

# The Drovers Solar Farm

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## Equality Impact Assessment

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# Executive Summary

## The Scheme

The Scheme comprises the construction, operation, maintenance, and decommissioning of a solar photovoltaic (PV) electricity generating station and Associated Development comprising Battery Energy Storage System (BESS), a Customer Substation, and Grid Connection Infrastructure, including a new National Grid Substation. The Scheme would allow for the generation and export of over 50MW Alternating Current (AC) of renewable energy, connecting into the National Electricity Transmission System (NETS) overhead line that passes through the Site.

## The Need for an Equality Impact Assessment (EqIA)

This EqIA helps to assist the Secretary of State (SoS) to consider their public sector equality duty (PSED) as set out in section 149 of the Equality Act 2010 (the Act), alongside considering the potential for the Scheme to discriminate based on certain protected characteristics under the Act. Section 149 of the Act requires the Secretary of State to have due regard to several equality considerations when exercising their functions. This includes eliminating discrimination and advancing equality of opportunity between persons with a protected characteristic and persons without.

## Methodology

Unlike other aspects of environmental assessments, there is relatively limited published guidance in the UK on how to carry out EqIAs for development projects. While the Act establishes the PSED, requiring public bodies and those exercising public functions to have due regard to equality considerations, it does not prescribe a standardised methodology for assessing the potential equality impacts of a development project.

In practice, this means that there is no single, nationally recognised framework for preparing EqIAs in the UK planning or infrastructure context. This creates variability in the scope, structure, and depth of EqIAs, with many assessments relying on professional judgement to determine the most appropriate methodology. For this Scheme, the EqIA has therefore been prepared using proportionate methods informed by good practice, drawing from wider equality assessment approaches and tailoring them to the specific context of renewable energy development. The absence of formal guidance means it is especially important to ensure transparency in assumptions, to set out clearly the potential equality impacts identified, and to explain the rationale for the assessment process adopted.

This EqIA uses the following methodology to assess the equality effects arising from the Scheme:



- Utilise baseline data and literature evidence to determine the risk of equality groups experiencing disproportionate and/or differential equality effects (defined below)
- Outline the impact that the Scheme has for a number of different effects, drawing from the conclusions of the chapters within the **Environmental Statement (ES) [APP/6.1 - 6.5]**; and
- Conclude whether the effects on different equality groups are beneficial or adverse, specifying where they are disproportionate or differential, and, where possible, outline measures to mitigate adverse or enhance beneficial effects.

## Disproportionate effects

Disproportionate effects can occur when an area contains a disproportionately high number of individuals with a protected characteristic, or an impacted asset is disproportionately used by an equality group. For example, religion is a protected characteristic, and it is reasonable to assume that there would be disproportionately high numbers of religious groups in areas where there are religious buildings. The baseline data is used to identify where equality groups have an above average presence across different study areas (comparing against local, regional, and national benchmarks), to determine where they are at risk of experiencing disproportionate equality effects.

## Differential effects

Differential effects occur when members of the public with protected characteristics are more likely to be affected in different ways to the rest of the general population. Differential effects may occur because of specific needs, or a recognised sensitivity or vulnerability associated with their protected characteristic.

To identify potential differential effects, a review of existing literature is undertaken. There is very limited literature available for how the specific effects of solar development are likely to be experienced differentially by equality groups. When determining the differential effects of the Scheme, care is taken to ensure conclusions taken from the literature review are only those that could reasonably apply to the Scheme.

## Effect assessment methodology

For each equality group, equality effects are concluded as either beneficial, adverse, or neutral, and are identified as being disproportionate and/or differential. Due to the temporary and short nature of the construction and decommissioning period, any effects during the construction and decommissioning phases would be temporary in nature, whilst effects during the operational phase are considered to be long term for the reversible elements of the Scheme and permanent for the permanent elements of the Scheme (being the Grid Connection Infrastructure and new National Grid Substation).

For beneficial and adverse differential equality effects, this is broken down further into four categories:



- **Negligible** – represents an equality effect on protected groups relative to the general population, which is so small in magnitude, it is reasonable to believe it would not be perceived by individual members of the protected group.
- **Minor** – represents a small equality effect on protected groups relative to the general population.
- **Moderate** – represents a medium-sized equality effect for protected groups relative to the general population.
- **Major** – represents a large-scale equality effect on equality groups relative to the general population.

The magnitude of equality effects is determined on the potential of the effects to change the lives of people with protected characteristics. This includes both the activities of their daily lives, but also, and perhaps more importantly, activities which are intrinsically related to their protected characteristics. For example, an effect which adversely impacts religious people's ability to worship would increase the adverse magnitude of the equality effect in question.

Equality effects that are negligible adverse do not require mitigation. This is because they are so small in magnitude it is reasonable to believe that they would not actually be perceived by those populations with protected characteristics. Minor adverse effects will be considered on a case-by-case basis to determine whether mitigation is appropriate. Moderate or major adverse effects will require mitigation where practicable.

This EqIA draws heavily on other technical assessments to inform the assessment. Given that the technical assessments look at the general impact only, a further level of interpretation is required to translate the technical findings into potential equality findings. Sometimes this can further support the technical findings and at other times it can change their meaning/impact/significance. Equality effects are often difficult to quantify and assess accurately. Where suitable data is not available, the potential effects are described qualitatively.

## Summary of Assessment

**Table 0.1** summarises the findings of the equality effect assessment. Any adverse equality effects tend to be negligible in nature. There is the potential for a minor adverse disproportionate equality effect relating to people of Gypsy, Roma and Traveller ethnicity, due to minor adverse noise effects during the construction phase at the Splashes Campsite (Traveller Site). However, taking into account a number of factors, including the very short duration of the effect, the baseline noise levels, and the mitigation measures outlined in the **outline Construction Environmental Management Plan (oCEMP) [APP/7.6]**, it has been determined that no additional equality specific mitigation is appropriate or required.

There are expected moderate and minor beneficial equality effects due to provision of local employment, education, training, and upskilling.




**Table 0.1 Summary of equality effects**

Potential equality impact	Residual equality effect	Disproportionately effected groups	Differentially effected groups
Impact on existing businesses	<b>Construction, operational, and decommissioning phases</b>  Neutral	N/A	N/A
Physical activity and Public Rights of Way (PRoW)	<b>Construction and decommissioning phases</b>  Negligible adverse  <b>Operational phase</b>  Minor beneficial	N/A	N/A
Neighbourhood amenity	<b>Construction phase (Splashes Campsite (Traveller Site))</b>  Minor adverse  <b>Construction and decommissioning phases (All other receptors)</b>  Negligible adverse  <b>Operational phase (Castle Acre Castle and Castle Acre Priory)</b>  Negligible adverse  <b>Operational phase (Splashes Campsite, St George's Church and Keeper's Cottage)</b>	<b>Construction phase (Splashes Campsite)</b>  Gypsy, Roma and traveller (ethnicity)	N/A



Potential equality impact	Residual equality effect	Disproportionately effected groups	Differentially effected groups
	Neutral  <b>Decommissioning phase (Splashes Campsite)</b>  Neutral		
Local employment, education, training, upskilling and	<b>Construction and decommissioning phases</b>  Moderate beneficial  <b>Operational phase</b>  Minor beneficial	<b>Construction, operational, and decommissioning phases</b>  Older people (age), disabled people and individuals who suffer from mental health issues (disability), and socio-economically disadvantaged residents (socio-economic disadvantage)	<b>Construction, operational, and decommissioning phases</b>  Younger and older people (age), females (sex), pregnant women (pregnancy), ethnic minority groups (ethnicity), LGBTQ+ people (sexual orientation and gender identify)



# 1 Introduction

- 1.1.1 This Equality Impact Assessment (EqIA) has been prepared on behalf of The Drovers Solar Farm Limited ('the Applicant') to assess the equality impacts in relation to the Development Consent Order (DCO) Application for the construction, operation, maintenance, and decommissioning of The Drovers Solar Farm (hereafter referred to as the 'Scheme').

## The Order limits

- 1.1.2 The extent of the Order limits are shown in **Location Plan [APP/2.1]** and the Scheme is described in full in **ES Chapter 5: The Scheme [APP/6.1]** and shown spatially on the **Works Plan [APP/2.3]**.

## The Scheme

- 1.1.3 The Scheme comprises the construction, operation, maintenance, and decommissioning of a solar photovoltaic (PV) electricity generating station and Associated Development comprising Battery Energy Storage System (BESS), a Customer Substation, and Grid Connection Infrastructure, including a new National Grid Substation. The Scheme would allow for the generation and export of over 50MW Alternating Current (AC) of renewable energy, connecting into the National Electricity Transmission System (NETS) overhead line that passes through the Site.
- 1.1.4 As the Scheme would have a generating capacity in excess of 50MW, it is considered to be a Nationally Significant Infrastructure Project (NSIP) under the Planning Act 2008.
- 1.1.5 The Scheme would be located within the Order limits, also referred to as 'the Site'. The Order limits contain all elements of the Scheme comprising the Solar PV Site, the Customer Substation, the National Grid Substation, the BESS, Grid Connection Infrastructure, Mitigation and Enhancement Areas, and the Highway Works (shown in **ES Figure 3.1: Scheme Location [APP/6.3]** and described further in **ES Chapter 3: Order limits and Context [APP/6.1]**).
- 1.1.6 Highway Works are sections of the highway network that will contain localised improvements, such as improvements to road edge where it is deteriorated, or temporary highway and traffic works required to safely accommodate the Abnormal Indivisible Load (AIL) deliveries. These areas will support the movement of construction vehicles on narrower sections of the local highway network within parts of the construction vehicle routes to the Site (refer to **ES Chapter 9: Transport and Access [APP/6.2]**).

## The Need for an EqIA

- 1.1.7 This EqIA has been prepared in response to a request from Norfolk County Council (NCC), which states that:



*An “Equality Impact Assessment (EqIA) (this must be included): The Council’s Planning functions are subject to equality impact assessments. A detailed equality impact assessment has not been carried out as this report is responding to a consultation; however, consideration has been given to equality issues. The recommended comments relate to the County Council’s role as a statutory consultee. This report and the comments set out in the report aim to ensure that any new Solar Farm infrastructure will have minimal impact on communities, while supporting the County Council’s own clean growth ambitions and Climate Strategy in line with the Government’s Energy Security Strategy.”*

- 1.1.8 This EqIA helps to assist the SoS comply with the PSED as set out in the Act, alongside considering the potential for the Scheme to discriminate based on certain protected characteristics under section 149 of the Act **[Ref. 1]**. Section 149 of the Act requires public authorities to have due regard to several equality considerations when exercising their functions. This includes eliminating discrimination and advancing equality of opportunity between persons with a protected characteristic and persons without.
- 1.1.9 The scale and nature of the Scheme is judged as having the potential to result in equality effects. Therefore, an EqIA has been undertaken and submitted with the DCO Application. 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.
- 1.1.10 The EqIA draws principally on the findings set out in the **Environmental Statement (ES) [APP/6.1 - 6.5]** supporting the DCO Application. 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. For the purposes of this EqIA, the following equality groups have been considered (in accordance with the Act) **[Ref. 1]**:
- Age
  - Disability and/or long-term health problems (including those with mental health problems)
  - Sex
  - Gender and gender reassignment/identities
  - Marital and civil partnership status
  - Pregnancy and maternity/paternity
  - Race
  - Religion or philosophical belief; and



- Sexual orientation.

1.1.11 The Act seeks to advance equality in part by imposing a PSED (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.”*

1.1.12 Socio-economically disadvantaged groups have also been considered on the basis that they might experience equality effects relative to the general population. This helps to consider the differential impact on those from socio-economically disadvantaged groups in relation to the Scheme’s impacts.

## Report structure

1.1.13 This report considers the potential equality effects of the Scheme. This EqlA is structured as follows:

- **Chapter 2:** Consultation and stakeholder engagement – This section summarises the consultation and engagement activities undertaken to inform the assessment, including the key stakeholders involved and how their feedback has been considered in the development of the Scheme
- **Chapter 3:** Policy, legislation, and industry practice – this section outlines all relevant legislation and policy context for the EqlA, including the Act, the National Policy Statements for Energy, and relevant equality policies adopted by Breckland Council (BC) as the relevant discharging authority in consultation with the Borough Council of King’s Lynn & West Norfolk (KLWN) and NCC
- **Chapter 4:** Methodology – the methodology section outlines the proposed study areas of this report, the approach to scoping the equality effects used in the EqlA.
- **Chapter 5:** Groups at risk of disproportionate effects – contains a detailed baseline identifying where equality groups may potentially be at risk of experiencing disproportionate effects
- **Chapter 6:** Groups at risk of differential effects – contains relevant literature identifying where equality groups may potentially be at risk of experiencing differential effects
- **Chapter 7:** Equality effects assessment – assesses the equality effects for each potential impact that may arise due to the Scheme; and
- **Chapter 8:** Conclusion – This section provides a summary of the key findings of the assessment.



## 2 Consultation and stakeholder engagement

### 2.1 Inclusive process and access to participation

- 2.1.1 The Applicant is committed to engaging and consulting with communities and local stakeholders at all stages of the development process and is happy to meet with interested parties at any time during the process. This section outlines the steps taken to ensure that all groups, including those with protected characteristics and seldom-heard communities, have had the opportunity to engage and share their views on the Scheme.
- 2.1.2 The Applicant hosted a series of early-engagement workshops during September – October 2024, with invited stakeholders, local representatives, community organisations and technical specialists. The aim of the sessions was to ensure a diverse range of stakeholders participated in the collaborative masterplanning and design development of the Scheme. Participants included representatives from the Swaffham Climate Change and Environment Group, the British Horse Society, and local parish councils.
- 2.1.3 The statutory consultation for the Scheme ran for seven weeks, between 21 May 2025 and 9 July 2025. During this period, the Applicant sought to engage a wide range of political, technical and community stakeholders, to share details about the proposals and encourage feedback. The steps taken to ensure that this process was inclusive and accessible are detailed below.

### 2.2 Identifying seldom heard and hard-to-reach groups

- 2.2.1 The Applicant recognises that some people or groups may have difficulties taking part in the consultation process for a range of reasons.
- 2.2.2 The Applicant undertook a detailed stakeholder audit to identify local interest groups, including those who may be seldom-heard and hard-to-reach. This list was reviewed by NCC, BC, and KLWN during consultation on the Statement of Community Consultation (SoCC), ahead of the launch of the statutory consultation on 21 May 2025. The list is categorised and includes organisations representing specific groups in society, such as Age UK Norfolk and local disability groups. The list can be found in Appendix 3 of the SoCC (see **Consultation Report Appendix C: Copy of the SoCC and Compliance with the SoCC [APP/5.2]**). As non-statutory consultees, these organisations received an invitation to attend an introductory briefing meeting, and details of how they could participate in the statutory consultation, ahead of its launch.





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## 2.3 Targeted outreach / engagement channels

- 2.3.1 The Applicant recognises the importance of using digital and non-digital methods to raise awareness of the statutory consultation across different groups. To ensure information about how to participate and share feedback was accessed by a wide-range of groups, the Applicant published details in print in the Eastern Daily Press, a regional newspaper, and two national publications (the Guardian and the London Gazette). The Consultation Leaflet and Poster were both shared with parish councils and representatives from identified local interest groups to support awareness in local communities. Stakeholders were encouraged to share with materials with their local networks and place the Consultation Poster on any suitable public noticeboards.

## 2.4 Accessible formats of consultation materials

- 2.4.1 The Applicant used several methods to widen inclusion and ensure those representing local interest groups were supported to best meet the needs of their members and those they represent. All consultation materials were available upon request in alternative formats, such as dementia-friendly, braille, large print and audio. Requests for alternative formats could be made via the Community Relations Freephone, Freepost address, or email.
- 2.4.2 All the consultation materials were available to view and download from the Scheme website. The website included an option to enlarge the text for those with visual impairments. For those unable to access the internet, the Applicant ensured all consultation materials were available to view at a designated local information point, Swaffham Library. The Applicant also placed selected materials at two further community hubs, Narborough Community Centre and Westacre Theatre, to further support community participation.

## 2.5 Statutory consultation events

- 2.5.1 The Applicant held four in-person events at locations within or in the immediate vicinity of the Primary Consultation Zone. The events were held across a range of days and times, including during the evening and at weekends, to accommodate different schedules and recognise that some people may be in full-time employment or carer roles.
- 2.5.2 The locations were accessible by both public and private transport. All event locations had step-free access and disabled parking outside the venues. The Applicant ensured that all members of the Applicant team were available to support disabled or vulnerable members of public in accessing and understanding the materials displayed at the consultation events. Each room was set up to include chairs and tables for those who were unable to stand for long periods of time, or who wished to sit and fill in a feedback form at the event. The room was also set up to ensure those with limited or no mobility, and those using



wheelchairs and mobile scooters, could safely move around the room and access all of the information on display.

- 2.5.3 Printed copies of all the consultation materials were available to view and take away from each of the four events.
- 2.5.4 For those unable to access the in-person events, the Applicant held two digital webinars. The webinars were hosted at times in the day and in the evening to accommodate different schedules.

## **2.6 Submitting feedback**

- 2.6.1 Local interest groups and stakeholders could submit their feedback to the statutory consultation by completing a feedback form online, completing a printed Feedback Form and returning it via Freepost or at an event, or via email. The Applicant also confirmed that feedback could be taken over the phone in exceptional circumstances to support inclusivity. The Applicant received one piece of feedback over the phone from an elderly stakeholder.



## 3 Policy, legislation, and industry practice

### 3.1 Introduction

- 3.1.1 A review has been undertaken of the relevant local and national planning policy and strategies of the host authorities of the Scheme. Documents which are relevant to this EqlA are listed below, followed by the key relevant policies and industry commitments the Scheme would comply with.

### 3.2 National Legislation

#### Equality Act 2010

- 3.2.1 As set out in paragraph 1.1.11 above, this Act **[Ref. 1]** legally protects people from all discrimination in the workplace and in wider society. This was introduced to replace the previous anti-discrimination laws, via this single Act. Section 149 of the Act requires public authorities to have due regard to several equality considerations when exercising their functions. This includes eliminating discrimination and advancing equality of opportunity between persons with a protected characteristic and persons without. The act defines the nine protected characteristics, as listed in paragraph 1.1.12.

#### Race Relations Amendment Act (2000)

- 3.2.2 This Act **[Ref. 2]** is an extension of the 1976 Act to police public authorities. It sets a responsibility on public authorities to eliminate unlawful racial discrimination, whilst also promoting equality of opportunity and good relations between different racial groups.

### 3.3 National Planning Policy

#### National Policy Statements

- 3.3.1 National Policy Statements (NPS) for energy set out the primary policy tests against which this DCO Application for the Scheme will be considered.
- 3.3.2 The NPS for renewable energy infrastructure (NPS EN-3, November 2023 **[Ref. 3]**) and NPS for electricity networks infrastructure (NPS EN-5, November 2023 **[Ref. 4]**) in conjunction with the overarching NPS for energy (NPS EN-1, November 2023 **[Ref. 5]**) provides the primary policy decisions by the SoS on applications for nationally significant renewable energy infrastructure and electrical networks infrastructure, including solar. Listed below are the details of the elements of the NPSs considered relevant to the equality assessment.
- 3.3.3 Paragraph 4.4.6 of NPS EN-1 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”.*

- 3.3.4 This falls under the wider requirement, set out at paragraph 4.3.4 of NPS EN-1, for DCO schemes to be accompanied by an ES 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.”*
- 3.3.5 NPS EN-3 states that applicants should set out where there may be socio-economic benefits in retaining infrastructure after the operational life, such as retaining pathways through the site. It also states that the SoS should take into the account the economic (and other) benefits of the best and most versatile agricultural land and ensure the applicant puts forward appropriate mitigation measures to minimise the impacts on soils or soil resources. This purpose of this EqlA is to consider how the pathways through which socio-economic effects translate to equality impacts.
- 3.3.6 NPS EN-3 also states that where flexibility is sought in the consent, the likely worst-case social and economic effects of the Scheme should be assessed. This principle is also assumed as part of this EqlA.
- 3.3.7 NPS EN-5 states that though decarbonisation is a priority for the government, the development of new infrastructure must minimise costs to consumers and limit community and environmental impacts where possible.

## National Planning Policy Framework

- 3.3.8 The National Planning Policy Framework (NPPF) [Ref. 6] as revised in December 2024 sets out national planning policies that reflect priorities of the Government for operation of the planning system and the economic, social, and environmental aspects of the development and use of land. The NPPF has a strong emphasis on sustainable development, with a presumption in favour of such development. The NPPF has the potential to be considered important and relevant to the SoS consideration of the Scheme. Listed below provides details of the elements of the NPPF that are relevant to this chapter.
- 3.3.9 Chapter 8 of the NPPF emphasises the importance of promoting healthy and safe communities, highlighting that planning policies should create places which encourage social interaction, are safe and accessible, and support healthy lifestyles. Particular focus is placed on reducing health inequalities by addressing the needs of more vulnerable groups, such as low-income households, older people and disabled people, ensuring that development contributes to overall well-being and social cohesion for all parts of the community.



## 3.4 Local planning policy

- 3.4.1 The Scheme is located within the administrative areas of NCC and BC, who are the host authorities. Local planning policies which are relevant to equality impacts and have informed the equality impact assessment are detailed below:

### **Better Together for Norfolk. Norfolk County Council Strategy (2021-2025)**

- 3.4.2 This document [Ref. 7] outlines the strategic objectives being prioritised for the 2021–2025 period. These objectives include creating a vibrant and sustainable economy, providing better opportunities for children and young people, fostering healthy, fulfilling, and independent lives, building strong, engaged, and inclusive communities, and promoting a greener, more resilient future. The Council’s vision is for the county to be a place where everyone can start life well, live well, and age well, ensuring that no one is left behind. The aim is to cultivate a vibrant, entrepreneurial, and sustainable economy, supported by the right jobs, skills, training, and infrastructure. Additionally, communities should feel safe, healthy, empowered, and connected, with their unique characteristics respected and preserved.

### **Local Growth plan: Norfolk Economic Strategy 2024-2029 (January 2025)**

- 3.4.3 This strategy [Ref. 8] acts as the council’s Local Growth Plan, identifying local priorities and will provide a key role in the Government’s new Modern Industrial Strategy which seeks to ensure growth in every part of the UK. It closely aligns with the Government’s Five Missions, including Norfolk’s key role in making the UK an offshore clean energy superpower, and breaking down barriers to opportunity and kickstarting economic growth. Creating an economy which is inclusive for all residents is at the heart of the strategy.

### **Breckland Local Plan (2023)**

- 3.4.4 BC’s Local Plan [Ref. 9] identifies 19 strategic objectives for all new development. The objectives relevant to the equality impacts of the Scheme include:
- Strategic objective 4 – *“To adapt and mitigate against the impacts of climate change”*; and
  - Strategic objective 8 – *“Promote and support economic growth in sustainable and accessible locations in a flexible manner, diversifying the urban and rural economic base of the District to enable a prosperous mix where investment is encouraged, skills are developed and retained and new and existing businesses are supported”*.

### **Breckland Corporate Plan 2024 to 2028**

- 3.4.5 This Corporate Plan [Ref. 10] sets out the approach to deliver BC’s vision for the District. It builds on the achievements of the plan launched in 2021. It includes tackling the



challenges of major cost of living pressures and constraints on public spending, whilst seeking to position the district to benefit from the opportunities of rapidly changing technology and the national economy. The Council aims to achieve the three following key themes:

- Inspiring Communities: Enabling everyone to lead happy, healthy, and fulfilling lives
- Thriving Places: Creating opportunities for skilled jobs and economic growth; and
- Working Smarter 2035: Protecting the environment, now and for future generations; and putting customers first by delivering quality, value-for-money services that meet their needs.

### **Future Breckland – Thriving People and Places (2023)**

- 3.4.6 The Future Breckland programme **[Ref. 11]** sets out a comprehensive set of plans, co-designed with residents, businesses/public sector agencies and town council partners, to transition Breckland for the future. The anchor to the Future Breckland approach has been to focus the depth of detail on the opportunities presented within Breckland's five Market Towns, and their surrounding hinterlands. As a collectively owned community plan, Future Breckland informs future priorities and investment.

### **Breckland Council, 2025. Equality and Diversity**

- 3.4.7 BC's approach to Equality and Diversity is set out on a page on the council's website **[Ref. 12]**. This includes a link to their 2018 Equality & Diversity Policy. The web page recognises the importance of EqlAs in guiding council decision making on major decisions.

### **Borough Council of King's Lynn & West Norfolk, 2016. Equality Policy**

- 3.4.8 KLWN's equality framework **[Ref. 13]** outlines the council's obligations under the Act. It confirms the use of Equality Impact Assessments in council plans and strategies and establishes an expectation that equality impacts are considered in development proposals.





## 4 Methodology

### 4.1 Introduction

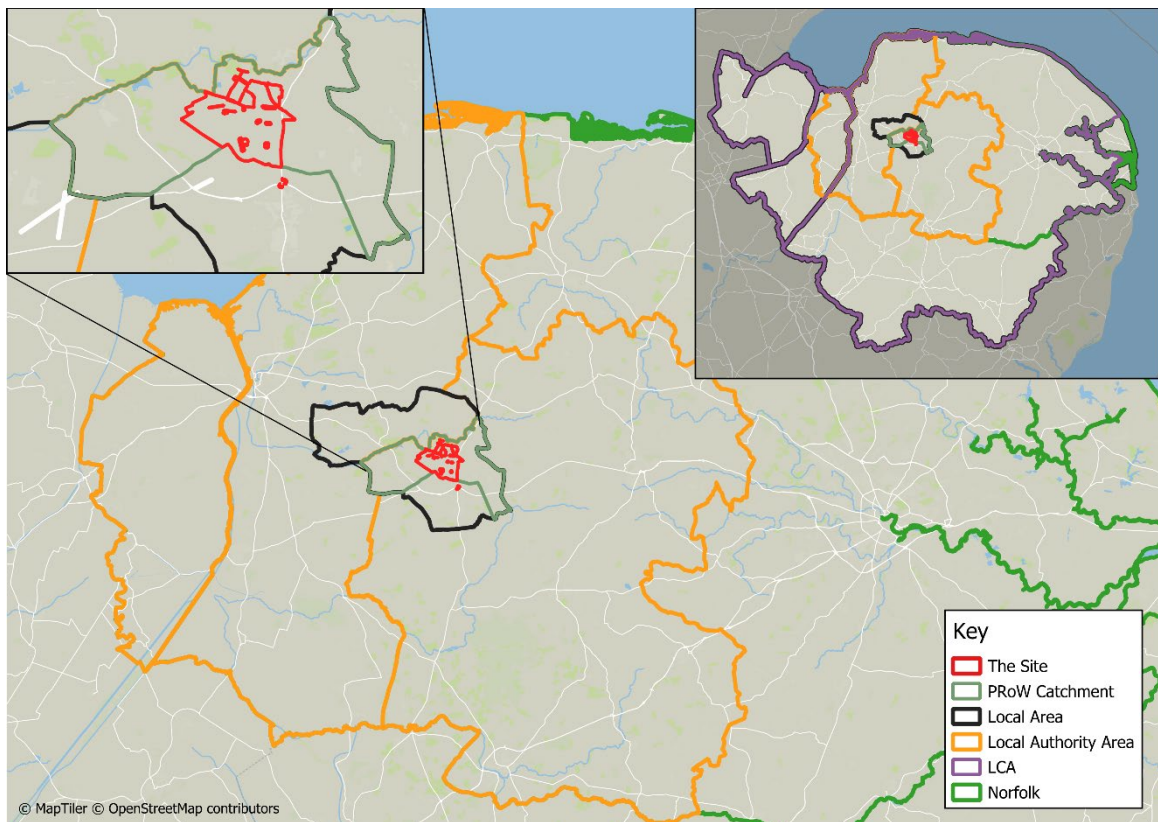
- 4.1.1 Unlike other aspects of environmental assessments, there is relatively limited published guidance in the UK on how to carry out EqlAs for development projects. While the Act establishes the PSED, requiring public bodies and those exercising public functions to have due regard to equality considerations, it does not prescribe a standardised methodology for assessing the potential equality impacts of a development project.
- 4.1.2 In practice, this means that there is no single, nationally recognised framework for preparing EqlAs in the UK planning or infrastructure context. This creates variability in the scope, structure, and depth of EqlAs, with many assessments relying on professional judgement to determine the most appropriate methodology. For this Scheme, the EqlA has therefore been prepared using proportionate methods informed by good practice, drawing from wider equality assessment approaches and tailoring them to the specific context of renewable energy development. The absence of formal guidance means it is especially important to ensure transparency in assumptions, to set out clearly the potential equality impacts identified, and to explain the rationale for the assessment process adopted.
- 4.1.3 This EqlA uses the following methodology to assess the equality effects arising from the Scheme:
- Utilise baseline data and literature evidence to determine the risk of equality groups experiencing disproportionate and/or differential equality effects (defined below)
  - Outline the impact that the Scheme has for a number of different effects, drawing heavily from the conclusions of the **ES [APP/6.1 - 6.5]**; and
  - Conclude whether the effects on different equality groups are beneficial or adverse, specifying where they are disproportionate or differential, and, where possible, outline measures to mitigate adverse or enhance beneficial effects.

### 4.2 Geographical definitions

- 4.2.1 **Figure 4.1** shows the Site in context of the Local Area and other geographies. **Table 4.1** outlines the various study areas utilised within this appraisal. The study areas include the Site, the PRow Catchment, the Local Area, the Local Authority area, the Labour Catchment Area (LCA), Norfolk, the East of England, and the national study area.



**Figure 4.1 Study areas**



Source: MapTiler, 2025

**Table 4.1 Geographical definitions**

Geography	Definition
The Site	The Order limits of the Scheme
PRoW catchment	Defining the specific area from which users of the PRoW are likely to originate is inherently challenging. The routes are open and publicly accessible, meaning users could come from both the immediate surroundings and further afield, depending on accessibility, purpose, and individual preferences. As such, it is not possible to delineate a definitive catchment area or identify a statistical geography that perfectly represents the PRoW user population. To provide a reasonable and evidence-based proxy, the assessment therefore adopts LSOA Breckland 002C to represent the local population most likely to use the PRoW. This offers the most appropriate balance between proximity and representativeness of the settlements adjacent to the Site.



Geography	Definition
Local Area	The Local Area comprises of the following LSOAs <sup>1</sup> (2011) surrounding the Site: King's Lynn and West Norfolk 012D, Breckland 002C, Breckland 007A, Breckland 007B, Breckland 007C, Breckland 007D, Breckland 007E.
Local Authority Area	KLWN and BC.
LCA	A 60-minute travel time to the Site, encompassing the host and neighbouring local authorities of East Cambridgeshire, Fenland, South Holland, Breckland, Broadland, King's Lynn and West Norfolk, North Norfolk, South Norfolk, Mid Suffolk, and West Suffolk, is used for assessing employment and related effects, as this represents a reasonable commuting distance for workers travelling to the Site.
Sub-regional	Norfolk
Regional	East of England
National	England

## 4.3 Baseline

- 4.3.1 The baseline review illustrates the prevalence of equality groups in the relevant study areas to determine the risk of disproportionate effects (**Section 5**), and reviews relevant literature to determine the potential of equality groups experiencing differential effects (**Section 6**). The equality groups considered are the nine protected characteristics included in the Act (see **paragraph 1.1.11**) and socio-economically disadvantaged groups.

## 4.4 Disproportionate effects

- 4.4.1 Disproportionate effects occur when an area contains a disproportionately high number of individuals with a protected characteristic, or an impacted asset is disproportionately used by an equality group. For example, religion is a protected characteristic, and it is reasonable to assume that there would be disproportionately high numbers of religious groups in areas where there are religious buildings. The baseline data is used to identify where equality groups have an above average presence across different study areas

<sup>1</sup> Lower layer Super Output Areas (LSOAs) are made up of groups of areas comprising between 400 and 1,200 households and have a usually resident population between 1,000 and 3,000 persons.



(comparing against local, regional, and national benchmarks), to determine where they are at risk of experiencing disproportionate equality effects.

## 4.5 Differential effects

- 4.5.1 Differential effects occur when members of the public with protected characteristics are more likely to be affected in different ways to the rest of the general population. Differential effects may occur because of specific needs, or a recognised sensitivity or vulnerability associated with their protected characteristic.
- 4.5.2 To identify potential differential effects, a review of existing literature is undertaken. There is very limited literature available for how the specific effects of solar development are likely to be experienced differentially by equality groups. Therefore, the literature review presents general evidence of the potential differential effects arising from the impacts identified in **Table 4.2**. When determining the differential effects of the Scheme, care is taken to ensure conclusions taken from the literature review are only those that could reasonably apply to the Scheme.

## 4.6 Equality effect scoping

- 4.6.1 Whilst various local authority bodies sometimes provide guidance on the effects to consider in an EqlA, these effects are generally tailored to traditional commercial or residential developments and may not be appropriate for a large renewable energy scheme. For this assessment, the socio-economic and health effects identified as potentially significant for the ES provide the foundation, given their close relationship to equality considerations.
- 4.6.2 Building on this foundation, a holistic view has been taken of all ES effects and their effect assessments, together with potentially significant bespoke equality effects, to create a tailored and focused list of potential equality effects for assessment. This approach ensures that all relevant equality effects are identified and assessed in a way that is focused and appropriate to the Scheme.
- 4.6.3 This assessment utilises industry standard techniques and professional judgment to determine which impacts should be scoped in and out of this assessment. **Table 4.2** outlines the outcome of this scoping exercise.

**Table 4.2 Scoping of potential equality effects as a result of the Scheme**

Impacts arising from the Scheme	Geography	Potential equality effects scoped in to the assessment
Impact on existing businesses	The Site	Scoped in (all phases) – Much of the Site is currently used for agricultural purposes, with a mix of owner-operator and tenant farmers. For



Impacts arising from the Scheme	Geography	Potential equality effects scoped in to the assessment
		<p>landowners, the Scheme could generate positive impacts, as they may benefit from long-term leasing arrangements for the solar farm while still being able to use parts of the land for certain agricultural purposes (e.g. sheep grazing or fodder production). By contrast, tenant farmers may face adverse impacts if they are unable to continue leasing land, with potential consequences for their income and business continuity.</p> <p>Properly understanding the potential for the disproportionate and differential equality effects arising from impact to existing businesses is appropriate.</p>
Physical activity, PRoW, and open space	Local Area	<p>Scoped in (All phases) – During the construction and decommissioning phases of the Scheme, temporary diversions of PRoWs and changes to visual amenity may discourage some individuals from engaging in physical activity, even though no permanent loss of access is anticipated. <b>ES Chapter 15: Human Health [APP/6.2]</b> concludes that there are no significant adverse effects during the construction or decommissioning phases. While no adverse effects are identified, mitigation measures such as phased works and clear signage will still be implemented to minimise potential impacts. In contrast, the operational phase is expected to deliver significant beneficial effects. PRoWs and open spaces are important community assets that support physical activity, mental health, and social interaction. Evidence also shows that reduced access, even temporarily, can differentially affect equality groups.</p>
Neighbourhood amenity		<p>Scoped in (all phases) – The Scheme has the potential to affect neighbourhood amenity through factors such as air quality, dust, noise, and visual amenity. These are important equality considerations as certain groups, such as children, older people, disabled people, and those in socio-economically disadvantaged circumstances, may be more sensitive to changes in local environmental conditions.</p>



Impacts arising from the Scheme	Geography	Potential equality effects scoped in to the assessment
Local employment, education, training, and upskilling	Local Authority Area	Scoped in (all phases) – The Scheme is expected to generate a substantial number of temporary jobs during the construction and decommissioning phases, across a wide range of occupations including management, skilled trades, technical professions, and general labour. While the <b>ES [APP/6.1 – 6.5]</b> concludes that these jobs will be widely distributed across the host authorities (BC and NCC) and therefore unlikely to lead to significant labour market effects overall, from an equalities perspective their availability remains relevant. Construction roles create pathways into work for residents who may face barriers to the labour market, particularly where supported by training, apprenticeships, and pre- or post-employment programmes. These opportunities are disproportionately relevant to younger residents and those from socio-economically disadvantaged backgrounds, including areas with higher proportions of people with no qualifications, lower skills attainment, or higher incidences of young people not in education, employment or training (NEET).

## 4.7 Equality impacts considered but ultimately scoped out

- 4.7.1 The following topics were initially identified as potentially relevant to equality but have been scoped out of further assessment for the reasons set out below. No significant disproportionate or differential effects on groups with protected characteristics are anticipated.

### Changes in commuting patterns

- 4.7.2 During the construction phase, there is a theoretical pathway by which changes in commuting patterns could affect equality groups such as disabled people, older residents, or those with limited access to private transport. However, as set out in the **ES [APP/6.1 – 6.5]**, construction traffic will be managed outside peak hours and the resulting increase in traffic flows is expected to be negligible. It is therefore judged that no meaningful disproportionate or differential effects would arise, and the effect is scoped out of the EqIA.





- 4.7.3 For the operational phase, commuting impacts were scoped out of the ES as the very low number of employees and visitors to the Site means no effects are anticipated. No equality impacts are therefore expected, and the effect is scoped out of the EqlA.

### Temporary worker accommodation

- 4.7.4 A proportion of the construction workforce is expected to come from outside the LCA and may require temporary accommodation. Baseline evidence (see **ES Chapter 14: Socio-Economics [APP/6.2]**) indicates that there is sufficient local capacity to accommodate this demand. While there is a pathway through which demand from temporary workers could displace existing users, including equality groups, the ES concludes that the scale of the effect would be minor and not significant. On this basis, the effect is scoped out of the EqlA, as no disproportionate or differential impacts on equality groups are anticipated.

## 4.8 Effect assessment methodology

- 4.8.1 For each equality group, equality effects are concluded as either beneficial, adverse, or neutral, and are identified as being disproportionate and/or differential (as defined in **Sections 4.4** and **4.5** respectively). Due to the temporary and short nature of the construction and decommissioning period, any effects during the construction and decommissioning phases would be temporary in nature, whilst effects during the operational phase are considered to be permanent.
- 4.8.2 For beneficial and adverse differential equality effects, this is broken down further into four categories:
- **Negligible** – represents an equality effect on protected groups relative to the general population, which is so small in magnitude, it is reasonable to believe it would not be perceived by individual members of the protected group.
  - **Minor** – represents a small equality effect on protected groups relative to the general population.
  - **Moderate** – represents a medium-sized equality effect for protected groups relative to the general population.
  - **Major** – represents a large-scale equality effect on equality groups relative to the general population.
- 4.8.3 The magnitude of equality effects is determined on the potential of the effects to change the lives of people with protected characteristics. This includes both the activities of their daily lives, but also, and perhaps more importantly, activities which are intrinsically related to their protected characteristics. For example, an effect which adversely impacts religious people's ability to worship would increase the adverse magnitude of the equality effect in question.
- 4.8.4 Equality effects that are negligible adverse do not require mitigation. This is because they are so small in magnitude it is reasonable to believe that they would not actually be



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perceived by those populations with protected characteristics. Minor adverse effects will be considered on a case-by-case basis to determine whether mitigation is appropriate. Moderate or major adverse effects will require mitigation where practicable.

- 4.8.5 This EqIA draws heavily on other technical assessments to inform the assessment. Given that the technical assessments look at the general impact only, a further level of interpretation is required to translate the technical findings into potential equality findings. Sometimes this can further support the technical findings and at other times it can change their meaning/impact/significance. Equality effects are often difficult to quantify and assess accurately. Where suitable data is not available, the potential effects are described qualitatively.



## 5 Groups at risk of Disproportionate Effects

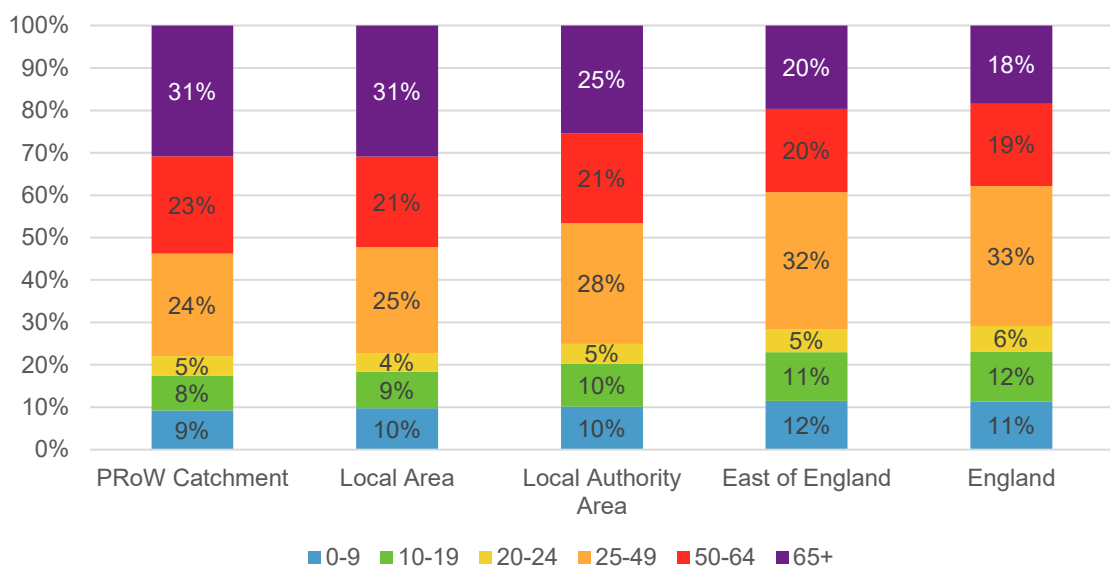
- 5.1.1 This section outlines the baseline data indicators within the relevant study areas. It summarises the groups which could experience disproportionate equality effects. Disproportionate effects are defined in **paragraph 4.4.1**.

### Age

- 5.1.2 **Figure 5.1** shows the population demographic of the study areas in 2021. The PRoW Catchment and the Local Area have a higher proportion of residents aged 65 or above than all comparator geographies, and accordingly has a lower proportion of residents aged 0 – 24 than all comparator geographies [**Ref. 14**].
- 5.1.3 A similar pattern is observed in the Local Authority Area, which has a higher proportion of residents aged 65 or above than the regional and national averages, and a lower proportion of residents aged 0 – 24. As such, residents of the PRoW Catchment, Local Area and the Local Authority Area who are aged 65 or above may face disproportionate equality effects.

**Figure 5.1 The Local Area and Local Authority Area have a higher proportion of 25-49 year olds than the regional and national averages**

Population by age group by geography (2021)



Source: ONS, 2025. TS007A - Age by five-year age bands

### Disability

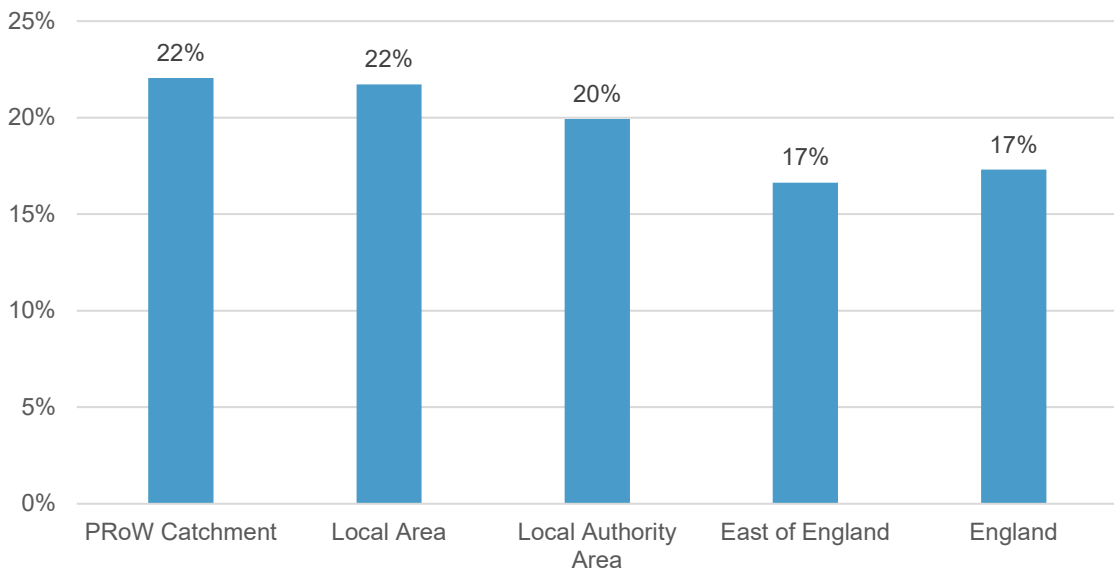
- 5.1.4 The PRoW Catchment (22%), Local Area (22%) and the Local Authority Area (20%) both contain a higher proportion of residents who are classed as disabled under the Act than the regional (17%) and national (17%) averages (see **Figure 5.2**). As a result of these



findings, residents with physical disabilities and/or long-term health problems in the PRoW Catchment, Local Area or the Local Authority Area are considered to be at risk of experiencing disproportionate equality effects [Ref. 15].

**Figure 5.2 The Local Area and Local Authority Area have a higher proportion of residents defined as disabled than the national level**

The proportion of residents who are disabled under the Act



Source: ONS, 2025. QS303EW - Long-term health problem or disability

- 5.1.5 Within the Local Authority Area, indicators of mental wellbeing are mixed. In KLWN, only 5.5% of residents report 'poor' levels of happiness, which is lower than both the regional (7.8%) and national (8.9%) averages. By contrast, in BC, 11.8% of residents report poor levels of happiness, a figure substantially higher than the comparator geographies [Ref. 16]. Therefore, it is conservatively expected that residents of the whole Local Authority Area who suffer from mental health problems could experience disproportionate equality effects. In the absence of reliable data at the Local Area level, it is cautiously assumed that the same conclusion applies for residents of the Local Area.

## Religion and philosophical belief

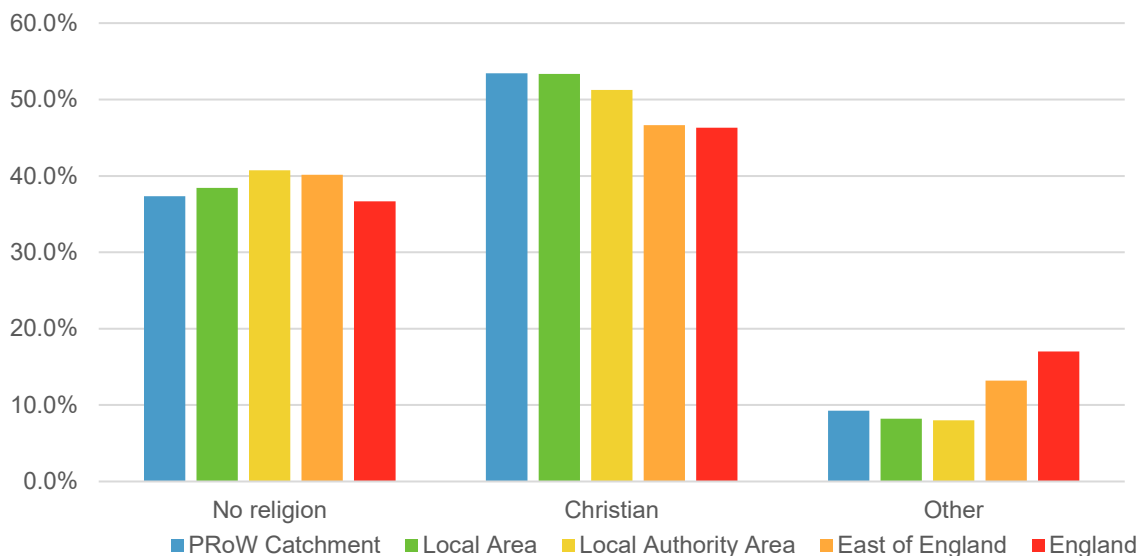
- 5.1.6 **Figure 5.3** shows that 53% of the Local Area's population is Christian, higher than the East of England's Christian proportion of 47% [Ref. 17]. Similarly, the Local Authority Area has a higher proportion of residents who identify as being Christian than the regional and national averages; however, this aligns with national trends and therefore does not suggest disproportionate representation.
- 5.1.7 For presentational ease, all other religions have been grouped together in the 'other' category. However, the data for the prevalence of people from each distinct religion has been individually checked. No religions have a disproportionately high prevalence in the PRoW Catchment, Local Area or Local Authority Area. Whilst there is a slightly higher



proportion of Christians in these areas, relative to regional and national levels, this difference is not judged to be of sufficient magnitude where it would risk disproportionate effects.

**Figure 5.3 There is a higher proportion of Christians in the Local Area and Local Authority Area than the regional and national areas**

Religion breakdown (2021)



Source: ONS, 2022. Census 2021 TS030 – Religion.

## Race

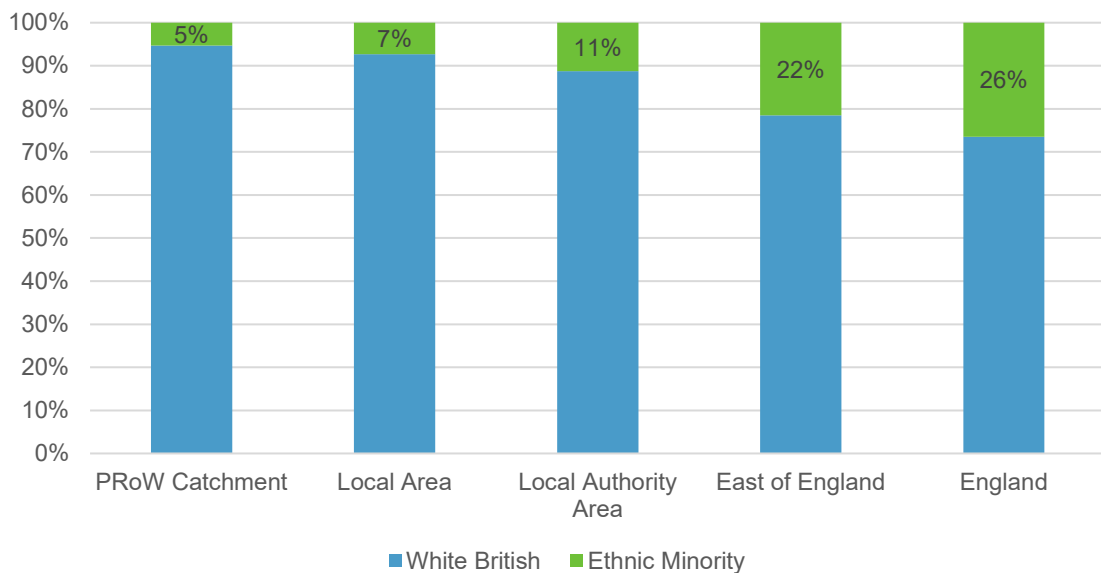
- 5.1.8 The proportion of residents who belong to ethnic minority groups is presented by geography in **Figure 5.4**.<sup>2</sup> The PRow Catchment, Local Area and the Local Authority Area, all have a proportion of residents who identify as being part of an ethnic minority group that is substantially lower than the regional and national averages [**Ref. 18**]. As such, it is considered that residents of the PRow Catchment, Local Area and the Local Authority Area would not experience disproportionate equality effects on the basis of ethnicity and race.
- 5.1.9 Splashes Campsite is an official NCC residential traveller site located within the A47 – A1065 junction. By its nature, Splashes contains a disproportionately high number of people from Gypsy, Roma and Traveller ethnic backgrounds. As such, any impacts of the scheme on Splashes could result in disproportionate equality effects for people of Gypsy, Roma and Traveller ethnic backgrounds.

<sup>2</sup> 'Ethnic minority' is defined as any ethnicity that is not White: English, Welsh, Scottish, Northern Irish or British, as per the ONS definition.



**Figure 5.4 The proportion of Local Area residents who are White British is substantially higher than the regional and national averages**

Ethnicities by geography (2021)



Source: ONS, 2022. Census 2021 TS021 - Ethnic group

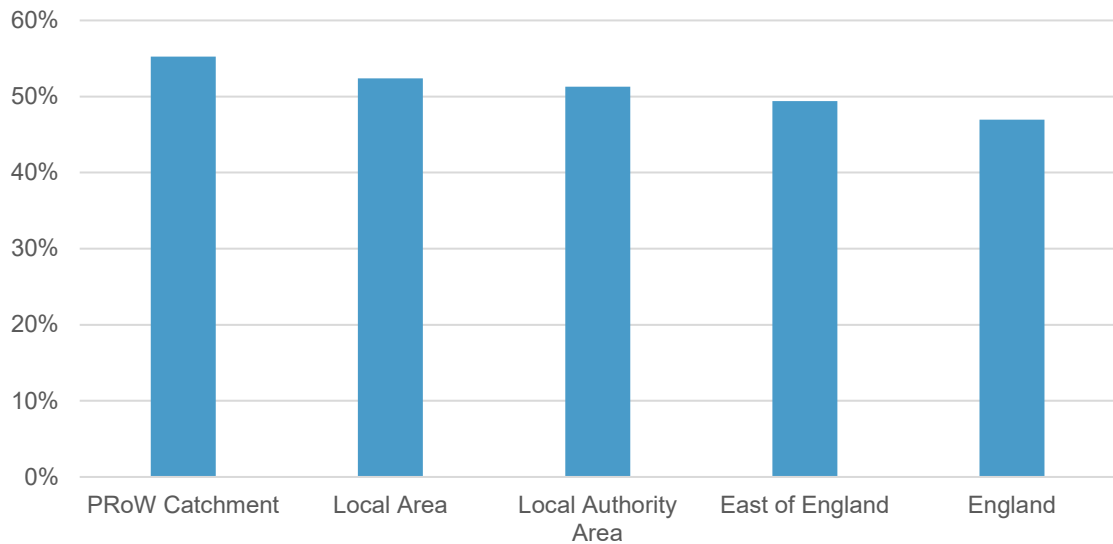
## Marriage and legal partnership

- 5.1.10 **Figure 5.5** presents the proportion of residents who are married or in a civil partnership for the study areas. It shows that within the PRow Catchment, Local Area and the Local Authority Area, there is a higher proportion of people that are married or in a registered civil partnership [Ref. 19]. It can be concluded from these findings that those married or in a registered civil partnership could face disproportionate equality effects.



**Figure 5.5 The share of individuals who are married or in a civil partnership are higher in the Local Area and the Local Authority Area than regional and national averages**

Relationship status: proportion of residents who are married or in a civil partnership (2021)



Source: ONS, 2022. Census 2021 TS002 - Legal partnership status

## Sex

- 5.1.11 The Local Area has only a marginally higher proportion of females, and lower proportion of males than all geographic comparators (**Figure 5.6**) [Ref. 20]. On this basis, it is not expected that either male or female residents in the PRow Catchment, Local Area or Local Authority Area will face any disproportionate equality impacts from the Scheme.





**Figure 5.6 The proportion of males and females is similar across all geographical comparators**

Proportion of males and females (2021)



Source: ONS, 2022. Census 2021 TS008 – Sex

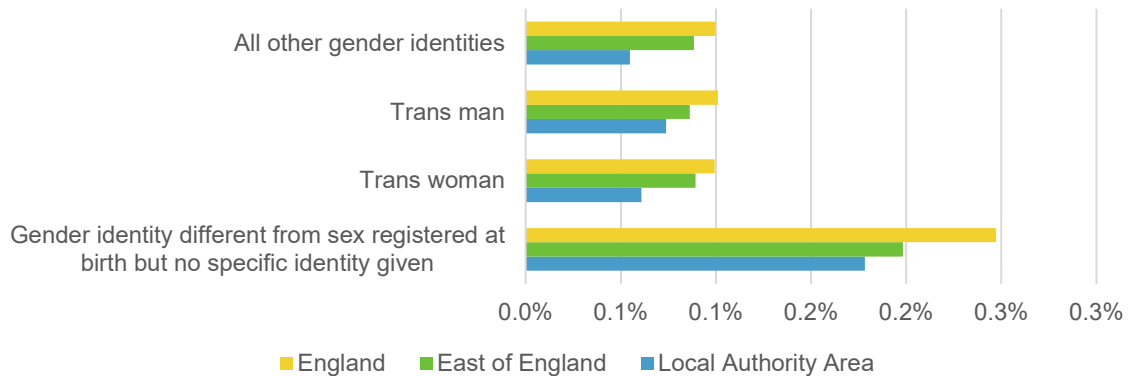
## Gender (reassignment and identities)

5.1.12 **Figure 5.7** provides a breakdown of specific gender identities across geographies [Ref. 21]. It shows that there is a lower proportion of gender identities which differ from those assigned at birth in the Local Authority Area compared to the regional and national levels. This is the case for those that identify as non-binary, trans man, and trans woman. Therefore, residents of the Local Authority Area whose gender identities differ from those assigned at birth are unlikely to be at risk of experiencing disproportionate equality effects. In the absence of reliable data at the Local Area level, it is assumed that the conclusions for the Local Authority Area also apply for residents of the Local Area.



**Figure 5.7 A lower proportion of residents in the Local Authority Area identify as Non-binary, Trans man, and Trans woman than other geographical comparators**

Proportion of residents identifying themselves (2021)



Source: ONS, 2022. Census 2021 TS070 - Gender Identity. Note: Due to availability of data, unable to present this at the local level.

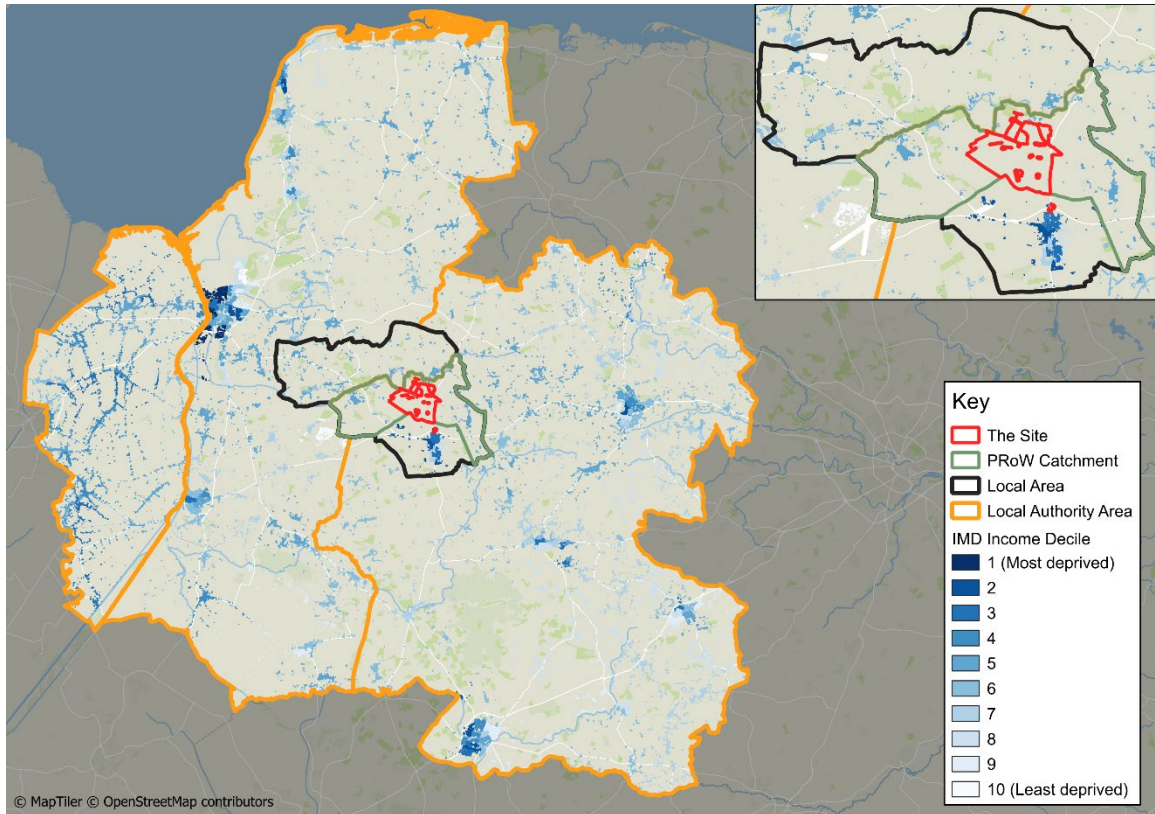
## Socio-economically disadvantaged groups

- 5.1.13 The Index of Multiple Deprivation (IMD) ranks LSOAs in the UK on multiple domains. The IMD is a measure of deprivation that comprises seven sub-domains [Ref. 22]. The sub-domains are Income, Employment, Education, Skills and Training, Health and Disability, Crime, Barriers to Housing and Services, and Living Environment. Although this is not a perfect system for measuring deprivation, the IMD provides a valuable indication on whether disproportionate groups of people on low-incomes reside in various study areas.
- 5.1.14 **Figure 5.8** shows the IMD Income sub-domain ranking in a map with the most deprived LSOAs shaded darkly [Ref. 23]. As can be seen, substantial pockets of income deprivation exist across the Local Authority Area, concentrated in areas such as King's Lynn and Swaffham. The latter of these two areas falls within the Local Area, which otherwise experiences relatively low levels of income deprivation.



**Figure 5.8 The nearby town of Swaffham experiences high levels of income deprivation**

Income deprivation IMD (2019)



Source: ONS, 2019. English indices of deprivation 2019

5.1.15 **Table 5.1** presents the unemployment rate and economic inactivity rate across study areas [Ref. 24]. The PRoW Catchment and the Local Area experiences a higher rate of economic inactivity and an unemployment rate that is similar to the regional and national averages. The two constituent local authorities that make up the Local Authority Area experience relatively low unemployment rates, and economic inactivity rates that are marginally above the regional and national averages.

**Table 5.1 The Local Area has higher rates of economic inactivity compared to other geographies**

Economic activity status across geographies (2021)

Area	Unemployment rate	Economic inactivity rate
PRoW Catchment	2.1%	48.4%
Local Area	4.8%	21.6%
Breckland	3.7%	17.9%



Area	Unemployment rate	Economic inactivity rate
King's Lynn and West Norfolk	3.9%	19.1%
East of England	4.2%	16.2%
England	4.9%	17.3%

Source: ONS, 2025. Census 2021: RM024 - Economic activity status by sex by age

- 5.1.16 Therefore, from the data presented, residents from socio-economically disadvantaged groups in the PRow Catchment and the Local Area are not at risk of experiencing disproportionate equality effects.

### Sexual orientation

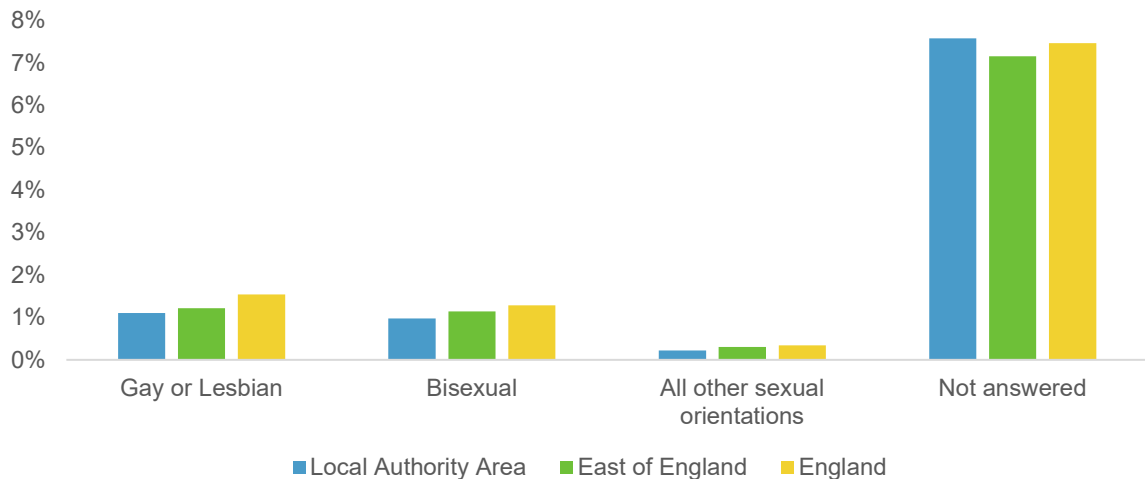
- 5.1.17 The proportion of people who identify as heterosexual or straight is roughly equivalent in the Local Authority Area (90%), compared to the regional (90%) and national level (89%) (See **Figure 5.9**)<sup>3</sup> [Ref. 25].
- 5.1.18 As a result of this, LGBTQ+ residents in the Local Authority Area are unlikely to be at risk of experiencing disproportionate equality effects. In the absence of reliable data at the Local Area level, it is assumed that the same conclusion applies for residents of the Local Area.

<sup>3</sup> ONS, 2025. Census 2021 TS077 - Sexual orientation



**Figure 5.9 There is a lower proportion of residents in the Local Authority Area that identify as Gay or Lesbian, Bisexual, Pansexual, Asexual, or Queer than there is across other geographies**

Sexual orientation of residents across geographies (2021)



Source: ONS, 2025. Census 2021 TS077 - Sexual orientation

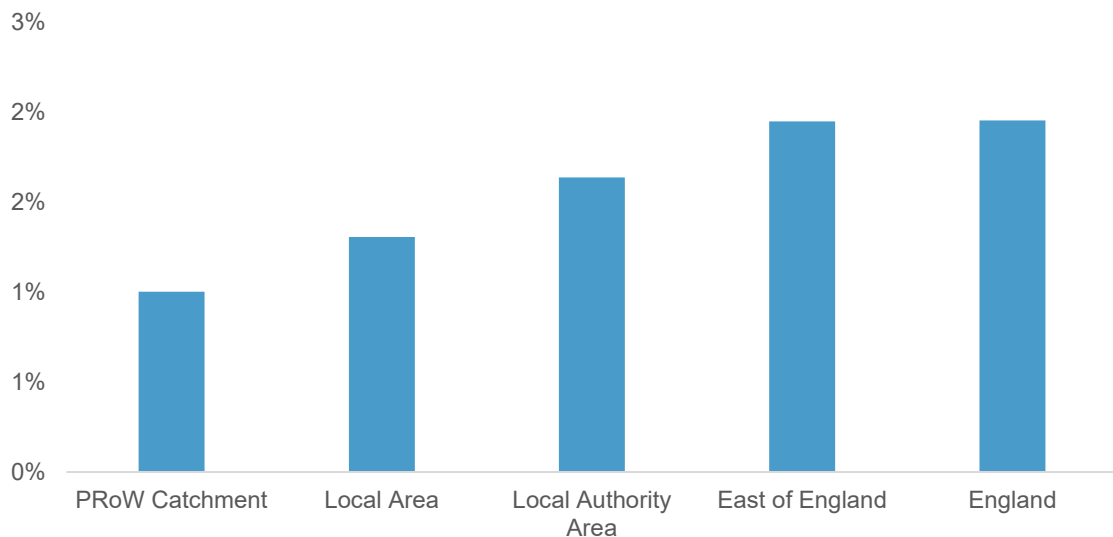
## Pregnancy

- 5.1.19 The proportion of pregnant women across different geographies is represented in **Figure 5.10 [Ref. 26]**. The PRoW Catchment, Local Area and the Local Authority Area have a lower proportion of pregnant women than the regional and national levels. Due to this, it is not deemed to be a risk for pregnant women residents in the Local Area or the Local Authority Area experiencing any disproportionate equality effects.



**Figure 5.10 The proportion of pregnant women is lower in the Local Area and the Local Authority Area relative to the regional, and national averages**

Proportion of pregnant women (2022)



Source: ONS, 2024. Births by Lower Layer Super Output area LSOA in England and Wales, mid-year 2022 to 2023. ONS, 2025. Population estimates - small area (2021 based) by single year of age - England and Wales

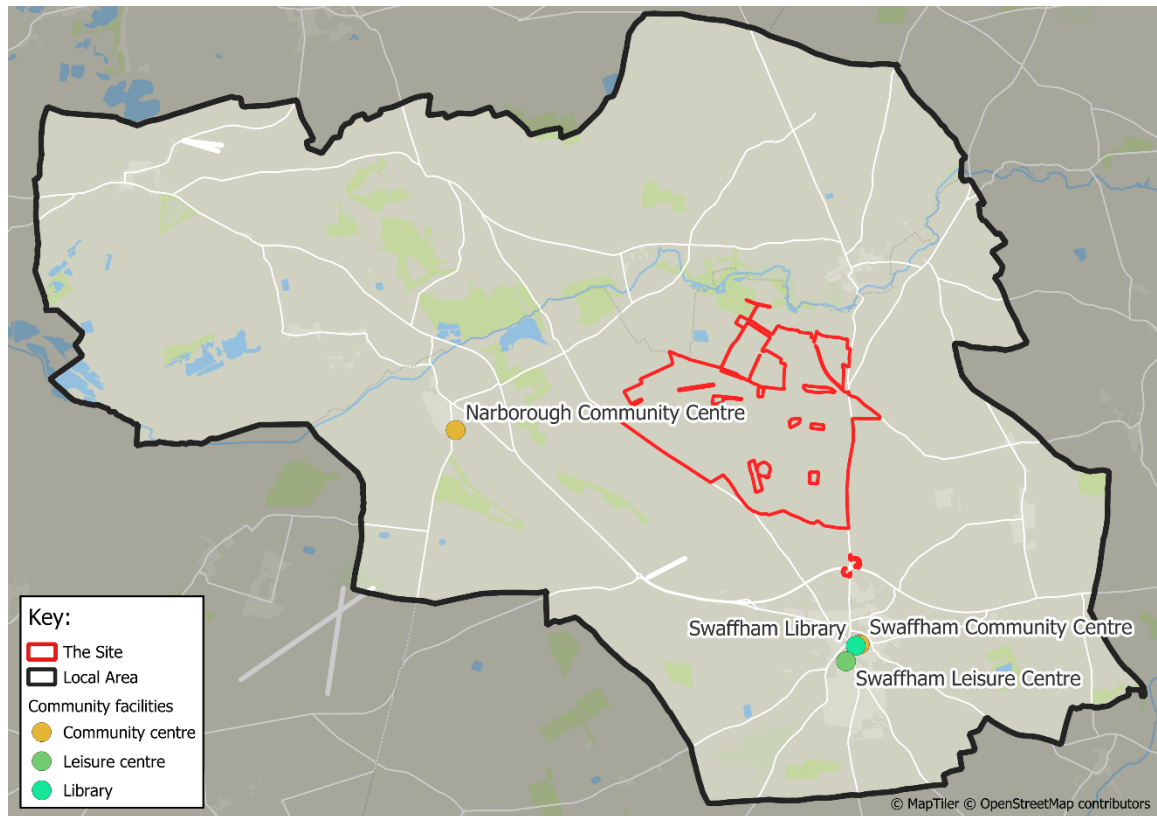
## Community infrastructure

- 5.1.20 **Figure 5.11** maps the community facilities identified within the Local Area. As can be seen, the community facilities within the Local Area are largely concentrated within the town of Swaffham, which contains a library, community centre, and leisure centre **[Ref. 27]**.
- 5.1.21 The Local Area contains two dedicated community centres: the aforementioned Swaffham Community Centre and a second community centre in the village of Narborough. This corresponds to a ratio of 7,095 residents per community centre in the Local Area.
- 5.1.22 Research suggests that a community centre is needed for every 7,000 – 11,000 residents **[Ref. 28]**, and as such, the Local Area does not contain an under provision of community centres.



**Figure 5.11 The Local Authority has a high number of community infrastructure**

Cultural Infrastructure in the Local Area



Source: Volterra research





## 6 Groups at risk of differential effects

- 6.1.1 This section outlines potential differential impacts relevant to the Scheme. The definition of differential impacts can be found in section 4.4 and 4.5.
- 6.1.2 Literature that links an equality group to the potential equality effects listed in **Table 6.1** will be utilised to provide evidence of differential impacts on specific protected groups. For clarity, this literature relates to general differential effects that equality groups could experience from development, and are not necessarily anticipated effects of the Scheme. Where there is an absence of literature, it is not assumed to be a relevant link between the target group and the potential equality effect.

**Table 6.1 Potential differential effects relevant to the Scheme**

Equality group	Key literature	Equality effects (and subgroup) where differential effects are experienced
Age	<ul style="list-style-type: none"><li>• There exists strong evidence proving that access to open spaces and sports facilities is associated with higher levels of physical activity, which could be particularly applicable to younger people. In a study on greenspace and obesity, twenty of the experiments found a positive association between greenspace and physical activity, particularly in reference to children and teenagers [Ref. 29].</li><li>• The presence of public open space can optimise social interactions with the neighbourhood, which in time can address social issues among older people, including loneliness [Ref. 30]. Older people are found to be more inactive relative to the rest of the population, and so can be differentially affected by access to open spaces.</li><li>• Access to open space can improve the cognitive development and educational attainment of children, helping to build a habit of regular physical activity for later life. Children suffering from obesity can be differentially impacted by access to open space.</li><li>• Children may be indirectly affected if there are job losses when their parents/carers are displaced, as it could lead to lower family income.</li><li>• Air pollution can be damaging to children as their lungs are still developing.</li></ul>	<ul style="list-style-type: none"><li>• Physical activity and PRow (younger people and older people).</li><li>• Neighbourhood amenity (younger people and older people).</li><li>• Local employment, education, training, and upskilling (younger people and older people).</li><li>• Impact on existing businesses (younger people).</li></ul>



Equality group	Key literature	Equality effects (and subgroup) where differential effects are experienced
	<ul style="list-style-type: none"> <li>• Older people are more likely to suffer from cardiovascular and respiratory conditions due to poor air quality <b>[Ref. 31]</b>.</li> <li>• Prolonged exposure to high levels of noise can cause a higher prevalence of cardiovascular disease, strokes, and dementia, which older people are already at risk of <b>[Ref. 32]</b>.</li> <li>• Parental unemployment can enhance stress and anxiety in children, as well as reducing educational attainment <b>[Ref. 33]</b>.</li> <li>• Unemployment for over 50's is associated with difficulty gaining re-employment as younger candidates are deemed preferable <b>[Ref. 34]</b>.</li> <li>• As people age their eyes become less sensitive to light, making it more difficult for them to see in low light conditions. One study found that bright light can reduce the risk of falls and improve the overall quality of life for the elderly <b>[Ref. 35]</b>.</li> <li>• Children need exposure to sunlight to help their bodies produce vitamin D, which is crucial for bone health <b>[Ref. 36]</b>.</li> </ul>	
Disability	<ul style="list-style-type: none"> <li>• The displacement of workers with disabilities and/or long-term health problems could increase their travel time to work and affect commuting patterns. As this vulnerable group may have mobility problems, they are at risk of experiencing differential effects.</li> <li>• Community facilities play an important role in the lives of those deemed to be disabled. Some disabled people (including those with mental health issues) rely on their communities for physical and emotional support <b>[Ref. 37]</b>.</li> <li>• Those with disabilities or long-term health problems may have an increased sensitivity to loud noises. Changes in noise exposure can differentially affect this vulnerable group, in particular, those living with epilepsy through acting as an additional trigger that may cause a seizure.</li> <li>• Literature has found strong links between unemployment and negative health outcome indicators for those with a pre-existing health</li> </ul>	<ul style="list-style-type: none"> <li>• Impacts on community facilities, places of worship, and tourism assets (disabled people including those with mental health).</li> <li>• Neighbourhood amenity (disabled people including those with mental health).</li> <li>• Local employment, education, training, and upskilling (people with pre-existing health conditions).</li> </ul>



Equality group	Key literature	Equality effects (and subgroup) where differential effects are experienced
	<p>condition including overall mortality and cardiovascular disease <b>[Ref. 38]</b>.</p> <ul style="list-style-type: none"> <li>Those with long-term illness or disabilities can be more affected by lack of sunlight. For example, Seasonal Affective Disorder is a type of depression that occurs due to lack of sunlight. A study showed that exposure to sunlight can help alleviate symptoms of this depression <b>[Ref. 39]</b>.</li> </ul>	
Religion and philosophical belief	<ul style="list-style-type: none"> <li>Religious people place greater reliance on places of worship. Muslims pray five times per day and mosques are available at all these prayer times <b>[Ref. 40]</b>.</li> <li>Christians can attend church on any day of the week, but the most common day is Sunday.</li> <li>In 2013, the percentage of people in England from a religious minority in employment was lower (58.7%) than those with no religion (73.8%) and Christians (74.8%) <b>[Ref. 41]</b>.</li> <li>Muslims face worst employment discrimination than any group, with a Muslim man being 76% less likely to have a job compared to a white, British man.</li> <li>3% of employees have faced discrimination due to their religion <b>[Ref. 42]</b>.</li> </ul>	<ul style="list-style-type: none"> <li>Impacts on community facilities, places of worship, and tourism assets (religious people).</li> <li>Local employment, education, training, and upskilling (religious people).</li> </ul>
Race	<ul style="list-style-type: none"> <li>Ethnic minority communities often face barriers such as cultural exclusion, social isolation, and systemic inequalities in planning that lead to limited or poor-quality access to green spaces <b>[Ref. 43]</b>.</li> <li>There is extensive evidence of an ethnic minority penalty present in the labour market historically <b>[Ref. 44]</b>.</li> <li>BAME-owned enterprises tend to be community-centric and focussed on easily accessible markets, causing concerns over displacement <b>[Ref. 45]</b>.</li> <li>Those from BAME backgrounds are more likely to live in areas with a higher amount of toxic air <b>[Ref. 46]</b>.</li> <li>Ethnic minority groups typically place more value in community facilities, such as places of worship <b>[Ref. 47]</b>.</li> </ul>	<ul style="list-style-type: none"> <li>Physical activity, and PRoW (ethnic minority groups).</li> <li>Impacts on community facilities, places of worship, and tourism assets (BAME people).</li> <li>Local employment, education, training, and upskilling (ethnic minority groups).</li> <li>Neighbourhood amenity (BAME people).</li> </ul>



Equality group	Key literature	Equality effects (and subgroup) where differential effects are experienced
	<ul style="list-style-type: none"> <li>Those from minority ethnic backgrounds face more barriers to employment, as they ‘wouldn’t fit in’ or may require English as a first language, or UK qualifications <b>[Ref. 48]</b>.</li> </ul>	<ul style="list-style-type: none"> <li>Impact on existing businesses (ethnic minority groups).</li> </ul>
Marriage and legal partnership	<ul style="list-style-type: none"> <li>The Act details forms of direct and indirect discrimination which could be faced by those who are married or in a civil partnership, for example: A woman could work night shifts but be dismissed when she gets married as her employer thinks a married woman should be at home in the evenings; or indirect discrimination as a result of a policy or way of working that puts married people at a disadvantage <b>[Ref. 49]</b>.</li> </ul>	<ul style="list-style-type: none"> <li>Local employment, education, training, and upskilling (married people).</li> </ul>
Sex	<ul style="list-style-type: none"> <li>Females also face barriers in the labour market, experiencing discrimination as employers may only recruit full-time workers <b>[Ref. 50]</b>. According to the House of Commons library, 38% of women are employed part-time compared to 13% of men <b>[Ref. 51]</b>.</li> <li>Women also face the burden of a significant gender pay gap, and higher unemployment rates.</li> </ul>	<ul style="list-style-type: none"> <li>Local employment, education, training, and upskilling (women).</li> <li>Neighbourhood amenity (women).</li> </ul>
Gender (reassignment and identities)	<ul style="list-style-type: none"> <li>Gender reassignment is defined as someone who is proposing to undergo, is undergoing, or has undergone 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 <b>[Ref. 52]</b>.</li> <li>A study reported a fifth of transgender respondents reporting harassment in the workplace, and 18% believe they were turned down a job due to their gender identity <b>[Ref. 53]</b>.</li> </ul>	<ul style="list-style-type: none"> <li>Employment and skills (transgender people).</li> </ul>
Socio-economically disadvantaged groups	<ul style="list-style-type: none"> <li>Low-income communities are affected due to the economic inequality, geographic marginalisation, and poor-quality open spaces. These areas often lack well-maintained green spaces or may have limited access to them, which contributes to health disparities <b>[Ref. 54]</b>.</li> <li>Groups with lower income experience larger financial constraints which restrict their ability to respond to changes to surrounding environmental conditions.</li> </ul>	<ul style="list-style-type: none"> <li>Physical activity, and PROW (socio-economically disadvantaged groups).</li> <li>Local employment, education, training, and upskilling (socio-economically disadvantaged groups).</li> </ul>



Equality group	Key literature	Equality effects (and subgroup) where differential effects are experienced
	<ul style="list-style-type: none"> <li>Those in more disadvantaged socioeconomic positions are more likely to be unemployed <b>[Ref. 55]</b>.</li> <li>Those from lower income backgrounds suffer disproportionately from lack of access to green spaces, leading to poor health outcomes <b>[Ref. 56]</b>.</li> </ul>	
Sexual orientation	<ul style="list-style-type: none"> <li>A 2014 study found that gay and lesbian employees were more likely to face harassment at work <b>[Ref. 57]</b>.</li> </ul>	<ul style="list-style-type: none"> <li>Local employment, education, training, and upskilling (LGBTQ+).</li> </ul>
Pregnancy	<ul style="list-style-type: none"> <li>Enhanced greenness of the environment has a positive effect on pregnancy outcomes, for example healthy birth weights <b>[Ref. 58]</b>.</li> <li>High levels of noise can lead to increased risk of the baby suffering hearing loss, premature delivery, and a low birthweight <b>[Ref. 59]</b>.</li> <li>Short-term exposure to air pollution increased the risk of losing a pregnancy by 16% <b>[Ref. 60]</b>.</li> <li>People traveling with small children face higher risk of physical injury as falling is the most common cause of injury for children of all ages <b>[Ref. 61]</b>.</li> <li>The Department for Business, Innovation and Skills (BIS) and the Equality and Human Rights Commission found in 2015 that 11% of mothers reported that they were either dismissed or made compulsorily redundant where others in their workplace were not <b>[Ref. 62]</b>.</li> </ul>	<ul style="list-style-type: none"> <li>Physical activity, and PRow (pregnant women).</li> <li>Local employment, education, training, and upskilling (pregnant women).</li> </ul>

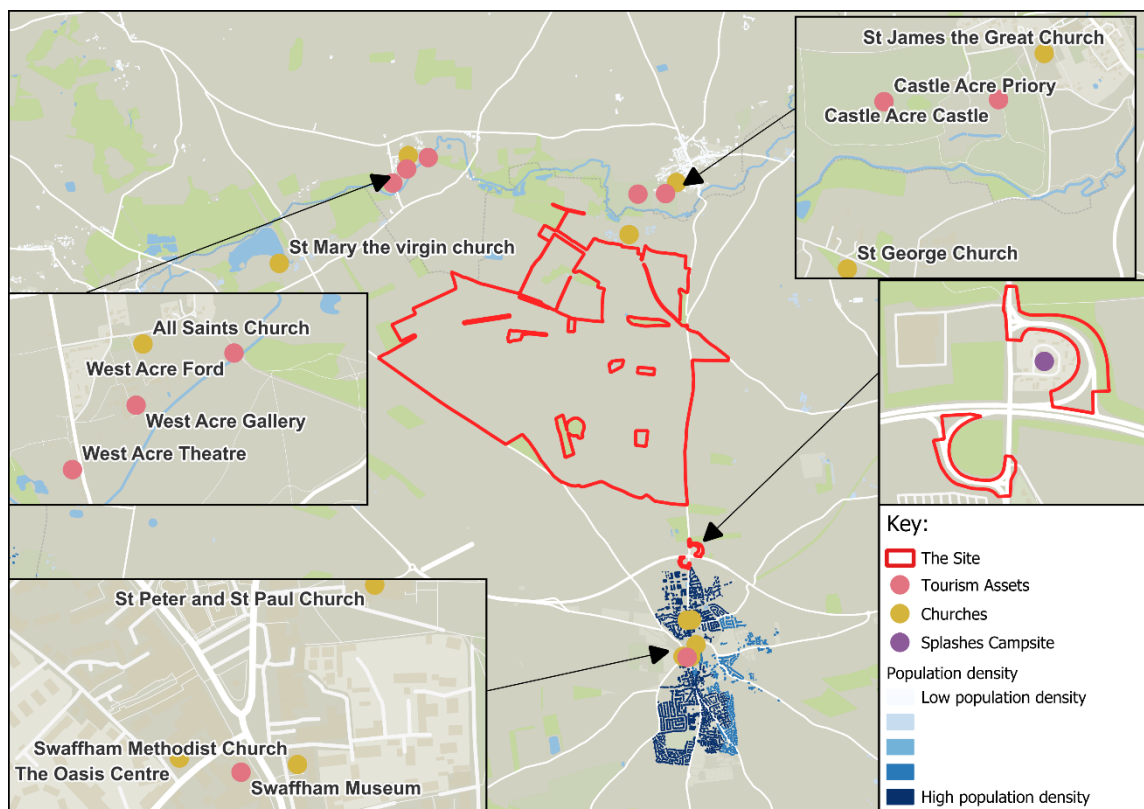


## 7 Equality effects assessment

### 7.1 Equality context

- 7.1.1 **Figure 7.1** provides an overview of the Site and its surrounding context. It illustrates the Site boundary alongside key local features, including residential dwellings, places of worship and tourism assets. Population density is also shown to highlight the distribution of local communities.
- 7.1.2 This contextual mapping demonstrates that the Site is located in a relatively sparsely populated area, with limited concentrations of sensitive receptors or community facilities in close proximity. As such, the baseline expectation is that the potential for significant equality effects is limited, though a more detailed assessment is provided in the sections below.

**Figure 7.1 Baseline Equality Context Map**



Source: ONS, 2024. Population estimates © MapTiler © OpenStreetMap contributors





## 7.2 Impact on existing businesses

- 7.2.1 Possible equality effects on existing businesses can occur where proposals impact businesses who are disproportionately owned by people from a certain equality group, or those businesses contain disproportionately high numbers of employees from certain equality groups. Equality effects can also arise where the impacted businesses provide a service which is disproportionately used by members of a certain equality group.
- 7.2.2 Given the available knowledge of the businesses currently operating within the Site, none of the above equality effects described above appear likely to materialise, as is set out below.
- 7.2.3 There are a number of agricultural businesses operating within the Site, including two substantial arable farming enterprises. The majority of the Site is leased to agricultural businesses, with the landowner managing only a small proportion directly. An assessment by Kernon Countryside Consultants concluded that the numbers of workers on-site is somewhere in the range of 10-15 Full Time Equivalent (FTE) jobs.

### Construction, Operational, and Decommissioning Phases

- 7.2.4 Most of the Site boundary is grassland and is actively farmed. **ES Chapter 11: Soils and Agriculture [APP/6.2]** concludes that the construction phase of the Scheme will lead to a temporary loss of agricultural land. The enterprises currently occupying the four fields within the ground-mounted PV module areas (Fields 3, 12, 19 and 20) operate on a rotational basis, typically every two to three years, and will have the opportunity to relocate to land outside the Site. While these businesses will experience some disruption and operational change, through a reduction in farmed area or relocation, such impacts are not expected to result in business closure or long-term loss of viability. In addition, parts of the Site are also used on short-term arrangements by vegetable growers, who may need to source alternative land or reduce the scale of operations. For the purposes of this assessment, it has been conservatively assumed that the decommissioning phase will result in a similar, short-term displacement effect as land is restored and therefore conclusions for the construction phase are also concluded for the decommissioning phase. This represents a worst-case scenario.
- 7.2.5 During the operational phase, arable activities will likely need to cease altogether due to the introduction of solar panels. There is potential for alternative agricultural activity such as sheep grazing under and around the solar panels, and overall, the quantum of agricultural labour is not expected to change significantly due to the shift from arable production to sheep-based enterprises (if this were to occur).
- 7.2.6 The two substantial arable farming enterprises comprise one in-hand holding and one operating under a short-term tenancy. Both will experience a change to day-to-day operations as a result of the Scheme. However, **ES Chapter 11: Soils and Agriculture [APP/6.2]** concludes that neither business is expected to be rendered unviable. As set out above, there is potential for alternative agricultural uses to come forward in both the





construction and operational phases, which have the potential to broadly retain the same quantum of agricultural labour.

## Conclusion

- 7.2.7 For the agricultural businesses who lease portions of the Site, the changes to land-use are not expected to render these businesses unviable in either the construction and operational phases. Whilst the unviability of arable farming has the potential to adversely impact these businesses, the viability of other forms of farming (namely sheep grazing) in part mitigates this effect. Furthermore, were these alternative forms of agriculture to come forward, it is possible that the levels of employment on-site would remain largely the same.
- 7.2.8 Overall, **ES Chapter 14: Socio-Economics [APP/6.2]** concludes a minor adverse effect on land uses in EIA terms under a worst-case scenario. This is prior to any equality considerations. The demographics, and hence presence of equality groups, within both the business owners and employees is unknown. However, there is no evidence to suggest that the business owners and workers have a disproportionately high representation within a certain equality group. Furthermore, the relatively small numbers of business owners and employees being impacted, and the small magnitude of the impact, would suggest that any adverse equality effect is likely negligible.
- 7.2.9 The landowner of the site is not expected to experience any adverse impacts on their business. Indeed, it is assumed that in permitting the Site to be used for solar development, the landowner judges this decision to be financially viable for themselves (i.e. the revenue and costs associated with leasing the land for solar development is greater than the revenue and costs associated with leasing the land for agricultural uses). Therefore, no equality effects related to the landowner and their business are anticipated.
- 7.2.10 The changes in land-use have the potential to slightly decrease agricultural production whilst increasing clean-energy production. Such services are used consistently by equality groups and the general population. Therefore, the changes in land-use are not anticipated to result in any equality effects with respects to the services they produce.
- 7.2.11 Therefore, considering everything set out above, the Scheme's impact on existing businesses is expected to have a **neutral equality effect** in both the construction and operational phases.

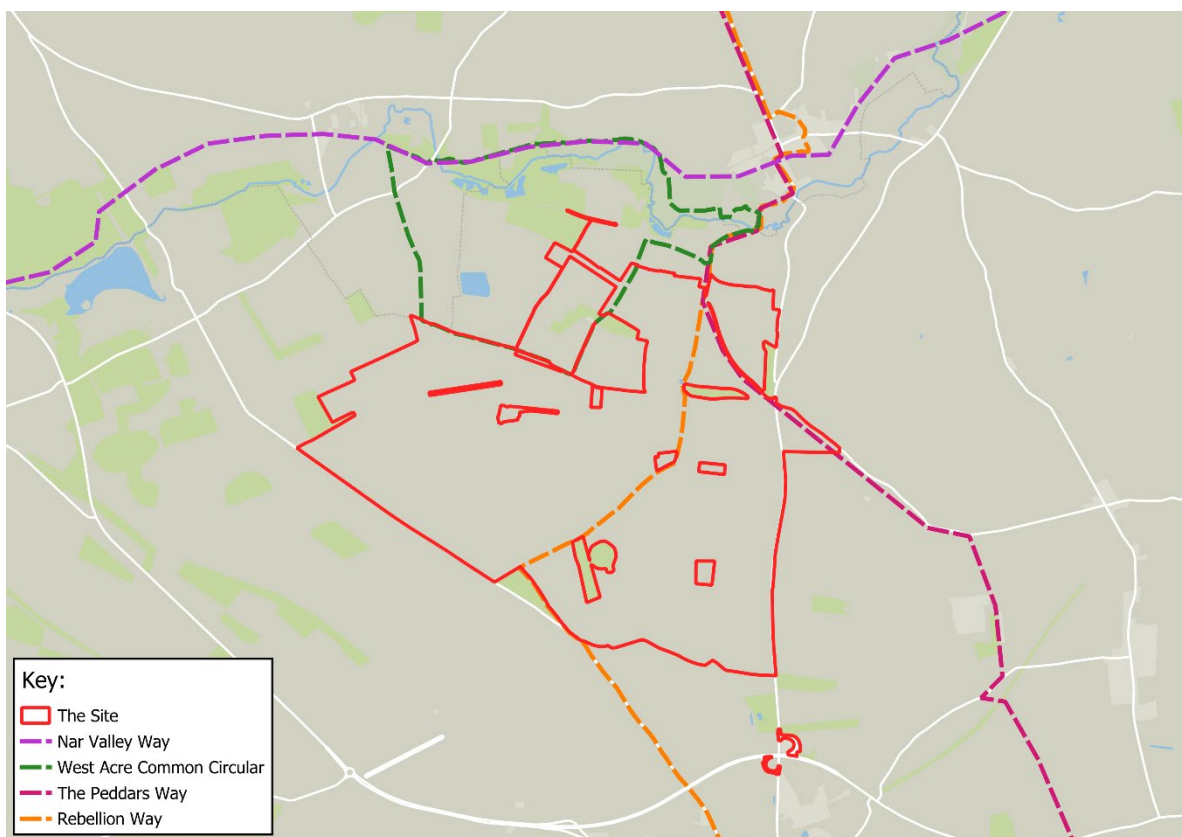
## 7.3 Physical activity and PRoW

- 7.3.1 The Scheme has the potential to affect physical activity and PRoW either directly or indirectly, primarily through changes in local environmental conditions such as noise, air quality, traffic, and visual amenity, but also through physical changes and extensions to the PRoWs themselves. These assets are particularly important to the wellbeing and cohesion of local residents and may serve groups with protected characteristics at higher rates than the general population.



- 7.3.2 The active travel routes in the Local Area are Nar Valley Way, the Peddars Way and Norfolk Coastal Path National Trail, the Castle Acre Circular Walk, and the Rebellion Way Cycle Route (see **Figure 7.2**).
- 7.3.3 It is difficult to determine precisely who currently uses the PRow within the Site. The routes are publicly accessible and are likely to attract a broad mix of users from both the immediate and wider area, meaning no definitive user profile can be established. To address this, the assessment has adopted LSOA Breckland 002C as a bespoke study area, representing a reasonable proxy for the population most likely to make use of the PRow. This approach excludes the population of Swaffham. This is because the approximate walking time between the northern edge of Swaffham and the southern extent of the Site is 1-hour walk along West Acre Road, which has no public footpaths. Therefore, it is reasonable to believe that very few residents of Swaffham will utilise these PRow for physical activity. As demonstrated in **Figure 4.1**, LSOA Breckland 002C captures the settlement immediately to the north of the site (West Acre, Castle Acre, and South Acre) who are much more likely to use these PRow.
- 7.3.4 This approach offers the most appropriate available indication of the demographic characteristics and equality groups that may potentially use the PRow of the Site, enabling a proportionate assessment of potential equality effects.

**Figure 7.2 PRow located near the Scheme**



Source: © MapTiler © OpenStreetMap contributors



## Construction and decommissioning phases

- 7.3.5 No permanent loss of PRow is proposed. Short-term diversions may be required where internal access tracks cross existing routes, but these will be brief and managed with signage and banksmen (**ES Appendix 6.8: Amenity and Recreation Assessment [APP/6.4]**). Access will therefore be maintained throughout, although there may be temporary closures or diversions required for a very limited time period during construction to establish internal access tracks within the Site where they cross PRow. These will be limited in extent and duration (it is likely to take just a few days to construct an access track across an existing PRow).
- 7.3.6 These temporary measures will be managed in accordance with the measures set out in the **oCEMP [APP/7.6]**, **outline Public Rights of Way and Permissive Paths Management Plan (oPRowPPP) [APP/7.12]**, and **outline Decommissioning Strategy (oDS) [APP/7.10]**, such as providing clear signage to recreational users and banksmen to manage plant movements and crossing where appropriate.
- 7.3.7 Users of the PRow (such as The Peddars Way and The Rebellion Way) are expected to experience temporary moderate adverse visual effects during construction (**ES Chapter 6: Landscape and Visual [APP/6.2]**). These effects are considered significant in EIA terms; however, given their short-term and temporary nature, they will be managed in accordance with the measures set out in the **oCEMP [APP/7.6]** and the **oDS [APP/7.10]**. While the visual setting of the PRowS will be affected during construction, access along the routes will be maintained throughout. As a result, users may experience a temporary reduction in visual amenity, but opportunities for physical activity through the area will remain unaffected.
- 7.3.8 The Noise and Vibration assessment (**ES Chapter 10: Noise and Vibration [APP/6.2]**) concludes that construction noise levels will remain below the relevant thresholds for significant effects. Average noise levels for users of nearby PRow are predicted to be below 75dB LAeq, even under worst-case assumptions as they pass the Site boundary. Given that PRow users would only be exposed to construction activity for a few minutes as they move through the area, the assessment identifies a Minor Adverse effect, which is not significant in EIA terms. Although some temporary disturbance may be experienced, this would be short-lived and would not prevent continued use of the PRowS for physical activity in the area.
- 7.3.9 Construction will be phased over two years, meaning not all routes will be affected at once. The activities generating the greatest temporary effects will be confined to the Site itself, ensuring that impacts on physical activity opportunities in the wider Local Area remain limited, temporary and not significant.
- 7.3.10 For this assessment, it has been conservatively assumed that the decommissioning phase mirrors the construction phase in terms of impact on physical activity and PRow. This represents a worst-case scenario, as it assumes there is a potential for temporary closures or diversions may be required for a very limited time period during the decommissioning phase.



- 7.3.11 In conclusion, construction and decommissioning activities may result in some temporary, localised visual, noise, and access-related disturbance for users of the PRowS. However, access along routes will be maintained throughout, and exposure to construction activity will be short in duration as users pass through the area. Given these factors, and the mitigation measures set out in the **oCEMP [APP/7.6]**, including managed diversions, clear signage, and noise controls, the overall equality effect is assessed as having a negligible adverse effect. Any impacts would be of such limited magnitude and duration that they are unlikely to be perceived by protected groups or affect their ability to use the PRowS for physical activity.

## Operational Phase

- 7.3.12 During the operational phase, all existing PRow will remain accessible. While some routes will have partial visibility of Scheme elements during the short term, these effects are assessed as slight to moderate and not significant in the long term once mitigation planting has fully established (**ES Chapter 6: Landscape and Visual [APP/6.2]**).
- 7.3.13 Importantly, the Scheme will deliver 4.7km of new permissive routes (1.2km offsite and 3.5km onsite) together with new amenity space, enhancing connectivity and broadening physical activity opportunities (**ES Appendix 6.8: Amenity and Recreation Assessment [APP/6.4]**). These enhancements are expected to encourage greater walking and cycling, contributing to improved physical and mental health outcomes.
- 7.3.14 Operational phase noise from Scheme infrastructure will remain below 65dB(A) at all PRow (**ES Chapter 10: Noise and Vibration [APP/6.2]**), representing a minor adverse effect that is not significant.
- 7.3.15 In conclusion, all PRowS will remain accessible during the operational phase, with only minor visual and noise effects that are not significant in EIA terms. The introduction of approximately 4.7km of new permissive routes and additional amenity space will enhance opportunities for walking, cycling, and recreation within and beyond the Site. On balance, the operational phase is assessed as having a minor beneficial equality effect, reflecting improved accessibility and opportunities for physical activity, while recognising the limited scale of existing and potential user numbers.

## Summary

- 7.3.16 The Scheme is expected to have a **negligible disproportionate equality impact during the construction and decommissioning phases** and a **minor beneficial disproportionate equality impact during the operational phase** for older people, disabled people and individuals who suffer from mental health issues, and socio-economically disadvantaged residents (see **section 5**). All these groups have a disproportionately high prevalence in the study area of this effect assessment.
- 7.3.17 The Scheme is expected to have a **negligible differential equality impact during the construction and decommissioning phases** and a **minor beneficial differential equality impact during the operational phase** for younger and older people, pregnant



women, ethnic minority groups, and socio-economically disadvantaged groups (see **section 6**). All these are groups face barriers to physical activity and access to PRoW and hence may experience these effects to a greater extent.

## 7.4 Neighbourhood amenity

- 7.4.1 The Scheme has the potential to affect neighbourhood amenity. Receptors include community facilities, places of worship, tourism assets, and nearby residences that could be influenced by changes in environmental conditions such as noise, traffic, and visual amenity. These receptors contribute to the wellbeing and character of the local area and are integral to community life and local identity.
- 7.4.2 Neighbourhood amenity effects occur at a very localised scale. Given how sparsely populated the surrounding area is, it is not meaningful to draw conclusions on disproportionate impacts using broad geographical datasets, as these would capture residents living a considerable distances from the Scheme. The assessment therefore focuses on specific receptors directly affected by the proposals. This approach is consistent with the methodology adopted across the Environmental Impact Assessment (EIA) disciplines that consider neighbourhood amenity. The main receptors assessed are St George's Church, Castle Acre Priory, Castle Acre Castle, Splashes Campsite (a Traveller site), and Keeper's Cottage, which is owned by the landowner. Effects on PRoW are considered separately in **Section 7.3**. The assessment considers how the Scheme may influence the experience and functioning of these places during the construction, operational, and decommissioning phases.
- 7.4.3 From an equality perspective, this topic focuses on whether changes to the setting or character of local places could affect how people with protected characteristics experience or participate in community life. Neighbourhood amenity is particularly relevant where community identity, faith activity, or access to familiar local spaces supports social inclusion and wellbeing.

### Construction and Decommissioning Phase

- 7.4.4 The neighbourhood amenity assessment considers how the Scheme may affect the enjoyment and character of local places, particularly those valued for community, residential, or tourism purposes. While topics such as access or physical activity focus on how people move through and use the area, this assessment examines how environmental changes, such as noise, temporary construction traffic, or visual effects, may alter the way people experience living in, working in, or visiting the area.
- 7.4.5 This topic also considers whether these effects could have disproportionate implications for particular community groups or protected populations who may use or value these places differently. For example, Splashes Campsite is directly associated with the Traveller community. Heritage and tourism assets such as Castle Acre Castle, Castle Acre Priory, and St George's Church are likely to attract both younger and older visitors. School groups frequently visit the Castle Acre Priory and Castle Acre Castle as part of educational



trips, while older people are often drawn to heritage sites for leisure and cultural interest [Ref. 63]. These groups may therefore be more sensitive to temporary neighbourhood amenity changes during construction.

**Table 7.1 Residual effects on neighbourhood amenity receptors**

Receptors	Residual effects	Disproportionate groups
Castle Acre Castle	<b>ES Appendix 6.8: Amenity and Recreation Assessment [APP/6.4]</b>  Amenity and perceptual change: Moderate Adverse (Not Significant)	Visitors including older and younger people
Castle Acre Priory	<b>ES Appendix 6.8: Amenity and Recreation Assessment [APP/6.4]</b>  Amenity and perceptual change: Moderate Adverse (Not Significant)	Visitors including school groups and older people
Splashes Campsite (Traveller Site)	<b>ES Chapter 10: Noise and Vibration [APP/6.2]</b>  Noise: Minor Adverse (Not Significant)  Vibration: Minor Adverse (Not Significant)	Travelling community
Keeper's Cottage	<b>ES Chapter 10: Noise and Vibration [APP/6.2]</b>  Noise: Minor Adverse (Not Significant)  Vibration: Negligible Adverse (Not significant)	None – private property owned by landowner with no known tenant.
St George's Church	N/A	General population; visitors including older and younger people

7.4.6 For Castle Acre Castle and Castle Acre Priory, construction works may temporarily affect the wider setting and views from heritage assets that attract local residents and visitors, including school groups and older people. These changes are visual only and will not





prevent continued access, appreciation, or use of these locations. Nor will it affect young people's ability to use the assets for educational purposes. Mitigation will be provided through the retention of existing vegetation within the Order limits, enhancements via gapping up with hedgerow whips and trees, and the long-term management of trees and hedgerows to increase visual screening in accordance with the **outline Landscape and Ecological Management Plan (oLEMP) [APP/7.11]**. As such, they are assessed as resulting in moderate adverse effects in amenity terms but negligible adverse equality effects.

- 7.4.7 The Splashes Campsite (Traveller Site) represents the most sensitive receptor due to its proximity to construction activity and association with a protected group under the race characteristic. Short-term daytime construction noise and increased vehicle movements along the nearby access route may cause some limited disturbance during the works period. However, these activities will be temporary, of short duration, and confined to normal working hours, with no evening or night-time activity expected. Residents will be notified in advance of the timing and nature of works, and access to the site will be maintained at all times.
- 7.4.8 **ES Chapter 10: Noise and Vibration [APP/6.2]** describes the noise impact from the works adjacent to the Splashes Campsite as a “*very short duration of works*”. Engagement with the chapter's authors found that whilst the exact length of time of this temporary impact is currently unknown, they are the sort of noise impacts that are comparable with regular highway maintenance conducted by the highway authority. Such works would tend to be permitted without the need for detailed noise assessments, or equality impact assessments, due to their very short duration. The baseline noise levels are another mitigating factor. The residents of the Splashes Campsite already reside within a major a-road junction and hence will experience a certain level of traffic noise both at daytime and nighttime. This means that the increase in noise due to the construction works will naturally be less perceived than had the increase been from very low noise levels.
- 7.4.9 Construction management measures, including noise controls and communication procedures set out in the **oCEMP [APP/7.6]**, will provide mitigation that further minimises disruption.
- 7.4.10 Taking all these factors into account, the effect on residents of the Splashes Campsite (Traveller Site) is assessed as having a minor adverse equality effect. For the reasons set out above, predominantly related to the very short duration of works, it is determined that no additional equality specific mitigation is appropriate or required.
- 7.4.11 Keeper's Cottage will experience minor localised changes in noise and views but remains in the ownership of the supportive landowner, and no displacement or access impacts are expected. Effects are considered minor adverse in amenity terms and negligible adverse in equality terms.
- 7.4.12 St George's Church will remain fully accessible, with no direct environmental disruption. The setting and tranquillity of the church will be largely preserved and will not affect Christians' ability to worship. Therefore, no equality impacts are anticipated.





- 7.4.13 For the purposes of this assessment, it has been conservatively assumed that the decommissioning phase will result in a similar effect on neighbourhood amenity as during the construction phase excluding Splashes Campsite (see **paragraph 7.4.16**). This represents a worst-case scenario.

## Operational Phase

- 7.4.14 During the operational phase, all receptors will remain accessible and continue to function as intended. Any effects on neighbourhood amenity will primarily relate to long-term changes in landscape character and views, with occasional low-level operational noise from equipment such as inverters. No increases in traffic or disruption to community or tourism use are anticipated.

**Table 7.2 Residual effects on neighbourhood amenity receptors**

Receptors	Residual effects	Disproportionate groups
Castle Acre	<b>ES Appendix 6.8: Amenity and Recreation Assessment [APP/6.4]</b>  Amenity and perceptual change: Moderate Adverse (Not Significant)	General population; visitors including older and younger people
Castle Acre Priory	<b>ES Appendix 6.8: Amenity and Recreation Assessment [APP/6.4]</b>  Amenity and perceptual change: Moderate Adverse (Not Significant)	Visitors including school groups and older people
Splashes Campsite (Traveller Site)	N/A	Travelling community
Keeper's Cottage	N/A	None – private property owned by landowner with no known tenant.
St George's Church	N/A	General population; visitors including older and younger people

- 7.4.15 Once operational, visual effects will lessen considerably over time as mitigation planting matures and integrates the Scheme into the landscape. Views from Castle Acre Castle and Castle Acre Priory will remain largely intact, and these assets will continue to attract visitors without restriction or loss of amenity value. Any visual effects will not impact



visitors' enjoyment of the site or young people's ability to use it as an educational facility. Effects on these receptors are therefore assessed as minor adverse in amenity terms but negligible adverse in equality terms.

- 7.4.16 St George's Church will continue to function as a place of worship with its setting and tranquility preserved. Splashes Campsite will experience no impact during the operational phase; therefore, the effects are considered neutral in equality terms. Unlike the construction phase, during which construction activity occurred, no further works are expected in this area. The road layouts introduced during construction are not anticipated to be reverted to their original form and will remain as they are once works have been completed. Consequently, the same conclusions drawn for the operational phase also apply to the decommissioning phase. Keeper's Cottage will remain unaffected in terms of access and use, with no operational noise or visual impacts of concern. Effects are neutral in both amenity and equality terms.

### Summary

- 7.4.17 The Scheme's impact on neighbourhood amenity has the potential to result in a **disproportionate minor adverse equality effect during the construction phase** for residents of Gypsy, Roma and Traveller ethnicity. This is due to minor adverse residual noise effects experience at the Splashes Campsite (Traveller Site). However, a number of factors such as the very short duration of the effect, the baseline noise levels, and the mitigation measures set out in the **oCEMP [APP/7.6]**, mitigate the magnitude of this effect. For these reasons it is judged that **no further equality specific mitigation is appropriate or required**. For all other receptors, the Scheme's impact on neighbourhood amenity is expected to be a **disproportionate negligible adverse equality effect during the construction and decommissioning phases**.
- 7.4.18 The Scheme's impact on neighbourhood amenity is expected to be a **disproportionate negligible adverse equality effect during the operational phase for Castle Acre Castle and Castle Acre Priory** and **neutral for Splashes Campsite, St George's Church and Keeper's Cottage**. For Splashes Campsite, it is assumed that the same conditions will apply during the decommissioning phase, as no further works are expected and effects are expected to remain the same; therefore, the conclusions for Splashes Campsite are consistent across both phases.
- 7.4.19 The Scheme's impact on neighbourhood amenity is expected to be a **differential negligible adverse equality effect during the construction phase**. With respect to the noise effects at the Splashes Campsite (Traveller Site) the literature in **Table 6.1** has been reviewed to understand whether these effects could be differentially experienced by certain groups. Whilst the literature shows that noise effects can be differentially experienced by older people, people with long-term health problems, and pregnant women, these relate to exposure to high impacts over a sustained period. Since the noise effects at the Splashes Campsite (Traveller Site) is not of this nature, differential equality effects have been concluded as negligible.



- 7.4.20 The Scheme's impact on neighbourhood amenity is expected to be a **differential negligible adverse equality effect during the operational phase for Castle Acre Castle and Castle Acre Priory** and **neutral for Splashes Campsite, St George's Church and Keeper's Cottage**. For Splashes Campsite, it is assumed that the same conditions will apply during the decommissioning phase, as no further works are expected and effects are expected to remain the same; therefore, the conclusions for Splashes Campsite are consistent across both phases.

## 7.5 Local employment, education, training, and upskilling

### Construction and Decommissioning Phase

- 7.5.1 As outlined in **ES Chapter 14: Socio-Economics [APP/6.2]**, the construction phase of the Scheme would generate employment both on-site and across the wider supply chain. In total, construction activity is expected to support around 1,245 jobs, with a peak workforce of around 740 at any one time. Applying a medium displacement rate of 50% results in approximately 625 net direct jobs supported over the construction phase. Using an uplifted regional construction multiplier of 1.84 to capture supply chain and expenditure effects, the total employment impact is expected to be around 1,145 net additional jobs, comprising approximately 525 indirect and induced jobs in addition to the 625 direct jobs. Of these direct jobs, between 155 and 310 jobs per annum are expected to be taken by residents within the LCA, after allowing for 50–75% leakage.
- 7.5.2 While these jobs represent a beneficial effect overall, equality groups may experience differing levels of access. Women, younger people, disabled people, and those from minority ethnic backgrounds are historically under-represented in construction, and may face barriers such as lack of qualifications, caring responsibilities, or inaccessible recruitment processes. Without targeted interventions, there is a risk that the benefits of new jobs will not be evenly shared.
- 7.5.3 The **outline Employment, Skills and Supply Chain Strategy (oESSCS) [APP/7.15]** sets out a committed programme of construction-related education, skills, training, and supply chain opportunities to be delivered through the Scheme. This includes apprenticeships, local employment initiatives, partnerships with schools and colleges, and organised site visits. The Plan confirms that these activities will be coordinated with BC and local partners to ensure participation from disadvantaged and under-represented groups.
- 7.5.4 During the decommissioning phase, only a small uplift in construction employment is expected, supporting between 1.5%–1.6% of existing LCA residents in construction (**ES Chapter 14: Socio-Economics [APP/6.2]**). While limited in scale, the same equality considerations apply, with potential for targeted skills and re-training opportunities to benefit those under-represented in the labour market.



- 7.5.5 In conclusion, the Scheme will generate substantial temporary employment, training, and supply chain opportunities during construction, with smaller but similar effects at decommissioning. While overall effects are beneficial, access to these opportunities may not be evenly distributed, as women, younger people, disabled people, and minority ethnic groups are under-represented in construction and face specific barriers. These groups may therefore experience the benefits of employment and skills interventions differentially, with inclusive recruitment as set out in the **oESSCS [APP/7.15]**.

## Operational Phase

- 7.5.6 As outlined in **ES Chapter 14: Socio-Economics [APP/6.2]**, the Applicant is actively engaging with BC, KLWN, and NCC to identify effective ways to support education and skills development in the area. The **oESSCS [APP/7.15]** includes operational-related opportunities in education, skills, training, and supply chain opportunities, such as apprenticeships, local employment, and partnerships with schools and colleges.
- 7.5.7 Employment during the operational phase is limited compared to construction, with only small numbers of permanent roles. However, temporary periods of maintenance, such as the 12-month full replacement of Solar PV panels and BESS batteries, are expected to generate around 125 gross FTE jobs per annum, with an on-site peak of 360 workers at any one time. These activities will also create continued opportunities for local skills development and SME participation in the supply chain, particularly in electrical works, logistics, and site services.

## Conclusion

- 7.5.8 The **disproportionate equality impact is expected to be moderate beneficial during the construction and decommissioning phases and minor beneficial during the operational phase** for older people, disabled people and individuals who suffer from mental health issues, and socio-economically disadvantaged residents (see **section 5**). All these groups have a disproportionately high prevalence in the study area of this effect assessment.
- 7.5.9 The **differential equality impact is expected to be moderate beneficial during the construction and decommissioning phases and minor beneficial during the operational phase** for younger and older people, females, pregnant women, ethnic minority groups, LGBTQ+ people, people who identify as a different gender than that assigned at birth, disabled people including those with mental health, socio-economically disadvantaged people and religious people (see **section 6**). These groups all face historical barriers to employment, and hence increasing the supply of local employment will naturally lead to beneficial differential equality effects. This beneficial effect could be maximised if the recommendations related to inclusive set out below with respect to inclusive recruitment, and targeted training programmes, are implemented.



## 8 Conclusion

- 8.1.1 This EqlA has drawn on the **ES [APP/6.1 – 6.5]** to consider the activities to 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 under the Act.
- 8.1.2 The assessment has considered whether the Scheme could give rise to any **differential** or **disproportionate** effects on people with protected characteristics compared to the general population. These are summarised in **Table 8.1**.
- 8.1.3 Any adverse equality effects tend to be negligible in nature. There is one potential minor adverse disproportionate equality effect identified relating to people of Gypsy, Roma and Traveller ethnicity, due to minor adverse noise effects at the Splashes Campsite (Traveller Site) during the construction phase. Due to a number of factors, including the very short duration of the effect, the baseline noise levels, and the mitigation measures outlined in the **oCEMP [APP/7.6]**, it has been determined that no additional equality specific mitigation is appropriate or required.
- 8.1.4 There are expected moderate and minor beneficial equality effects due to provision of local employment, education, training, and upskilling.

**Table 8.1 Summary of equality effects**

Potential equality impact	Residual equality effect	Disproportionately effected groups	Differentially effected groups
Impact on existing businesses	<b>Construction, operational, and decommissioning phases</b>  Neutral	N/A	N/A
Physical activity and PRow	<b>Construction and decommissioning phases</b>  Negligible adverse  <b>Operational phase</b>  Minor beneficial	N/A	N/A
Neighbourhood amenity	<b>Construction phase (Splashes</b>	<b>Construction phase (Splashes Campsite)</b>	N/A



Potential equality impact	Residual equality effect	Disproportionately effected groups	Differentially effected groups
	<p><b>Campsite (Traveller Site))</b></p> <p>Minor adverse</p> <p><b>Construction and decommissioning phases (All other receptors)</b></p> <p>Negligible adverse</p> <p><b>Operational phase (Castle Acre Castle and Castle Acre Priory)</b></p> <p>Negligible adverse</p> <p><b>Operational phase (Splashes Campsite, St George's Church and Keeper's Cottage)</b></p> <p>Neutral</p> <p><b>Decommissioning phase (Splashes Campsite)</b></p> <p>Neutral</p>	Gypsy, Roma and Traveller (ethnicity)	
Local employment, education, training, and upskilling	<p><b>Construction and decommissioning phases</b></p> <p>Moderate beneficial</p> <p><b>Operational phase</b></p> <p>Minor beneficial</p>	<p><b>Construction, operational, and decommissioning phases</b></p> <p>Older people (age), disabled people and individuals who suffer from mental health issues (disability), and socio-economically disadvantaged residents (socio-</p>	<p><b>Construction, operational, and decommissioning phases</b></p> <p>Younger and older people (age), females (sex), pregnant women (pregnancy), ethnic minority groups (ethnicity), LGBTQ+ people (sexual orientation)</p>



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Potential equality impact	Residual equality effect	Disproportionately effected groups	Differentially effected groups
		economic disadvantage)	and gender identify)



## References

- 1 UK Gov, Equality Act 2010, (2010). Available at <https://www.legislation.gov.uk/ukpga/2010/15/contents> Accessed October 2025
- 2 UK Gov, Race Relations Amendment Act 2000 (2000). Available at <https://www.legislation.gov.uk/ukpga/2000/34/contents> Accessed October 2025
- 3 UK Gov, National Policy Statement for renewable energy infrastructure (EN-3), November 2023
- 4 UK Gov, National Policy Statement for electricity networks infrastructure (EN-5), November 2023
- 5 UK Gov, Overarching National Policy Statement for Energy (EN-1), November 2023
- 6 MHCLG, NPPF, 2024
- 7 Norfolk County Council, Better Together for Norfolk. Norfolk County Council Strategy (2021– 2025), 2021
- 8 Norfolk and Suffolk County Councils, Norfolk and Suffolk Economic Strategy, 2022
- 9 Breckland Council, Local Plan, 2023
- 10 Breckland Council, Breckland Corporate Plan 2024 to 2028, 2024
- 11 Breckland Council, Future Breckland – Thriving People and Places, 2023
- 12 Breckland Council, Equality and Diversity, 2025
- 13 Borough Council of King's Lynn & West Norfolk, Equality Policy, 2016
- 14 ONS, TS007A - Age by five-year age bands, 2025
- 15 ONS, QS303EW - Long-term health problem or disability, 2025
- 16 ONS, Personal well-being estimates by local authority, 2023
- 17 ONS, Census 2021 TS030 – Religion, 2021
- 18 ONS, Census 2021 TS021 - Ethnic group, 2021
- 19 ONS, Census 2021 TS002 - Legal partnership status, 2021
- 20 ONS, Census 2021 TS008 – Sex, 2021
- 21 ONS, Census 2021 TS070 - Gender Identity, 2021
- 22 MHCLG, English indices of deprivation 2019, 2019
- 23 MHCLG, English indices of deprivation 2019, 2019
- 24 ONS, Census 2021: RM024 - Economic activity status by sex by age, 2021





- 
- 25 ONS, Census 2021 TS077 - Sexual orientation, 2021
  - 26 ONS, Births by Lower Layer Super Output area LSOA in England and Wales, mid-year 2022 to 2023, 2024; ONS, Population estimates - small area (2021 based) by single year of age - England and Wales, 2025
  - 27 Volterra research
  - 28 Barton, Grant and Guise, Shaping neighbourhoods for local health and global sustainability (2nd ed.), 2010
  - 29 Coombes et al, The relationship of physical activity and overweight to objectively measured green space accessibility and use, 2010; Lachowycz and Jones: Greenspace and obesity: a systematic review of the evidence, 2011
  - 30 HTA Design LLP, Planning Application for the Aylesbury Estate Regeneration (Ige et al. 2019), 2016.
  - 31 British Lung Foundation, How air pollution affects your children's lungs, 2016
  - 32 Harding, A-H et al., The cost of hypertension-related ill-health attributable to environmental noise, 2013
  - 33 Stevens and Schaller, Short-run effects of parental job loss on children's academic achievement, 2011
  - 34 Agediscrimination.info, A practical guide to age discrimination law
  - 35 Scheuermaier, Improved cognitive morning performance in healthy older adults following blue-enriched light exposure on the previous evening, 2018
  - 36 Holick, Optimal vitamin D status for the prevention and treatment of osteoporosis, 2007
  - 37 Livability, Why community is so important to disabled people and how it works for me, (no date)
  - 38 European Society of Cardiology, Unemployment associated with 50% higher risk of death in heart failure patients, 2017
  - 39 Terman and Terman, Controlled trial of naturalistic dawn simulation and negative air ionization for seasonal affective disorder, 2006
  - 40 Kim Mack, Saadia Qureshi, A non-Muslim's guide to visiting a mosque, 2019.
  - 41 Equality and Human Rights Commission, Is Britain Fairer? Key facts and findings on religion and belief, 2015
  - 42 Applied, Religious discrimination in the workplace (mini report), 2021
  - 43 Wolch, J. R., Byrne, J., & Newell, J. P, Urban green space, public health, and environmental justice: The challenge of making cities 'just green enough, 2014
  - 44 JRF, Ethnic minority disadvantaged in the labour market, 2015.
  - 45 LDA, Redefining London's BME-owned businesses, 2005
  - 46 GLA, BAME and poorer Londoners more likely to live in areas with toxic air, 2021
  - 47 LBC, Community uses, leisure facilities and pubs, 2017



- 
- 48 Citizen's advice. Discrimination because of race, no date
  - 49 Equality and Human Rights Commission, 'Marriage and civil partnership discrimination, 2022
  - 50 Citizen's advice. Discrimination because of sex, no date
  - 51 House of Commons Library, Women and the Economy, 2021
  - 52 UK Gov, Equality Act 2010, (2010). Available at <https://www.legislation.gov.uk/ukpga/2010/15/contents> Accessed October 2025
  - 53 Scottish Transgender Alliance, Non-binary people's experiences in the UK, 2016
  - 54 Marmot, M, Fair society, healthy lives: The Marmot review, 2010
  - 55 Public Health England, Local action on health inequalities: Increasing employment opportunities and improving workplace health, 2014.
  - 56 Maas, Verheji, and Spreeuwenberg, Green space, urbanity and health: how strong is the relation? Journal of epidemiology and community health, 2006
  - 57 Drydakis, N. Sexual orientation and labor market outcomes. IZA World of Labor 2019
  - 58 Kyung Ju Lee, Greenness, civil environment, and pregnancy outcomes: perspectives with a systematic review and meta-analysis, 2020
  - 59 What to expect, Loud noises during pregnancy, 2018
  - 60 The Guardian, Air pollution 'as bad as smoking in increasing risk of miscarriage', 2019
  - 61 BetterHealth, Child Safety and Injury Prevention, 2019
  - 62 Equality Human Rights, Pregnancy and maternity discrimination research finding, 2015
  - 63 English Heritage, School Visits, 2025



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