. 19] [Ref. 20] [Ref. 21];
  - Office for National Statistics Census 2021 [Ref. 22] [Ref. 23];
  - Joint Strategic Needs Assessment: Data Profile Protected Characteristics [Ref. 24];
  - Ministry of Housing Communities & Local Government IoD2019 Interactive Dashboard [Ref. 25]; and
  - Office for National Statistics English indices of deprivation 2019 [Ref. 26].

- 3.2.4. The baseline review was informed by the most recent Census data available at the time of writing, which was Census 2021 for the Grendon Underwood Ward and Great Brickhill Ward.

- 3.2.5. District Councils change periodically. The mentioned wards were previously part of Aylesbury Vale District Council. However, following the merger with Buckinghamshire Council in 2020, the Site now falls under Buckinghamshire Council. Therefore, Census 2021 data from Buckinghamshire Council has been used to inform this EqlA where available, otherwise data from Aylesbury Vale has been used.

### 3.3. Equality impacts

- 3.3.1. To identify the impacts that are relevant to equality, disproportionate and/or differential impacts have been identified for groups of people based on their protected characteristics as defined by the Equality Act 2010 [Ref. 1]. Protected characteristic groups can experience both disproportionate and differential impacts simultaneously.

#### Disproportionate impacts

- 3.3.2. Disproportionate impacts occur when either:
- An affected group contains a disproportionate number of individuals with a shared given protected characteristic; or
  - Where an affected asset is disproportionately used by a protected group.
- 3.3.3. For example, where age is a protected characteristic, and there is a disproportionately higher number of older people (perhaps living in assisted living/care facilities). Therefore, a disproportionate impact may be experienced where a negative impact occurs on a living/care facility in relation to noise or air quality.

- 3.3.4. The baseline assessment is used to identify whether a vulnerable group is particularly prevalent in an area in comparison to the ward and local authority averages. If so, the study area is considered to have the potential to experience a disproportionate impact.

### Differential impacts

- 3.3.5. Differential impacts are where groups of people with shared characteristics are likely to be impacted in different ways compared with the general population. These impacts may occur due to specific needs, or a recognised sensitivity or vulnerability associated with a protected characteristic. Whilst disproportionate impacts consider the number of people affected, differential impacts can occur even when the total number of people affected is small. For example, where disability is a protected characteristic, people with limited mobility may be more affected by changes to pedestrian routes or access points, even if the total number of people affected is small.
- 3.3.6. Protected characteristic groups can experience both disproportionate and differential impacts simultaneously.

### 3.4. Structure of assessment

- 3.4.1. This section outlines the structure of the EqIA and is based on the Buckinghamshire Equality Impact Assessment Guidance **[Ref. 18]**. The approach reflects recommended best practice for identifying, analysing, and addressing the potential impacts of policies and practices on individuals and groups with protected characteristics, in line with the Equality Act 2010 **[Ref. 1]**.
- 3.4.2. The Buckinghamshire Council structures the assessment process into two key stages, Screening Exercise and Full Impact Assessment. According to the Buckinghamshire Equality Impact Assessment Guidance **[Ref. 18]** where public consultation is a component of the project, an EqIA is automatically required in line with Buckinghamshire Council's policy, therefore, a Full Impact Assessment has been completed for the Proposed Development.

### Screening Exercise

- 3.4.3. Buckinghamshire Council suggests that the initial stage is undertaking a Screening Exercise, which includes asking:
- What is the purpose of the proposed function or policy?
  - Who is affected by it?



- Is there any evidence that groups have different needs, experiences and priorities in relation to this policy?

3.4.4. If the answer to the last question is yes an EqlA should be carried out.

### Full impact assessment

3.4.5. Buckinghamshire Council suggests this assessment should follow a structured process comprising:

- **Step 1 - Introduction**

This step sets out the background to the assessment, including the names and contact details of the officers responsible for the development or delivery of the policy, project, or service under review.

- **Step 2 – Scoping**

This stage involves defining the scope of the assessment based on the outcomes of the initial screening exercise.

- **Step 3 – Information gathering**

A detailed data analysis is undertaken to explore potential differential impacts on equality groups. This includes:

- **Existing Data**, such as national data and research to identify barriers, issues and areas where equality is likely to be a priority (e.g. research undertaken by the Equality and Human Rights Commission, research from trade unions, commissioned research and reports, census data, labour force surveys, and institutional data).
- **‘Missing data’**, such as gaps in information that may affect the accuracy or completeness of the EqlA.

Where relevant, data gathered through public consultation is also considered to help identify potential impacts on equality groups.

- **Step 4 – Making a judgement about impacts**

At this stage, the available data is reviewed to identify any signs of unequal access, participation, or outcomes. This includes examining whether certain or disadvantaged groups experience lower engagement, are negatively affected by eligibility criteria, face barriers to access, or reduced benefits as a result of the policy or practice.

- **Step 5 – Improvement Plan – Finding ways of mitigating or eliminating any adverse impact**

This step involves assessing the severity of the potential impact identified. If a policy or practice could result in unlawful discrimination, changes should be made. Alternatives should be explored to meet objectives without causing harm, and opportunities to create positive



impacts should also be considered. Information gathered must be used to guide decisions, with actions to improve equality prioritised and implemented. The process should involve affected equality groups, and any revised policy should reflect their input. Broad consultation is essential before final implementation.

- **Step 6 – Publish data**

Buckinghamshire Council is committed to transparency and accountability. Findings and action plans arising from the EqlA must be published in an accessible format. Regular updates should be provided to demonstrate progress, explain any decisions taken, and ensure that equality considerations remain central throughout the policy or project lifecycle.

- 3.4.6. The above information has been incorporated into this EqlA, and a wayfinding table of the location of the information within this EqlA report is summarised in Error! Reference source not found..

**Table 1: Buckinghamshire Council Equality Impact Assessment Process**

<b>Buckinghamshire Council Criteria</b>	<b>Section within this report</b>	<b>Paragraphs/ Table</b>
<b>Step 1 – Introduction</b> Name and contact details of the officers <sup>1</sup>	Section 1 Introduction	<b>Paragraph 1.1.1 to 1.3.9</b>
<b>Step 2 – Scoping</b> Description of the assessment	Section 3 Methodology	<b>Paragraphs 3.1.1 to 3.4.14</b>
<b>Step 3 – Information gathering</b> Internal and external data analysis	Section 4 Equalities baseline	<b>Paragraphs 4.1.1 to 4.12.5</b>
<b>Step 4 – Making a judgement about impacts</b> Data examination	Section 6 Assessment of impacts	<b>Paragraphs 6.1.1 to 6.5.4</b>
<b>Step 5 – Improvement Plan – Finding ways of mitigating or eliminating any adverse impact</b>	Section 6 Assessment of impacts	<b>Paragraphs 6.1.1 to 6.5.4</b>

<sup>1</sup> Name and contact details have been withheld to maintain confidentiality.

<b>Buckinghamshire Council Criteria</b>	<b>Section within this report</b>	<b>Paragraphs/ Table</b>
Assessment of the severity of the potential impacts identified.	Section 7 Summary of actions secured through the DCO	<b>Paragraph 7.1.1</b>
Alternatives or mitigations measures proposed.		<b>Paragraphs 5.1.1 to 5.3.4</b>
Consultation undertaken.	Section 5 Consultation and engagement	
<b>Step 6 – Publish data</b>	Not applicable at this stage	-
Findings and action plans arising from the EqlA		

3.4.7. The assessment of equality impacts considers positive and negative impacts on protected characteristic groups during construction, operation (including maintenance) and decommissioning phases.

3.4.8. The assessment has been informed by information and reports submitted in support of the DCO Application. In particular, the assessment draws upon evidence from the following sources, including appendices to chapters and technical reports where relevant:

- **ES Volume 1, Chapter 3: Proposed Development Description [EN010158/APP/6.1] ;**
- **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2];**
- **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2];**
- **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2];**
- **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2];**
- **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2];**
- **Outline Construction Environmental Management Plan [EN010158/APP/7.2];**
- **Outline Operational Environmental Management Plan [EN010158/APP/7.3];**
- **Outline Decommissioning Environmental Management Plan (DEMP) [EN010158/APP/7.4];**
- **Outline Construction Traffic Management Plan [EN010158/APP/7.5];**

- **Outline Landscape and Ecological Management Plan (LEMP) [EN010158/APP/7.6];**
- **Outline Employment, Skills and Supply Chain Plan [EN010158/APP/7.14];**
- **Outline Rights of Way and Access Strategy [EN010158/APP/7.8];**
- **Consultation Report Tranche 1, 2 and 3[EN010158/APP/5.1];**
- **Planning Statement [EN010158/APP/5.7] ;**
- **Design Approach Document [EN010158/APP/5.8] ; and**
- **Design Commitments [EN010158/APP/5.9].**

3.4.9. The assessment of potential equality impacts on each protected characteristic has been focussed on the following key technical aspects of the Proposed Development, associated within its design and during construction, operation (including maintenance) and decommissioning:

- Noise and Vibration;
- Air Quality;
- Climate Change;
- Transport and Access; and
- Population.

3.4.10. The EqIA is informed on the topic assessments presented in the ES, which are based on a reasonable worst-case scenario representing the maximum design parameters and construction activities likely to occur. Throughout the pre-application period, the Proposed Development has been refined in response to engagement and baseline evidence to minimise potential adverse effects. This includes embedded mitigation such as the layout design, construction practices and buffer distances from sensitive receptors. As such, the EqIA reflects a realistic and proportionate assessment of potential equality-related effects based on an evolved and mitigated design.

3.4.11. The five aspects above mentioned have been grouped into four key considerations, informed by the baseline analysis, and carried through to the assessment of potential equality related impacts on protected characteristics:

- Environmental amenity;
- Accessibility and active travel;
- Community uses and amenity spaces; and
- Employment and business.

- 3.4.12. This list is not exhaustive, and stakeholders may have a different perception of an impact from that characterised in the ES. While there is some overlap between these considerations in terms of sensitive receptors (for example, users of Public Rights of Way (PRoW) may be relevant to multiple aspects), this assessment considers each aspect discretely. Any combined or inter-related effects are considered as part of the **ES Volume 2, Chapter 17: Cumulative Effects [EN010158/APP/6.2]**. Where relevant matters related to equality or protected characteristics have been raised by interested parties through the pre-application process, these have been identified in the **Consultation Report [EN010158/APP/5.1]**, and addressed, where applicable, within this EqIA.
- 3.4.13. Should the analysis identify negative equality impacts on protected characteristic groups, an action plan to eliminate or minimise these negative impacts would be proposed.
- 3.4.14. The potential equality impacts on protected characteristic groups during the construction, operation (including maintenance) and decommissioning phases are set out in **Table 2**.

Table 2: Potential impacts

Impacts arising from the Proposed Development	Study area	Justification
<b>Environmental amenity (air quality, noise and climate)</b>	Local area	Local residents, workers and visitors to the area could be impacted by changes to neighbourhood amenity including air quality, noise and climate considerations.
<b>Accessibility and active travel</b>	Buckinghamshire Council	Residents, workers and visitors within Buckinghamshire Council could be impacted by changes to transport.
<b>Community uses and amenity spaces</b>	Local area	Local residents and visitors to the area could be impacted by disruptions to the PRoW.  The Proposed Development will enhance and create new permissive paths and improvements to amenity and recreation spaces.
<b>Employment and business</b>	Local area	The Proposed Development will provide employment opportunities and generate economic benefits. In some

Impacts arising from the Proposed Development	Study area	Justification
		circumstances, certain aspects of the Proposed Development could have the potential to affect local businesses in a negative way (for example, construction-related noise, traffic or access). However, any such effects are expected to be limited and have been assessed for significance, where applicable, within the relevant <b>ES Chapters [EN010158/APP/6.2]</b> .

## 4. Equalities baseline

### 4.1. Overview

- 4.1.1. This section provides relevant baseline information, where available, in relation to protected characteristics groups that may be present in the local population.
- 4.1.2. As previously mentioned in **Section 3.2**, the most up to date data (Census 2021) has been used for the baseline context focusing on Grendon Underwood Ward, Great Brickhill Ward, Buckinghamshire County, and England.

### 4.2. Age

- 4.2.1. According to the Census 2021, Grendon Underwood Ward, Great Brickhill Ward, Buckinghamshire Council and England have aligning working age populations (between 16 and 74 years) at 73.7%, 71.7%, 71.0% and 72.8% respectively.
- 4.2.2. Populations within Grendon Underwood Ward, Great Brickhill Ward, Buckinghamshire Council and England aged under 16 are also similar at 18.3%, 18.4%, 19.9% and 18.5% respectively.
- 4.2.3. The proportion of residents aged 65 to 74 is slightly higher in Great Brickhill Ward (12.7%) and Grendon Underwood Ward (11.2%) than in Buckinghamshire Council (9.7%) or England (9.8%).
- 4.2.4. **Table 3** presents the population ages profiles for Grendon Underwood Ward, Great Brickhill Ward, Buckinghamshire Council and England.

Table 3: Population age profile (%) by geographical area (Census 2021)

Age	Grendon Underwood Ward	Great Brickhill Ward	Buckinghamshire Council	England
<b>Ages 4 years and under</b>	4.8	4.4	5.6	5.4
<b>Aged 5-9</b>	6.1	5.8	6.4	5.9
<b>Aged 10-15</b>	7.4	8.2	7.9	7.2
<b>Aged 16-19</b>	4.4	3.7	4.3	4.6
<b>Aged 20-24</b>	3.8	4.0	4.6	6.0
<b>Aged 25-34</b>	10.4	8.7	11.6	13.6

Age	Grendon Underwood Ward	Great Brickhill Ward	Buckinghamshire Council	England
<b>Aged 35-49</b>	19.9	18.0	20.4	19.4
<b>Aged 50-64</b>	24.0	24.6	20.4	19.4
<b>Aged 65- 74</b>	11.2	12.7	9.7	9.8
<b>Aged 74-84</b>	6.2	7.5	6.3	6.1
<b>Ages 85 and over</b>	1.9	2.4	2.7	2.4

4.2.5. The data does not indicate that there is a particularly sensitive age profile in the local area, however, young or elderly individuals can be more sensitive to impacts caused by the Proposed Development due to the following factors:

- Elderly residents may spend more time at home during the day [Ref. 27];
- Young children's sleeping patterns include daytime hours [Ref. 27];
- Elderly residents are more vulnerable to changes to accessibility and amenity space, feeling disoriented and being at risk of road traffic collisions [Ref. 28];
- Exposure to noise and poor air quality is known to affect older people and children more [Ref. 29]; and
- Children and elderly may have slower reaction times to changes to the traffic patterns [Ref. 30].

### 4.3. Sex

4.3.1. **Table 4** provides the population breakdown by sex for Grendon Underwood Ward, Great Brickhill Ward, Buckinghamshire Council and England.

Table 4: Population breakdown by sex (%) by geographical area (Census 2021)

Sex	Grendon Underwood Ward	Great Brickhill Ward	Buckinghamshire Council	England
<b>Female</b>	48.7	51.3	51.1	51.0
<b>Male</b>	51.3	48.7	48.9	49.0

4.3.2. Based on the Census 2021, the sex split in Grendon Underwood Ward is approximately 49% female and 51% male. The split is slightly more

weighted towards the male sex compared to Great Brickhill Ward and the wider scales of Buckinghamshire Council and England where the split is 51% female and 49% male.

#### 4.4. Sexual orientation

- 4.4.1. A person's sexual orientation can include their sexual behaviour, attraction, and identity. Sexual orientation is a protected characteristic allowing individuals to choose how to express their sexual orientation without discrimination. This includes discrimination in the provision of goods, facilities, and services on the ground of sexual orientation.
- 4.4.2. Sexual orientation discrimination is possible in various forms that include discrimination arising from self-perceived sexual identity, one's links to other individuals and their sexual orientation (discrimination by association) or one's perceived sexual orientation (discrimination by perception).
- 4.4.3. According to the Census 2021, the proportion of the Buckinghamshire population aged 16 years and over that identified as gay or lesbian, bisexual, pansexual, asexual, queer or other sexual orientation was 2.1%, which was slightly lower than at the national level (3.2%). A full breakdown of sexual orientation by geographical area is presented in **Table 5**. Data is not available for Grendon Underwood Ward or Great Brickhill Ward.

Table 5: Sexual orientation (%) by geographical area (Census 2021)

Sexual orientation	Grendon Underwood Ward	Great Brickhill Ward	Buckinghamshire Council	England
<b>Straight or Heterosexual</b>	-	-	90.7	89.4
<b>Gay or Lesbian</b>	-	-	1.0	1.5
<b>Bisexual</b>	-	-	0.9	1.3
<b>Pansexual</b>	-	-	0.1	0.1
<b>Asexual</b>	-	-	0.0	0.1
<b>Queer</b>	-	-	0.0	0.0
<b>All other sexual orientations</b>	-	-	0.1	0.2
<b>Not Answered</b>	-	-	7.1	7.5



## 4.5. Gender reassignment

- 4.5.1. Gender reassignment is defined as someone who is proposing to undergo, is undergoing, or has undergone a process (or part of a process) for the purpose of reassigning his or her sex by changing physiological or other attributes of sex. It is not necessary for the individual to be under medical supervision or undergoing surgery to fall within this protected characteristic group (Equality Act 2010, Section 7 [Ref. 1]).
- 4.5.2. To be protected from gender reassignment discrimination, one does not need to have undergone any specific treatment or surgery to change from one's birth sex to one's preferred gender. This is because changing physiological or other gender attributes is a personal process rather than a medical one. Protection applies at any stage of the transition, whether you are considering, in the process of, or have completed gender reassignment (as stated by the Equality and Human Rights Commission [Ref. 5]).
- 4.5.3. Comprehensive data on gender reassignment however, is currently limited in England and is unreliable. Several social surveys are currently being conducted by the Office for National Statistics and other data collectors across government and wider however, the samples sizes are not large enough to provide robust local-level estimates.
- 4.5.4. In the Census 2021, the optional question 'Is the gender you identify with the same as your sex registered at birth?' was included. Findings for Buckinghamshire Council and England are presented in **Table 6**. There is no data available at ward level.

Table 6: Gender identity (%) by geographical area (Census 2021)

Gender identity	Grendon Underwood Ward	Great Brickhill Ward	Buckinghamshire Council	England
<b>Gender identity the same as sex registered at birth</b>	-	-	94.1	93.5
<b>Gender identity different from sex registered at birth but no specific identity given</b>	-	-	0.2	0.2
<b>Trans woman</b>	-	-	0.1	0.1
<b>Trans man</b>	-	-	0.1	0.1
<b>Non-binary</b>	-	-	0.0	0.1

Gender identity	Grendon Underwood Ward	Great Brickhill Ward	Buckinghamshire Council	England
<b>All other gender identities</b>	-	-	0.0	0.0
<b>Not answered</b>	-	-	5.5	6.0

- 4.5.5. According to the 2021 Census, 0.2% of residents aged 16 years and over in Buckinghamshire Council indicated that they themselves have a gender identity different from the sex registered at birth, which is the same as the proportion at the national level (0.2%).

#### 4.6. Marriage or civil partnership

- 4.6.1. According to the Census 2021, 29.6% of the residents in Grendon Underwood Ward aged 16 and over are single (having never married or registered a civil partnership), which is similar to the proportion in Great Brickhill Ward (25.6%) but lower than the proportion in Buckinghamshire Council (31.5%) and England (37.9%).
- 4.6.2. In Grendon Underwood Ward, 54.1% of residents are married or in a civil partnership, compared to 58.1% in Great Brickhill Ward, 52.3% in Buckinghamshire Council and 44.7% in England.
- 4.6.3. The proportion of residents who are separated, divorced, formerly in a civil partnership, or widowed is 16.2% in Grendon Underwood Ward, and is comparable with 16.4% in Great Brickhill Ward, 16.2% in Buckinghamshire Council and 17.4% in England.
- 4.6.4. The percentage breakdown of marriage and civil partnership status by geographical area is presented in **Table 7**.

**Table 7: Marriage and civil partnership status (%) by geographical area (Census 2021)**

Marriage and civil partnership status	Grendon Underwood Ward	Great Brickhill Ward	Buckinghamshire Council	England
<b>Single (never married and never registered a civil partnership)</b>	29.6	25.6	31.5	37.9
<b>Married or in a registered civil partnership</b>	54.1	58.1	52.3	44.7

Marriage and civil partnership status	Grendon Underwood Ward	Great Brickhill Ward	Buckinghamshire Council	England
Separated, divorced, formerly in civil partnership, or widowed	16.2	16.4	16.2	17.4

#### 4.7. Pregnancy and maternity

- 4.7.1. The Office for National Statistics does not provide statistics on the number of people who are pregnant. Therefore, this baseline analysis considered live birth data as a proxy. The latest available data from 2022 indicates that the total fertility rate (the average number of live children that a group of women would bear if they experienced the age-specific fertility rates of the calendar year throughout their childbearing lifespan) for Buckinghamshire is slightly higher (1.62) than in England (1.49). A breakdown of total fertility rate is summarised in **Table 8**. Data is not available for Grendon Underwood Ward and Great Brickhill Ward.

Table 8: Total fertility rate by geographic location (2022)

Pregnancy and Maternity	Grendon Underwood Ward	Great Brickhill Ward	Buckinghamshire Council	England
Total fertility rate*	-	-	1.62	1.49
<b><i>*Total fertility rate being the number of children born per woman</i></b>				

#### Disability

- 4.7.2. Data from the 2021 Census identified that 13.5% of residents in Buckinghamshire Council are disabled under the Equality Act 2010 [Ref. 1], 5.0% of which have their day-to-day activities limited a lot, and 8.5% of which have their day-to-day activities limited a little. Of the remaining 86.5% of the population of Buckinghamshire Council who are not disabled under the Equality Act 2010 [Ref. 1], 7.2% have a long-term physical or mental health condition which does not limit day-to-day activities, and 79.3% have no long-term physical or mental health conditions.
- 4.7.3. The data for Buckinghamshire Council is highly comparable to Grendon Underwood Ward and Great Brickhill Ward, where 13.8% and 13.9% of residents are disabled under the Equality Act 2010 [Ref. 1], respectively with 4.6% and 5.3% having their day-to-day activities limited a lot, and 9.2% and 8.6% having their day-to-day activities limited a little. Of the

remaining population of Grendon Underwood Ward and of Great Brickhill Ward, 8.7% and 7.8% of residents have long-term physical or mental health conditions but day-to-day activities are not limited, and 77.5% and 78.3% of residents have no long-term physical or mental health conditions, respectively.

4.7.4. This is below the national level where 17.3% of residents are disabled under the Equality Act 2010 **[Ref. 1]**, of which 7.3% have their day-to-day activities limited a lot, and 10% have their day-to-day activities limited a little. Of the remaining population who are not disabled under the Equality Act 2010 **[Ref.1]**, 6.8% have a long term physical or mental health condition by day-to-day activities are not limited, and 75.9% have no long term physical or mental health condition.

4.7.5. A breakdown of the percentage of people with a disability by geographic area is presented in **Table 9**.

Table 9: Disability (%) by geographic area (Census 2021)

Disability	Grendon Underwood Ward	Great Brickhill Ward	Buckinghamshire Council	England
<b>Disabled under the Equality Act 2010: Day-to-day activities limited a lot</b>	4.6	5.3	5.0	7.3
<b>Disabled under the Equality Act 2010: Day-to-day activities limited a little</b>	9.2	8.6	8.5	10.0
<b>Not disabled under the Equality Act 2010: Has long term physical or mental health condition but day-to-day activities are not limited</b>	8.7	7.8	7.2	6.8
<b>Not disabled under the Equality Act 2010: No long term physical or mental health conditions</b>	77.5	78.3	79.3	75.9

## 4.8. Race

- 4.8.1. As defined in the Equality Act 2010 **[Ref. 1]**, race includes colour, nationality and ethnic or national origins. Therefore, this baseline assessment has considered a range of data sources including ethnicity, place of birth and language spoken to provide a baseline analysis of the local area with respect to race.

### Ethnicity

- 4.8.2. The percentage breakdown of ethnic groups by geographical area is summarised in **Table 10**. The Census 2021 shows that the majority of the population within Grendon Underwood Ward and Great Brickhill Ward identify as white (94.7% and 94.0%, respectively), which is larger than the proportion in Buckinghamshire Council (79.9%) and England as a whole (81.0%).
- 4.8.3. The second largest ethnic group in Grendon Underwood Ward is mixed or multiple ethnic groups (2.0%), whilst Asian, Asian British or Asian Welsh is the second largest ethnic group for Great Brickhill Ward (2.7%), Buckinghamshire Council (12.4%) and also at the national level (9.6%).

Table 10: Ethnic groups (%) by geographic area (Census 2021)

Ethnicity	Grendon Underwood Ward	Great Brickhill Ward	Buckinghamshire Council	England
Asian, Asian British or Asian Welsh	1.7	2.7	12.4	9.6
Black, Black British, Black Welsh, Caribbean or African	1.3	1.3	2.6	4.2
Mixed or multiple ethnic groups	2.0	1.5	3.5	3.0
White	94.7	94.0	79.9	81.0
Other ethnic group	0.4	0.4	1.6	2.2

### Country of birth

- 4.8.4. **Table 11** provides the percentage breakdown of country of birth for Grendon Underwood Ward, Great Brickhill Ward, Buckinghamshire Council and England.

- 4.8.5. The Census 2021 indicates that in Grendon Underwood Ward, Great Brickhill Ward and Buckinghamshire Council, the majority of the population was born in the United Kingdom (UK) (92.7%, 91.9% and 83.4%, respectively). This is slightly higher than at the national level (82.6%).

Table 11: Country of birth (%) by geographical area (Census 2021)

Place of birth	Grendon Underwood Ward	Great Brickhill Ward	Buckinghamshire Council	England
<b>UK</b>	92.7	91.9	83.4	82.6
<b>Europe</b>	3.3	3.5	6.2	7.2
<b>Africa</b>	1.6	1.6	2.4	2.8
<b>Middle East and Asia</b>	1.1	1.7	6.1	5.7
<b>The Americas and the Caribbean</b>	1.0	0.9	1.5	1.4
<b>Antarctica and Oceania (including Australasia) and Other</b>	0.4	0.5	0.4	0.3

## Language

- 4.8.6. The Census 2021 identified an individual's 'main language' as 'a person's first or preferred language'.
- 4.8.7. According to the Census 2021, 90.8% of households (aged 16 and over) in Buckinghamshire Council have English as a main language and 3.5% of households do not have English as a main language. This proportion differs from England at the national level, where 89.3% of households have English (or English or Welsh in Wales) as a main language and 5.0% of households don't have English as a main language.
- 4.8.8. Grendon Underwood Ward and Great Brickhill Ward are aligned, 97.5% and 97.3% of households (aged 16 and over) have English as a main language respectively, and 0.7% and 0.8% of households do not have English as a main language, respectively. The proportion of people with English as a main language is higher than the national level.

4.8.9. **Table 12** provides the full percentage breakdown of main language by geographic area.

**Table 12: Main language (%) by geographical area (Census 2021)**

Main Language	Grendon Underwood Ward	Great Brickhill Ward	Buckinghamshire Council	England
<b>All adults in household have English in England, or English or Welsh in Wales as a main language</b>	97.5	97.3	90.8	89.3
<b>At least one but not all adults in household have English in England, or English or Welsh in Wales as a main language</b>	1.5	1.5	4.5	4.3
<b>No adults in household, but at least one person aged 3 to 15 years, has English in England or English or Welsh in Wales as a main language</b>	0.3	0.4	1.3	1.4
<b>No people in household have English in England, or English or Welsh in Wales as a main language</b>	0.7	0.8	3.5	5.0

## Summary

4.8.10. The largest ethnic group in Grendon Underwood Ward and Great Brickhill Ward is white (approximately 94%) with less than 10% of people born in different countries other than the UK and a limited few people speaking a different language than English (less than 1%).

## 4.9. Religion or belief

4.9.1. According to the Census 2021, 38.8% of the population within Grendon Underwood Ward identify themselves as having no religion, compared to 36.8% in Great Brickhill Ward, 34.2% in Buckinghamshire Council and 36.7% in England at the national level.

- 4.9.2. For those who identify with a religion, Christianity was the most common religious group in Grendon Underwood Ward (52.0%), Great Brickhill Ward (55.0%), Buckinghamshire Council (47.2%) and England (46.3%).
- 4.9.3. A full percentage breakdown of religion or belief by geographical area is provided in **Table 13**.

Table 13: Religion or belief (%) by geographical area (Census 2021)

Religion or and belief	Grendon Underwood Ward	Great Brickhill Ward	Buckinghamshire Council	England
No religion	38.8	36.8	34.2	36.7
Christian	52.0	55.0	47.2	46.3
Buddhist	0.4	0.2	0.5	0.5
Hindu	0.4	0.5	2.7	1.8
Jewish	0.4	0.3	0.3	0.5
Muslim	1.0	1.3	7.0	6.7
Sikh	0.3	0.3	1.6	0.9
Other religion	0.5	0.2	0.5	0.6

#### 4.10. Deprivation

- 4.10.1. While deprivation is not classified as a protected characteristic under the Equality Act 2010 [Ref. 1], levels of deprivation have been considered as part of this baseline analysis as it provides relevant context for understanding how different groups with protected characteristics may experience inequality. It is noted that some inputs to the indices of deprivation include factors that overlap with protected characteristics, such as health, disability and social isolation.
- 4.10.2. The Government's Indices of Multiple Deprivation (2019) measured deprivation by combining indicators. This includes a range of social, economic, and housing factors to give a single deprivation score for each small area across England (referred to as Lower Layer Super Output Areas). These factors are divided among seven domains of deprivation as outlined below:
- Income deprivation;
  - Employment deprivation;
  - Education, skills, and training deprivation;
  - Health deprivation and disability,



- Crime;
- Barriers to housing and services; and
- Living environment deprivation.

- 4.10.3. The Indices of Multiple Deprivation (2019) [Ref. 26] indicate that Buckinghamshire Council has low levels of deprivation compared to the rest of the country, ranking as the 7<sup>th</sup> least deprived district out of 151 Local Authorities in England. However, significant inequalities exist within the county with higher levels of deprivation concentrated in certain areas such as Aylesbury, which is ranked as 5 (where 1 is the least deprived and 5 the most deprived).
- 4.10.4. No Lower Layer Super Output Areas within Aylesbury Vale District Council<sup>2</sup> [Ref. 25] are ranked in the top 10% most deprived parts of the country.

#### 4.11. Receptors

- 4.11.1. As part of the baseline, a review has been undertaken of the location of community facilities that could have particular relevance to equality, because their users may share a particular protected characteristic or characteristics.
- 4.11.2. The focus of this has been an area of approximately 1km from the Order Limits, taking into account the location of nearby sensitive receptors as well as relevant parish and community boundaries. This is considered to represent the communities in closest proximity to the Proposed Development, where potential for direct or indirect impacts on people and their access to services, facilities, or the local environment is most likely.
- 4.11.3. **Table 14** shows local facilities (community, religious, educational and healthcare) that may be particularly relevant to a specific protected characteristic.
- 4.11.4. **Table 15** shows PRoW that are located within and intersecting the Order Limits that are relevant to protected characteristics, as they directly influence the ability of people to access and use public spaces safely and inclusively. Within the assessment area, PRoWs are used by a range of people, including residents, workers and visitors, for active travel between communities, for recreation, and for access to local amenities. Potential effects may therefore relate to changes in connectivity, amenity and

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<sup>2</sup> 2019 data from Aylesbury Vale has been used as it is the most up-to-date available. Aylesbury Vale started to form part of Buckinghamshire Local Authority in 2020.

access for groups with specific needs, including disabled people, older adults and those with caring responsibilities.

- 4.11.5. Detailed data on the protected characteristics of users of specific facilities is not publicly available. However, publicly accessible sources, such as school population and catchment data, and information gathered through engagement have been considered where relevant. This review is intended to be representative of facilities and infrastructure most likely to be relevant to equality issues which are also most likely to be subject to impacts from the Proposed Development. These have been compared to the assessment of effects on sensitive receptors carried out in the ES, to inform consideration of protected characteristics that may potentially be affected.

**Table 14: Local facilities (commercial, community, educational, recreational, religious, and healthcare) located within 1km of the Site.**

Facility	Local facility within 1km of the Site
Commercial and Community Facility	Claydon Auctioneers
	TCS Biosciences
	Hogshaw Farm and Wildlife Park
	Bunsoy Services Ltd.
	Claydon Clocks
	Mutts and Mogs
	The Mushroom Village Bar
	Star Massage Ltd.
	Loved Before
	Featherstone Jewellery
	Signature Flowers
	The Flying Fox
	The Braided Rug Company
	The Spa @ The Courtyard
	New Aura
Educational Facility	The Stables
	Phoenix Kitchen
	East Claydon School
	Claydon Tutoring
	Grendon Underwood School

Facility	Local facility within 1km of the Site
	Marsh Gibbon CofE Primary School
	Quinton Church of England School
Recreational Facility	East Claydon Playground
Religious Facility	St Mary's Church
Healthcare	Eaton Medical Services

Table 15: PRow within and adjacent to the Site

PRow	Proposed Development area
SCL/12/1	Parcel 1
SCL/12/2	
SCL/13/1	
SCL/13/2	
MCL/15/1	East of Knowlhill Farm
ECL/9/1	
MCL/17/1	
MCL/18/1	
MCL/18/2	
MCL/20/2	
ECL/7/1	Northern extent of Parcel 2
ECL/7/2	
ECL/8/1	
ECL/9/2	
ECL/10/1	
ECL/10/2	
ECL/10/3	
ECL/10/4	
ECL/10/5	
ECL/8/2	
QUA/38/1	
QUA41/1	
QUA/42/2	
MCL/22/1	

<b>PRoW</b>	<b>Proposed Development area</b>
<b>QUA/38/2</b>	Southern boundary of Parcel 2
<b>QUA/39/1</b>	
<b>QUA/40/1</b>	
<b>QUA/40/3</b>	
<b>QUA/42/1</b>	
<b>GUN/34/1</b>	
<b>ECL/11/1</b>	West of Parcel 3
<b>ECL/11/2</b>	
<b>ECL/11/3</b>	
<b>ECL/11/4</b>	
<b>ECL/11/1</b>	
<b>ECL/3/1</b>	Parcel 3
<b>ECL/3A/1</b>	
<b>ECL/3/2</b>	
<b>ECL/4/1</b>	
<b>ECL/4/2</b>	
<b>ECL/5/1</b>	
<b>ECL/6/1</b>	
<b>HOG/6/1</b>	
<b>GRA1/1</b>	
<b>GRA/2/1</b>	
<b>GRA/2/2</b>	
<b>GRA/3/1</b>	
<b>GRA/3/2</b>	
<b>GRA/4/1</b>	
<b>GRA/10/1</b>	
<b>GRA/11/1</b>	
<b>WIS/1/2</b>	
<b>HOG/1/1</b>	
<b>HOG/8/1</b>	
<b>HOG/8/2</b>	
<b>HOG/9/2</b>	

PRoW	Proposed Development area
HOG/9/3	
QUA/2/1	
QUA/2/2	
QUA/9/1	

## 4.12. Summary

- 4.12.1. While Buckinghamshire as a whole has a relatively high proportion of working-age residents, the local ward populations (including Grendon Underwood and Great Brickhill) have a higher proportion of older people (aged 50 to 84) compared to both the wider county and national averages.. Most of the residents are married or in a registered civil partnership followed by single residents.
- 4.12.2. Some households in the local area and Buckinghamshire have been identified with long term health problems or disability.
- 4.12.3. The local area and Buckinghamshire are mainly white with most of the residents being born in the UK. A low proportion of the population were not born in the UK, with countries of birth mainly in Europe. The main spoken language is English.
- 4.12.4. Half of the residents are Christian followed by no religion.
- 4.12.5. The population in the local area and Buckinghamshire is similarly split between male and females. A small proportion of the population was identified as LGBTQ+.
- 4.12.6. A range of local services and facilities are present in the area, which are used by different groups and may be relevant to equality considerations in terms of access and use.
- 4.12.7. Levels of deprivation across the study area vary, with some localised differences across domains such as access to local facilities or housing. These have been considered, where relevant, in the assessment.

## 5. Consultation and engagement

### 5.1. Overview

- 5.1.1. Consultation and engagement was undertaken as part of the Proposed Development and was open to all, including statutory and non-statutory bodies, community organisations and local residents.
- 5.1.2. The Applicant has undertaken a continuous programme of engagement in parallel with, and complementary to, its formal phases of consultation. The important distinction between consultation and engagement is as follows:
- 5.1.3. Engagement relates to discussions between the Applicant, community and stakeholders outside formal phases of consultation. Whereas consultation relates to the formal phases of consultation (both Phase One and Phase Two Consultation) and additional Targeted Consultation. Further information about consultation undertaken on the Proposed Development is provided in Chapters 2, 3 and 4 of the **Consultation Report [EN010158/APP/5.1]**.
- 5.1.4. The main phases of consultation were:
- Phase One Consultation: Early plans and proposals (28 September 2023 and 10 November 2023) – a non-statutory consultation on early plans and proposals for the Proposed Development;
  - Phase Two Consultation: Updates plans and proposals (18 September 2024 to 14 November 2024) – a statutory consultation on updated plans and proposals for the Proposed Development, carried out in accordance with the PA 2008, APFP Regulations and EIA Regulations, and in parallel with the development of the **Statement of Community Consultation (SoCC) (Appendices C-1 – D-4: Final SoCC) [EN010158/APP/5.2]**.
  - Targeted Consultation (21 May to 16 July 2025) - a targeted consultation on two proposed changes with relevant prescribed and non-prescribed consultees and affected land interests. The consultation period was determined in consultation with the host authority.

### 5.2. Consultation phases

- 5.2.1. Information about non-statutory consultation is included as part of the **Consultation Report [EN010158/APP/5.1]**.

## Phase One Consultation

### Zone of consultation

- 5.2.2. The Phase One Consultation was open to anyone with an interest in the Proposed Development.
- 5.2.3. The Applicant defined inner and outer zones of consultation to ensure that consultation activity was appropriate and proportionate to the potential impacts of the Proposed Development. These were defined as:
- Inner zone: People living, working or studying closest to the proposals (and likely to be directly affected by the Proposed Development), and their political representatives. This zone includes all properties within 1.5km of the areas where Solar PV development, battery storage and the Rosefield Substation would be positioned, extending in some locations to consider the potential wider impacts of the proposal and human geographic boundaries. For example, the inner zone boundary was extended to include:
    - Villages with Public Rights of Way that connect into the areas proposed for solar and/or battery storage, such as Quainton and Steeple Claydon.
    - Locations that were highlighted as important to the local community in Phase One Consultation feedback, such as Quainton Hill.
    - Properties that are near the proposed main access route.
  - Outer zone: People living, working or studying outside the inner zone who may be affected by or have an interest in the Proposed Development due to it being proposed within their Council area. This zone follows the local authority boundary of Buckinghamshire Council.

### Purpose of consultation

- 5.2.4. The purpose of the Phase One Consultation was to introduce early proposals of the Proposed Development to the local community in order to collect feedback on its emerging design.
- 5.2.5. The Applicant's approach to this non-statutory pre-application consultation was designed to ensure that consultees had the opportunity to understand and share feedback on the proposals and feel satisfied that they had been able to engage with the process. The key objectives for achieving this through pre-application consultation were:
- Ensuring thorough, open and transparent engagement and consultation on our proposals.
  - Ensuring proposals are clearly presented and easily understood.

- Providing sufficient opportunities for interested parties to understand, provide feedback and influence our plans.
- Gathering high quality responses to, and feedback on, our plans to help inform proposals.
- Delivering a consultation that meets the legal requirements and best practice for a DCO Application.

### Approach to consultation

- 5.2.6. Consultation activity included posting two leaflets to 2,887 addresses around the proposed Order Limits on 14 September 2023 and 28 September 2023 to share information about the proposals and promote the consultation. The Applicant held five public events at venues located around the proposed Order Limits and wrote to a range of consultees.
- 5.2.7. All of the materials published as part of Phase One Consultation are available to view on the Rosefield Solar Farm website<sup>3</sup>.
- 5.2.8. The Applicant received 565 responses to Phase One Consultation. Feedback from Phase One Consultation helped shape both the design of the Proposed Development presented at Phase Two Consultation and the overall approach to that consultation phase.

## Phase Two Consultation

### Zone of consultation

- 5.2.9. The Phase Two consultation was open to anyone with an interest in the Proposed Development who had feedback they wanted to be considered.
- 5.2.10. To ensure consultation activity was targeted towards those living, working, studying, or otherwise using areas most likely to be affected by the Proposed Development, the Applicant applied the same two zones as defined for Phase One Consultation.
- 5.2.11. The Applicant also consulted a wide range of non-prescribed consultees, due to their representative function, local knowledge and potential interest in the Proposed Development. Organisations were identified through desktop research, feedback from Phase One Consultation and engagement with the host authority. These included parish councils, community and seldom heard groups, education providers, business representative groups and local interest organisations (including ecology,

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<sup>3</sup> [www.rosefieldsolarfarm.co.uk/document-library](http://www.rosefieldsolarfarm.co.uk/document-library)



heritage and walking groups). A total of 124 non-prescribed consultees were contacted by the Applicant.

### Purpose of consultation

- 5.2.12. The purpose of the consultation was to seek feedback on the updated plans and proposals for Rosefield Solar Farm.
- 5.2.13. During Phase Two Consultation, 239 people attended events about the Proposed Development, with 1,598 unique visitors to the Rosefield Solar Farm website (7,162 total views). The Applicant received 186 responses to the consultation.

### Approach to consultation

- 5.2.14. To ensure that anyone with an interest in the Proposed Development could find out more and share their views, the Applicant designed a consultation strategy comprising a mix of techniques, including:
- Issuing 2,993 letters to homes and businesses around the proposed Order Limits;
  - Holding five events in locations around the proposed Order Limits, supported by a virtual exhibition available through the Rosefield Solar Farm website;
  - Placing copies of the consultation materials – including the Preliminary Environmental Information Report (PEIR) – in locations around the proposed Order Limits for people to inspect. Copies of the consultation booklet, consultation questionnaire and USBs containing the consultation materials were also available to take away from these locations;
  - Writing to a number of stakeholders and community organisations to raise awareness of the consultation;
  - Providing a range of communication channels to enable anyone to find out more about the Proposed Development and share their feedback; and
  - Conducting statutory and non-statutory advertising to publicise information about the Proposed Development and how people could participate in the consultation.
- 5.2.15. In addition to seeking comments on the Proposed Development generally, feedback was sought on the key elements of the Proposed Development, including:

- The design of the Proposed Development, including the preferred location of each of its elements and proposed environmental enhancements and mitigation.
- The PEIR, which presented an initial account of the likely significant environmental effects of the Proposed Development during construction, operation (including maintenance) and decommissioning phases, as well as preliminary details on mitigation measures that could be introduced to avoid, prevent, reduce or, if possible, offset any potentially significant adverse effects.
- How the Proposed Development could contribute to the local community, including the development of a community benefit package.
- Information on the Proposed Development and preliminary environmental assessment was published for consultation in a range of different materials and formats, including:
  - Phase Two Consultation booklet: an accessible, 36-page non-technical overview of the Proposed Development. It also included information on the planning process, the consultation process (including how to find out more and respond to Phase Two Consultation) and the Applicant's approach to community benefit.
  - Phase Two Consultation maps: the updated operational layout for Rosefield Solar Farm, as well as a map showing the proposed construction routes, access points and construction compounds. A version of the updated operational layout was published with a grid overlay to aid respondents to make location-specific comments on the design of the Proposed Development.
  - Phase Two Consultation questionnaire: the main mechanism for collecting feedback.
  - Phase Two Consultation exhibition banners: an accessible summary of the Proposed Development, EIA process, the consultation and planning process, approach to community benefit and next steps.
  - Virtual exhibition: a virtual exhibition hall which contained the exhibition banners, consultation questionnaire, and a digital interactive portal to enable users to view 3D visualisations of the Proposed Development from key views around the proposed Order Limits.

5.2.16. All of these materials are available to view on the Rosefield Solar Farm website<sup>4</sup>. These materials will be appended to the **Consultation Report [EN010158/APP/5.2]** submitted as part of the DCO Application.

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<sup>4</sup> [www.rosefieldsolarfarm.co.uk/document-library](http://www.rosefieldsolarfarm.co.uk/document-library)

5.2.17. All consultees were able to respond to the consultation by:

- Completing an online questionnaire on the Rosefield Solar Farm website<sup>5</sup>
- Submitting feedback or completed questionnaire by email to [info@rosefieldsolarfarm.co.uk](mailto:info@rosefieldsolarfarm.co.uk)
- Posting a completed questionnaire or submitting comments to the Freepost address: Rosefield Solar Farm, FREEPOST SEC Newgate UK LOCAL
- Returning a completed questionnaire at the public events. The design of the Proposed Development, including the preferred location of each of its elements and proposed environmental enhancements and mitigation.

### 5.3. Purpose of consultation

5.3.1. The Applicant was committed to ensuring that everyone had the opportunity to understand the Proposed Development and provide their feedback. The key objectives for achieving this included:

- Ensuring thorough engagement and consultation on our proposals;
- Ensuring proposals are clearly presented, and issues easily understood;
- Providing sufficient opportunities for interested parties to understand and influence our plans;
- Gathering high quality responses to, and feedback on, our plans to help inform proposals; and
- Delivering a consultation that meets the legal requirements and is in accordance with the relevant guidance from the Planning Inspectorate [Ref. 11].

5.3.2. Furthermore, the consultation process aimed to be inclusive and gather feedback from a wide range of audiences, including those who are seldom heard (under-represented people who might be affected by a proposal and who are less likely to be heard or engage with the consultation process) in public consultations such as people without internet access, seasonal workers, younger people and socially isolated people.

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<sup>5</sup> [www.rosefieldsolarfarm.co.uk](http://www.rosefieldsolarfarm.co.uk)

5.3.3. This was achieved by:

- Writing to local authorities and organisations representing individuals and groups that may otherwise be difficult to reach such as seldom heard groups<sup>6</sup>;
- Choosing accessible venues (accessible by wheelchair, accessible parking facilities) for deposit points and public events;
- Publicising the consultation in digital editions of local newspapers;
- Publicising the consultation using Meta social media advertising to help reach young people;
- Holding public events at a variety of times, including evenings and weekends to enable participation by people with different time commitments;
- Making provision for people without internet access through the consultation programme. This included sending a consultation newsletter to every address within the inner zone, holding public events in the area, publicising the consultation in print editions of local newspapers and making hard copies of consultation materials available on-request and at deposit points; and
- Requests for consultation information in alternative formats (e.g. in different languages, large print or easy access) was considered on a case-by-case basis so we could establish how best to provide the information required.

5.3.4. More detailed information on the consultation and engagement processes can be found within the **Consultation Report Appendices B-1-B-4: Final SoCC [EN010158/APP/5.2]**.

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<sup>6</sup> Seldom heard groups are individuals or communities who face barriers to participation and are not well represented in mainstream engagement, often due to factors such as language, disability, digital exclusion, discrimination, or socio-economic disadvantage.

## 6. Assessment of impacts

### 6.1. Overview

- 6.1.1. The assessment of impacts considers the potential impacts arising from the Proposed Development, as well as proposed mitigation measures and actions to enhance opportunities from beneficial impacts where applicable. Positive, neutral and negative impacts have been considered on protected characteristics groups during all phases of the Proposed Development.
- 6.1.2. A judgement has been made as to the likely impacts on protected characteristic groups using DCO Application documents, wider evidence gathered, and consultation feedback. In particular, the assessment draws upon evidence as outlined in **Section 3: Methodology**.
- 6.1.3. It is generally not possible to quantify equality impacts on protected characteristic groups. Therefore this section seeks to identify areas with potential for significant residual impacts overall.
- 6.1.4. This section also identifies the approach to mitigation, which in part will require ongoing monitoring and management. In most cases, the Applicant has included mitigation embedded in the design itself, or through Management Plans (see **Section 7: Summary of actions secured through the DCO**) that will reduce the likelihood of significant impacts.
- 6.1.5. Because of this, it is important to consider equality of protected characteristic groups not just in advance, but also in the ongoing monitoring and management of the Proposed Development as it progresses. In many cases, mitigating impacts on equality is achieved through mitigation required for other impacts. For example, for noise impacts, the mitigation measures introduced are chosen to minimise significant impacts where possible, irrespective of whether those impacts have an equality dimension.
- 6.1.6. In addition to the specific mechanisms for potential impacts relating to protected characteristics, there is also the possibility that any impacts of the Proposed Development may overall disproportionately affect people with particular protected characteristics due simply to their greater prevalence in the local area.
- 6.1.7. This EqIA considers potential equality impacts on protected characteristic groups arising during the construction, operation (including maintenance) and decommissioning phases of the Proposed Development. On the basis of the findings of the ES submitted with the DCO Application, it is anticipated that potential equality effects on protected characteristic groups will include the matters raised in **Section 3.4: Structure of**

**assessment** (air quality, climate, noise and vibration, population, and transport and access).

- 6.1.8. A summary of the potential disproportionate and/or differential equality impacts to protected characteristic groups that the Proposed Development may have on the identified protected characteristics groups is presented in **Table 17** in **Section 8**.

## 6.2. Construction phase

### Environmental amenity

#### Negative impact: Noise impacts on residential properties, workers and PRow users

- 6.2.1. Construction of the Proposed Development has the potential to generate noise and vibration impacts that could have a negative effect on the well-being of residents and the amenity of their properties. Users of PRow within or adjacent to the Order Limits may also experience construction noise.
- 6.2.2. **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]** indicates that during construction the predominant sources of noise will be from construction activities involving earthworks and potential increase in road traffic. Furthermore, the main source of vibration is expected to be vibratory compaction activities. It is assumed that people with the protected characteristics could be residents, workers surrounding the Site and users to the PRow within or adjacent to the Order Limits. A list of receptors can be found within the noise and vibration chapter.
- 6.2.3. As per **ES Volume 2, Chapter 13: Noise and Vibration [EN010158/APP/6.2]**, following the implementation of suitable additional mitigation measures, no significant construction noise and vibration effects arising from construction traffic or activities are predicted.
- 6.2.4. With the implementation of best practice measures, temporary noise barriers, piling mitigation and community liaison as outlined in the **Outline Construction Environmental Management Plan (Outline CEMP) [EN010158/APP/7.2]** and the **Outline Construction Traffic Management Plan (Outline CTMP) [EN010158/APP/7.5]**, construction noise levels are not anticipated to exceed 65dB LA<sub>eq,T</sub>. In addition, traffic during construction is predicted to increase baseline traffic noise levels by less than 3dB in the short-term. For users of the PRow network, any construction noise is expected to be localised and transitory during individual visits, due to the nature of PRow usage. However, for regular users of the same PRow routes, such as local residents using them daily for recreation or commuting, these short-term exposures may be repeated over time. While there is no anticipated risk of hearing damage or other

noise-related adverse health impacts, repeated exposure could affect amenity and contribute to a differential effect on certain protected characteristic groups. Furthermore, no vibratory compaction works are proposed within 45m of off-site residential properties. Construction noise and vibration will be managed through measures set out in the **Outline CEMP [EN010158/APP/7.2]**. Therefore, construction noise and vibration are predicted to be not significant.

- 6.2.5. There remains, however, a potential for negative impacts on protected characteristic groups as their tolerance for noise and vibration can be considerably lower. Groups that may spend more time at home during the day, such as the elderly, children, people with disabilities, or pregnant women, may be more vulnerable to noise and vibration disturbances as a result. Additionally, certain individuals including those with dementia or pre-existing medical conditions, may experience negative responses.
- 6.2.6. As with any development proposal involving noise and vibration, where such groups may be present, there is a potential for **negative** impact and **differential** effect. In this case, while the predicted noise and vibration levels are not considered significant in EIA terms, a precautionary conclusion of a negative and differential effect on relevant protected groups is identified for the construction phase of the Proposed Development.

#### Negative impact: Air quality impacts on sensitive receptors

- 6.2.7. There is potential for air quality impacts arising from construction of the Proposed Development to have a negative effect on the well-being of residents and the amenity of their properties.
- 6.2.8. As outlined in **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2]**, construction activities and the operation of site equipment have the potential to result in dust and particulate matter emissions to the atmosphere. In addition, construction traffic, comprising haulage/construction vehicles and vehicles used for workers' trips to and from the Site, have the potential to release exhaust emissions. Both of which may impact on human receptors.
- 6.2.9. It is considered that the implementation of effective mitigation measures during the construction phase, as outlined in the **Outline CEMP [EN010158/APP/7.2]** and the **Outline CTMP [EN010158/APP/7.5]** will effectively mitigate dust emissions generated from construction activities and therefore air quality impacts are likely to be not significant.
- 6.2.10. There remains, however, potential for negative impacts on protected characteristic groups. A deterioration in air quality can negatively impact the elderly and people with disabilities as it may exacerbate pre-existing



chronic diseases as well as cause new respiratory problems. Furthermore, children might be more susceptible to changes in the environment due to physiological reasons as well as spending more time outdoors. Therefore, as with any development proposal with potential for air quality impacts, a **negative** impact and **differential** effect is expected as a result of the Proposed Development on people with protected characteristics (the elderly, children and people with disabilities) in terms of air quality during the construction phase.

- 6.2.11. As with any development involving short-term construction dust emissions, a negative and differential effect may occur where protected characteristic groups, such as people with pre-existing respiratory conditions or children, are present. While residual impacts are considered not significant in EIA terms, a precautionary conclusion of potential negative and differential effects is identified.

### Accessibility and active travel

#### Negative impact: Transport and access issues resulting from the Proposed Development during construction activities

- 6.2.12. **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]** considers the impact on those roads that are expected to experience increased traffic flows associated with the construction of the Proposed Development, quantifying impacts which may result in changes to actual or perceived amenity or safety (e.g., related to fear and intimidation on and by road users), or on health and well-being where community links and access to facilities may be materially changed (e.g. via severance of communities, driver and pedestrian delay). Aspects of particular relevance to equality on protected characteristic groups include:
- Severance of communities;
  - Non-motorised user delay;
  - Non-motorised user amenity; and
  - Fear and intimidation on and by road users.
- 6.2.13. As outlined in **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]**, increased traffic volume during construction is not predicted to increase by more than 30% across any link, including on Station Road/Dewes Lane, Snake Lane/Fiddlers Field and Granborough Road (identified as the most sensitive receptors) during the construction phase.
- 6.2.14. According to the assessment, there are no potential impacts relating to pedestrian delay, non-motorised user amenity and fear and intimidation that could arise with the implementation of mitigation measures for users



of the links during the construction phase. This includes users of Snake Lane/Fiddlers Field, Granborough Road and PRoW, Bridleway and Path Users within the development areas (identified as the most sensitive receptors).

- 6.2.15. An **Outline CTMP [EN010158/APP/7.5]** has been prepared and submitted in support of the DCO Application. The **Outline CTMP [EN010158/APP/7.5]** identifies measures to control traffic movements, to facilitate community liaison and feedback, to detail signage, to include road wear and tear requirements and to cater for Abnormal Invisible Load movements. The **Outline CTMP [EN010158/APP/7.5]** will be implemented and managed by the Principle Contractor and sets out measures to avoid, minimise or mitigate the environmental impacts of traffic during construction. It will limit the impact on existing users of the public road network or those located close to it, residents living along the access route and users of the PRoW, bridleway and path network within the study area. Furthermore, an **Outline RoWAS [EN010158/APP/7.8]** has been prepared to ensure safe access across the Order Limits for pedestrians, cyclists and equestrians.
- 6.2.16. The implementation of the **Outline CTMP [EN010158/APP/7.5]** will assist with the mitigation of negative impacts associated with increased construction traffic. However, the construction process will still increase the number of vehicles on the road and therefore, it is expected that it could cause negative impacts on protected characteristic groups. As outlined in **Section 4**, the elderly and people with reduced or impaired physical abilities may have reduced mobility and slower reaction times therefore, they may be at greater risk due to the difficulty perceiving or reacting to changes in traffic patterns and access routes. Pregnant women and children could be also affected due to slower reaction times. All of these protected characteristic groups may also be more vulnerable to increased stress as a result.
- 6.2.17. As a result, a **negative** impact and **differential** effect is expected as a result of the Proposed Development on people with protected characteristics (the elderly, children, pregnant women and people with disabilities) in terms of transport and access issues resulting from the Proposed Development construction activities.
- 6.2.18. As with any development involving temporary changes to transport and access, a negative and differential effect may occur where protected characteristic groups, such as older people, disabled individuals or people with limited mobility, are present. While the effects are not considered significant under the EIA, a potential differential impact is acknowledged due to the increased sensitivity of certain groups to changes in travel or access conditions.

## Community uses and amenity spaces

### Negative Impact: Public Rights of Way disruption

- 6.2.19. A number of existing PRow traverse the Proposed Development.
- 6.2.20. Users of some PRow are likely to be affected during the construction phase as they require temporary diversion/closure, or alternative routing where the former is not possible. Furthermore, in some instances, permanent diversions will be required during the construction phase.
- 6.2.21. **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** outlines that during the 30-month construction phase, existing PRow and permissive paths that interact with the Order Limits would be kept open as far as it is practicable and safe to do so. However, where it is not practicable and safe, some PRow may need to be temporarily diverted.
- 6.2.22. Where PRow are to be temporarily diverted or closed, the duration of such a diversion/closure in that area would be for a maximum period of six months. The **Outline RoWAS [EN010158/APP/7.8]** details this and forms the framework for these temporary arrangements. This will inform the development of a detailed RoWAS, which will be prepared by the Principal Contractor to cover all phases of the Proposed Development, including long-term diversions. In some instances, permanent diversions will be required during the construction phase, in line with current proposals and the **Outline RoWAS [EN010158/APP/7.8]**.
- 6.2.23. During construction, there is also potential for interactions between construction traffic and users of the existing footpath network, including walkers, cyclists, and equestrians. To address these potential impacts, several outline management plans have been prepared and submitted in support of the DCO Application. These include the **Outline CTMP [EN010158/APP/7.5]**, **Outline CEMP [EN010158/APP/7.2]**, **Outline RoWAS [EN010158/APP/7.8]** and **Outline Landscape and Ecological Management Plan (Outline LEMP) [EN010158/APP/7.6]**.
- 6.2.24. The **Outline RoWAS [EN010158/APP/7.8]** commits the Applicant to minimising disruption to the PRow network while maintaining safety during construction and operation (including maintenance) of the Proposed Development. A pragmatic, risk-based approach will be taken, with construction phasing informed by the current project understanding. Detailed PRow management measures will be agreed with relevant planning and PRow officers and secured through a detailed oRoWAS prior to construction. Any changes to PRow management during detailed design will also require agreement with the local planning authority, and advance notice of closures or diversions will be provided to Buckinghamshire Council's Access Officers.

- 6.2.25. Changes to PRoW are expected to have an impact on protected characteristic groups, such as the elderly and people with disabilities as they could feel lost, disorientated, or at heightened risk of being involved in a road traffic collision if routes are not sufficiently marked. Therefore, the Proposed Development is expected to have a **negative** impact and **differential** effect on the elderly and people with disabilities during the construction phase.

## Employment and business

### Neutral impact: Employment

- 6.2.26. The Proposed Development will provide construction job opportunities over the anticipated 30-month construction programme. The Applicant estimates that a maximum of 600 workers will be on Site at any one time during peak periods and will likely extend for the duration of the construction phase. This figure represents the gross employment supported on site across all roles and contract types.
- 6.2.27. In terms of net local employment benefit, the **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** estimates that approximately 420 to 470 full time equivalent (FTEs) roles per year will be supported within the Construction Labour Market Area (CLMA), defined as within 50 miles of the Site. Of these, approximately 180 FTEs per year are expected to be supported in the e CLMA Focus Area, defined as within 10 miles of the Site.
- 6.2.28. **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** outlines that the employment supported will be in a range of different positions and skillsets across civil construction sectors, and includes a variety of electrical and mechanical skills including specialised solar installation professionals. Some non-construction and supporting roles such as security, process and administrative and transportation roles will also be required. Employment supported will also be in a range of tenures depending on the work package/contract and contractor at each phase of construction.
- 6.2.29. An **Outline Employment, Skills and Supply Chain Plan [EN010158/APP/7.14]** has been prepared which includes details on how the Applicant aims to support and enhance opportunities for employment, skills and the supply chain during the construction phase. It is important to note that the Applicant and the Tier 1 Contractors (those appointed to deliver major packages of construction work) would work in tandem to identify and maximise opportunities. The Applicant and Tier 1 Contractors would be dependent upon close collaborative working with local stakeholders and organisations across Buckinghamshire to translate these

opportunities into jobs, skills, and contracts for local people and businesses.

6.2.30. The main objectives of the **Outline Employment, Skills and Supply Chain Plan [EN010158/APP/7.14]** are detailed below:

- Promote opportunities for people who are employed, unemployed and economically active and young people who are Not in Education, Employment or Training;
- Create opportunities for businesses to tender for work and join the supply chain of the Proposed Development;
- Clearly define the workforce, skills and supply chain requirements of the Proposed Development and articulate these in a clear and timely way to relevant stakeholders involved at a County and Regional-level in supporting education, access to employment, skills development and business engagement;
- Harness the motivational potential of the Proposed Development to inspire the next generation of talent, particularly, to confidently invest in a career and future in Buckinghamshire, benefitting all employers; and
- Contribute to an evidence base to support the planning and delivery of education and skills curricula and training capable of delivering the workforce and skills needed across the County and wider Region.

6.2.31. Employment created by the Proposed Development will be required to adhere to anti-discrimination laws with respect to sex, gender reassignment, race, disability and religion as set out in the Equality Act 2010 **[Ref. 1]**. Therefore, protected characteristic groups including men and women, gender reassignment, disabilities and religion are expected to experience a **neutral** impact with **no differential/disproportionate** impacts as a result of the Proposed Development.

6.2.32. While the Proposed Development is expected to create a range of employment and skills opportunities, it is also acknowledged that certain existing businesses could experience disruption or temporary impacts, particularly where land access or construction activity may affect site operations. This may have indirect effects on employees, including those with protected characteristics. Heads of Terms for land swaps and financial compensation have been agreed with all affected tenants and landowners, with some agreements already finalised. These measures are designed to mitigate impacts by ensuring that businesses retain access to land or receive fair financial redress. Therefore, these effects are not anticipated to give rise to disproportionate or differential equality impacts but are noted here for balance.

### Neutral impact: Local expenditure

- 6.2.33. The Proposed Development will generate economic benefits during the construction phase as it is expected that the workforce will expend in the local economy and services, helping to sustain jobs across a range of sectors.
- 6.2.34. **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** outlines that the gross effect, based on average daily workforce expenditure on subsistence, would be equivalent to approximately £1.9m on average per year during the construction phase. While the number of workers on-site will vary over the course of the programme, and on-site welfare facilities may reduce some local expenditure, a proportion of this spending will still benefit local businesses, such as shops, cafés, accommodation providers, and transport services. These businesses often employ people from a broad demographic cross-section, including younger and older workers, women, and people from ethnic minority backgrounds, thereby indirectly supporting job stability for groups who may be more vulnerable to economic exclusion.
- 6.2.35. Employment created by the Proposed Development will be required to adhere to anti-discrimination laws with respect to sex, gender reassignment, race, disability and religion as set out in the Equality Act 2010 **[Ref. 1]**. Therefore, protected characteristic groups including men and women, gender reassignment, disabilities and religion are expected to experience a **neutral** impact with **no differential/disproportionate** impacts as a result of the Proposed Development.

### 6.3. Operation (including maintenance) phase

#### Environmental amenity

#### Negative impact: Noise impacts on sensitive receptors

- 6.3.1. During the operation (including maintenance) phase, the predicted exceedances at the sensitive receptors are primarily due to noise from the Rosefield Substation, Satellite Collector Compounds, BESS and Inverter Transformer Stations.
- 6.3.2. The Proposed Development includes embedded mitigation during this phase which includes the following:
- Rosefield Substation, Collector Compounds, Standalone Inverter, Transformer and Switchgear and ITS (part of the Balance of Solar System plant comprised in Work No 1) will be offset a minimum distance of 50m from all existing residential properties;
  - Use of equipment with low noise emissions, where feasible; and

- Orientating noise emitting equipment to reduce noise level beyond the Order Limits.

- 6.3.3. Furthermore, an **Outline Operational Environmental Management Plan (OEMP) [EN010158/APP/7.3]** has been developed and submitted in support of the DCO Application. The **Outline OEMP [EN010158/APP/7.3]** outlines procedures aimed at achieving a minimum of noise reduction of 5dB(A) by refining engineering requirements, including the adoption of lower noise transformers, which are identified as the primary source of operational acoustic emissions from the Proposed Development. Additionally, physical noise mitigation measures such as the installation of barriers have been proposed and are secured in the **Outline OEMP [EN010158/APP/7.3]**.
- 6.3.4. As a result of the implementation of mitigation measures, predicted operational noise levels throughout daytime and night-time periods would not exceed 35dB L<sub>Ar, T</sub> at any sensitive receptors. Such noise levels are considered to represent successful application of the lowest observed adverse effect level within relevant noise planning policy.
- 6.3.5. There remains, however, potential for negative impacts on protected characteristic groups, as their tolerance for noise can be considerably lower. Groups that spend more time at home, such as the elderly, children, people with disabilities, or pregnant women, may be more vulnerable to noise disturbances. Additionally, certain individuals, including those with dementia or pre-existing medical conditions may experience negative impacts. Therefore, a **negative** impact and **differential** effect is expected as a result of the Proposed Development on people with protected characteristics (the elderly, children, people with disabilities and pregnant women) in terms of noise and vibration during the operation (including maintenance) phase.

#### Neutral impact: Air quality impacts on residential properties and local facilities

- 6.3.6. During the operation (including maintenance) phase, the Proposed Development has the potential to affect air quality through release of exhaust emissions from vehicles, as a result of any changes in traffic flows or flow composition the Proposed Development may bring.
- 6.3.7. **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2]** assesses the potential impacts of road traffic exhaust emissions on human receptors during operation (including maintenance) phase. The assessment concludes that the Proposed Development is not expected to generate a minimal increase in traffic during operation. This level of traffic is below the thresholds. Consequently, the predicted emissions would fall below the Environment Protection UK and Institute of Air Quality Management 2017 guidance screening criteria **[Ref. 31]** and the Design Manual for Roads



and Bridges LA 105 Air Quality [Ref. 32]. Therefore, the impacts are considered to be not significant.

- 6.3.8. No specific operation (including maintenance) phase mitigation measures are required. Nevertheless, best practice mitigation measures found in **ES Volume 2, Chapter 6: Air Quality [EN010158/APP/6.2]** can be considered to further reduce any residual impacts on air quality. An **Outline OEMP [EN010158/APP/7.3]**, including such measures described, has been prepared and is submitted in support of the DCO Application.
- 6.3.9. Given the low volume of traffic anticipated and the corresponding low level of associated emissions, the Proposed Development is expected to have a **neutral** impact on air quality during the operation (including maintenance) phase. As such **no differential/disproportionate** effect on groups with protected characteristic are anticipated during the operation (including maintenance) phase.

#### Positive impact: Contribution to Climate Change

- 6.3.10. People with protected characteristics are more vulnerable to the impacts of climate change, including:
- More variable and extreme weather – climate change is expected to lead to more variable and extreme weather events, for example, heatwaves, storms and cold snaps. These events can have an increased impact on some protected characteristic groups, such as elderly people, children, pregnant women and people with disabilities who may be more vulnerable to extreme weather conditions and more likely to experience illness, reduced mobility, or difficulties accessing care during such events [Ref. 31].
  - Increased risk of flooding – with climate change likely to alter rainfall patterns and bring more heavy downpours, flood risk is expected to increase in the future. This could impact properties and infrastructure with serious consequences for people, heritage, businesses and communities. For some disabled people and their carers, it is expected that the risk of flooding could have a greater effect compared to the rest of society as they face greater obstacles in preparing and responding to flood events [Ref. 33]. Other groups such as children, older adults and pregnant women may also be more vulnerable to disruption and risk during flood events due to physical, health or care-related needs.
  - Health and well-being – a warming climate has the potential to alter patterns of disease and exacerbate various health issues. Additionally, there is emerging evidence suggesting that increased awareness of climate change is contributing to anxiety and other mental health concerns, particularly among children [Ref. 34].

- 6.3.11. As set out in **ES Volume 2, Chapter 8: Climate [EN010158/APP/6.2]**, greenhouse gas emissions generated from the construction, operation (including maintenance) and decommissioning of the Proposed Development total 1,191,562 tCO<sub>2</sub>e.
- 6.3.12. Over the proposed 40-year lifetime, the operation of the Proposed Development results in GHG savings of over 3 million tonnes CO<sub>2</sub>e when compared to Combined Cycle Gas Turbine-generated electricity.
- 6.3.13. The renewable energy generation of the Proposed Development, and comparative carbon reduction compared to non-renewable methods, will have a positive effect on the climate, and therefore **positive** impact and **no differential/disproportionate** effect on groups with protected characteristic.

### Community uses and recreational facilities

#### Positive impact: Public Right of Way enhancement

- 6.3.14. By the operation (including maintenance) phase, the diversion of five PRoW will have been completed, with the replacement/diverted PRoWs fully open and accessible to the public. **ES Volume 3, Figure 3.10: Existing and Proposed PRoW and Permissive Footpaths [EN010158/APP/6.3]** illustrates the existing PRoW network, the proposed permanent diversions, new permissive paths, and wider recreation and amenity improvements, including the creation of new public routes.
- 6.3.15. The Proposed Development would include recreation and amenity improvements designed to retain and enhance recreational connectivity across the Site, as set out within the **Outline RoWAS [EN010158/APP/7.8]**.
- 6.3.16. Furthermore, three new footpath routes would be implemented during the construction phase. These routes would remain open for the duration of the Proposed Development, with exception of closures associated with maintenance procedures during the operational phase.
- 6.3.17. **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** has identified a beneficial effect on users of the PRoW as it will enhance their well-being and quality of life. Furthermore, access to green spaces can improve mental health and promote active lifestyles.
- 6.3.18. The creation of new permissive paths would also increase community accessibility and recreational opportunities in an area that is currently inaccessible. The routes would improve community connectivity between the existing public highway and community areas such as East Claydon, Middle Claydon and Botolph Claydon in the east and Calvert in the west.



- 6.3.19. An **Outline OEMP [EN010158/APP/7.3]** has been developed and submitted in support of the DCO Application. Furthermore, as set out within the **Outline RoWAS [EN010158/APP/7.8]**, the implementation of any new route, and the approach to diversion and extinguishment of any route, would comply with the legal requirements of the Highways Act 1980 and Equality Act 2010 in terms of temporary access infrastructure and management, by ensuring that there are no physical barriers to access without lawful authority and that reasonable adjustments are made to facilitate participation by all.
- 6.3.20. It is considered that the Proposed Development will have a **positive** impact with **no differential/disproportionate** effect to all protected characteristic groups during the operation (including maintenance) phase.

**Neutral impact: Community uses and recreational facilities, land and assets**

- 6.3.21. Community and recreational facilities, land and assets and their users may experience change to their operating environment (including environmental change and changes to access), during the operation (including maintenance) phase.
- 6.3.22. The potential impacts on community uses and recreational facilities during the operation (including maintenance) phase of the Proposed Development have been assessed with reference to accessibility, environmental amenity, and the potential to deter or impact use of such facilities.
- 6.3.23. **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** has identified that access to community and recreational facilities would not be adversely impacted, and users would not be deterred from continuing to use these facilities during the operation phase due to traffic or transport issues. The quality of the local environment, in terms of air quality, would not be diminished in a way that could reduce access to or enjoyment of these facilities. Lastly, the operational noise is not expected to deter the use of nearby community or recreational facilities, and no significant adverse noise impacts are predicted for these receptors during the operation phase.
- 6.3.24. An **Outline OEMP [EN010158/APP/7.3]** has been prepared and submitted in support of the DCO Application. The **Outline OEMP [EN010158/APP/7.3]** includes measures to manage potential impacts on environmental amenity associated with operation (including maintenance) activities. It outlines procedures to ensure continued safety and amenity for communities adjacent to the Order Limits.
- 6.3.25. Based on the findings of the EIA and the nature of the Proposed Development during the operation (including maintenance) phase, no

significant impacts are expected on community or recreational facilities for equality groups. Environmental factors such as traffic, air quality, and noise will remain within acceptable thresholds, and therefore, protected characteristic groups are expected to experience a **neutral** impact with **no differential/disproportionate** impacts as a result of the Proposed Development during the operational (including maintenance phase).

## Employment and business

### Neutral impact: Employment

- 6.3.26. The majority of direct employment opportunities that result from the Proposed Development will be during the construction phase, however there will also be up to 10 operational jobs created during the operation (including maintenance) phase, with additional staff attending when required for maintenance, replacement of faulty or end of service life solar equipment, vegetation management activities and cleaning. Applying additionality assumptions (which account for the percentage of economic benefit that people outside of the area receive such as displacement, leakage) to this figure results in an estimated net additional employment average of approximately 7 jobs in Buckinghamshire.
- 6.3.27. **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** outlines that the operational roles will likely be specialised positions specific to the needs of a solar energy generation facility and therefore, would be undertaken by people based both locally and from a wider geographic area. The employment supported would include electrical engineering roles likely to require higher level skills and qualifications, as well as Site management, administrative and process/elementary occupations including security and maintenance.
- 6.3.28. An **Outline Employment, Skills and Supply Chain Plan [EN010158/APP/7.14]** has been prepared which includes details on how the Applicant aims to support and enhance opportunities for employment, skills and the supply chain during the operation (including maintenance) phase.
- 6.3.29. Employment created by the Proposed Development will be required to adhere to anti-discrimination laws with respect to sex, gender reassignment, race, disability and religion as set out in the Equality Act 2010 **[Ref. 1]**. Therefore, protected characteristic groups including sex, gender reassignment, disabilities and religion are expected to experience a **neutral** impact with **no differential/disproportionate** impacts as a result of the Proposed Development during the operational (including maintenance phase).

- 6.3.30. While the Proposed Development is expected to create a range of employment and skills opportunities, it is also acknowledged that certain existing businesses could experience disruption or temporary impacts, particularly where land access or construction activity may affect site operations which for some operations, this change may extend into the operational and maintenance period of the Proposed Development. This may have indirect effects on employees, including those with protected characteristics. Heads of Terms for land swaps and financial compensation have been agreed with all affected tenants and landowners, with some agreements already finalised. These measures are designed to mitigate impacts by ensuring that businesses retain access to land or receive fair financial redress. Therefore, these effects are not anticipated to give rise to disproportionate or differential equality impacts but are noted here for balance.

#### Neutral impact: Local expenditure

- 6.3.31. It is expected that the workforce will spend in the local economy and services, helping to sustain jobs across a range of sectors.
- 6.3.32. **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** outlines the gross effect based on average daily workforce expenditure on subsistence would be equivalent to approximately £76,100 on average per year during the operation (including maintenance) phase.
- 6.3.33. Investment in certain sectors results in indirect impacts on others in an interconnected economy. This can lead to changes in production, sourcing, and distribution practices, influencing the entire supply chain ecosystem. As such it can be anticipated that investment will be retained locally and regionally, both within the energy sector but also outside it. These can have positive economic impacts by supporting and sustaining local jobs.
- 6.3.34. However, employment created by the Proposed Development will be required to adhere to anti-discrimination laws with respect to sex, gender reassignment, race, disability and religion as set out in the Equality Act 2010 **[Ref. 1]**. Therefore, protected characteristic groups including men and women, gender reassignment, disabilities and religion are expected to experience a **neutral** impact with **no differential/disproportionate** impacts as a result of the Proposed Development during the operational (including maintenance phase).

## 6.4. Decommissioning phase

### Environmental amenity

#### Negative impact: Noise impacts on residential properties

- 6.4.1. The likely noise impacts during the decommissioning phase are considered to be similar to the construction phase as it is envisaged that similar plant and works would be used. All decommissioning activities, including traffic flows and construction type activities will implement appropriate mitigation include the best practice measures included in the **Outline Decommissioning Environmental Management Plan (Outline DEMP) [EN010158/APP/7.4]**. Noise levels are therefore, expected to be not significant during the decommissioning phase.
- 6.4.2. However as with construction phase, there is a potential for negative impacts on protected characteristic groups, as their tolerance for noise can be considerably lower. Groups that spend more time at home, such as the elderly, children, people with disabilities (including those with dementia or pre-existing medical conditions may experience negative impacts), or pregnant women, may be more vulnerable to noise disturbances.. Therefore, as with any development proposal that would result in noise and vibration, a **negative** impact and **differential** effect is expected as a result of the Proposed Development on people with protected characteristics (the elderly, children, people with disabilities and pregnant women) in terms of noise and vibration during the decommissioning phase.

#### Negative impact: Air quality impacts on residential properties and local facilities

- 6.4.3. The likely air quality impacts during the decommissioning phase are considered to be similar to the construction phase as it is envisaged that similar plant and works would be used. All decommissioning activities, including traffic flows and construction type activities will implement appropriate mitigation include the best practice measures included in the **Outline DEMP [EN010158/APP/7.4]**.
- 6.4.4. Although air quality impacts are likely to not be significant, there is potential for negative impacts on protected characteristic groups. A deterioration in air quality can negatively impact the elderly and people with disabilities as it may exacerbate pre-existing chronic diseases as well as cause new respiratory problems. Furthermore, children might be more susceptible to changes to the environment due to physiological reasons as well as spending more time outdoors. Therefore, as with any development proposal with potential for air quality impacts, a **negative** impact and **differential** effect is expected as a result of the Proposed Development on people with protected characteristics (the elderly, children and people with disabilities) in terms of air quality during the decommissioning phase.

## Accessibility and active travel

### Negative impact: Increased traffic movements on local road networking

- 6.4.5. **ES Volume 2, Chapter 15: Transport and Access [EN010158/APP/6.2]**, details that during the decommissioning phase, traffic associated with decommissioning is lower than that for the construction phase.
- 6.4.6. To protect future stakeholders it is proposed that a Decommissioning Traffic Management Plan be prepared prior to decommissioning works commencing, which is secured in the draft DCO as a requirement. This plan will ensure the necessary mitigation is achieved to reduce the risk of accidents occurring and reduced environmental amenity. However, the decommissioning process will still increase the number of vehicles on the road and therefore, it is expected that it could cause negative impacts on protected characteristic groups. The elderly and some disabled people may have reduced mobility and slower reaction times, and therefore they may be at greater risk due to the difficulty perceiving or reacting to changes in traffic patterns. Pregnant women and children could be also affected as it could increase their stress level and they have slower reaction times. Therefore, as with any development proposal with potential for increased traffic movements, a **negative** impact and **differential** effect is expected as a result of the Proposed Development on people with protected characteristics (the elderly, children, pregnant women and people with disabilities) in terms of the increased traffic movements during the decommissioning phase.

## Employment and business

### Neutral Impact: Employment

- 6.4.7. **ES Volume 2, Chapter 14: Population [EN010158/APP/6.2]** states that the likely level of effect during decommissioning is expected to be similar to, or less than, that experienced during construction. Therefore, similar to the construction phase, during decommissioning the Applicant aims to, where practicable, use local decommissioning workers and businesses during the decommissioning phase, which would help to support the creation of new direct job opportunities for local people as secured within the **Outline Employment, Skills and Supply Chain Plan [EN010158/APP/7.14]**. Throughout the 24 month decommissioning phase, should it not be possible to source all decommissioning staff locally, there may be a need to draw in decommissioning staff from outside of the area.
- 6.4.8. Employment created by the Proposed Development will be required to adhere to anti-discrimination laws with respect to sex, gender reassignment, race, disability and religion as set out in the Equality Act 2010 **[Ref. 1]**. Therefore, protected characteristic groups including men

and women, gender reassignment, disabilities and religion are expected to experience a **neutral** impact with **no differential/disproportionate** impacts as a result of the Proposed Development.

## 6.5. Summary

- 6.5.1. Overall, impacts on environmental amenity during the construction works are considered to be temporary. As with any development with impacts during construction related to noise, air quality and traffic movements, there can be a **negative differential** effect on people with protected characteristics such as the elderly, children, people with disabilities and pregnant women. These impacts are not considered disproportionate, as the proportion of these groups within the affected population is broadly in line with local and national averages. Furthermore, disruption to the existing PRoW would have a **negative differential** effect on the elderly and people with disabilities. Impacts will be monitored and mitigated/minimised as far as possible throughout the construction phase in accordance with the relevant Management Plans, strategies and mitigation measures. Impacts during decommissioning phase have been considered to be similar to impacts during construction.
- 6.5.2. The assessment has identified **negative** and **differential** impacts related to noise on protected characteristic groups (the elderly, children, people with disabilities and pregnant women) during the operation (including maintenance) phase due to the noise generated from the Rosefield Substation, Satellite Collector Compounds, BESS and Inverter Transformer Stations. Impacts will be monitored and mitigated/minimised as far as possible throughout this phase in accordance with the **Outline OEMP [EN010158/APP/7.3]** and mitigation measures outlined above in **Sections 6.2 to 6.4**.
- 6.5.3. The assessment has identified a **positive differential and/or disproportionate effect** on people with protected characteristics due to the improvements to the existing PRoW and the provision of new permissive paths and wider recreation and amenity improvements, including the creation of new public routes.
- 6.5.4. Lastly, the Proposed Development is expected to positively contribute to climate change mitigation, which in turn is anticipated to have a **positive** and **differential/disproportionate** effect on protected characteristic groups.
- 6.5.5. The identification of multiple negative differential effects within this assessment is not unusual and reflects the purpose of the EqIA, which is to identify where people with protected characteristics may be more sensitive to environmental change, even where impacts are temporary, localised, and mitigated. All identified effects are being addressed through

management plans and embedded mitigation to minimise potential adverse impacts and ensure inclusive access to benefits.



## 7. Summary of actions secured through the DCO

- 7.1.1. A series of outline Management Plans have been established through consultation with key stakeholders, setting out measures to avoid or reduce impacts identified in the EIA and EqIA. These plans include controls that will be implemented across construction, operation and decommissioning phases. While not all measures are tailored specifically to protected characteristic groups, several have relevance in minimising effects on groups that may be more sensitive to disruption.
- 7.1.2. Where appropriate, measures will be informed by ongoing monitoring and feedback mechanisms secured through the DCO. This may include noise and traffic monitoring and coordination with local authority. These processes allow for mitigation to be adapted in response to emerging issues where practicable.
- 7.1.3. Examples of how this may support people with protected characteristics include:
- The provision of advance notice of construction works or temporary diversions in accessible formats to help older people, disabled people, or carers plan their movements;
  - Use of traffic marshals or on-site signage to assist people with visual impairments or mobility challenges in navigating PRow diversions;
  - Noise and dust monitoring to ensure best practice controls are effective near sensitive receptors such as schools or care facilities;
  - Community liaison arrangements that allow local stakeholders to raise access or amenity concerns, which can be fed back into construction planning.
- 7.1.4. The following plans detail the environmental and management measures to be implemented: The **Outline CEMP [EN010158/APP/7.2]** which includes measures relating to the mitigation and management of environmental aspects of the Site, roles and responsibilities, communications and general amenity relating to construction activities;
- The **Outline CTMP [EN010158/APP/7.5]** which includes measures related to construction traffic to reduce risk of severance or risk of incident and delay, and promote accessibility and public safety within the Order Limits;
  - The **Outline OEMP [EN010158/APP/7.3]** which includes measures relating to the mitigation and management of environmental aspects of the Site, roles and responsibilities, communications and general amenity relating to operational activities;



- The **Outline DEMP [EN010158/APP/7.4]** which includes measures relating to the mitigation and management of environmental aspects of the Site, roles and responsibilities, communications and general amenity relating to decommissioning activities;
- The **Outline RoWAS [EN010158/APP/7.8]** which includes measures to manage PRow to ensure they are safe and accessible during the construction and decommissioning phases of the Proposed Development;
- The **Outline LEMP [EN010158/APP/7.6]** which includes measures relating to the management of land within the Order Limits, maintenance of ecological mitigation areas and mitigation/enhancement of visual amenity for receptors during the construction, operation (including maintenance) and decommissioning phases; and
- The **Outline RoWAS [EN010158/APP/7.8]** which forms the framework for detailed Rights of Way and Access Strategy Plan(s) which is to be developed by the principal contractor to cover all phases of the Proposed Development. It details the principles, management and inspection requirements as well as the extent and nature of any closure, diversion and/or improvement to the PRow network and permissive footpaths.

7.1.5. Full details of commitments made are captured in the **Commitment Register [EN010158/APP/6.4]**.

7.1.6. In addition, a **Community Liaison Group (CLG)** will be established for the operational phase of the Proposed Development, secured through a Requirement in the DCO. This group will provide a structured forum for engagement with local residents and stakeholders, including those who may represent or support people with protected characteristics.

## 8. Summary of impacts

- 8.1.1. **Table 17** summarises the potential disproportionate and/or differential impacts to protected characteristics groups arising from the Proposed Development during the construction phase, operation (including maintenance) phase, and decommissioning phase, as defined in **Section 6: Assessment of Impacts**.
- 8.1.2. **Table 17** also provides a brief overview of the relevant Management Plan(s) containing relevant mitigation measures to avoid, minimise or mitigate adverse impacts as well as activities to be implemented to enhance opportunities resulting from beneficial impacts. While the Management Plans do not contain mitigation measures tailored exclusively to protected characteristic groups, many of the controls (such as those on noise, access, traffic and amenity) are relevant to the potential impacts identified in this assessment.
- 8.1.3. Ongoing engagement and community liaison are also central to ensuring that equality related effects are identified and addressed effectively during delivery. A CLG will be established for the operational phase of the Proposed Development, secured through a Requirement of the DCO.

Table 17: Summary of potential equality impacts to protected characteristic groups of the Proposed Development

Potential Impacts	Description of potential impacts	Phase	Relevant protected characteristics	Differential / Disproportionate	Rating (Positive, neutral or negative)	Mitigation and enhancement measures
<b>Environmental amenity</b>	Noise and vibration impacts from construction and decommissioning activities and operational noise. No likely significant noise impacts expected, however noise may impact protected characteristic groups.	Construction Operation (including maintenance) Decommissioning	Age, Disability and Pregnancy and Maternity	Differential	Negative	<b>Outline CEMP [EN010158/APP/7.2]; Outline CTMP [EN010158/APP/7.5]; Outline OEMP [EN010158/APP/7.3]; and Outline DEMP [EN010158/APP/7.4]</b>
	Air Quality impact from construction and decommissioning activities. No significant likely air quality impacts however, there is	Construction Decommissioning	Age and Disability	Differential	Negative	<b>Outline CEMP [EN010158/APP/7.2]; Outline OEMP [EN010158/APP/7.3] and Outline DEMP [EN010158/APP/7.4]</b>

Potential Impacts	Description of potential impacts	Phase	Relevant protected characteristics	Differential / Disproportionate	Rating (Positive, neutral or negative)	Mitigation and enhancement measures
	the potential for protected characteristic groups to be impacted, due to their susceptibility to changes and pre-existing chronic diseases.					
	The Proposed Development supports climate change mitigation which may have a positive impact on protected characteristics groups who are more vulnerable to the impacts of climate change.	Operation (including maintenance)	All protected characteristic groups	Differential and / or disproportionate	Positive	N/A

Potential Impacts	Description of potential impacts	Phase	Relevant protected characteristics	Differential / Disproportionate	Rating (Positive, neutral or negative)	Mitigation and enhancement measures
<b>Accessibility and active travel</b>	Changes on traffic flow. No likely impacts associated with the increased construction and decommissioning traffic. However, the increase in number of vehicles on the road could cause negative impacts on protected characteristic groups as they are more vulnerable to changes.	Construction Decommissioning	Age, Disability and Pregnancy and Maternity	Differential	Negative	<b>Outline CTMP [EN010158/APP/7.5] and Proposed Decommissioning Traffic Management Plan</b>
<b>Community uses and amenity space</b>	Disruptions to the existing PRow which would have an impact on	Construction Operation (including maintenance)	Age and Disability	Differential	Negative	<b>Outline RoWAS [EN010158/APP/7.8]</b>

Potential Impacts	Description of potential impacts	Phase	Relevant protected characteristics	Differential / Disproportionate	Rating (Positive, neutral or negative)	Mitigation and enhancement measures
	protected characteristics groups.					
	Provision of new permissive paths would lead to improvements to accessibility, increased recreational opportunities and improved connectivity.	Operation (including maintenance)	All protected characteristic groups	Differential and disproportionate	Positive	<b>Outline OEMP [EN010158/APP/7.3]</b> <b>Outline RoWAS [EN010158/APP/7.8]</b>
<b>Employment and Business</b>	Construction job opportunities and economic benefits.  Employment will be required to adhere to anti-discrimination laws	Construction Operation (including maintenance) Decommissioning	Sex, gender reassignment, race, disability and religious groups	-	Neutral	<b>Outline Employment, Skills and Supply Chain Plan [EN010158/APP/7.14]</b>

Potential Impacts	Description of potential impacts	Phase	Relevant protected characteristics	Differential / Disproportionate	Rating (Positive, neutral or negative)	Mitigation and enhancement measures
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as set out in the  
Equality Act 2010.

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