

Green Hill Solar Farm

EN010170

Equality Impact Assessment

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Issue Sheet

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DCO Submission

Equality Impact Assessment

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1 Introduction

1.1 Overview

- 1.1.1 This report has been prepared on behalf of Green Hill Solar Farm Limited (the Applicant) in relation to an application made to the Secretary of State (SoS) for the Department for Energy Security and Net Zero (DESNZ), under section 37 of the Planning Act 2008, seeking a Development Consent Order (DCO) for the Green Hill Solar Farm (hereinafter referred to as the Scheme).
- 1.1.2 The Scheme comprises a number of land parcels (Sites) described as Green Hill A, A.2, B, C, D, E, F, G, and BESS which accommodate a ground mounted solar Photovoltaic (PV) generating station (incorporating the solar arrays); grid connection infrastructure and energy storage; and the Cable Route Corridors. The Sites are located to the northeast and southeast of Northampton and the west and south of Wellingborough. See the Location Plan **[EN010170/APP/GH2.1]** for the site locations.
- 1.1.3 The Scheme is described in full in Chapter 4 of the Environmental Statement (ES), Scheme Description **[EN010170/APP/GH6.2.4]** which is submitted in support of the application.

1.2 Purpose of the Equality Impact Assessment (EqIA)

- 1.2.1 Section 149 of the Equality Act 2010 (the Act) (Ref .1) requires public authorities to have due regard to equality considerations when exercising their functions. This Equality Impact Assessment (EqIA) considers the potential for the Scheme to discriminate based on certain protected characteristics under the Act in order to assist the SoS in their consideration of the public sector equality duty under section 149. It aims to:
- Identify and assess any likely effects of the Scheme on relevant receptors, including during the construction, operational and decommissioning phases of the Scheme;
 - Set out measures, where possible, to minimise any adverse effects on relevant receptors; and
 - Set out measures, where possible, to further enhance any beneficial effects on relevant receptors.
- 1.2.2 The EqIA draws principally on the findings set out in the ES supporting the application **[EN010170/APP/GH6.1 to EN010170/APP/GH6.5]**. The findings of the ES are interrogated to determine whether, and to what extent, potential effects could have different magnitude on relevant receptors compared to the general population.



2 Legislation and Policy

2.1 The Equality Act 2010

2.1.1 The Act (Ref .1) consolidated previous legislation designed to prohibit discrimination on the grounds of protected characteristics. The Act identifies nine protected characteristics. These are:

- Age;
- Disability;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race;
- Religion or belief (including lack of belief);
- Sex; and
- Sexual orientation.

2.1.2 “*Relevant receptors*” is the term used in this EqIA to refer to groups of people with similar characteristics in the categories above, such as people in the same age group, people of a particular race, people of particular marital status, etc.

2.1.3 The Act seeks to advance equality in part by imposing a Public Sector Equality Duty (section 149). It requires that public authorities must have due regard to the need to:

“(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and

(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.”

2.1.4 The SoS, when deciding whether to grant a DCO for the Scheme, is subject to the Public Sector Equality Duty. For the avoidance of doubt, that is a duty for the SoS to discharge, not the Applicant. Even so, this EqIA provides relevant information to assist the SoS in carrying out this duty.

2.2 Overarching National Policy Statement for Energy (EN-1)

2.2.1 The Equality Act is further a direct consideration in ensuring that the assessment of environmental and human health effect from the Scheme is carried out in accordance with national policy. Paragraph 4.4.6 of Overarching National Policy Statement for Energy (EN-1) (Ref .2) requires the ES to consider the following:

“Opportunities should be taken to mitigate indirect impacts, by promoting local improvements to encourage health and wellbeing ... [including] potential impacts on vulnerable groups within society and impacts on those with protected



characteristics under the Equality Act 2010, i.e. those groups which may be differentially impacted by a development compared to wider society as a whole”.

- 2.2.2 This falls under the wider requirement, set out at paragraph 4.3.4 of EN-1, for DCO schemes to be accompanied by an Environmental Statement which considers *“the potential effects, including benefits, of a proposal for a project, the applicant must set out information on the likely significant environmental, social and economic effects of the development, and show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. This information could include matters such as employment, equality, biodiversity net gain, community cohesion, health and well-being.”*



3 Methodology

3.1 Guidance

- 3.1.1 Whilst guidance on fulfilling the requirements of the Public Sector Equality Duty is available (Ref .2, Ref .4 and Ref .5), there is only very limited guidance on carrying out Equality Impact Assessments in the UK in relation to individual developments, or for developers or DCO Applicants to provide supporting information to assist the SoS in adhering to their duties under the Act. The guidance that does exist is designed for the assessment of policies; however, the principles can be adapted for applications to individual developments, including DCO applications.
- 3.1.2 Meeting the Equality Duty in Policy and Decision-Making (Ref .6) states that *“there is no prescribed methodology for assessing the impact on equality”* but recognises that established methods of equality assessment can be useful.
- 3.1.3 The Equality and Human Rights Commission (EHRC) has produced guidance for the assessment of equality impacts, aimed at the potential impacts of policies, but applicable more generally (Ref .7). It identifies a 10-stage process for considering equality in policy making, of which the following stages are considered most relevant to this EqlA:
- “Step 2: gather evidence to inform your initial equality screening and record your conclusions;*
- Step 4: gather further evidence if needed;*
- Step 5: Use all evidence to inform your full equality considerations and record equality impacts; and*
- Step 6: Finalise your equality considerations and produce your actions.”*
- 3.1.4 The screening process involves considering the relevance of the policy/activity to each of the protected characteristics and providing justification to support the conclusion on relevance. This should be built on qualitative and quantitative data collection and analysis, considered through the lens of all groups within the population with protected characteristics, with particular emphasis placed on those with multiple characteristics, or small groups that may be disproportionately affected by decisions made.
- 3.1.5 Furthermore, the UK Research and Innovation website hosts specific guidance and an outline template for the production of EqlAs (Ref .8) that is helpful for setting out the methodology and level of proportionality in detail required for EqlAs for different types of policy considerations.
- 3.1.6 The Equality Commission for Northern Ireland provides concise guidance on ‘Screening and Equality Assessments’ and ‘Practical Guidance on Equality Impact Assessment’ (Ref .9 and Ref .10). This identifies that *“the EqlA process is intended to anticipate barriers to participation or failings in service provision”* and identifies key indicators of adverse impact, as follows:
- “Lower participation rates compared to other groups e.g., fewer members of Protestant church-based groups applying for grants in light of objections to lottery funding;*



Lower success rates in selection processes e.g., fewer disabled people meeting non-essential selection criteria for jobs – driving licence;

Eligibility criteria which disadvantage any groups e.g., timing of regular training courses so that those with caring responsibilities cannot take part;

Different charges applied to some groups e.g., concessionary fares extended to men and women at different ages;

Upper threshold on payments or provision e.g., compensation payments capped irrespective of the number of dependants/children;

Experiencing poorer quality of treatment e.g., information on fixed penalties/court summons and fines provided only in English to those who are not fluent in the language;

Experiencing increased difficulty or indignity e.g., public buildings with segregated access for those with mobility disabilities; and

Changing a policy which reduces benefits disproportionately for one group e.g., contracting out catering services may particularly affect females adversely.”

- 3.1.7 Whilst the above key indicators are more relevant to policies in Northern Ireland, they are a useful reference point when considering an individual development.

3.2 Assessment Methodology

- 3.2.1 The potential for equality effects of the Scheme is limited to those aspects of the Scheme that affect people. Where the Scheme does not affect people, it cannot affect different groups of people differently and therefore cannot affect equality.
- 3.2.2 Each category of effect, and the affected population, is described, and a description, with justification, is made of the potential for relevant receptor groups to be affected differently to the general population, because of the specific characteristics of the relevant receptor group. For any identified equality effects, the potential for mitigation of adverse effects, or enhancement of beneficial effects, is considered.
- 3.2.3 To describe the potential for equality effects, the specific needs of a receptor group, or a recognised sensitivity or vulnerability associated with their protected characteristic, are considered.
- 3.2.4 The EqlA considers impacts on relevant receptor groups, rather than specific individual cases.
- 3.2.5 There are a range of disabilities which could result in an individual experiencing effects in a different, and more or less acute way than the general population. Where an individual with specific concerns in this regard is identified, or identifies themselves or their dependants to the project team through consultation, the Applicant would engage with the affected parties directly to discuss and understand the specific concerns raised, and to suggest potential additional mitigation measures where practicable. The Applicant will make communication lines available in part for this purpose, as set out within the Outline Construction Environmental Management Plan (OCEMP) [EN010170/APP/GH7.1] and Outline Operational Environmental Management Plan (OOEMP) [EN010170/APP/GH7.2] and is committed to ongoing dialogue with the local



community throughout all phases of development. The Applicant considers information on specific circumstances to be personal and of a sensitive nature and so has deliberately not reported on any such circumstances in this document.

- 3.2.6 This approach is in accordance with the approaches to EqlA set out in the guidance in Section 3.1 above.



4 Scope of the EqlA

4.1 Overview

- 4.1.1 The ES includes the population as a general receptor group, in accordance with the requirements of the EIA Regulations. Effects on human receptors that have the potential to affect relevant receptor groups differently to the wider population, are considered in this EqlA.

4.2 Assessment Criteria

- 4.2.1 The EqlA does not assess significance of effects. Instead, qualitative descriptive judgements are made regarding the nature of potential equality effects. Equality effects are defined as where an impact is identified as likely to have a disproportionate or differential effect on groups of people on the grounds of their protected characteristics.
- 4.2.2 A disproportionate equality effect arises when an impact has a proportionately greater effect on protected characteristic groups than on other members of the general population at a particular location.
- 4.2.3 A differential equality effect is one which affects members of a protected characteristic group differently from the rest of the general population because of specific needs, or a recognised sensitivity or vulnerability associated with their protected characteristics, irrespective of the number of people affected.
- 4.2.4 In some cases, protected characteristic groups could be subject to both disproportionate and differential equality effects.
- 4.2.5 The EqlA considers impacts on groups of people rather than on individuals.

4.3 Equality Effects Considered

- 4.3.1 The EqlA considers potential equality effects arising during both the construction and operational phases of the Scheme. On the basis of the findings of the ES submitted with the DCO application it is anticipated that potential equality effects will include the following matters. It is these matters which are carried forward to assessment:
- community infrastructure and open spaces;
 - employment and business;
 - traffic, transport and physical accessibility;
 - noise, and other environmental effects;
 - crime, safety and personal security; and
 - health related equality effects.
- 4.3.2 It is recognised that such a list can never be exhaustive as all stakeholders may have a different perception of an impact from that characterised in an ES. Where matters have been raised by interested parties through the pre-application process, these have been considered in the Consultation Report submitted with the application [EN010170/APP/GH5.1].



5 Assessment

5.1.1 Table 1 below sets out the EqlA for the Scheme:

Table 1: Assessment of Equality Effects

Area for Consideration	Assessment of Equality Effect
Community Infrastructure and open spaces	<p>The Applicant's site selection and design evolution process has fully considered potential social impacts based on proximity to the Sites. The Concept Design Parameters and Principles for the Scheme [EN010170/APP/GH7.17] stipulate that solar PV infrastructure will be offset at least 50 metres from residential curtilage. Additionally, large population centres, such as Northampton and Wellingborough, were avoided during the site selection process as set out in the Site Selection Assessment [EN010170/APP/GH6.3.5.1] due to constraints on land availability, constraints on project viability, and greater likelihood of significant effects on the social environment. Additional offsets from smaller settlements (such as Mears Ashby, Earls Barton, and Easton Maudit) have also been implemented through the design evolution prior to DCO submission, based on consultation feedback and assessment outcomes. As a result, direct impacts on community facilities, care homes, places of worship, local high streets, schools, public open spaces, play spaces and recreational facilities have largely been avoided.</p> <p>The Environmental Statement [EN010170/APP/GH6.1-6.5] has however identified a small number of community infrastructure receptors that due to their spatial relationship to the Scheme, may experience significant effects that would disproportionately affect users with protected characteristics.</p> <p>Adjacent to Green Hill F is Oakfield, a supported living and residential care home for adults with learning disabilities (Ref .11). As a result, residents are likely to be disproportionately affected by disruption and amenity impacts as a result of the Scheme. Without specific mitigation, construction works in particular may limit the ability for the care home operators to provide sufficient care or maintain a suitable living environment for its residents. As a result of this as a risk to residents with protected characteristics, additional targeted mitigation has been implemented to ensure impacts on this receptor do not disproportionately adversely affect their living environment, including increased offsetting from this property boundary, and restrictions on heavy machinery use, work hours and material storage within 100 m of the property boundary. Open channels of contact between the construction contractor or Scheme operator and the care home operators should be maintained ahead of and during the construction period to ensure these measures are being adhered to. These measures are set out in the OCEMP [EN010170/APP/GH7.1] and OOEMP [EN010170/APP/GH7.2] and are secured by requirements 13 and 14 of Schedule 2 to the draft DCO [EN010170/APP/GH3.1]. Therefore, with this mitigation, the relevant receptor groups at</p>



Area for Consideration	Assessment of Equality Effect
	<p>Oakfield will not be affected to any greater significance than to the general population.</p> <p>Green Hill A is located to the north of the Acorn Centre, which hosts The Seeds of Change, a dedicated equine care and therapy centre for children and young people facing barriers in their learning and ability to function healthily in current education systems (Ref .12). Furthermore, Green Hill D is located to the west of the Hannah Payne Riding for the Disabled Association (RDA) Group, which caters for children and young people with disabilities (Ref .13). As a result of their patrons and the services provided, both receptors are sensitive to changes that would disproportionately affect young and disabled individuals. As a result, the Scheme has embedded design mitigation to reduce impacts on the use of both the Acorn Centre and Hannah Payne RDA. These include the removal of fields AF11 and DF4 from the solar array areas, the provision of enhanced landscape planting to screen views from the Scheme to both receptors, and the siting of the substation at Green Hill A to field AF24, away from its previously proposed position in field AF28. Transport and access routes to both Green Hill A and D have been considered so that they do not directly impact upon access to either the Acorn Centre or Hannah Payne RDA, or the immediate highway network that may be used for walking or hacking. These measures are controlled through the Concept Design Parameters and Principles [EN010170/APP/GH7.17], in the Outline Landscape and Ecological Management Plan (OLEMP) [EN010170/APP/GH7.4], OCEMP [EN010170/APP/GH7.1], OOEMP [EN010170/APP/GH7.2], and Outline Construction Traffic Management Plan (OCTMP) [EN010170/APP/GH7.9], which are respectively secured by requirements 5, 7, 13, 14, and 15 of Schedule 2 to the draft DCO [EN010170/APP/GH3.1]. Therefore, with this mitigation, the relevant receptor groups at the Acorn Centre and Hannah Payne RDA will not be affected to any greater significance than to the general population.</p> <p>The Scheme will make no permanent adverse changes to access to the Public Rights of Way (PRoW) around the Sites or on the Cable Route Corridor that could affect any relevant receptors differently to the general population. Where feasible, efforts have been made to improve PRoW accessibility by repairing or removing PRoW furniture such as stiles and gates to provide better access for those with additional mobility needs. A set of new permissive routes on six of the Sites will be created which will have a beneficial effect on recreational opportunities and access to the countryside. This is likely to disproportionately benefit children and elderly people by providing greater access to recreational space, and in some locations providing safer access between settlements. The proposed permissive routes are shown on ES Figure 4.22 [EN010170/APP/GH6.4.4.22] and are secured through requirement 18 of Schedule 2 to the draft</p>



Area for Consideration	Assessment of Equality Effect
	<p>DCO [EN010170/APP/GH3.1] which pertains to the Outline Public Rights of Way and Permissive Paths Management Plan (OPRoWMP) [EN010170/APP/GH7.10].</p> <p>Therefore, no predicted differential or disproportionate adverse impact to protected characteristic groups is predicted as a result of impacts on community facilities and services.</p>
Employment and Business	<p>Beneficial effects from increased local employment opportunities arising from the Scheme's construction, replacement, and decommissioning would affect principally those employed directly by the Scheme's operators and contractors, and indirectly from the local service industry and supply chains, with induced effects benefiting the wider local economy. In line with the Outline Skills, Supply Chain and Employment Plan (OSSCEP) [EN010170/APP/GH7.8], opportunities for maximising workforce equity and inclusion will be identified. This is of particular note for construction-industry jobs, the significant majority of which are presently occupied by males. As such, the OSSCEP outlines measures to ensure females are not subject to discrimination in hiring, or in construction industry work practice.</p> <p>It is acknowledged that the Scheme is likely to result in minor long-term employment reduction as a result of adverse impacts on the agriculture and tourism industries not being outweighed by new employment derived from the operation of the Scheme. Whilst an adverse impact, this is not anticipated to disproportionately affect any group with protected characteristics. Furthermore, those whose employment is displaced by the Scheme and its effects will be able to take up reskilling and employment opportunities as supported by the OSSCEP.</p> <p>The site selection process (as presented in the Site Selection Assessment [EN010170/APP/GH6.3.5.1]) has avoided large population centres. This ensures the Scheme's likely adverse effects on surrounding businesses and employment centres are minimised. There is no anticipated disruption that would disproportionately business or charitable organisations providing services or products to protected characteristic groups. An Outline Construction Traffic Management Plan [EN010170/APP/GH7.9] has been prepared to manage any changes in traffic as a result of Scheme construction, to ensure impacts on businesses and service providers are minimised. In some circumstances, where infrastructure crosses public highways, trenchless techniques such as Horizontal Directional Drilling (HDD) may be employed to reduce impacts (see the Crossing Schedule [EN010170/APP/GH7.18]) submitted with the DCO Application.</p>



Area for Consideration	Assessment of Equality Effect
	<p>Therefore, no predicted differential or disproportionate adverse impact to protected characteristic groups is predicted as a result of impacts on employment and businesses.</p>
Transport and Access	<p>The construction phase of the Scheme will involve increased levels of traffic flow at certain locations. The OCTMP [EN010170/APP/GH7.9] submitted with the application details measures specific to general road safety and has been provided to manage any changes in traffic as a result of Scheme construction.</p> <p>There are no planned permanent changes to public road or pedestrian networks at this stage, over and above potential minor localised road widening or passing places, and new access points. Any changes will be developed with due consideration to safety and accessibility of the respective networks, and therefore will not have any disproportionate effect on protected characteristic groups. The ES assesses the potential effect of construction work on severance, which the assessment guidelines define as “the perceived division that can occur within a community when it becomes separated by major transport infrastructure” and concluded no significant effect (ES Chapter 13, Transport and Access [EN010170/APP/GH6.2.13]).</p> <p>Although there will be additional traffic movements on the road network during construction, this will be controlled through the mitigation measures set out in the OCTMP, which include a booking system for HGV arrivals and departures, and specific routing for each area of works. The OCTMP is secured by requirement 15 of Schedule 2 to the draft DCO [EN010170/APP/GH3.1]. Of particular importance is the use of Station Road between Grendon and Earls Barton to access the Green Hill BESS and Cable Route Compound CC4, due to the location of multiple Gypsy and Traveller halting and settled sites on this road. As such, where the OCTMP includes specific measures for community engagement with the Construction Site Manager, this will include residents and site owners of the identified Gypsy and Traveller Sites on Station Road, to ensure that this community is not disproportionately affected by traffic impacts on Station Road. These measures should ensure that residents at these identified Gypsy and Traveller Sites on Station Road are not subject to significantly adverse amenity issues (as a result of HGV movements, noise, and emissions), or not disproportionately affected in their ability to access social infrastructure and services (such as health facilities, food shops, schools etc.).</p> <p>The ES Chapter 13, Transport and Access [EN010170/APP/GH6.2.13], considers highway capacity and concludes that the construction of the Scheme would not cause significant effects in relation to driver delay as a result of the construction vehicle movements. As no significant effects are</p>



Area for Consideration	Assessment of Equality Effect
	<p>predicted on traffic, and therefore no significant increase in journey times/delay effects, there are no predicted resulting differential or disproportionate impact to protected characteristic groups in personal travel, using public transport, or travelling to access services.</p> <p>Temporary diversions to Public Rights of Way have been detailed in the OPRoWMP [EN010170/APP/GH7.10]. The Applicant has not identified any PRoWs as being relied upon by protected characteristic groups. With the proposed PRoW management measures in place, there is no predicted differential or disproportionate impact to protected characteristic groups.</p> <p>During the Scheme's operational phase, the Acorn Centre and its users are anticipated to benefit from a new permissive bridleway through Green Hill A, which is set to provide a loop to and from Newland Road, to the north of the Acorn Centre. This is likely to disproportionately benefit users of the Acorn Centre who will be able to ride their horses on a new traffic-free route.</p>
Noise during construction and operation	<p>Noise is assessed in the ES Chapter 14: Noise and Vibration [EN010170/APP/GH6.2.14] as having non-significant moderate/minor to moderate residual effects during both the construction and operational phases. The assessment identifies the potential for a likely significant effect from construction vibrations, where receptors are within 10 m of heavy ground works. This can be managed through mitigation and best practice measures, including prior warning and explanation of works, as well as limiting works duration, to ensure this is not disproportionately affecting members of the public with protected characteristics – particularly sensory and learning disabilities that may exacerbate sensitivity to noise and vibration.</p> <p>Measures contained within the OCEMP [EN010170/APP/GH7.1] and the OOEMP [EN010170/APP/GH7.2] will minimise noise and vibration impacts from the Scheme. Therefore, no differential or disproportionate impact to protected characteristic groups is predicted.</p> <p>The Site Selection process, as explained above, has avoided large population centres, while additional Scheme design measures have offset away from smaller settlements to minimise the number of high sensitivity receptors (such as residential dwellings) likely to be impacted by the Scheme. As identified in ES Chapter 18: Human Health [EN010170/APP/GH6.2.18] there is one residential care home for adults with learning disabilities (Oakfield) in close proximity to Green Hill F wherein the resident population would be disproportionately sensitive to impacts from noise. As such, specific targeted mitigation has been implemented to ensure</p>



Area for Consideration	Assessment of Equality Effect
	<p>impacts on this receptor do not disproportionately adversely affect their living environment, including increased offsetting from this property boundary, and restrictions on heavy machinery use, work hours and material storage within 100 m of the property boundary. Open channels of contact between the construction contractor or Scheme operator and the care home operators should be maintained ahead of and during the construction period to ensure these measures are being adhered to. These measures are set out in the OCEMP [EN010170/APP/GH7.1] and OOEMP [EN010170/APP/GH7.2] and are secured by requirements 13 and 14 of Schedule 2 to the draft DCO [EN010170/APP/GH3.1]. Therefore, with this mitigation, the relevant receptor groups at Oakfield will not be affected to any greater significance than to the general population.</p>
Crime, Safety and Personal Security	<p>Consultation with local authorities and members of the public has identified perception of crime, safety and personal security as a potential impact from the Scheme. Perceived risk of crime and personal security impacts are likely to disproportionately affect women, elderly people, and those living alone.</p> <p>Physical site security and crime prevention measures are included in the Scheme to mitigate against the actual risk of crime. This includes physical security to construction compounds, fencing, CCTV and monitoring throughout construction and the operational lifetime, and onsite site security during construction and infrastructure replacement works. Furthermore, a Community Liaison Manager will be available up to and throughout the construction phase to whom outstanding public concerns about crime and site security can be raised, and actioned where required. These measures are secured through the OCEMP [EN010170/APP/GH7.1] and the OOEMP [EN010170/APP/GH7.2] and secured through requirements 13 and 14 of Schedule 2 to the draft DCO [EN010170/APP/GH3.1]. The Applicant considers that the up-front provision of these secured measures should go some way to alleviate existing concerns of crime and security ahead of the Scheme's construction.</p> <p>Safety risk perception is likely also to impact upon people with physical and mental disabilities that are specifically susceptible to increased safety risks (such as from fire, and road safety).</p> <p>Safety considerations pertinent to the Scheme include onsite health and safety procedures to protect workers, safety measures to protect nearby residents from fire, contaminants, pollution, and impacts for water runoff. Mitigation measures to ensure that these measures to not have significant effects are set out in the OCEMP [EN010170/APP/GH7.1]. Specific control measures for BESS fire are separately controlled and secured through the Outline Battery Storage Safety Management Plan [EN010170/APP/GH7.7]. Transport specific safety measures to</p>



Area for Consideration	Assessment of Equality Effect
	<p>ensure highway safety for vehicular and non-vehicular users are controlled through the OCTMP [EN010170/APP/GH7.9]. Safety considerations for PRow users where they interact with the Scheme are set out in the OPRoWMP [EN010170/APP/GH7.10]. Together, these control documents should provide suitable assurance to members of the public that safety measures will be adhered to, and safety fears and impacts should not disproportionately affect any population group of protected characteristics.</p> <p>With management plans in place, there are therefore no predicted differential or disproportionate impacts on protected characteristic groups.</p>
Health Related Equality Effects	<p>Human health is a key consideration in many technical areas assessed within the ES and is covered in detail in Chapter 18 [EN010170/APP/GH6.2.18]. This includes assessment in respect of the general population and vulnerable groups, many of whom have been identified as of being sensitive to changes in health conditions due to protected characteristics such as age and disability.</p> <p>The assessment of health effects identifies Oakfield, a supported living and residential care home for adults with learning disabilities as a sensitive receptor to health effects, and identifies a likely significant adverse effect to residents. As these residents have protected characteristics under the Act, they are at risk of being disproportionately affected by the Scheme, particularly during construction. As a result of this, additional targeted mitigation has been implemented to ensure construction and long-term operational impacts on this receptor are reduced. As set out in the assessment above for “community infrastructure and open spaces” and “noise during construction and operation”, these measures are set out in the OCEMP [EN010170/APP/GH7.1] and OOEMP [EN010170/APP/GH7.2] and are secured by requirements 13 and 14 of Schedule 2 to the draft DCO [EN010170/APP/GH3.1]. Therefore, with this mitigation, the relevant receptor groups at Oakfield are not anticipated to experience residual significant adverse health effects, and therefore will not be affected disproportionately more than the general population.</p> <p>The Acorn Centre (The Seeds of Change) and the Hannah Payne RDA are both identified in ES Chapter 17: Socio-Economics, Tourism and Recreation [EN010170/APP/GH6.2.17] as sensitive recreation receptors due to being equestrian facilities catering for children experiencing social barriers, as well as those with mental and physical disabilities. As a result of embedded design, procedural, landscape, and transport mitigation (see “community infrastructure and open spaces” assessment above), it is not anticipated that users of these facilities are</p>



Area for Consideration	Assessment of Equality Effect
	<p>anticipated to be disproportionately affected by adverse health effects.</p> <p>The assessment of health impacts in ES Chapter 18 [EN010170/APP/GH6.2.18] does not identify any further significant adverse effects to human health. Subject to the implementation of all embedded and additional mitigation, the assessments carried out in ES Chapter 18 and here in this EqIA together do not identify any members of the population, including those with protected characteristics that are disproportionately more likely to be adversely affected by health equality effects from the Scheme.</p> <p>Although not significant effects, the assessment does identify beneficial effects in relation to education and training, employment and income during all phases of the Scheme. Opportunities to enhance these effects through the OSSCEP [EN010170/APP/GH7.8] should be targeted to improve health inequalities related to deprivation, socio-economic status, and provide greater opportunity for skills and employment uplifting in underrepresented members of the population. The measures in the OSSCEP are secured through requirement 20 of Schedule 2 to the draft DCO [EN010170/APP/GH3.1].</p> <p>With consideration of all these factors, no differential or disproportionate health impacts on protected characteristic groups is predicted.</p>



6 Conclusion

6.1 Overview

- 6.1.1 This EqIA has drawn on the ES **[EN010170/APP/GH6.1-6.5]** to consider the activities that will be carried out as part of the Scheme, and has assessed whether they are relevant to the protected characteristics of groups of people set out in the Act.
- 6.1.2 Those effects of the Scheme that could affect people have been considered further, to examine the potential for them to affect groups of people with protected characteristics differently to the general population.
- 6.1.3 No differentiated or disproportionate impacts on groups with protected characteristics under the Act (Ref .1) are predicted as a result of the Scheme, subject to implementation of mitigation and enhancement measures to be secured through the DCO.
- 6.1.4 These mitigation and enhancement measures include, but are not limited to:
- Embedded design offsets from community facilities and services, and from PRow, and the provision of upgrades to PRow infrastructure and provision of new permissive access routes to benefit access to open space. These measures are set out in the OLEMP and OPRoWMP, secured by requirements 5 (detailed design), 7 (landscape and ecological management) and 18 (PRow and permissive paths) of Schedule 2 to the draft DCO **[EN010170/APP/GH3.1]**;
 - Enhancements to local employment and education and skills uplifting through prioritising local procurement and training support where feasible, set out in the OSSCEP secured by requirement 20 of Schedule 2 to the draft DCO **[EN010170/APP/GH3.1]**;
 - Traffic control measures and horizontal directional drilling to minimise impacts on highways, and thus on access to services and businesses, set out in the OCEMP secured by requirement 13 of Schedule 2 to the draft DCO **[EN010170/APP/GH3.1]**;
 - Specific HGV access control measures to regulate traffic flows and to minimise impacts on road safety, with specific assessment of the effect of severance considered to ensure community, and targeted measures to ensure the local Gypsy and Traveller community are not disproportionately affected, set out in the OCTMP and OOTMP secured by requirements 15 and 16 respectively of Schedule 2 to the draft DCO **[EN010170/APP/GH3.1]**;
 - Targeted mitigation measures to minimise impacts on specific sensitive receptors adjacent to the Site with regard to amenity, noise, and other construction impacts. These measures are set out in the OCEMP, OOEMP and Operational Noise Assessment, secured by requirements 13 (construction environment), 14 (operational environment) and 17 (operational noise) of Schedule 2 to the draft DCO **[EN010170/APP/GH3.1]**;



- Provision of site security and publication of site security proposals to ensure actual and perceived risk of impacts to crime and personal security, and embedded site safety measures to ensure the safety of workers and nearby residents, including highways and PRow users, is upheld. These measures are set out in the OCEMP and OOEMP, secured by requirements 5 (detailed design), 13 (construction environment) and 14 (operational environment) of Schedule 2 to the draft DCO **[EN010170/APP/GH3.1]**; and
- Embedded mitigation measures to ensure adverse health impacts from the Scheme do not disproportionately affect population groups with protected characteristics, as set out in all relevant documents certified under Schedule 14 of the draft DCO **[EN010170/APP/GH3.1]**.

6.1.5 The Applicant recognises the potential for protected characteristic groups to have less access to consultation processes, and therefore has built in protections through appropriate site selection and best practice management of construction and operation processes, informed by their previous experience of constructing solar DCO projects in the UK. Specific care has been given to seldom heard groups, as set out in the Consultation Report which supports the DCO Application **[EN010170/APP/GH5.1]**.

6.1.6 As set out in the OCEMP **[EN010170/APP/GH7.1]** and OOEMP **[EN010170/APP/GH7.2]**, where, during construction and operation, impacts do arise, communications and complaints can be directed to the Site Manager or via a Community Liaison Officer who will ensure a proactive approach to communication with local stakeholders.

6.1.7 The Scheme also embeds important social contribution through the investment in skills and jobs. Whilst the Applicant cannot quantitatively state how many jobs will be secured by residents, qualitative analysis of the type of employment and the match with the local labour market suggests that this will provide good opportunities.



References

- Ref .1 Equality Act 2010, 2010 c.15. (*as amended*)
- Ref .2 Department of Energy Security & Net Zero (*DESNZ*) (2023). Overarching National Policy Statement for Energy (EN-1). London: The Stationery Office. Available at www.gov.uk/government/collections/national-policy-statements-for-energy-infrastructure
- Ref .3 Equality and Human Rights Commission (2022). The Essential Guide to the Public Sector Equality Duty: England (and Non-Devolved Public Authorities in Scotland and Wales). 5th eds. Available at [REDACTED]
- Ref .4 Equality and Human Rights Commission (2023). Technical guidance on the Public Sector Equality Duty: England. Available at [REDACTED]
- Ref .5 Government Equalities Office, Equality Hub, Office for Equality and Opportunity, Women and Equalities Unit (2023). Public Sector Equality Duty: guidance for public authorities. Available at www.gov.uk/government/publications/public-sector-equality-duty-guidance-for-public-authorities/public-sector-equality-duty-guidance-for-public-authorities
- Ref .6 Equality and Human Rights Commission (2014). Meeting the Equality Duty in Policy and Decision-Making: England (and non-devolved public authorities in Scotland and Wales). Available at [REDACTED]
- Ref .7 Equality and Human Rights Commission (2024). How to consider equality in policy making: A 10-step guide for public bodies in England. Available at [REDACTED]
- Ref .8 United Kingdom Research and Innovation (2021). Equality Impact Assessment Guidance and Template. Available at [REDACTED]
- Ref .9 Equality Commission for Northern Ireland (2017). Effective Section 75 Equality Assessments: Screening and Equality Assessments. Available at [REDACTED]
- Ref .10 Equality Commission for Northern Ireland (2005). Section 75 of the Northern Ireland Act 1998: Practical Guidance on Equality Impact Assessment. Available at [REDACTED]
- Ref .11 Oakfield Community (2025). Oakfield Community: Setting New Standards. Available at [REDACTED]
- Ref .12 The Seeds of Change (2025). The Seeds of Change: Personal development & growth in an equine environment. Available at [REDACTED]
- Ref .13 Riding for the Disabled Association (2025). Find your local group: Hannah Payne Group. Available [REDACTED]