



The Great Grid Upgrade

Sea Link

Sea Link

Volume 7: Other Documents

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Executive Summary

Ex1.1 Introduction

- Ex1.1.1 This Equality Impact Assessment (EqIA) assesses the potential impacts of National Grid Electricity Transmission plc's (National Grid) Sea Link Project (the Proposed Project) on protected characteristic groups, as defined under the Equality Act 2010. The assessment considers how the consultation, construction, operation, and decommissioning phases of the Proposed Project may differentially or disproportionately affect these groups.
- Ex1.1.2 The purpose of the EqIA is to assist the Secretary of State in determining National Grid's application for development consent for the Proposed Project. The EqIA demonstrates that due regard has been given to the aims of the Public Sector Equality Duty (PSED), Section 149 of the Equality Act 2010. Those subject to the PSED are required to have due regard to:
- Eliminating unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
 - Advancing equality of opportunity between people who share a protected characteristic and those who do not; and
 - Fostering good relations between people who share a protected characteristic and those who do not.
- Ex1.1.3 Although National Grid is not itself subject to the PSED, the Secretary of State is, and must have regard to these requirements in determining the outcome of the application for development consent.
- Ex1.1.4 The Proposed Project comprises an electricity transmission reinforcement between Friston in Suffolk and Pegwell Bay in Kent, intended to accommodate additional power from renewable and low carbon generation, and an additional interconnection with mainland Europe. The project comprises the construction of a High Voltage Direct Current (HVDC) subsea cable, onshore infrastructure, and associated works. The project is planned in distinct phases: consultation, construction (expected to commence in 2026), operation (from 2031 onwards), and eventual decommissioning.
- Ex1.1.5 A desk-based review was undertaken to inform the assessment of potential equality impacts. This involved: review of relevant legislation and policy, review of all relevant project documentation being submitted as part of the development consent application, review and analysis of population data on protected characteristic groups and socio-economic deprivation, and review of pre-application consultation and engagement activities.

Ex1.2 Summary of Potential impacts

- Ex1.2.1 The EqIA identifies various potential impacts on protected characteristic groups during the different stages of the Proposed Project, outlined below:

Consultation

Ex1.2.2 National Grid's pre-application consultation was designed to be inclusive and accessible, supporting protected characteristic groups to have equal opportunities to participate and helping to foster good relations between all groups. Efforts made by National Grid to achieve these positive outcomes included:

- Providing multiple formats for consultation, such as online platforms, written responses, and in-person events may have encouraged participation for people with disabilities, older people, and those more likely to not be digitally adept or with limited digital access.
- Offering provision of consultation material in alternative formats, including in alternative languages for non-English speakers, and in large print, Braille or audio tape.
- Selecting venues with good public transport links, benefiting groups less likely to have access to private vehicles, such as older people and young people.
- Targeting seldom-heard groups through direct outreach to organisations representing young people, disabled people, and people whose first language is not English.

Construction

Ex1.2.3 During the construction phase, several potential equality impacts are identified:

- Public Rights of Way (PRoW):
 - Temporary and permanent diversions to PRoWs may impact older adults, disabled individuals, or those using a wheelchair differently, as cognitive or physical limitations could make it more challenging to navigate unfamiliar or longer routes.
- Traffic:
 - Increased construction traffic could differentially impact older people and disabled people who are more likely to have mobility issues or be more sensitive to fear and intimidation caused by HGVs.
 - There may also be differential and disproportionate impact caused by increased construction traffic in proximity to local facilities including schools and Churches.
- Noise, vibration, and air quality:
 - Construction noise and vibrations could differentially impact children, older people, pregnant women, and people with sensory disabilities (e.g., those with autism or hearing impairments).
 - Increased air pollution may have greater health implications for those with heightened physiological sensitivity, including older people, young children, pregnant women, and some people with disabilities.
- Visual amenity

- People with neurodivergent conditions, such as autism, may be more sensitive to changes in their visual landscape, which could lead to increased anxiety and distress.
- Employment opportunities
 - Temporary job creation during construction could benefit young people and disabled individuals, who experience higher rates of unemployment.

Operation

- PRow
 - Some PRow diversions may remain in place permanently, potentially causing long-term effects for older or disabled people.
- Noise, vibration, and air quality
 - Although considered unlikely, differential noise, vibration, and air quality impacts similar to those that could arise during construction may occur due to operation and maintenance activities.
- Visual amenity
 - Similar equality impacts as anticipated during construction may occur during operation.

Decommissioning

Ex1.2.4 The potential equality impacts that may arise during the decommissioning phase are assessed to be the same as, or not greater than, the construction phase.

Ex1.3 Conclusion

Ex1.3.1 The EqlA concludes that, with the implementation of embedded and additional mitigation measures potential negative equality impacts arising due to the Proposed Project are not expected to be substantial in nature.

1. Introduction

1.1 Purpose

- 1.1.1 The Sea Link Project (hereafter referred to as the 'Proposed Project') is a proposal by National Grid Electricity Transmission plc (hereafter referred to as National Grid) to reinforce the transmission network in the South East and East Anglia. The Proposed Project is required to accommodate additional power flows generated from renewable and low carbon generation, as well as accommodating an additional interconnection with mainland Europe.
- 1.1.2 National Grid owns, builds and maintains the electricity transmission network in England and Wales. Under the Electricity Act 1989, National Grid holds a transmission license under which it is required to develop and maintain an efficient, coordinated, and economic electricity transmission system.
- 1.1.3 This would be achieved by reinforcing the network with a High Voltage Direct Current (HVDC) Link between the proposed Friston substation in the Sizewell area of Suffolk and the existing Richborough to Canterbury 400kV overhead line close to Richborough in Kent.
- 1.1.4 National Grid is also required, under Section 38 of the Electricity Act 1989, to comply with the provisions of Schedule 9 of the Act. Schedule 9 requires license holders, in the formulation of proposals to transmit electricity, to:
 - 1.1.5 *Schedule 9(1)(a) '...have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and*
 - 1.1.6 *Schedule 9(1)(b) '...do what [it] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects'.*
- 1.1.7 This Equality Impact Assessment (EqIA) has been prepared by National Grid and is being submitted as part of a range of supplementary documents that form National Grid's application for development consent for the Proposed Project.
- 1.1.8 As an applicant for development consent, National Grid is not a public body and therefore, in this context, not subject to the requirement to fulfil the Public Sector Equality Duty (PSED) set out in the Equality Act 2010 (UK Government, 2010). The PSED requires public bodies to not only eliminate discrimination but also advance equality of opportunity and foster good relations between people who share protected characteristics and those who do not. Whilst National Grid is not a public body and is not bound by the Public Sector Equality Duty requirements of the Equality Act 2010, the Secretary of State is, and must have regard to the requirements in determining the outcome of the application for development consent for the Proposed Project. As such, this EqIA provides the Secretary of State with relevant information to assist in their determination.
- 1.1.9 The Proposed Project was granted Section 35 Direction of the Planning Act 2008 (UK Government, 2008) by the Secretary of State on the grounds that the Proposed Project

is of national significance and would play an important role in enabling an energy system that meets the United Kingdom's (UK's) commitment to reduce carbon emissions and create a secure, reliable and affordable energy supply for consumers. Since the Section 35 Direction is now granted, National Grid intends to apply for the granting of an order for development consent under Section 37 of the PA2008 to the Planning Inspectorate.

- 1.1.10 This EqIA aims to assist the Secretary of State's decision-making process by demonstrating that National Grid has paid due regard to the needs of protected characteristic groups in line with the Equality Act 2010 and the PSED. Demonstration of due regard is provided through the assessment of potential equality impacts (both adverse and beneficial) associated with the consultation, construction, operational, and decommissioning phases of the Proposed Project on protected characteristic groups as defined by the Equality Act 2010 and outlined under Section 2.3 of this EqIA. This systematic assessment is informed by policy and legislation review, an overview of the Proposed Project, equalities baseline as well as consultation activities.
- 1.1.11 The approach draws on evidence from **Application Documents 6.2.1.1 – 6.2.3.13**, secondary data sources, as well as feedback from consultation and engagement processes and information from construction planning undertaken for the Proposed Project.

1.2 The Proposed Project

- 1.2.1 The Proposed Project would comprise the following elements:

The Suffolk Onshore Scheme

- A connection from the existing transmission network via Friston Substation, including the substation itself. Friston Substation already has development consent as part of other third-party projects. If Friston Substation has already been constructed under another consent, only a connection into the substation would be constructed by as part of the Proposed Project.
- A high voltage alternating current (HVAC) underground cable of approximately 1.9 km in length between the proposed Friston Substation and a proposed converter station (below).
- A 2 GW high voltage direct current (HVDC) converter station (including permanent access from the B1121 and a new bridge over the River Fromus) approximately up to 26 m high plus external equipment (such as lightning protection, safety rails for maintenance works, ventilation equipment, aerials, similar small scale operational plant, or other roof treatment) near Saxmundham.
- A HVDC underground cable connection of approximately 10 km in length between the proposed converter station near Saxmundham, and a transition joint bay (TJB) approximately 900 m inshore from a landfall point (below) where the cable transitions from onshore to offshore technology.
- A landfall on the Suffolk coast (between Aldeburgh and Thorpeness).

The Offshore Scheme

- Approximately 122km of subsea HVDC cable, running between the Suffolk landfall location (between Aldeburgh and Thorpeness), and the Kent landfall location at Pegwell Bay.

The Kent Onshore Scheme

- A landfall point on the Kent coast at Pegwell Bay.
- A TJB approximately 800 m inshore to transition from offshore HVDC cable to onshore HVDC cable, before continuing underground for approximately 1.7 km to a new converter station (below).
- A 2 GW HVDC converter station (including a new permanent access off the A256), up to 28 m high plus external equipment such as lightning protection, safety rails for maintenance works, ventilation equipment, aerials, and similar small scale operational plant near Minster. A new substation would be located immediately adjacent.
- Removal of approximately 2.2 km of existing HVAC overhead line, and installation of two sections of new HVAC overhead line, together totalling approximately 3.5 km, each connecting from the substation near Minster and the existing Richborough to Canterbury overhead line.

1.2.2 The Proposed Project also includes modifications to sections of existing overhead lines in Suffolk (only if Friston Substation is not built pursuant to another consent) and Kent, diversions of third-party assets, and land drainage from the construction and operational footprint. It also includes opportunities for environmental mitigation and compensation. The construction phase will involve various temporary construction activities including overhead line diversions, use of temporary towers or masts, working areas for construction equipment and machinery, site offices, parking spaces, storage, accesses, bellmouths, and haul roads, as well as watercourse crossings and the diversion of public rights of way (PRoW) and other ancillary operations.

1.3 Proposed Project Phases

1.3.1 The Proposed Project phases and the details of activities to occur within each, are as follows:

Construction

1.3.2 An **Outline Onshore Construction Environmental Management Plan (CEMP)** (**Application Document 7.5.3**) and **Outline Offshore CEMP (Application Document 7.5.2)** have been produced. This includes an outline Code of Construction Practice (CoCP) (**Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice**).

1.3.3 Subject to gaining development consent, construction works would be expected to start in 2026 and be functionally completed by the end of 2031 with reinstatement potentially continuing into 2032. Certain advance works (such as archaeological trial trenching or protected species mitigation) may take place in advance of the main construction period. An indicative construction programme for the Proposed Project is presented in

Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project.

- 1.3.4 Construction would commence with site establishment, involving demarcation of the site, stripping of topsoil and erection of temporary facilities, i.e. site offices, storage areas and hardstands. Bellmouths and access roads would also be constructed at this stage to ensure prior access from the highway network for construction traffic.
- 1.3.5 In Suffolk, construction compounds to store all materials necessary for the works are proposed adjacent to the substation site, converter site, B1121 bellmouth, landfall site and along the HVDC cable route. The indicative location of the construction compounds for the Suffolk Onshore Scheme are illustrated on **Application Document 2.14.1 Indicative General Arrangement Plans - Suffolk**.
- 1.3.6 The proposed construction core working hours, unless otherwise approved by the Local Planning Authority are:
- Monday – Friday: 7am–5pm; and
 - Saturday, Sundays and Bank Holidays: 7am–5pm.
- 1.3.7 The core working hours exclude start up and close down activities up to 1 hour either side of the core working hours. For the marine cable, construction would be a 24-hour operation where viable to minimise overall installation time, maximise the use of suitable weather windows and take advantage of vessel and equipment availability.

Operational activities

- 1.3.8 The proposed substations would be operated by a small team but would not be staffed continuously. The substations would be continuously monitored remotely by National Grid, it is therefore anticipated that the substations would not be staffed. There would be regular monthly visits to inspect site.
- 1.3.9 The proposed converter stations would be operated by a small team based on site. In general, a minimum of two operators would be present at all times. During normal operation there would be approximately six personnel on site, divided between three shifts over a 24-hour period. During maintenance (planned and unplanned) the number of personnel present on site would increase with the number of staff proportionate to the nature of the maintenance works being undertaken.
- 1.3.10 During operation the overhead line in Kent would transmit electricity from the proposed Minster 400 kV substation onto the existing network in the South East of England. The overhead lines would not require daily attendance from operators.
- 1.3.11 During operation the HVDC link would transmit electricity from the proposed Friston Substation in Suffolk to the existing network in Kent and vice versa depending on the supply and demand at the time. The underground cables would not require daily attendance from operators.
- 1.3.12 The main operation requirement for the Offshore Scheme is for regular monitoring surveys along the installed cable route through the use of autonomous vehicles, as per the approach adopted by the industry.

Decommissioning

- 1.3.13 The lifespan of substation equipment is approximately 40 years. If the elements of the proposed substations, that form part the Proposed Project were no longer required, the equipment would be safely disconnected from the transmission system and carefully dismantled using cranes.
- 1.3.14 The anticipated operational life of the proposed Saxmundham and Minster Converter Stations is approximately 40 years. It is likely that during this period refurbishment and plant replacement would extend the life of the converter station rather than decommissioning. In the event that the Proposed Project ceases operation the proposed converter stations would be decommissioned in accordance with a decommissioning plan.
- 1.3.15 If the Proposed Project is required to be decommissioned the section of overhead line between the proposed Minster Converter Station site and the existing Richborough to Canterbury 400 kV overhead line and the underground HVAC and HVDC cables would be decommissioned.
- 1.3.16 The Offshore Scheme is designed for a lifespan of approximately 40-60 years. Dependent on requirements at end of asset life, the redundant marine cables could either be recovered for recycling (in its entirety, or in parts), or left *in-situ*, if that has less environmental impact. The techniques for decommissioning are often simpler than for installation, and would prioritise minimising seabed disturbance over cable integrity.
- 1.3.17 All decommissioning would be undertaken safely and with regard to the environmental legislation at the time of decommissioning, including relevant waste legislation. An initial decommissioning plan would be written once the final infrastructure and installation methodology is engineered by the Contractor. This would be in accordance with all applicable legislation and best practice guidance at the time of compilation, subject to updates at the time of decommissioning.

1.4 Report structure

- 1.4.1 Following on from this introductory chapter, the remainder of this report is structured as follows:
- **Chapter 2:** Methodology – setting out the approach to collecting evidence and assessment of impacts;
 - **Chapter 3:** Policy and legislative context – providing context through review of relevant national and regional policy and legislation associated with equalities, planning, and other relevant topics;
 - **Chapter 4:** Equalities baseline Suffolk study area – uses secondary data sources, such as Census 2021 data, to form an understanding of residents living within the Suffolk study area and surrounding geographies;
 - **Chapter 5:** Equalities baseline Kent study area – uses secondary data sources, such as Census 2021 data, to form an understanding of residents living within the Kent study area and surrounding geographies;
 - **Chapter 6:** Consultation and engagement – provides an overview of consultation and engagement activities undertaken;

- **Chapter 7:** Equality impacts – provides an overview of the potential equality impacts and the affected protected characteristic groups;
- **Chapter 8:** Suffolk assessment of impacts – provides a detailed assessment of potential impacts and equality effects of the Suffolk Onshore Scheme using the evidence gathered;
- **Chapter 9:** Kent assessment of impacts - provides an assessment of potential impacts and equality effects of the Kent Onshore Scheme using the evidence gathered; and
- **Chapter 10:** Conclusions – summary of equality effects and National Grid's due regard to the PSED. This Chapter also contains continued actions for enhancing positive equality effects and minimising potential negative effects based on available evidence to date.

2. Methodology

2.1 Introduction

- 2.1.1 This Chapter sets out the approach to assessing the equality impacts of the Proposed Project on different groups of persons who may be impacted differently, and demonstrating how National Grid have paid due regard to the aims of the Equality Act and Public Sector Equality Duty. The assessment considers the potential positive and negative impacts of the Proposed Project throughout the consultation, construction, operational, and decommissioning phases.
- 2.1.2 The approach for undertaking this EqlA and compiling this report follows a three-stage process as follows:
- Desk-based review - including review of relevant national and regional policies and legislation, documents associated with the Proposed Project and secondary datasets relating to groups with protected characteristics;
 - Assessment of potential impacts – split into the impacts in Suffolk and Kent individually, these chapters are informed by a consideration of the policy context, consultation responses, equalities baseline data, ES and other Proposed Project documentation; and
 - Providing conclusions.
- 2.1.3 The approach is based on professional judgement, an understanding of the Equality Act 2010, particularly Section 149 regarding the PSED, and supporting technical guidance produced by the Equality and Human Rights Commission (EHRC) (Equality and Human Rights Commission, 2023).

2.2 Desk-based review

- 2.2.1 In addition to a review of relevant national, regional and local policies and legislation, the desk-based review includes the following:
- Review of all relevant documentation from the application for development consent, including design information, relevant assessment work and mitigation and management plans;
 - Review of national and local datasets, including Census 2021 data, to develop an equalities baseline of groups with protected characteristics within and surrounding the Proposed Project;
 - Review of the consultation and engagement activities to date in relation to the Proposed Project undertaken by the National Grid to identify any issues of relevance to this EqlA; and
 - High-level overview of the equality impacts that may arise due to the Proposed Project and the protected characteristic groups that may be affected.
- 2.2.2 Separate equalities baselines have been produced for the Suffolk study area and Kent study area.

2.3 Assessment of impacts

- 2.3.1 The assessment of equality impacts takes into account the information gathered via the above activities, with Suffolk and Kent being assessed individually. A professional judgement has been made as to how the consultation, construction, operational and decommissioning phases of each Scheme may affect people with protected characteristics as defined in section four of the Equality Act 2010. These protected characteristics are:
- **Age:** this refers to persons defined by either a particular age or a range of ages. This can include children (aged under 16), young people (aged 16-25), older people or pensioners (i.e. those aged 65+) and the elderly/very old (i.e. those aged 85+);
 - **Disability:** a disabled person is defined as someone who has a physical or mental impairment that has a substantial and long-term adverse effect on their ability to undertake normal day-to-day activities. It can also include people who have progressive conditions such as human immunodeficiency virus (HIV), cancer, or multiple sclerosis (MS), even where someone is able to undertake day to day activities;
 - **Gender reassignment:** this refers to people who are proposing to undergo, are undergoing, or have undergone a process for the purpose of reassigning their gender identity;
 - **Pregnancy and maternity:** pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth;
 - **Race:** race is defined as encompassing colour, nationality (including citizenship) and ethnic or national origins;
 - **Religion or belief:** religion means any religion a person follows. Belief means any religious or philosophical belief, and includes those people who have no formal religion or belief;
 - **Sex:** this refers to a man or to a woman or a group of people of the same sex, while gender refers to the wider social roles and relationships that structure men's and women's, boys' and girls' lives; and
 - **Sexual orientation:** a person's sexual orientation relates to their emotional, physical and/or sexual attraction and the expression of that attraction.
- 2.3.2 While marriage and civil partnership is also a protected characteristic under the Equality Act, it is not covered by the PSED in relation to its aims of advancing equality of opportunity and fostering good relations. This means that it is unlawful to discriminate, harass or victimise someone due to their marriage or civil partnership status, however public authorities do not have to assess impact on this characteristic in impact assessment work of this kind.
- 2.3.3 Everyone affected by a development will have some protected characteristics under the Equality Act (such as age, race, and sex), and they will not all be equally affected. This does not, however, necessarily constitute an equality impact. To identify which impacts are relevant to equality, the assessment distinguishes them as being either disproportionate or differential in nature:

- Disproportionate: there may be a disproportionate equality impact where people with a particular protected characteristic make up a significantly greater proportion of those affected than in the wider (regional and national) population.
- Differential: there may be a differential equality impact where people with a protected characteristic are affected differently compared to the general population as a result of existing vulnerabilities or restrictions they face because of that protected characteristic.

2.3.4 This assessment is qualitative in nature as it is not always possible to quantify equality impacts by assigning significance, magnitude or sensitivity.

2.3.5 Note, the EqIA also considers the potential for equality impacts resulting from the proposed permanent acquisition of land and acquisition of permanent rights (and temporary use powers) required to facilitate delivery of the Proposed Project (noting that no information was available on affected persons with protected characteristics at the time of writing). Where it has been necessary to seek the acquisition of land or rights to facilitate delivery of the Proposed Project, National Grid has ensured that they are only seeking to acquire the minimum land/rights required for the delivery of the Proposed Project. Any land interests required would be subject to compensation in accordance with statutory provisions. The Proposed Project does not require any residential properties to be acquired, and the land proposed for compulsory acquisition is predominantly rural land comprising agricultural fields. Consequently, no known equality impacts have been identified because of land or rights acquisition and are therefore not considered further in this report. Should any landowners, tenants or those with an interest in the land required for the Proposed Project be identified as having protected characteristics at a later date, potential equality impacts (and mitigation of the same) will be considered separately on a case-by-case basis.

2.4 Conclusions

2.4.1 The concluding chapter of this report sets out conclusions on the equality effects and National Grid's due regard to the PSED.

3. Policy and legislative context

3.1 Legislation

Equality Act 2010 and the Public Sector Equality Duty (PSED)

- 3.1.1 The Equality Act 2010 (UK Government, 2010) provides the framework to protect the rights of individuals against unlawful discrimination and to advance equal opportunities for all. Section 149 of the Equality Act sets out the PSED to which the Secretary of State, as a public authority, must have due regard to in the exercise of their functions, including decision-making in the DCO process.
- 3.1.2 Those subject to the PSED must, in the exercise of their functions, have due regard to the need to:
- Eliminate discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010;
 - Advance equality of opportunity between people who share a protected characteristic and those who do not; and
 - Foster good relations between people who share a protected characteristic and those who do not.
- 3.1.3 These are sometimes referred to as the three aims or arms of the PSED. Section 149(3) of the Equality Act 2010 explains that having due regard to the need to for advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard to the need to:
- Removing or minimising disadvantages suffered by people due to their protected characteristics;
 - Taking steps to meet the needs of people from protected groups where these are different from the needs of other people; and
 - Encouraging people from protected characteristics groups to participate in public life or in other activities where their participation is disproportionately low.
- 3.1.4 The Equality Act 2010 states that meeting different needs involves taking steps to take account of disabled people's disabilities (Section 149(4)). It describes fostering good relations as tackling prejudice and promoting understanding between people from different groups (Section 149(5)). It states that compliance with the duty may involve treating some people more favourably than others (Section 149(6)).
- 3.1.5 The PSED applies fully to the following eight protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.
- 3.1.6 Therefore, while marriage and civil partnership is a protected characteristic under the Equality Act, it is not covered by the PSED in relation to its aims of advancing equality of opportunity and fostering good relations. This means that it is unlawful to discriminate, harass or victimise someone due to their marriage or civil partnership

status, however public authorities do not have to have due regard to the matters set out in Section 2.3 above in relation to this protected characteristic.

Human Rights Act 1998

- 3.1.7 The Human Rights Act 1998 (UK Government, 1998) incorporated into UK law the European Convention on Human Rights (the 'Convention'). The following Articles of the Convention are relevant to the Secretary of State's decision as to include powers of compulsory acquisition.
- 3.1.8 Article 1 of the First Protocol to the Convention provides that no one can be deprived of their possessions except in public interest and subject to the relevant national and international laws and principals.
- 3.1.9 Article 8 Protects private and family life, home and correspondence. No public authority can interfere with these rights except in accordance with the law, and so far, as is necessary in the interest of national security, public safety or the economic wellbeing of the country.

Planning Act 2008

- 3.1.10 The Planning Act 2008 (UK Government, 2008) establishes a legal framework for applying for, examining, and determining DCO applications for NSIPs and projects brought into the DCO regime via S35 directions. It sets out the requirement for obtaining development consent as well as thresholds for classifying projects as nationally significant. Under the Planning Act 2008, the development consent may be granted only if an application is made for it, with the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2017 (UK Government, 2017) further setting out application requirements.
- 3.1.11 Section 104 of the Planning Act 2008 requires the Secretary of State, when determining DCOs, to have regard to the provisions of National Policy Statements ("NPSs") where they have effect. NPSs are produced by the UK Government and comprise the Government's objectives for the development of NSIPs and projects brought into the DCO regime via S35 directions.
- 3.1.12 The Planning Act 2008 does not contain any specific guidance relating to protected characteristics and equalities, but it does include a duty to consult with the local community as a part of the DCO application process.

3.2 National policy

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

- 3.2.1 NPS EN-1 (Department for Energy Security and Net Zero, 2023) sets out national policy for the delivery of major energy infrastructure. The NPS EN-1 has effect on relevant decisions by the Secretary of State on applications for energy developments that are nationally significant under the Planning Act 2008.
- 3.2.2 Section 4.4 of NPS EN-1 recognises the potential impacts on health and well-being that energy infrastructure can have, in particular the construction, production and distribution related to energy infrastructure and the potential negative impacts this may have. Direct

impacts on health identified include increased traffic, air or water pollution, dust and odours, hazardous waste or substances, noise, exposure to radiation and increases to pests. NPS EN-1 also recognises that new energy infrastructure may affect the composition and size of the local population, and in doing so have indirect health impacts, for example by affecting access to key public services, transport, and open spaces for recreation and physical activity.

National Policy Statement: Renewable Energy Infrastructure (EN-5) (January 2024)

- 3.2.3 NPS EN-5 (Department for Energy Security and Net Zero, 2024) sets out the framework for decision-making on electricity network infrastructure projects. It emphasises the importance of expanding the UK's electricity grid to support the country's transition to net zero, particularly in response to the growing need for renewable energy sources like offshore wind. The document outlines the infrastructure required, including overhead lines, underground cables, and substations.
- 3.2.4 Key considerations include the environmental and social impacts of these developments, such as biodiversity, landscape, noise, and the effects of electromagnetic fields (EMFs). The NPS encourages a strategic and coordinated approach to grid planning, ensuring that projects minimise disruption to communities and the environment while maintaining energy security. It highlights the need for careful site selection, good design practices, and mitigation strategies, such as undergrounding cables in sensitive areas like national parks.
- 3.2.5 Overall, NPS EN-5 works in conjunction with other policy statements, like EN-1, to guide the approval process for electricity infrastructure, ensuring developments contribute to the UK's decarbonisation goals while balancing environmental and community concerns.

National Planning Policy Framework (2024)

- 3.2.6 The National Planning Policy Framework (NPPF) (Ministry of Housing, Communities and Local Government, 2024) was originally published in March 2012, with revisions in 2018, 2019, 2021, 2023, and most recently December 2024.
- 3.2.7 The NPPF provides a framework within which locally-prepared plans can provide for housing and other development in a sustainable manner. While the NPPF does not contain specific guidance on protected characteristics nor equalities, it does emphasise the importance of sustainable development and the need to support a healthy and just society.
- 3.2.8 Section 1 Paragraph 5 of the NPPF states that whilst it does not contain specific policies for NSIPs, it may be considered as 'relevant' as a major infrastructure decision-making framework.
- 3.2.9 Section 8 of the NPPF states that planning policies should aim to achieve healthy, inclusive and safe places, which:
- Promote social interaction;
 - Are safe and accessible, for example through the use of well-designed, clear and legible pedestrian and cycle routes, and high quality public space; and

- Enable and support healthy lives, through both promoting good health and preventing ill-health.

3.2.10 In relation to meeting the challenges of climate change, flooding and coastal change, Section 14 of the NPPF outlines that the planning system should support the transition to net zero by 2050. In particular, it should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

3.3 Suffolk local policy

3.3.1 The following local policies are relevant to the study area of the Suffolk Onshore Scheme and the Suffolk landfall as part of the Offshore Scheme.

Suffolk Coastal Local Plan

- 3.3.2 The Suffolk Coastal Local Plan (East Suffolk Council, 2020), adopted in September 2020, outlines strategic priorities for the former Suffolk Coastal area, focusing on sustainable development across housing, economy, and infrastructure. A key aspect is the integration of major energy infrastructure, including provisions for the Sizewell Nuclear Power Station, offshore wind developments, and improvements to key transport routes that support energy projects. Policy SCLP3.4 addresses proposals for major energy infrastructure, ensuring they meet local and national needs while protecting the environment and communities.
- 3.3.3 The plan emphasizes the balance between economic growth—especially through energy projects—and environmental stewardship. It recognises the significance of the Port of Felixstowe and the energy sector as critical to both local and national economic health. Additionally, the plan considers the future impacts of energy transmission projects, particularly in relation to the offshore wind sector, which is set to play a vital role in achieving renewable energy targets.
- 3.3.4 The document also highlights the need for collaboration with various stakeholders, including UK Power Networks, to ensure that the energy transmission infrastructure supports regional development and integrates seamlessly with environmental protection measures. The Local Plan prioritises minimising the environmental impact of new energy projects and outlines strategies for protecting areas of outstanding natural beauty and maintaining biodiversity during infrastructure expansion.

Leiston Neighbourhood Plan (2017)

- 3.3.5 The Leiston Neighbourhood Plan 2015-2029 (East Suffolk Council, 2017), adopted in March 2017, provides a comprehensive vision for the development of Leiston, focusing on sustainable growth while preserving the character of the town. Key themes in the plan include housing, community infrastructure, environmental sustainability, and employment opportunities.
- 3.3.6 One notable aspect of the plan is its recognition of the influence of energy infrastructure, particularly the Sizewell nuclear power stations, on the town's economy. Sizewell A and B, and the potential development of Sizewell C, are highlighted as significant employers. The plan addresses the impact of these projects on housing needs,

emergency planning, and local employment. It acknowledges that the construction of Sizewell C, if approved, would dramatically influence the local economy, with the influx of workers increasing demand for housing and local services.

- 3.3.7 However, it is also clear that the energy sector plays a crucial role beyond nuclear power, with Leiston serving as a key location for the offshore wind industry, which connects to the National Grid via Sizewell. The Neighborhood Plan emphasises the importance of balancing the benefits of this energy infrastructure with the need to protect the local environment and ensure that future developments align with community needs.
- 3.3.8 Overall, the plan outlines strategies for growth that respect Leiston's industrial heritage while seeking to enhance local amenities and infrastructure to support sustainable development. It highlights the ongoing importance of energy-related developments to the local economy but stresses the need for careful planning to mitigate any adverse impacts on the town's landscape and community.

3.4 Kent local policy

- 3.4.1 The following local policies are relevant to the study area of the Kent Onshore Scheme and the Kent landfall as part of the Offshore Scheme.

Thanet Local Plan (2020)

- 3.4.2 The Thanet Local Plan (Thanet District Council, 2020) outlines Thanet District Council's vision for sustainable growth, housing development, and infrastructure over a 20-year period. One of its core objectives is to meet the growing housing demand, aiming to provide a variety of new homes, including affordable housing, while balancing the need for economic and social development with environmental sustainability. The plan is driven by Thanet's commitment to sustainable development, addressing the economic, social, and environmental needs of the community in line with the NPPF published in 2019.
- 3.4.3 The plan prioritises development in areas with established infrastructure, particularly within the existing settlement patterns of Thanet's coastal towns. Ramsgate's port, marina, and Royal Harbour are integral to boosting the local economy, alongside tourism and renewable energy initiatives. Broadstairs and Westwood are also highlighted as key hubs for development, with retail, education, and housing projects being promoted. The plan emphasises maintaining the character of smaller villages while ensuring adequate services are available for the growing population.
- 3.4.4 A key challenge for the plan is addressing Thanet's historic economic issues while promoting a balanced development approach. The Local Plan is rooted in fostering job creation, improving infrastructure such as roads and schools, and enhancing green spaces. However, sustainable development is at the heart of the strategy, aiming to protect the natural landscape and historical character of the region.

Dover District Local Plan to 2040

- 3.4.5 The Dover District Local Plan to 2040 (Dover District Council, 2024), adopted on 16 October 2024, establishes a vision for growth and sustainable development in the district through to 2040. It aims to provide approximately 11,000 new homes, enhance local infrastructure, and promote economic growth while preserving the district's rich

natural and historic assets. Key focus areas include climate change adaptation, sustainable housing, biodiversity enhancement, and the regeneration of urban and rural areas.

- 3.4.6 Major developments include the expansion of Whitfield as a key residential and commercial hub and the regeneration of Dover Town Centre. Strategic policies prioritise climate mitigation through renewable energy, sustainable transport, and carbon-neutral designs. Social priorities include creating healthy and inclusive communities, improving access to services, and addressing health inequalities, particularly in areas of deprivation.
- 3.4.7 The Plan also highlights the protection and enhancement of natural and cultural heritage, including the Kent Downs Area of Outstanding Natural Beauty (AONB), now a National Landscape, and internationally recognised historic sites. Extensive public consultation shaped the document, ensuring alignment with national policies and addressing local needs. Monitoring and review mechanisms are built-in to adapt to changing circumstances and ensure effective delivery.

3.5 National Grid's equalities policies

- 3.5.1 National Grid embraces diversity, and their mission is to build a business that represents, reflects and celebrates the cultures and communities they serve. Their business is conducted in line with the values to 'Do the Right Thing, Find a Better Way and Make it Happen', and respect for human rights is incorporated into National Grids employment practices and Values.
- 3.5.2 This is also reflected in National Grid's Code of Ethics document (National Grid, 2024) which has clear objectives and greater accountability around the organisation with regard to Diversity, Equity and Inclusion.
- 3.5.3 National Grid has been recognised for their inclusivity through various awards including (National Grid, 2024):
- Ranking 1st in the UK and 3rd globally for gender equality in an assessment of almost 4000 companies in 23 markets by Equileap, the leading provider of gender equality data and insights, in 2021;
 - Rated in the annual Times Top 50 Employers for Gender Equality 2023, which recognises the employers that are taking action to drive gender equality at work, from embracing flexible working practices to tackling the pay gap and normalising caring responsibilities for all genders;
 - One of 484 companies across 45 countries to be included in the 2023 Bloomberg Gender-Equality Index, which aims to track the performance of public companies committed to transparency in gender-data reporting; and
 - Joined 499 other companies around the world, as part of the Valuable 500, to take action on disability inclusion.
- 3.5.4 National Grid works with its supply chains to provide adherence to the principles of the UK Modern Slavery Act 2015 and the requirements of the Living Wage Foundation. It takes responsibility to report and monitor human rights violations and mitigate against any risk in its supply chain.
- 3.5.5 National Grid is committed to maintaining a work environment and supply chain that recognises and upholds the importance of human rights and is committed to the

communities served while supporting programmes designed to help improve the way people live and work.

4. Equalities baseline – Suffolk study area

4.1 Introduction

- 4.1.1 A baseline profile of the population living in proximity of the Suffolk Onshore Scheme enables an assessment of the potential impacts the Scheme may have on groups with protected characteristics. The Suffolk Onshore Scheme is located within East Suffolk District.
- 4.1.2 This chapter outlines the equalities baseline relevant to the location of the Suffolk Onshore Scheme. The impact of the Suffolk Onshore Scheme with respect to equality is considered at various spatial levels according to available data and the likely extent of the effect under consideration. This includes analysis of the 2021 Census and other datasets from the Office for National Statistics (ONS).
- 4.1.3 The geographical areas used in this baseline are, in increasing size:
- The 'Study Area' – Aldeburgh & Leiston Ward, and Saxmundham Ward (both located within East Suffolk District);
 - East Suffolk District;
 - East of England; and
 - England.
- 4.1.4 Prior to 1 April 2019, the East Suffolk District consisted of two distinct districts: Suffolk Coastal and Waveney. The current ward of 'Aldeburgh & Leiston' was previously divided, to varying extents, across the former wards of 'Aldeburgh', 'Leiston', 'Snape', and 'Saxmundham'. Additionally, the present 'Saxmundham' ward had a different geographical boundary under the previous structure. Due to these differences in boundary configurations, a direct Study Area population comparison between the 2011 and 2021 Census data is not feasible. Instead, the former wards of 'Aldeburgh', 'Leiston', 'Snape', and 'Saxmundham' have been grouped together as the Study Area when referencing Census 2011 data. A review of the geographical boundaries of the two Study Areas reveals that the discrepancy between them is minimal. Furthermore, the difference does not affect the outcome of this assessment because it is focused on the existing population (i.e. that informed by Census 2021), and not the historical population.
- 4.1.5 In some instances, data for protected characteristic groups has only been presented at district, regional, and national level as it is not available at lower disaggregated geographies such as wards.

4.2 Population

- 4.2.1 Table 4.1 (ONS, 2011) (ONS, 2021) highlights population change between 2011 and 2021 across the relevant geographical areas. The East of England saw the largest population increase at 8.3%, followed by England at 6.6%. East Suffolk District Council and the Study Area both experienced lower rates of population growth, at 2.7% and 2.9% respectively.

Table 4.1 Population size and change, 2011 – 2021

Year	Study Area	East Suffolk District Council (formerly Suffolk Coastal District and Waveney District)	East of England	England
2011	16,409	239,552	5,846,965	53,012,456
2021	16,879	246,058	6,335,074	56,490,048
Population change	+2.9%	+2.7%	+8.3%	+6.6%

4.3 Protected characteristics

Age

- 4.3.1 Table 4.2 (ONS, 2021) present data on age breakdown (%) across the geographical areas in 2021.
- 4.3.2 The data highlights that the Study Area has the highest proportion of older residents aged over 65+, 31%, followed by East Suffolk District, 27.8%, and 18.3% in England. All of the geographies have a similar proportion of 0-15 year old residents, ranging from 15.2% in the Study Area to 18.7% in the East of England.

Table 4.2 Age breakdown (%) by geographical area, 2021

Age	Study Area	East Suffolk District	East of England	England
0-15	15.2	16	18.7	18.5
16-64	53.8	56.3	61.6	63
65+	31	27.8	19.6	18.3

Disability

- 4.3.3 Table 4.3 (ONS, 2021) provides an overview of people experiencing a disability that limits their daily activities across the geographies.
- 4.3.4 The data highlights that the Study Area has the highest proportion of residents who are classified as disabled under the Equality Act, 21.4%. Correspondingly the Study Area also has the joint highest proportion of residents whose day-to-day activities are limited a lot at 8.5%, with East Suffolk District having the same proportion.

Table 4.3 Disability breakdown (%) by geographical area, 2021

Disability	Study Area	East Suffolk District	East of England	England
Disabled under the Equality Act	21.4	20.6	16.6	17.3
Day-to-day activities limited a lot	8.5	8.5	6.6	7.3
Day-to-day activities limited a little	13.0	12.2	10.0	10.0
Not disabled under the Equality Act	78.6	79.4	83.4	82.7

Gender reassignment

- 4.3.5 Data on gender reassignment is not currently available at ward level, therefore Table 4.4 (ONS, 2021) provides information for East Suffolk District, the East of England, and England.
- 4.3.6 0.4% of East Suffolk District's residents have a gender identity different from the sex registered at birth, are trans, or identify as another gender identity. This compares with 0.5% in the East of England and England.
- 4.3.7 It should be noted that there are relatively high levels of uncertainty in the estimates for this topic due to the impact of question non-response and possible misinterpretation of the question (ONS, 2023).

Table 4.4 Gender identity breakdown (%) by geographical area, 2021

Gender identity	East Suffolk District	East of England	England
Same as sex registered at birth	94.1	93.9	93.5
Different from sex registered at birth	0.1	0.2	0.2
Trans woman	0.1	0.1	0.1
Trans man	0.1	0.1	0.1
All other gender identities	0.1	0.1	0.1
Not answered	5.6	5.6	6.0

Marriage and civil partnership

- 4.3.8 Table 4.5 (ONS, 2021) presents data on legal partnership status. No data is available at ward level, therefore only East Suffolk District, the East of England, and England are included.
- 4.3.9 A larger proportion of the population in East Suffolk District are married or in a registered civil partnership, 49.1%, compared to the East of England, 47.2%, and England, 44.7%.
- 4.3.10 East Suffolk District also has the highest proportion of residents who are divorced, 10.9%, and widowed, 8.1%.

Table 4.5 Legal partnership status breakdown (%) by geographical area, 2021

Legal partnership status	East Suffolk District	East of England	England
Never married or in a registered civil partnership	29.6	34.8	37.9
Married or in a registered civil partnership	49.1	47.2	44.7
Separated	2.2	2.2	2.2
Divorced	10.9	9.5	9.1
Widowed	8.1	6.3	6.1

Pregnancy and maternity

- 4.3.11 Table 4.6 (ONS, 2022) provides data on live births in East Suffolk District, the East of England, and England (ward level data is not available). In 2022, East Suffolk District made up 2.8% of the live births in the East of England.

Table 4.6 Live births by geographical area, 2022

Live births	East Suffolk District	East of England	England
Live births	1,809	64,294	577,046

Ethnic group

- 4.3.12 Table 4.7 (ONS, 2021) provides the breakdown of ethnic groups across the relevant geographies. The Study Area and East Suffolk District Council have a significantly

higher proportion of White residents, at 96.6% and 96.2% respectively, compared to the East of England and England, at 86.5% and 81.0% respectively.

- 4.3.13 Correspondingly, the Study Area has a comparatively lower proportion of residents from minority ethnic groups compared to the wider geographies. Asian/Asian British residents make up the largest minority ethnic group, comprising 1.3% of the Study Area's population.

Table 4.7 Ethnic group breakdown (%) by geographical area, 2021

Ethnic group	Study Area	East Suffolk District	East of England	England
White	96.8	96.2	86.5	81.0
Mixed/multiple ethnic groups	1.2	1.5	2.8	3.0
Asian/Asian British	1.3	1.4	6.4	9.6
Black/African/Caribbean/Black British	0.4	0.6	2.9	4.2
Other ethnic group	0.4	0.4	1.4	2.2

Religion or belief

- 4.3.14 Table 4.8 (ONS, 2021) highlights that all four geographies have broadly similar proportions of residents belonging to each religious group.
- 4.3.15 Christian residents make up the largest proportion across all geographies, ranging from 47.1% in East Suffolk District to 46.3% in England. The Study Area has the highest proportion of residents who have No religion, at 45.4%, compared to the lowest in England, 36.7%. Muslim residents make up the largest religious minority group in the Study Area at 0.6%, however, this is a significantly smaller proportion than seen in the East of England, 3.7%, and England, 6.7%.
- 4.3.16 There are several religious facilities in the Suffolk Onshore Scheme area; St John's Church in Saxmundham and Knodishall Methodist Church are both located within 300 m of the Order Limits. There are also several churches in Leiston and Aldeburgh.

Table 4.8 Religion breakdown (%) by geographical area, 2021

Religion	Study Area	East Suffolk District	East of England	England
No religion	45.4	44.9	40.2	36.7
Christian	47.0	47.1	46.6	46.3
Buddhist	0.4	0.3	0.4	0.5
Hindu	0.1	0.3	1.4	1.8
Jewish	0.1	0.1	0.7	0.5
Muslim	0.6	0.5	3.7	6.7

Religion	Study Area	East Suffolk District	East of England	England
Sikh	0.0	0.1	0.4	0.9
Other religion	0.3	0.6	0.6	0.6
Not answered	6.3	6.1	6.1	6.0

Sex

- 4.3.17 Table 4.9 (ONS, 2021) highlights the proportion of female and male residents across the geographies is relatively similar. The Study Area has the highest proportion of female residents, 52.3%, and correspondingly lowest proportion of male residents 47.8%.

Table 4.9 Sex breakdown (%) by geographical area, 2021

Gender	Study Area	East Suffolk District	East of England	England
Male	47.8	48.7	49.0	49.0
Female	52.3	51.3	51.0	51.0

Sexual orientation

- 4.3.18 Data on sexual orientation is not currently available at ward level and therefore cannot be provided for the Study Area. Table 4.10 (ONS, 2021) provides data on sexual orientation for East Suffolk District, the East of England, and England.
- 4.3.19 Overall, the proportion of the population who are gay, lesbian, bisexual or any other sexual orientation is relatively similar across all geographies; being largest in England, 3.2%, and lowest in East Suffolk District, 2.5%.

Table 4.10 Sexual orientation breakdown (%) by geographical area, 2021

Sexual orientation	East Suffolk District	East of England	England
Straight or heterosexual	90.4	90.2	89.4
Gay or lesbian	1.2	1.2	1.5
Bisexual	1.0	1.1	1.3
Pansexual	0.1	0.1	0.1
Asexual	0.1	0.1	0.1
Queer	0.0	0.0	0.0
All other sexual orientation	0.1	0.1	0.2
Not answered	7.2	7.2	7.5

4.4 Socio-economic profile

- 4.4.1 The socio-economic profile considers several factors including levels of deprivation, employment, education, health, housing, transport, and connectivity; as well as access to services and facilities; public realm and open space; safety, security and well-being; and community cohesion. These factors are pertinent to those with protected characteristics and inequality and, as such, provide additional baseline information relevant to the assessment of equality impacts.
- 4.4.2 Deprivation is measured by the 2019 English Indices of Deprivation (Ministry of Housing Communities and Local Government, 2019). This provides an overall deprivation score and rank for Lower Super Output Areas (LSOAs) across England by building upon seven distinct 'domains' of deprivation. These domains are seen as the key indicators which influence a person's level of deprivation, as follows:
- Income – measures the proportion of the population experiencing deprivation relating to low income. The definition of low income used includes both those people that are out of work, and those that are in work but who have low earnings.
 - Employment – measures the proportion of the working age population in an area involuntarily excluded from the labour market. This includes people who would like to work, but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
 - Education, skills and training – measures the lack of attainment and skills in the local population. The indicator falls into two sub-domains intended to reflect the 'flow' and 'stock' of educational disadvantage:
 - Children and young people sub-domain: measures the attainment of qualifications and associated measures (flow).
 - Adult skills sub-domain: measures the lack of qualifications in the resident working population (stock).
 - Health deprivation and disability – measures the risk of premature death and the impairment of quality of life through poor physical and mental health.
 - Crime – measures the risk of personal and material victimisation at a local level.
 - Barriers to housing and services – measures the physical and financial accessibility of housing and local services. The indicator falls into two sub-domains:
 - Geographical barriers: which relates to the physical proximity of local services.
 - Wider barriers: which includes issues relating to access to housing such as affordability and homelessness.
 - Living environment – measures the quality of the local environment. The indicator falls into two sub-domains:
 - 'Indoors': measures the quality of housing.
 - 'Outdoors': measures the local air quality and road traffic accidents.
- 4.4.3 The overall relative score generated by the combination of these ranks is the Index of Multiple Deprivation ("IMD"). The Income Deprivation Affecting Children Index ("IDACI") measures the proportion of children aged 0 to 15 living in income deprived families. The

Income Deprivation Affecting Older People Index (“IDAOPI”) measures the proportion of all those aged 60 or over who experience income deprivation.

- 4.4.4 The Indices of Multiple Deprivation measure deprivation at LSOA level, with a rank of 1 being the most deprived LSOA in England, and a rank of 32,844 being the least deprived LSOA in England. For ease of comparison, this socio-economic profile uses the respective decile ranking of the LSOA, rather than its numbered rank out of 32,844 LSOAs. So, for example, a decile ranking of ‘1’ means that the LSOA in question is in the top 10% most deprived LSOAs in the country. A decile ranking of 10 means the LSOA is in the 10% least deprived LSOAs in the country. Local Authority Districts are also ranked out of a total of 317 in the Indices of Deprivation, where 1 is the most deprived Local Authority District and 317 the least deprived.
- 4.4.5 The scores provided against each domain are a measure of relative deprivation rather than affluence. As such, it is important to recognise that not every person in a deprived area will themselves be deprived and likewise, that there will be some deprived people living in the least deprived areas.
- 4.4.6 People belonging to protected characteristic groups are more likely to experience deprivation, as they may experience poor health, have lower levels of income, or experience barriers to accessible housing, car ownership and access to services. This can lead to poor health and wellbeing outcomes, and detrimentally affect the equality of opportunity.
- 4.4.7 The Suffolk Onshore Scheme spans several Lower Layer Super Output Areas (LSOAs) which, in line with **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing**, have been used to develop this socio-economic profile. These are Suffolk Coastal 003A, 003C, 003E, and 004A (collectively referred to as the ‘Suffolk LSOAs’ hereafter). Although the higher-level district and ward boundaries changed following Suffolk’s administrative reorganisation (as detailed in paragraph 5.1.4), the relevant LSOA boundaries remained the same. Only their names were updated prior to the 2021 Census (and post the 2019 Indices of Deprivation being released), becoming East Suffolk 018A, 018C, 018E, and 019A respectively. Accordingly, where Census 2021 data has been utilised to support this socio-economic profile, the average of these updated LSOAs has been used. The deprivation ranking of East Suffolk District has also been considered for wider local comparison, as well as Census 2021 data for East Suffolk District, the East of England, and England.

Index of Multiple Deprivation

- 4.4.8 According to the 2019 English Indices of Deprivation, the Suffolk LSOAs ranked within the 30% to 50% least deprived neighbourhoods in the country, as measured by the Index of Multiple Deprivation. East Suffolk District ranked 158th out of 317 Local Authority Districts in terms of deprivation, placing roughly in the middle, indicating modest levels of deprivation compared to other districts across the country.

Income

- 4.4.9 According to the 2019 English Indices of Deprivation, the Suffolk LSOAs ranked between the 50% most and 20% least deprived neighbourhoods in the country; Suffolk Coastal 003C ranked as the 50% most, and Suffolk Coastal 004A ranked as the 20% least. East Suffolk District ranked 167th out of 317 Local Authority Districts indicating a relatively low level of income deprivation across the district, with variation between certain areas.

Employment

- 4.4.10 The Suffolk LSOAs ranked between the 50% most and 20% least deprived neighbourhoods in the country in terms of employment deprivation. East Suffolk District ranked 143rd out of 317 Local Authority Districts, indicating relatively average levels of employment deprivation compared to other areas nationwide.
- 4.4.11 Table 4.11 (ONS, 2021) provides a breakdown of economic activity status according to the relevant geographies. The proportion of economically active residents in employment is significantly lower, 45.3% on average, within the Suffolk LSOAs than it is in the wider geographies, East Suffolk District being the next highest proportion at 50.4% of residents. Correspondingly, the Suffolk LSOAs have the highest proportion of residents who are economically inactive – which takes into account retired and long-term sick or disabled residents, and therefore corresponds to the comparatively higher proportion of older and disabled residents in the Scheme area.

Table 4.11 Economic activity status (%) by geographical area, 2021

Area	Suffolk LSOAs	East Suffolk District	East of England	England
Economically active (excluding full-time students): In employment	45.3	50.4	57.3	55.7
Economically active (excluding full-time students): unemployed	1.5	2.3	2.5	2.9
Economically inactive	52.4	45.9	38.2	39.1

Education

- 4.4.12 In 2019, the Suffolk LSOAs ranked between the 40% most and 50% least deprived LSOAs nationally in terms of education, skills and training deprivation. This ranking is reflected in Table 4.12 (ONS, 2021) which indicates the Suffolk LSOAs and East Suffolk District have a similar proportion of residents with no qualifications, 18.7% and 19.4% respectively, compared to the East of England and England, both 18.1%.
- 4.4.13 The Suffolk LSOAs and East Suffolk District both have a higher proportion of residents with an Apprenticeship as their highest level of qualification, at 6.7% and 6.9% respectively, compared to the East of England and England, 5.5% and 5.3% respectively.

Table 4.12 Highest level of qualification (%) by different geographical area, 2021

Highest level of qualification	Suffolk LSOAs	East Suffolk District	East of England	England
No qualifications	18.7	19.4	18.1	18.1
Level 1 and entry level qualifications	10.6	11.3	10.8	9.7
Level 2 qualifications	12.9	15.0	14.4	13.3
Apprenticeship	6.7	6.9	5.5	5.3
Level 3 qualifications	15.6	16.9	16.8	16.9
Level 4 qualifications or above	32.8	27.6	31.6	33.9
Other qualifications	2.8	2.9	2.8	2.8

4.4.14 There are several educational facilities, namely primary schools, in proximity to the Order Limits, as outlined in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism**; Benhall Saint Mary's Primary School located approximately 640 m to the south, and Saxmundham Primary School located approximately 960 m to the north, as well as Kelsale Primary School approximately 1 km north.

Health

4.4.15 The Suffolk LSOAs ranked between the 50% and 20% least deprived LSOAs for health deprivation and East Suffolk District ranked 159th out of 317 Local Authority Districts.

4.4.16 Table 4.13 (ONS, 2021) contrastingly highlights that the proportion of people who self-reported their health to be very good is significantly lower in the Suffolk LSOAs, 40.3%, compared to the East of England, 48.3%, and England, 48.5%. This disparity may be due to the reporting definition of health in the Indices of Multiple Deprivation, which considers the risk of premature death, compared to people self-reporting.

Table 4.13 General health rating (%) by geographical area, 2021

Area	Suffolk LSOAs	East Suffolk District	East of England	England
Very good health	40.3	43.3	48.3	48.5
Good health	38.6	36.0	34.6	33.7
Fair health	15.9	15.0	12.5	12.7
Bad health	4.0	4.5	3.6	4.0
Very bad health	1.1	1.2	1.0	1.2

- 4.4.17 There are a number of GP surgeries located in proximity to the Order Limits. These include (distances estimated based on the closest point of the Order Limits to the facility); Saxmundham Health Surgery (approximately 300 m west), several GP surgeries located in the same location in Leiston (approximately 2 km northeast), and Peninsula Practice Aldeburgh (approximately 1 km south). The nearest hospital is Aldeburgh Community Hospital (approximately 1.25 km south).

Housing

- 4.4.18 The Suffolk LSOAs rank between the 20% most and 10% least deprived LSOAs nationally regarding barriers to housing and services which is influenced by the geographical barriers sub-domain. East Suffolk District was ranked 209th out of 317, indicating that there is significant variation in terms of housing deprivation within the Scheme area and wider district.
- 4.4.19 Table 4.14 (ONS, 2021) highlights that a higher proportion of residents in the Suffolk LSOAs own their house, 73.1%, compared to the lowest proportion of household ownership seen in England, at 61.3%. Comparatively, the Suffolk LSOAs had the lowest proportion of social rented housing, 12.6%, with the highest proportion being seen in England, 17.1%.

Table 4.14 Tenure (%) by geographical area, 2021

Area	Suffolk LSOAs	East Suffolk District	East of England	England
Owned	73.1	68.9	65.2	61.3
Social rented	12.6	13.1	15.5	17.1
Private rented	13.9	17.6	18.2	20.5

- 4.4.20 **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** highlights there are no residential properties located within the Suffolk Onshore Scheme Order Limits. Moreover, a number of settlements lie within close proximity to the Suffolk Onshore Scheme. To the northwest of the Suffolk Onshore Scheme, Saxmundham borders the Suffolk Onshore Scheme Order Limits. The southern portion of the village of Knodishall borders the Suffolk Onshore Scheme Order Limits to the north. The north of the village of Friston borders the South of the Suffolk Onshore Scheme Order Limits. The town of Aldeburgh is located approximately 460 m to the south of the Suffolk Onshore Scheme Order Limits. The villages of Benhall and Sternfield are also located within 500 m of the Suffolk Onshore Scheme Order Limits to the south west.
- 4.4.21 A number of small clusters of residential properties or isolated properties also lie within close proximity to the Suffolk Onshore Scheme Order Limits.

Transport and connectivity

- 4.4.22 Due to the predominantly rural setting of the Scheme, local country lanes are the primary road type and therefore footways and other pedestrian/cycle facilities are limited aside from in towns and villages where there are footways to facilitate pedestrian

movements. **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** that there are 21 Public Rights of Way (PRoWs) and recreational routes which pass within the Suffolk Onshore Scheme Order Limits and a further 38 PRoW and recreational routes located within 500 m of the Suffolk Onshore Scheme Boundary.

4.4.23 **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** uses a study area based on the area where there is likely to be transport impact resulting from the construction of the Proposed Project. Within this area, the most significant portions of the highway network are the A12, the B1121 to the south of Saxmundham, the B1119 and the A1094 to the west of Aldeburgh. The A1094 has a single lane in each direction and is the main route between Aldeburgh and the A12. The portion of the A1094 within the study area includes a number of farm accesses and is subject to the national speed limit (derestricted).

4.4.24 **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** also highlights that there are bus stops in both directions on the B1122 towards the southeast of the study area, circa 800 m to the south of the Order Limits. Bus routes 64, 65 and 522 operate along the B1122. The 522 service operates between Saxmundham and Aldeburgh, with services operating from 7am and 5pm at a frequency of one service per hour in each direction. The 64 service runs from Ipswich to Aldeburgh via Leiston between 6am and 8pm at a frequency of one service per hour in each direction. The 65 service runs from Ipswich to Leiston via Woodbridge between 6am and 3:30pm on an hourly frequency in each direction. The B1121 within the study area is used by bus route 521 which runs between Aldeburgh and Halesworth. The service operates four times per day in each direction and can be accessed from stops at Friston circa 800m to the west of the Order Limits, and Sandy Lane further to the west. Bus route 522 also operates along the B1119 circa 1km to the southwest of the Order Limits, with access points within Saxmundham, including from the Waitrose store on this road.

Public realm and open space

4.4.25 **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** highlights that there are 12 areas of open space within 500 m of the Suffolk Onshore Scheme Order Limits. A portion of Aldeburgh Beach falls within the Suffolk Onshore Scheme Order Limits at the landfall site. Carlton Park, located to the north of Saxmundham, lies approximately 140 m to the northwest. Saxmundham Park is located approximately 450 m to the northwest of the Suffolk Onshore Scheme Order Limits. Knodishall Playground is located approximately 450 m to the northeast of the Suffolk Onshore Scheme Order Limits within Knodishall. Friston Playground is located approximately 480 m to the south of the Suffolk Onshore Scheme Order Limits.

Safety and security

4.4.26 The Suffolk LSOAs rank between the 50% most and 10% least deprived LSOAs in the country in the crime domain – Suffolk Coastal 003C is in the 50% most deprived, and the remaining LSOAs are in the 10-20% least deprived. Suffolk as a county is in the top five counties in England and Wales where people are least likely to be victims of crime (Suffolk Constabulary, 2024).

Community cohesion

- 4.4.27 To ensure healthy communities are functional, safe and enjoyable places to live and work, community cohesion and good relations between different groups are fundamental. Encouraging civic engagement and ensuring dialogue with all people in the community, particularly those belonging to protected characteristic groups, is an important step in working towards community cohesion. For people belonging to protected characteristic groups, their feelings of a lack of cohesion (or exclusion) may be more acute than those of other people.
- 4.4.28 East Suffolk Council record data on social housing tenant satisfaction across a range of indicators (East Suffolk Council, 2024); results for the period 2024/25 show that 78.5% of social housing residents recorded they were very/fairly satisfied overall. However, only 35.8% of respondents said that they were very or fairly satisfied in their landlords' approach to handling complaints, and 54.9% were very or fairly satisfied with the landlords' approach to handling anti-social behaviour.

5. Equalities baseline – Kent study area

5.1 Introduction

- 5.1.1 A baseline profile of the population living in proximity of the Kent Onshore Scheme enables an assessment of the potential impacts the Scheme may have on groups with protected characteristics. The Kent Onshore Scheme Boundary is located within Thanet District and Dover District.
- 5.1.2 This chapter outlines the equalities baseline relevant to the location of the Kent Onshore Scheme. The impact of the Kent Onshore Scheme with respect to equality is considered at various spatial levels according to available data and the likely extent of the effect under consideration. This includes analysis of the 2021 Census and other datasets from the Office for National Statistics (ONS).
- 5.1.3 The geographical areas used in this baseline are, in increasing size:
- The ‘Study Area’ – Cliffsend & Pegwell ward, and Thanet Villages ward (both located in Thanet District), and Little Stour & Ashstone ward (located in Dover District);
 - Thanet District and Dover District;
 - South East England; and
 - England.

5.2 Population

- 5.2.1 Table 5.1 (ONS, 2011) (ONS, 2021) highlights population change between 2011 and 2021 across the relevant geographical areas. The Study Area saw the largest population increase over this period at 9.4%, this contrasts with the two wider Districts, Dover and Thanet, which saw the lowest increases of all the geographies, at 4.2% and 4.8% respectively.

Table 5.1 Population size and change, 2011 - 2021

Area	Population (2011)	Population (2021)	Population Change (%)
Study Area	18,452	20,191	9.4
Dover District	111,674	116,410	4.2
Thanet District	134,186	140,587	4.8
South East England	8,634,750	9,278,065	7.5
England	53,012,456	56,490,048	6.6

5.3 Protected characteristics

Age

- 5.3.1 Table 5.2 (ONS, 2021) presents data on age breakdown (%) across the geographical areas in 2021.
- 5.3.2 The data highlights that the Study Area has a higher proportion of older residents aged over 65, 26.9% compared to the wider geographies, with Dover District having the next highest proportion at 24%. Correspondingly the Study Area has a lower proportion of young residents aged 0-15.

Table 5.2 Age breakdown (%) by geographical area, 2021

Age	Study Area	Dover District	Thanet District	South East England	England
0-15	15.8%	17.5%	17.9%	18.6%	18.5%
16-64	57.3%	58.2%	58.5%	62%	63%
65+	26.9%	24%	23.6%	19.4%	18.3%

Disability

- 5.3.3 Table 5.3 provides an overview of people experiencing a disability that limits their daily activities across the geographies.
- 5.3.4 The data highlights that the Study Area and surrounding districts have significantly higher proportions of residents who are classified as disabled under the Equality Act; 19.4% of residents in the Study Area are classified as disabled, compared to 16.1% in South East England and 17.3% in England. Thanet District has the highest proportion of disabled residents at 22.9%.

Table 5.3 Disability breakdown (%) by geographical area, 2021

Disability	Study Area	Dover District	Thanet District	South East England	England
Disabled under the Equality Act	19.4	21.2	22.9	16.1	17.3
Day-to-day activities limited a lot	8.0	9.1	10.2	6.3	7.3
Day-to-day activities limited a little	11.4	12.0	12.6	9.9	10.0

Disability	Study Area	Dover District	Thanet District	South East England	England
Not disabled under the Equality Act	80.6	78.8	77.1	83.9	82.7

Gender reassignment

- 5.3.5 Data on gender reassignment is not currently available at ward level, therefore Table 5.4 (ONS, 2021) provides information for Dover District, Thanet District, South East England, and England.
- 5.3.6 The data reveals the same proportion of residents have a gender identity different from the sex registered at birth, are trans, or identify as another gender identity across all geographies, 0.5%.
- 5.3.7 It should be noted that there are relatively high levels of uncertainty in the estimates for this topic due to the impact of question non-response and possible misinterpretation of the question (ONS, 2023).

Table 5.4 Gender identity breakdown (%) by geographical area, 2021

Gender identity	Dover District	Thanet District	South East England	England
Same as sex registered at birth	94.6	94.2	94.1	93.5
Different from sex registered at birth	0.2	0.2	0.2	0.2
Trans woman	0.1	0.1	0.1	0.1
Trans man	0.1	0.1	0.1	0.1
All other gender identities	0.1	0.1	0.1	0.1
Not answered	5.0	5.3	5.4	6.0

Marriage and civil partnership

- 5.3.8 Table 5.5 (ONS, 2021) presents data on legal partnership status. No data is available at ward level, therefore only Dover District, Thanet District, South East England, and England are included.
- 5.3.9 Thanet District has the lowest proportion of residents who were married or in a registered civil partnership, 42.1%. The remaining geographies have broadly similar proportions of residents who are married or in a registered civil partnership – ranging between 46.0% in Dover District and 47.6% in South East England.
- 5.3.10 Dover District and Thanet District both have higher proportions of divorced and widowed residents compared to the wider geographies.

Table 5.5 Legal partnership status breakdown (%) by geographical area, 2021

Legal partnership status	Dover District	Thanet District	South East England	England
Never married or in a registered civil partnership	33.1	35.7	34.8	37.9
Married or in a registered civil partnership	46.0	42.1	47.6	44.7
Separated	2.5	2.8	2.1	2.2
Divorced	11.0	11.9	9.3	9.1
Widowed	7.4	7.5	6.1	6.1

Pregnancy and maternity

- 5.3.11 Table 5.6 (ONS, 2022) provides data on live births in Dover District, Thanet District, South East England, and England (ward level data is not available). In 2022, births in Dover District and Thanet District made up 6.7% and 8.3% respectively of the total births in the South East.

Table 5.6 Live births by geographical area, 2022

Live births	Dover District	Thanet District	South East England	England
Live births	1,100	1,360	16,364	577,046

Ethnic group

- 5.3.12 Table 5.7 (ONS, 2021) provides the breakdown of ethnic groups across the relevant geographies.
- 5.3.13 The Study Area and districts in Kent have a significantly higher proportion of residents in the White ethnic group compared to South East England and England. The Study Area has the highest proportion, at 95.7% of residents.
- 5.3.14 Residents in the Mixed/Multiple Ethnic group make up the largest minority ethnic group in the Study Area at 1.8%.

Table 5.7 Ethnic group breakdown (%) by geographical area, 2021

Ethnic group	Study Area	Dover District	Thanet District	South East England	England
White	95.7%	94.9%	93.0%	86.3%	81.0%
Mixed/multiple ethnic groups	1.8%	1.5%	2.4%	2.8%	3.0%
Asian/Asian British	1.4%	2.1%	2.3%	7.0%	9.6%
Black/African/Caribbean/Black British	0.4%	0.7%	1.1%	2.4%	4.2%
Other ethnic group	0.7%	0.9%	1.2%	1.5%	2.2%

Religion or belief

- 5.3.15 Table 5.8 (ONS, 2021) presents data on religious affiliations across the different geographical areas.
- 5.3.16 The Study Area has a significantly larger proportion of Christian residents, 53.1%, compared to the wider geographies, with Dover District having the next largest proportion at 49.6%.
- 5.3.17 There are two churches – St Mary’s and Redeemer Church – located in Cliffsend approximately 450m from the Order Limits.

Table 5.8 Religion breakdown (%) by geographical area, 2021

Religion	Study Area	Dover District	Thanet District	South East England	England
No religion	38.6	42.4	44.1	40.2	36.7
Christian	53.1	49.6	46.7	46.5	46.3
Buddhist	0.3	0.5	0.4	0.6	0.5
Hindu	0.5	0.6	0.6	1.7	1.8
Jewish	0.2	0.1	0.2	0.2	0.5
Muslim	0.8	0.6	1.5	3.3	6.7
Sikh	0.1	0.1	0.1	0.8	0.9
Other religion	0.4	0.6	0.6	0.6	0.6
Not answered	5.8	5.5	5.8	6.1	6.0

Sex

- 5.3.18 Table 5.9 (ONS, 2021) highlights the proportion of female and male residents across the geographies is relatively similar.

Table 5.9 Sex breakdown (%) by geographical area, 2021

Gender	Study Area	Dover District	Thanet District	South East England	England
Male	48.8	48.8	48.1	48.9	49.0
Female	51.2	51.2	51.9	51.1	51.0

Sexual orientation

- 5.3.19 Data on sexual orientation is not currently available at ward level and therefore cannot be provided for the Study Area. Table 5.10 (ONS, 2021) provides data on sexual orientation for East Suffolk District, the East of England, and England.
- 5.3.20 Overall, the proportion of the population who are gay, lesbian, bisexual or any other sexual orientation is relatively similar across all geographies; being largest in Thanet District, 3.3%, and lowest in South East England, 3.1%.

Table 5.10 Sexual orientation breakdown (%) by geographical area, 2021

Sexual orientation	Dover District	Thanet District	South East England	England
Straight or heterosexual	90.2	89.6	89.8	89.4
Gay or lesbian	1.6	1.7	1.5	1.5
Bisexual	1.1	1.3	1.3	1.3
Pansexual	0.1	0.1	0.1	0.1
Asexual	0.1	0.1	0.1	0.1
Queer	0.0	0.0	0.0	0.0
All other sexual orientation	0.1	0.1	0.1	0.2
Not answered	6.8	7.0	7.0	7.5

5.4 Socio-economic profile

- 5.4.1 This socio-economic profile follows the same approach used to develop the Suffolk socio-economic profile in Chapter 4, please therefore refer back to Chapter 4 for information.
- 5.4.2 In Kent, the Proposed Project spans several LSOAs which, in line with **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing**, have been used to develop this socio-economic profile. These are Dover 001C, Thanet 014A, Thanet 014B, and Thanet 017C (collectively referred to as the 'Kent LSOAs' hereafter). Prior to Census 2021 (and post the 2019 Indices of Deprivation being released), Thanet 014A changed to Thanet 014F and the boundaries of the LSOAs changed slightly but are still

suitable to use for supporting evidence. Accordingly, where Census 2021 been utilized to support this socio-economic profile, the average of the updated LSOAs has been used. The deprivation ranking of Dover District and Thanet District has also been considered for wider local comparison, as well as Census 2021 data for Dover District and Thanet District, South East England, and England.

Index of Multiple Deprivation

- 5.4.3 According to the 2019 English Indices of Deprivation, the Kent LSOAs ranked within the 40% most to 30% least deprived neighbourhoods in the country, as measured by the Index of Multiple Deprivation. Thanet District ranked as the 34th most deprived district in the country, whereas Dover District was slightly less deprived, ranking 107th.

Income

- 5.4.4 According to the 2019 English Indices of Deprivation, the Kent LSOAs ranked between the 30% most and 40% least deprived neighbourhoods in the country in the income domain. Thanet District ranked 26th most deprived out of 317 Local Authority Districts, and Dover ranked 91st.

Employment

- 5.4.5 The Kent LSOAs ranked between the 30% most and 40% least deprived neighbourhoods in the country in terms of employment deprivation. Thanet District ranked as the 13th most deprived district in the country in terms of employment, and Dover the 66th most deprived.
- 5.4.6 Table 5.11 (ONS, 2021) provides a breakdown of economic activity status according to the relevant geographies. The proportion of economically active residents across the Kent geographies is lower compared to South-East England, 57.6%, and England, 55.7%. Thanet District has the lowest proportion of economically active residents at 50.2%. Correspondingly, Thanet District has the highest proportion of economically inactive residents, 45.1%, South-East England has the lowest proportion, 37.8%, with the national average being 39.1%.

Table 5.11 Economic activity status (%) by geographical area, 2021

Area	Kent LSOAs	Dover District	Thanet District	South-East England	England
Economically active (excluding full-time students): In employment	53.8	52.0	50.2	57.6	55.7
Economically active (excluding full-time students): Unemployed	1.9	2.8	3.2	2.5	2.9

Area	Kent LSOAs	Dover District	Thanet District	South-East England	England
Economically inactive	43.0	43.8	45.1	37.8	39.1

Education

- 5.4.7 In 2019, the Kent LSOAs ranked between the 40% most and 40% least deprived LSOAs nationally in terms of education, skills and training deprivation. Thanet ranked 39th out of 317 Local Authority Districts and Dover ranked 111th.
- 5.4.8 Table 5.12 (ONS, 2021) indicates that the Kent geographies have higher proportions of residents with no qualifications compared to South-East England, 15.4%, and England, 18.1%. Thanet District has the highest proportion of residents with no qualifications, 21.7%. Correspondingly, the Kent LSOAs have lower proportions of residents with level 4 and above qualifications, with Thanet District having the lowest share at 26.3% compared to 33.9% in England and 35.8% in South East England.

Table 5.12 Highest level of qualification (%) by different geographical area, 2021

Highest level of qualification	Kent LSOAs	Dover District	Thanet District	South East England	England
No qualifications	19.3	19.5	21.7	15.4	18.1
Level 1 and entry level qualifications	10.6	11.2	11.6	9.8	9.7
Level 2 qualifications	15.4	15.5	14.4	13.9	13.3
Apprenticeship	5.9	5.9	6.2	5.1	5.3
Level 3 qualifications	18.2	17.9	16.7	17.4	16.9
Level 4 qualifications or above	27.4	27.0	26.3	35.8	33.9
Other qualifications	3.3	3.0	3.1	2.7	2.8

- 5.4.9 Great Oaks Small School is an independent special educational need school located approximately 30 m from the Kent Onshore Scheme Order Limits. Minster Church of England Primary School is located approximately 1.1 km to the northwest of the Order

Limits, and the Royal Harbour Academy secondary school is located approximately 3.5 km to the northeast.

Health

- 5.4.10 The Kent LSOAs ranked between the 40% most and 40% least deprived LSOAs for health deprivation. Thanet District ranked 73rd and Dover District 138th out of 317 Local Authority Districts.
- 5.4.11 Table 5.13 (ONS, 2021) highlights that the Kent geographies have a lower proportion of residents who reported their health to be very good, with Thanet District having the lowest proportion at 42.0%. Contrastingly, South East England and England have significantly higher proportions at 50.0% and 48.5% respectively.
- 5.4.12 Thanet District had the highest proportion of residents with bad and very bad health, at 7.3%, compared to South East England, 4.2%, and England, 5.2%.

Table 5.13 General health rating (%) by geographical area, 2021

Area	Kent LSOAs	Dover District	Thanet District	South East England	England
Very good health	44.2	44.2	42.0	50.0	48.5
Good health	36.1	35.0	35.0	34.0	33.7
Fair health	14.2	14.6	15.8	11.8	12.7
Bad health	4.4	4.8	5.6	3.3	4.0
Very bad health	1.3	1.4	1.7	0.9	1.2

- 5.4.13 There are a number of GP surgeries located in proximity to the Order Limits. These include Minster Surgery, which is located approximately 1.2 km northwest, and a number of GPs to the northeast in Ramsgate and in Sandwich to the south. The nearest hospital is the Queen Mother Hospital located in Margate, approximately 6 km northeast of the Ken Onshore Scheme Order Limits.

Housing

- 5.4.14 The Kent LSOAs ranked between the 10% most and 30% least deprived LSOAs nationally regarding barriers to housing and services which is influenced by the geographical barriers sub-domain. Despite the high deprivation ranking of some of the LSOAs, Thanet District was ranked 147th and Dover District 127th out of 317 Local Authorities in this domain. This highlights high levels of inequality in respect to housing in the Kent Onshore Scheme area.

- 5.4.15 Table 5.14 (ONS, 2021) highlights that a higher proportion of residents in the Kent LSOAs own their properties, 72.2%, compared to the wider geographies. Contrastingly, Thanet District has the second lowest proportion of residents who own their properties, 61.4%, with England being the lowest at 61.3%. England also has a significantly greater proportion of socially rented properties, 17.1%, with Dover District having the second greatest proportion at 13.9%.

Table 5.14 Tenure (%) by geographical area, 2021

Area	Kent LSOAs	Dover District	Thanet District	South East England	England
Owned	72.2	66.2	61.4	65.7	61.3
Social rented	11.2	13.9	11.9	13.6	17.1
Private rented	16.1	19.0	26.3	19.2	20.5

- 5.4.16 **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics Recreation and Tourism** highlights that there are no residents properties within the Kent Onshore Scheme Order Limits. The nearest settlements to the Scheme are Cliffsend which borders the Order Limits, and Minster which is located approximately 1 km to the northwest.

Transport and connectivity

- 5.4.17 Due to the predominantly rural setting of the Kent Onshore Scheme, local country lanes are the primary road type and therefore footways and other pedestrian/cycle facilities are limited aside from in towns and villages where there are footways to facilitate pedestrian movements. **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics Recreation and Tourism** highlights that there are 11 PRoWs that pass within the Kent Onshore Scheme Order Limits used for recreational purposes, including the King Charles III Coastal Path. There are a further 12 PRoW and recreational routes located within 500 m of the Kent Onshore Scheme Boundary used for a combination of access and recreational purposes. **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport** highlights that the King Charles III Coastal Path is a long-distance footpath running between Camber, East Sussex and Ramsgate, Kent, forming part of the longest managed coastal path in the world. It follows the coastline in the proximity of the study area. The cable route would traverse the route of the path using a trenchless method as it makes landfall.
- 5.4.18 **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport** uses a study area based on the area where there is likely to be transport impact resulting from the construction of the Proposed Project. Within this area, the most significant portions of the highway network are the A256 Richborough Way, A299 Hengist Way, Sandwich Road, Ebbsfleet Lane, Ebbsfleet Lane North and Brook Lane.
- 5.4.19 **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport** also highlights that there are bus stops a short distance to the south of the Ebbsfleet Roundabout located in the Study Area. These stops serve bus route 4/45A which runs between Ramsgate and Sandwich approximately once per hour Monday – Saturday. The first and last bus services towards Sandwich arrive at around 7am and 6:30pm

whilst the first and last services towards Ramsgate arrive at around 7:30am and 6pm. The closest railway station to the Proposed Project is Minster, located approximately 2 km northwest of the A256 Richborough Way, however there is limited walking/cycling infrastructure to accommodate pedestrians and cyclists between the station and the Proposed Project (e.g. Ebbsfleet Lane North) and the overall route is approximately 3-4 km. Minster station is typically served by one train per hour to Ramsgate and one train per hour to London Victoria (via Maidstone East). During the peak hours, there are additional services to London Charing Cross (via Tonbridge).

Public realm and open space

- 5.4.20 **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics Recreation and Tourism** highlights that there are three areas of open space within 500 m of the Kent Onshore Scheme Order Limits. Pegwell Bay Country Park borders the landfall section of the Kent Onshore Scheme Order Limits to the south. Cliffsend Recreation Ground and the Hugin Viking Ship green space lie approximately 450 m and 480 m respectively to the northeast of the Kent Onshore Scheme Order Limits within the settlement of Cliffsend.

Safety and security

- 5.4.21 The Kent LSOAs rank between the 30% most and 20% least deprived LSOAs in the country in the crime domain. Thanet District ranked 22nd in the crime domain and Dover District ranked 106th, out of 317 Local Authority Districts.

Community cohesion

- 5.4.22 To ensure healthy communities are functional, safe and enjoyable places to live and work, community cohesion and good relations between different groups are fundamental. Encouraging civic engagement and ensuring dialogue with all people in the community, particularly those belonging to protected characteristic groups, is an important step in working towards community cohesion. For people belonging to protected characteristic groups, their feelings of a lack of cohesion (or exclusion) may be more acute than those of other people.
- 5.4.23 Thanet District Council publish data on social housing tenant satisfaction scores across a range of indicators (Thanet District Council, 2024); results for the period 2023/24 show that 75.0% of residents were satisfied overall with their landlord. However, only 55.3% of residents stated they were satisfied that the Council makes a positive contribution to the neighbourhood, and only 51.6% were satisfied with the Council's approach to handling anti-social behaviour. Dover District Council publishes similar results on social housing tenant satisfaction (Dover District Council, 2024); the results for 2023/24 showed the 68.0% of respondents reported they were satisfied with the overall service from their landlord. However, similarly to in Thanet, only 51.2% of respondents reported they were satisfied that their landlord makes a positive contribution to the neighbourhood, and 49.3% reported they were satisfied with their landlords approach to handling anti-social behaviour.

6. Consultation and engagement

6.1 Introduction

- 6.1.1 This chapter provides a summary of consultation and engagement activities undertaken to inform development of the Proposed Project.
- 6.1.2 National Grid acknowledges that undertaking effective consultation is critical to the overall success of the Proposed Project. As demonstrated in the **Consultation Report (Application Document 5.1)**, National Grid’s approach to consultation has included early and continuous engagement with key stakeholders, non-statutory consultation, statutory consultation, targeted consultation and ongoing engagement.
- 6.1.3 A summary of consultation and engagement activities is provided in Table 6.1.

Table 6.1 Overview of consultation stages and dates

Dates	Activity
2020	Commencement of early engagement
Monday 24 October – Sunday 18 December 2022	Non-statutory consultation
Tuesday 24 October – Monday 18 December 2023	Statutory consultation
Monday 8 July – Sunday 11 August 2024	Targeted consultation
22 November 2024 – 12 January 2025	Pre-submission engagement

6.2 Early Engagement

- 6.2.1 National Grid commenced engagement activities in 2020. Initial engagement with local planning authorities in Suffolk and Kent, the Environment Agency, Natural England Closed and the Marine Management Organisation was undertaken to identify the Proposed Project study area, mapping constraints, identify and appraise corridor and siting options.
- 6.2.2 Feedback from early stakeholder engagement was reviewed on a regular basis by the Proposed Project team and, where appropriate, considered for further investigation to inform the ongoing design of the Proposed Project.

6.3 Non-Statutory Consultation

- 6.3.1 As a result, a non-statutory consultation was undertaken. This was held for eight weeks, from 24 October to 18 December 2022.

- 6.3.2 The non-statutory consultation sought feedback from members of the public, impacted landowners and key stakeholders on the strategic options that could deliver the required transmission system reinforcement in the southeast of England with the aim to:
- Introduce the Proposed Project to the public, providing an overview of the Proposed Project and why the reinforcement is needed.
 - Set out options that have been considered and the decision-making undertaken so far.
 - Present early plans, including proposed cable corridors, HVDC converter sites and landfall locations.
 - Provide an opportunity for stakeholders and those interested in the Proposed Project to give their feedback on our work-to-date.
 - Outline the next steps and onward programme for the development of the Proposed Project.
- 6.3.3 340 responses to the feedback form on the Proposed Project in Suffolk and 120 responses to the feedback form on the Proposed Project in Kent were received as part of the non-statutory consultation. The 2022 Non-Statutory Consultation Report (**Application Document 5.1.4 Appendix C Non-Statutory Consultation**) includes a full narrative of the non-statutory consultations undertaken and the feedback provided to those consultations.
- 6.3.4 Following feedback from this consultation, and further technical work by the Proposed Project team to find the optimum route corridor, some key changes were made to the corridor.

6.4 Statutory Consultation

- 6.4.1 Following the non-statutory consultation, statutory consultation for the Proposed Project took place over an eight-week period from 24 October 2023 to 18 December 2023. The Statutory Consultation was carried out with prescribed stakeholder bodies and affected landowners, in accordance with Sections 42 and 48 of the Planning Act 2008 (UK Government, 2008). Consultation was also undertaken with local communities under Section 47 of the Planning Act 2008 (UK Government, 2008).
- 6.4.2 The purpose of the statutory consultation was to gain valuable feedback from stakeholders with regard to the emerging design and construction methodology.
- 6.4.3 The methods of engagement that were undertaken as part of the statutory consultation included in-person events at various locations (Aldeburgh, Ramsgate, Minster, Sandwich and Saxmundham), online live webinars, a series of appointment-only 'ask the experts' sessions, engagement with local authorities and elected members.
- 6.4.4 National Grid also sought to engage with seldom heard groups during the Statutory Consultation. **Application Document 5.1 Consultation Report** defines seldom heard groups as being inaccessible to most traditional and conventional methods of consultation for any reason. These reasons could include young people, people with a physical disability, people with learning difficulties and people whose first language is not English. These people are less likely to participate in or respond to traditional consultation techniques in comparison to other consultees.

- 6.4.5 National Grid sought to identify organisations who represent these groups and engaged with them via letter and email between October and November 2023. On October 26th, 2023, National Grid also held a stakeholder briefing with the Engaged Communities Forum in Suffolk to give them a high-level introduction to the Proposed Project. The purpose of the session was to encourage participation amongst seldom heard communities, of whom the Engaged Communities Forum represents.
- 6.4.6 Further efforts were made to engage with 87 seldom heard consultees specifically representing younger people, including youth networks, local youth councils, education providers and youth service providers. The letter and email contained information about the consultation, encouraged feedback and included an invitation to a youth webinar on 12 December 2023. Four people registered for this webinar, but none of them attended.
- 6.4.7 All the responses received during the statutory consultation were carefully considered in the design evolution of the Proposed Project in accordance with Section 49 of the Planning Act 2008 (UK Government, 2008). Details of the full responses to the feedback received during the Statutory Consultation is included within the **Application Document 5.1 Consultation Report**.
- 6.4.8 Following the feedback received at statutory consultation as well as further technical work, a number of changes were introduced to the Proposed Project.

6.5 Targeted Consultation

- 6.5.1 A targeted consultation exercise took place from Monday 8 July to Sunday 11 August 2024 targeted at those who were likely to be affected by the changes to the Proposed Project.
- 6.5.2 Changes consulted on during the targeted consultation included:
- Permanent infrastructure: proposed changes to the permanent infrastructure planned as part of the Proposed Project, including the cable routes and converter station/substation(s).
 - Construction and maintenance work: proposed changes to how the Proposed Project would be built and maintained during the construction and operational phases.
 - Mitigation, enhancements and approach to biodiversity net gain: proposed changes to mitigation for the Proposed Project on the environment and deliver enhancements to the local environment.
 - Strategy for coordination: proposed changes to how construction and operation of the Proposed Project may be coordinated with other projects planned in Suffolk.
 - Order Limits: proposed refinements, including reductions and increases to the size of the Order Limits.
 - Working Hours: the proposed core working hours set out at statutory consultation did not include Sundays or bank holidays. However, to accommodate contractor requirements, and to give the flexibility to deliver the construction programme on time, a need was identified to include 7am to 5pm on Sundays and bank holidays within the core working hours.
- 6.5.3 Further details on how National Grid responded to the feedback from the targeted consultation are provided within the **Application Document 5.1 Consultation Report**.

6.6 Pre-submission engagement

- 6.6.1 Following targeted consultation, between 22 November 2024 to 12 January 2025, National Grid has considered the feedback received and made a series of further minor amendments to the Proposed Project where there are demonstrable benefits for affected landowners and sensitive receptors.
- 6.6.2 A small number of stakeholders were contacted and circa 100 newly affected landowners who may be directly impacted by design changes have been consulted. In-person consultation events with National Grid's land agents were offered to landowners during all engagement, with relevant materials also being published on the Proposed Project website otherwise.
- 6.6.3 Key topics of the pre-submission engagement include re-location and changes to construction and maintenance compounds, and adjustments to access routes and underground cable alignments. Moreover, none of the changes are expected to change the conclusions of chapters of the Environmental Statement (see **Application Documents 6.2.1.1 – 6.2.3.13**), used to inform this EqlA.

6.7 Ongoing engagement and EqlA Thematic Meetings

- 6.7.1 National Grid has undertaken ongoing stakeholder engagement throughout the evolution of the Proposed Project. This has included:
- Regular liaison with the relevant Local Authorities and the Marine Management Organisation (MMO), including strategic and topic specific meetings. The relevant local authorities have also been consulted on the draft Statement of Community Consultation (SoCC);
 - Meeting with statutory stakeholders such as the Environment Agency, Historic England and Natural England, and non-statutory stakeholders such as the RSPB and Port and Harbour Authorities, to update them on the Proposed Project, discuss technical issues and respond to questions.
- 6.7.2 In June 2024, two thematic meetings were held with consultees from Kent (Kent County Council, Dover District Council, and Thanet District Council) and Suffolk (Suffolk County Council and East Suffolk District Council) respectively to inform them about the Equality Impact Assessment, its purpose, the approach taken, and potential impacts that could be identified. The meetings presented an opportunity for the Council representatives to gain an insight into the EqlA and ask questions regarding its development.
- 6.7.3 Thematic meetings have also been held to support the development of the Socio-economics, Recreation and Tourism, and Health and Wellbeing chapters of the Environmental Statement. The findings from these assessments have informed the EqlA.

6.8 Consultation feedback

- 6.8.1 **Application Document 5.1 Consultation Report** presents an analysis of the inclusion and diversity data collected from the feedback forms used during the consultation.
- 6.8.2 A review of the comments received was undertaken in collaboration with the Socio-economics, Recreation and Tourism and Health & Wellbeing teams, given these teams had engaged with relevant stakeholders on issues of relevance to the equality impact

assessment. No equalities specific issues deemed of great enough significance to influence the outcomes of the assessment of impacts were identified in the comments received.

7. Equality impacts

7.1 Introduction

- 7.1.1 This chapter explains how the potential effects identified in the Environmental Statement could lead to disproportionate and/or differential equality impacts on protected characteristic groups.
- 7.1.2 Equality impacts have been considered with regard to the following stages of the project:
- Consultation;
 - Construction;
 - Operation; and
 - Decommissioning.
- 7.1.3 Chapters 8 (Suffolk) and 9 (Kent) of this EqlA provide a project-specific assessment of the identified impacts. These two chapters provide evidence that details how the potential impacts caused by the Proposed Project may affect protected characteristic groups, and specific locations and receptors where these effects may arise.

7.2 Consultation

Accessible and inclusive consultation

- 7.2.1 Implementation of accessible and inclusive consultation methods can help to achieve positive equality outcomes amongst certain protected characteristic groups who may otherwise face barriers to participation.
- 7.2.2 Provision of consultation material online can benefit those who are more likely to spend more time at home such as older people, disabled people, and pregnant women. Equally, holding in-person consultation events can benefit older and disabled people who are less likely to be digitally adept. Providing consultation materials in alternative formats can also benefit protected characteristic groups, for example, material in a different language for non-English speakers, or in Braille for people with visual disabilities.
- 7.2.3 Hosting consultation events at accessible venues can benefit older people, disabled people, and others with mobility issues or who require a mobility aid such as a wheelchair. Locating these venues near to public transport connections can also benefit groups who are less likely to drive or own a car, including young people, disabled people, and pregnant women.

7.3 Construction

Temporary employment generation

- 7.3.1 Employment opportunities generated during construction could positively affect protected characteristic groups that are disproportionately affected by unemployment, such as young people and people with disabilities.

Temporary public rights of way (PRoW) changes

- 7.3.2 Changes to PRoW (notably temporary diversions and closures leading to severance and increased journey lengths and times) have the potential to differentially affect certain protected characteristic groups. Older people, disabled people, and wheelchair users may have trouble using unfamiliar or longer routes due to cognitive and/or physical limitations and barriers. Older, disabled, and young people may also be disproportionately affected as these groups are less likely to have access to a car as an alternative method of travel.
- 7.3.3 Certain groups may be disproportionately affected by PRoW changes that hinder access to services and facilities they rely on, such as older and disabled people accessing medical facilities, young people attending education centres, and religious groups visiting places of worship.

Noise, vibration, and air quality impacts

- 7.3.4 Certain protected characteristic groups may be more sensitive to changes in noise and vibration levels caused by construction activities and/or construction traffic and may experience differential effects. These groups include children, older people, people with disabilities, and pregnant women. Elevated noise and vibrations are broadly correlated with lower health-related quality of life, and can lead to hearing impairment, hypertension, ischemic heart disease, annoyance, and sleep disturbance.
- 7.3.5 Those more likely to spend significant time at home, including older people, disabled individuals, and pregnant women or those with young children, may face prolonged exposure if they live near the source of the noise and vibrations.
- 7.3.6 Increased dust and/or vehicle emissions caused by construction activities can have differential health impacts on older people, disabled people, and children as these groups are more likely to have heightened physiological sensitivities including pre-existing respiratory conditions.
- 7.3.7 Where services and facilities are in proximity to construction-borne noise, vibrations, or air quality changes, certain protected characteristic groups may be disproportionately impacted. For example, children and young people attending school, older people using medical facilities, and religious groups visiting places of worship.

Traffic impacts

- 7.3.8 Increased construction traffic, particularly Heavy Goods Vehicles (HGVs), can diminish non-motorised user amenity by creating barriers to safe and accessible pedestrian routes. This disruption can lead to feelings of fear and intimidation among vulnerable road users, including disabled people, older people, children, and pregnant women, who may feel unsafe navigating areas with heavy vehicle movement. Construction traffic

poses a particular risk to some groups of disabled people, including visually impaired, deaf people, people who are hard of hearing, and people with mental disabilities.

- 7.3.9 Construction traffic can also cause severance for communities, leading to barriers between certain protected characteristic groups and services and facilities; for example, children and young people attending school, older people using medical facilities, and religious groups visiting places of worship.

Visual amenity impacts

- 7.3.10 Changes to visual amenity from community areas (people living and moving around an area) and recreational receptors, relating to construction activity and loss of vegetation, has the potential to differentially affect some protected characteristic groups. Such changes may affect those with neurodivergent conditions such as autism that affect a person's ability to interact and experience their surrounding environment.

7.4 Operation and decommissioning

- 7.4.1 The same types of impact identified in the construction phase have the potential to occur during operation and decommissioning. While the nature of the impact would be consistent irrespective of project stage, it is considered reasonable to assume based on the findings of the Environmental Statement that the severity of any effects on protected characteristic groups would be the same as, or not greater than, that experienced during construction.

8. Suffolk assessment of impacts

8.1 Introduction

- 8.1.1 The assessment considers the potential equality impacts on affected people sharing protected characteristics arising from the Suffolk Onshore Scheme, and where applicable, proposed mitigation measures. It considers disproportionate and differential positive and negative impacts on protected characteristic groups during consultation, construction, operation, and decommissioning phases.
- 8.1.2 Please see Table 8.1 at the end of this chapter for an overview of the identified impacts, the affected protected characteristic groups, and identified mitigation measures.
- 8.1.3 As detailed in Chapter 2, this EqlA is qualitative in nature as it is often not possible to quantify equality impacts. Unlike the technical chapters in Part 2 of the Environmental Statement, this EqlA does not assign significance, magnitude, or sensitivity to impacts. Consequently, there may be instances where potential equality impacts are identified despite the corresponding chapter(s) of the Environmental Statement assessing an effect to not be significant. Moreover, there may also be instances where reference to significant effects identified in other chapters of the Environmental Statement are used as evidence to support potential equality impacts.
- 8.1.4 Given the qualitative nature of EqlAs, this assessment does not provide an exhaustive review of all potential impacts. There remains a possibility that some individuals with protected characteristics could be affected by activities associated with the Suffolk Onshore Scheme in ways that are not foreseeable at the time of writing.
- 8.1.5 A professional judgement has been made as to the potential impacts on protected characteristic groups using the documents prepared as part of the application for development consent, wider evidence such as the legislation and policy review, the equalities baseline, and consultation information and responses. In particular, the assessment draws upon evidence from the following sources:
- **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport, Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality, Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration, Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism, Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing; Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects;**
 - **Application Document 5.1 Consultation Report;**
 - **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk;**
 - **Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan;**
 - **Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan;**
 - **Application Document 7.5.6.1 Outline Air Quality Management Plan – Suffolk;**

- **Application Document 7.5.8.1 Outline Construction Noise and Vibration Management Plan – Suffolk;** and
- **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk.**

8.1.6 In considering the impact of potential cumulative effects, the assessment of ‘total cumulative effects’ of developments taken through to Stage 4 assessment in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects** have been used to inform the impacts identified in this EqIA.

8.2 Consultation

Positive: Accessible and inclusive community consultation

- 8.2.1 Throughout the pre-application consultation process, National Grid has undertaken a wide range of engagement and consultation activities with relevant parties including local authorities, statutory consultees, members of the public and landowners detailed in **Application Document 5.1 Consultation Report**. Best practice guidelines for those implementing policies, strategies, programmes, and schemes recommends that they ensure accessibility of consultation documents, information, and events to ensure they are inclusive, meaningful and consider the needs of users (United Nations, 2021).
- 8.2.2 National Grid’s pre-application consultation process has given all equality groups the opportunity to be engaged by implementing accessible and inclusive engagement methods.
- 8.2.3 As outlined and defined in Chapter 6 of this document, and in **Application Document 5.1 Consultation Report**, National Grid made significant efforts to consult with seldom heard groups during statutory consultation. Although no feedback was received, the efforts made to engage with seldom-heard groups demonstrate National Grid’s commitment to advancing equality of opportunity and set a good-practice standard for future consultation exercises supporting development consent applications.
- 8.2.4 Within consultation documentation, National Grid also included the offering to provide any consultation materials in alternative formats, such as in a different language for non-English speakers, as well as in large print, Braille, or audio tape for people who require or prefer to use these formats.
- 8.2.5 During the pre-application consultation process National Grid has also sought to maximise the accessibility of consultation materials and events to enable people to participate if they are keen. The positive impact of these efforts is that they may have facilitated wider participation amongst some protected characteristic groups who are more likely to experience barriers with regards to taking part in public consultations. For example, by providing consultation material online, elderly people, disabled individuals, those with mobility issues, or people who spend a significant amount of time at home or feel less confident in public spaces, were able to participate in the consultation activities through the website and provide feedback online.
- 8.2.6 At the same time, recognising that some older and disabled people may not be digitally adept or lack internet access, National Grid provided information via post, and people had the opportunity to attend in-person events and submit feedback through written methods.

- 8.2.7 Furthermore, as highlighted in **Application Document 5.1 Consultation Report**, National Grid selected venues for the public information events at accessible locations in proximity to the Proposed Project and with good transport access including for those who prefer not to drive, or who are less likely to own a car. Older people, young people, and disabled people are more likely to rely on public transport, in particular buses, compared to the rest of the population and therefore may have benefited from the location of the consultation events being near to public transport routes.
- 8.2.8 These efforts highlight National Grid's commitment to meeting the requirements of the PSED, in particular promoting equal opportunities and fostering good relations between groups.

8.3 Construction

- 8.3.1 The assessment of construction-related equality impacts is informed by effects assessed in relevant technical chapters of the Environmental Statement, which consider embedded mitigation and control and management measures. The conclusion of each equality impact takes into account these effects as well as any additional mitigation measures.

Positive: Temporary employment generation

- 8.3.2 During construction there is potential for positive equality impacts associated with temporary employment generation required to construct the Suffolk Onshore Scheme. **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** predicts that, accounting for leakage, displacement and the multiplier effect, during the construction period the Suffolk Onshore Scheme would support an average of 65 total net jobs per annum. It is expected that of these 65 jobs, 20 jobs per annum would be taken up by residents within a 60-minute drive time from the Order Limits (i.e. 'local' jobs).
- 8.3.3 The 20 local jobs and 45 non-local jobs could potentially benefit residents who are disproportionately affected by unemployment, such as young people and people with disabilities.
- 8.3.4 However, it cannot be guaranteed that the local employment opportunities would be targeted at specific groups, and the realisation of these benefits may be limited by the specialised nature of the roles required. Without measures to target specific groups it would be challenging to ensure that these opportunities are accessible to those who could benefit the most. As a result, the positive equality impacts, while possible, are not guaranteed and may require additional measures to be fully realised.
- 8.3.5 In relation to inter-project cumulative effects on employment generation during construction, **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects** assesses that there is potential for significant beneficial effects on employment within the economic study area due to coincidence of the Proposed project and other relevant developments. Whilst not guaranteeing positive equality impacts resulting from employment generation, this cumulative effect could enhance opportunities for protected characteristic groups to find employment.

Negative: Temporary public rights of way (PRoW) changes during construction

- 8.3.6 During construction there is potential for negative equality impacts associated with temporary changes, such as closures and diversions to PRoWs that are within the Suffolk Onshore Scheme Order Limits. The potential impacts assessed in this EqIA are informed by the effects detailed in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism**, such as journey lengths and times, local travel patterns, and severance, and **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** which also covers severance, as well as pedestrian delay.
- 8.3.7 **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** highlights that there are 21 PRoWs within the Suffolk Onshore Scheme Order Limits that would be affected to some extent during the construction phase.
- 8.3.8 Diversions or closures to PRoWs have the potential to have a greater impact on users who are older, disabled, or who require a mobility aid such as a wheelchair. Research highlights that these groups are more likely to rely on consistent and familiar routes due to cognitive or physical limitations, and any changes to these routes can lead to confusion, reduced mobility, and a reluctance to travel independently (Wiener, 2021). Whilst the usage of the affected PRoWs by protected characteristic groups is unknown, there is potential for negative equality impacts to arise in relation to specific changes that would occur during construction of the Suffolk Onshore Scheme.
- 8.3.9 PRoW Footpath 491/005/0 would be changed throughout construction of the Suffolk Onshore Scheme. As detailed in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** PRoW Footpath 491/005/0 passes through the Saxmundham Converter Station site. As a result, the PRoW is required to be diverted which would add approximately 100m to the route length. **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** also assesses the impact on PRoW Footpath 491/005/0 to be significant in terms of severance and pedestrian delay.
- 8.3.10 PRoW Footpath 491/005/0 is understood as a route used for recreation and that connects to the local PRoW network. Whilst the details of frequent users of the PRoW cannot be confirmed, there is potential for negative equality impacts for individuals sharing protected characteristics such as older and disabled people with mobility issues or cognitive impairments. The significant length of the proposed diversion could pose a differential challenge for these groups and affect their perceived, or actual, ability to use the PRoW. However, these potential impacts are unlikely to have a substantial effect as the PRoW runs through a primarily agricultural area and is not used for access to key services or amenities.
- 8.3.11 The residual (i.e. after embedded and additional mitigation measures) construction effects of the diversion to PRoW Footpath 491/005/0 are assessed to be moderate adverse (significant) in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** and of large magnitude but minor significance in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport**. In relation to inter-project cumulative effects on PRoW Footpath 491/005/0, **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects** assesses that the effect of the diversion is unlikely to be significant.

- 8.3.12 In conclusion, the potential equality impacts arising from diversion to PRow Footpath 491/005/0 are not considered to be substantial and likely to only occur on an infrequent individual basis.

Negative: Noise, vibration, and air quality impacts during construction

- 8.3.13 During construction there is potential for negative equality impacts associated with increased noise and vibration, and changes to air quality. The potential impacts assessed in this EqlA are informed by the noise and vibration effects of construction on people in buildings, and of construction traffic noise, which are detailed in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration**. In relation to air quality, the impacts in this EqlA are considered in relation to the effects of construction dust emissions, construction vehicle emissions, and Non-Road Mobile Machinery (NRMM) emissions, which are detailed in **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality**.
- 8.3.14 Any increased levels of noise and vibration, or increased emissions resulting in changes to air quality, could have negative differential impacts on some protected characteristic groups. Disabled people for example, especially those with mental health impairments and neurological disorders, are more likely to have heightened sensitivity to noise and vibrations that means even minor increases can have a negative impact resulting in increased stress, anxiety, or discomfort. Decreases in air quality resulting from emissions can also differentially impact disabled people with physiological vulnerabilities such as weakened immune systems, with this potential impact also being true for older people and young children.
- 8.3.15 **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** assesses that there are potential significant adverse effects caused by construction noise at twenty-nine Noise Sensitive Receptors (NSRs) during daytime works in the week and at weekends, and four NSRs during potential night-time works. One of the NSRs that would be affected during the weekday and at weekends is identified as being a community facility (a Church) which is highly sensitive. The rest of the NSRs are residential receptors. Construction noise could have a disproportionate negative impact on local residents who attend the Church, as well as a differential impact, particularly on older attendees who may be more sensitive to increased noise. The Suffolk Study Area, defined in Chapter 4, has a large proportion of residents aged over 65 and notably people aged over 50 comprise the largest proportion of church attendees in the UK (ONS, 2023).
- 8.3.16 **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** also highlights that there would be construction vibration impacts at six NSRs, three of which are residential properties that would also be impacted by construction noise. Whilst details of the specific individuals living at these residential properties is unknown, there is potential for any residents with protected characteristics at these properties to experience negative differential equality impacts. For example, pregnant women, or those with babies and young children residing at these properties, could experience differential impacts due to having a heightened sensitivity to loud noise and vibrations and also because they have a tendency to spend more time at home.
- 8.3.17 **Application Document 6.3.2.9.C ES Appendix 2.9.C Suffolk Construction Traffic Noise Assessment** assesses that there would not be any significant adverse noise effects caused by construction traffic, however, equality impacts could still arise. Descriptions of the road links used to inform the assessment are reviewed in detail in

Application Document 6.3.2.7.J ES Appendix 2.7.J Traffic and Transport

Assessments, with instances of potentially sensitive receptors, including residential properties and places of worship, fronting onto various road links that would be used by construction traffic. Whilst details of specific individuals living at or using these receptors is unknown, there is potential that any people who are older or experience a disability to be differentially impacted, as well as pregnant women and those with babies or young children as these groups are more likely to spend more time at home and have existing vulnerabilities.

- 8.3.18 In relation to construction dust, **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality** identifies high sensitivity residential receptors in Saxmundham, Aldeburgh, Friston and Benhall. Although the potential for human health risk resulting from construction dust is assessed as low, equality impacts could still arise. Whilst the characteristics of residents at specific properties is unknown, there is potential for construction dust to have occasional differential impacts on residents if they are older or disabled due to these protected characteristic groups having heightened physiological sensitivities. If there are pregnant women at these properties, or people with babies and young children, they may also experience differential impacts due to having heightened sensitivity and because these groups are likely to spend more time at home.
- 8.3.19 The impact of construction vehicle emissions is also presented in **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality** in relation to the same road links contained in **Application Document 6.3.2.7.J ES Appendix 2.7.J Traffic and Transport Assessments**. The air quality assessment of construction vehicle emissions determines that the effects are not significant, however, equality impacts could still arise. **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality** identifies six 'worst case' residential receptors within 200 m of construction vehicle routes. Whilst the details of specific residents living at properties is not known, if there are residents who are older, experience a disability, are pregnant, or caring for babies and young children, then differential negative impacts may arise as these groups are more likely to have heightened physiological sensitivity to emissions and spend more time at home.
- 8.3.20 **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** contains additional and site-specific mitigation measures intended to mitigate or offset the significant effects identified in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration**. In relation to construction noise, National Grid has committed to employ Best Practice Measure (NV01) to reduce the identified adverse effect of construction noise. This means that construction works would be undertaken within the agreed working hours set out within the DCO. Best practicable means to reduce construction noise are set out within the **Application Document 7.5.3 Outline Onshore Construction Environment Management Plan**. Additional temporary noise mitigation measures such as screening would also be introduced at specific locations highlighted in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration**. As **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality** does not identify any significant adverse effects, no additional mitigation measures are required.
- 8.3.21 The residual (i.e. after embedded and additional mitigation measures) construction effects of noise and vibration are assessed to be of minor significance in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration**, and not significant in **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality**. In relation to inter-project cumulative effects on air quality at receptors shared with other projects, **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme**

Inter-Project Cumulative Effects assesses that the effect will be negligible and not significant.

- 8.3.22 In conclusion, the potential equality impacts are not considered to be substantial but could arise on an individual basis at the sensitive residential and community receptors identified.

Negative: Construction-related traffic impacts

- 8.3.23 During construction there is potential for negative equality impacts associated with increased construction traffic movements on the local road network. The potential impacts assessed in this EqlA are informed by the effects detailed in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport**; namely severance, pedestrian delay, non-motorised user amenity, and fear and intimidation.
- 8.3.24 **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** highlights that there would be a daily peak of 319 vehicles (638 movements) associated with the Proposed Project, in terms of Heavy Goods Vehicle (HGV) movements, there would be a daily peak of 173 HGVs (346 movements). HGVs are considered the most influential construction vehicles in terms of negative equality impacts due to their potential to contribute to severance, pedestrian delay, non-motorised user amenity, and fear and intimidation.
- 8.3.25 **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** identifies several locations that are assessed to be impacted significantly by severance and pedestrian delay. These include road link S-RL10 (A1094 between A12 and B1069 Snape Road) which would be used by HGVs and is directly bordered through the village of Snape by St John the Baptist Church and Snape Community Primary School. Certain protected characteristic groups are more likely to be primary users of the Church ((older Christian residents (ONS, 2023)) and Primary School (children) and therefore could be impacted disproportionately by severance and pedestrian delay.
- 8.3.26 **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** defines severance as the perceived division within a community caused by traffic. Due to the subjective nature of this effect, it could also differentially impact older people as they are more likely to have pre-existing vulnerabilities such as mental health issues or reduced confidence when outside due to mobility challenges. Whilst it cannot be assumed that all older people would have these vulnerabilities or be users of affected facilities such as the Church, there remains a potential for a differential impact in instances where these factors are present.
- 8.3.27 **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** does not assess any significant impacts in relation to non-motorised user amenity, or fear and intimidation, so equality impacts are unlikely, however, could arise on an individual basis similarly to severance.
- 8.3.28 **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** contains additional and site-specific mitigation measures intended to mitigate or offset the significant effects identified in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport**.
- 8.3.29 Despite the additional mitigation, potential construction-related traffic impacts may be worsened by the planned core construction working hours, with the Proposed Project intending to have construction works on Sundays/Bank Holidays (7am-5pm) when required. **Application Document 7.5.1.1 Outline Construction Traffic Management**

and Travel Plan - Suffolk states that as mitigation HGV arrivals would be limited to 30 per day on Sundays and public holidays, however this would not eliminate the presence of HGV traffic and therefore negative equality impacts may still arise.

- 8.3.30 The residual (i.e. after embedded and additional mitigation measures) construction-related traffic effects are assessed as minor (in relation to severance, pedestrian and driver delay on S-RL10) or otherwise negligible in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport**. In relation to inter-project cumulative effects on S-RL10, **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects** assesses that the effect of severance and pedestrian delay, and driver delay, are unlikely to be significant.
- 8.3.31 In conclusion, while potential equality impacts are not considered substantial overall, they could still occur on an individual basis, particularly at sensitive community and educational facilities identified. Additionally, the likelihood of such impacts would increase when construction works take place on Sundays and public holidays.

Negative: Visual amenity impacts during construction

- 8.3.32 During construction there is potential for negative equality impacts associated with changes to views (i.e., visual amenity). The potential impacts assessed in this EqIA are informed by the effects detailed in **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual**, namely changed views for residential receptors. Effects on changed views for recreational receptors haven't been assessed here because the usage of these receptors by protected characteristic groups who may be differentially impacted is likely to be on an infrequent, individual basis.
- 8.3.33 **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** highlights that there are 12 (out of 23) representative viewpoints that include residential receptors (excluding those residential receptors whose views are screened to some extent by vegetation). Of these 12 representative viewpoints, four (representative viewpoints 1, 3, 4, 5) are assessed in **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** to experience moderate or major (significant) adverse effects arising from construction of the Suffolk Onshore Scheme.
- 8.3.34 Although the specific protected characteristics of residents at these four affected properties are not known, there is potential for negative equality impacts to occur, particularly for protected characteristic groups that may be more sensitive to changes in the familiar views they regularly experience. For example, disabled and neurodivergent individuals, such as those with autism, may rely on consistent visual environments to feel safe and secure. Sudden changes to familiar landscapes or the introduction of new visual stimuli can increase stress and anxiety levels, potentially affecting their mental health and overall well-being (Greven, 2019).
- 8.3.35 **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** outlines that, because landscaping proposals have responded to the design of the Proposed Project throughout its development, the embedded mitigation within the design has addressed visual effects wherever possible. As a result, the residual visual effects on the four residential receptors remain significant. In conclusion,
- 8.3.36 In conclusion, whilst the characteristics of individual residents cannot be confirmed, there is potential that negative equality impacts may arise on the individuals living at the residential receptors which comprise representative viewpoints 1, 3, 4, and 5, which are assessed to be significantly impacted in **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual**.

8.4 Operation

Neutral: Permanent employment generation during operation

- 8.4.1 **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** states that operational employment has been scoped out of assessment on the basis that the scale of employment would be very limited. Positive or negative equality impacts are therefore not expected.

Negative: Permanent public rights of way changes during operation

- 8.4.2 While PRoW diversions during operation have the potential to cause negative equality impacts, they are considered unlikely. **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10: Socio-economics, Recreation, and Tourism** notes that the diversion of PRoW 491/005/0 will be permanent. As a result, older individuals, disabled people, and wheelchair users may face similar challenges as those experienced during construction. However, since this PRoW passes through agricultural land with low footfall, any resulting equality impacts are expected to be minimal.

Neutral: Noise, vibration, and air quality impacts during operation

- 8.4.3 During operation there is potential for negative equality impacts associated with operational and maintenance activities. However, these potential impacts are considered unlikely and would only affect individuals with protected characteristics on an incidental basis if they happened to be in the proximity of specific noise, vibration, dust or emission generating activities.
- 8.4.4 As outlined in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration**, the effects of operational noise and vibration from the proposed Saxmundham Converter Station are assessed to be negligible and not significant. With embedded mitigation measures, the potential equality impacts on nearby NSRs are considered unlikely.
- 8.4.5 **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality** highlights that during the operational and maintenance phases the Proposed Project would be manned by a limited number of operatives across the site, with additional infrequent trips associated with maintenance/inspections or repairs when required. Vehicle emissions would therefore be negligible, and equality impacts unlikely. There are no human receptors within 200 m of the Saxmundham Converter Station or Friston Substation, as such, potential equality impacts relating to diesel-powered back-up generator emissions are not expected occur.

Neutral: Operational-related traffic impacts

- 8.4.6 As detailed in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport**, there are anticipated to be two operatives across the Kent Onshore Scheme during operation resulting in up to four daily car/LGV trips (HGVs would only access the site on the rare occasion that equipment needs replacing). There are not expected to be any operational related traffic equality impacts.

Negative: Visual amenity impacts during operation

- 8.4.7 As detailed in **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual**, the same four representative viewpoints (1, 3, 4, 5) which comprise residential receptors, would also be significantly impacted during operation and maintenance. Any potential equality impact would be similar to that experienced during construction.

8.5 Decommissioning

Positive: Temporary employment generation

- 8.5.1 As **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** outlines, in the event that the Suffolk Onshore Scheme is decommissioned, the workforce required for decommissioning of the assets would be lower than the number required during construction. An estimated peak of 210 people would be required to decommission the Suffolk Onshore Scheme across 2 years, compared to 5 years for construction. However, exact timing of the decommissioning is unknown.
- 8.5.2 No further differentiation between the construction and decommissioning phase that would lead to additional impacts on equality groups is identified. There would be similar methods, equipment, construction compounds and working hours to that used during construction for decommissioning. It is therefore considered reasonable to assume that the impacts of the decommissioning phase would be the same as, or not greater than, the construction phase.

Negative: Temporary public rights of way changes and access to services

- 8.5.3 As **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** and **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** outline, the effects and conclusions on the potential equality impact of PRoW changes during construction are applicable to the decommissioning phase.

Negative: Noise, vibration, and air quality impacts during decommissioning

- 8.5.4 As **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration** and **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality** outline, the potential equality impacts during decommissioning are expected to be less than those experienced during construction. Noise, vibration, dust, and emissions are predicted to have negligible or minor effects due to reduced activity levels and the implementation of mitigation measures.

Negative: Decommissioning-related traffic impacts

- 8.5.5 **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport** identifies that in the event that the Proposed Project is decommissioned, there are expected to be fewer HGV, LGV and worker arrivals and departures associated with the

decommissioning phase of the Suffolk Onshore Scheme than during the construction phase.

- 8.5.6 It is therefore considered reasonable to assume that the impacts of the decommissioning phase would be the same as, or not greater than, the construction phase.

Negative: Visual amenity impacts during decommissioning

- 8.5.7 **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual** highlights that the effects at decommissioning would be no greater than the effects identified at construction.

- 8.5.8 It is therefore considered reasonable to assume that the impacts of the decommissioning phase would be the same as, or no greater than, the construction phase.

8.6 Summary of impacts – Suffolk

- 8.6.1 Table 8.1 provides a summary of the potential consultation, construction, operation and decommissioning equality impacts of the Suffolk Onshore Scheme. This provides an assessment of potential disproportionate and differential impacts on groups with protected characteristics. As defined in Chapter 2 of this EqIA:

- Disproportionate: there may be a disproportionate equality impact where people with a particular protected characteristic make up a significantly greater proportion of those affected than in the wider (regional and national) population.
- Differential: there may be a differential equality impact where people with a protected characteristic are affected differently compared to the general population as a result of existing vulnerabilities or restrictions they face because of that protected characteristic.

- 8.6.2 Table 8.1 also provides a brief overview of the additional mitigation measures in respect to potential negative impacts and may be used to monitor equality impacts as the Proposed Project progresses.

Table 8.1 Summary of the potential impacts of the Suffolk Onshore Scheme

Impact		Disproportionately/ Differentially Affected Protected Characteristic Groups											Mitigation measures	
		Age			Sex	Ethnicity	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage and civil partnership		Overview of Potential Effects
		Children	Young People	Older People										
Consultation														
Positive	Accessible and inclusive community consultation			✓		✓		✓					National Grid's pre-application consultation has promoted positive equality outcomes by using inclusive, accessible engagement methods, targeting seldom-heard groups, and providing multiple information and feedback channels. This potentially facilitated participation for protected characteristic groups that otherwise may have faced barriers, for example people with disabilities.	N/A

Impact		Disproportionately/ Differentially Affected Protected Characteristic Groups											Mitigation measures	
		Age			Sex	Ethnicity	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage and civil partnership		Overview of Potential Effects
		Children	Young People	Older People										
													the elderly, and those with mobility issues.	
Construction														
Positive	Temporary employment generation		✓					✓					The construction of the Suffolk Onshore Scheme could create positive equality impacts by generating local job opportunities, particularly benefiting young people and those with disabilities.	N/A

Impact		Disproportionately/ Differentially Affected Protected Characteristic Groups											Mitigation measures	
		Age			Sex	Ethnicity	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage and civil partnership		Overview of Potential Effects
		Children	Young People	Older People										
Negative	Temporary public rights of way changes during construction			✓				✓					The construction of the Suffolk Onshore Scheme may cause negative equality impacts due to diversions and closures of PRowS. Older individuals, people with disabilities, and wheelchair users may face challenges navigating unfamiliar or extended routes due to physical or cognitive barriers.	Impact of the diversion to PRow Footpath 491/005/0 has been minimised as far as possible by reducing the diversion length.

Impact		Disproportionately/ Differentially Affected Protected Characteristic Groups											Mitigation measures	
		Age			Sex	Ethnicity	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage and civil partnership		Overview of Potential Effects
		Children	Young People	Older People										
	Noise, vibration, and air quality impacts during construction	✓		✓			✓	✓			✓		Construction of the Suffolk Onshore Scheme may cause negative equality impacts due to increased noise, vibration, and air quality changes, potentially having differential effects on disabled individuals, older people, pregnant women, and young children. There is also a church in proximity to the construction works which could experience adverse noise and vibration impacts.	National Grid has committed to employ Best Practice Measure (NV01) to reduce the adverse effects of construction noise. Additional temporary noise mitigation measures such as screening would also be introduced at specific locations.

Impact		Disproportionately/ Differentially Affected Protected Characteristic Groups											Mitigation measures	
		Age			Sex	Ethnicity	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage and civil partnership		Overview of Potential Effects
		Children	Young People	Older People										
	Construction-related traffic impacts	✓		✓			✓	✓					During construction, increased traffic could cause negative equality impacts, particularly for older individuals, children, and people with disabilities, due to severance, pedestrian delays, and fear and intimidation. Key locations like St John the Baptist Church and Snape Community Primary School may be disproportionately affected.	Sensitive routing and siting of infrastructure has been adopted to reducing traffic and transport impacts. On Sundays and public holidays, HGV arrivals would be limited to 30 per day.
Operation														

Impact		Disproportionately/ Differentially Affected Protected Characteristic Groups											Mitigation measures		
		Age			Sex	Ethnicity	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage and civil partnership		Overview of Potential Effects	
		Children	Young People	Older People											
Negative	Permanent public rights of way changes during operation			✓				✓						Permanent diversions to PRoWs during operation of the Suffolk Onshore Scheme could pose a differential impact for protected characteristic groups such as older people with mobility issues as the extended distance may be unmanageable.	The permanent diversion to PRoW 491/005/0 would be minimised as far as practicable to reduce the diversion distance and re-connect it with the original alignment.
Decommissioning															
Positive	Temporary employment generation		✓					✓						Nature of the potential impact is consistent with the construction phase.	N/A

Impact		Disproportionately/ Differentially Affected Protected Characteristic Groups											Mitigation measures	
		Age			Sex	Ethnicity	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage and civil partnership		Overview of Potential Effects
		Children	Young People	Older People										
Negative	Temporary public rights of way changes and access to services			✓				✓					Nature of the potential impact is consistent with the construction phase.	Specific mitigation measures for affected PRoWs during decommissioning are not yet known due to the timeframe of when impacts are likely to arise.
	Noise, vibration, and air quality impacts during decommissioning	✓		✓				✓					Nature of the potential impact is consistent with the construction phase.	Specific mitigation measures for affected receptors during decommissioning are not yet known due to the timeframe of when impacts are likely to arise.

Impact		Disproportionately/ Differentially Affected Protected Characteristic Groups											Mitigation measures		
		Age			Sex	Ethnicity	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage and civil partnership		Overview of Potential Effects	
		Children	Young People	Older People											
	Decommissioning-related traffic impacts	✓		✓				✓						Nature of the potential impact is consistent with the construction phase.	Specific mitigation measures for affected receptors during decommissioning are not yet known due to the timeframe of when impacts are likely to arise.

9. Kent assessment of impacts

9.1 Introduction

- 9.1.1 The assessment considers the potential equality impacts on affected people sharing protected characteristics arising from the Kent Onshore Scheme, and where applicable, proposed mitigation measures and actions to enhance positive impacts. It considers disproportionate and differential positive and negative impacts on protected characteristic groups during consultation, construction, operation, and decommissioning phases.
- 9.1.2 Please see Table 9.1 at the end of this Chapter for an overview of the identified impacts, the affected protected characteristic groups, and relevant mitigation measures.
- 9.1.3 As detailed in Chapter 2, this EqlA is qualitative in nature as it is often not possible to quantify equality impacts. Unlike the technical chapters in Part 3 of the Environmental Statement, this EqlA does not assign significance, magnitude, or sensitivity to impacts. Consequently, there may be instances where potential equality impacts are identified despite the relevant chapter(s) of the Environmental Statement assessing an effect to not be significant. Moreover, there may also be instances where reference to significant effects identified in other chapters of the Environmental Statement are used as evidence to support potential equality impacts.
- 9.1.4 Given the qualitative nature of EqlAs, this assessment does not provide an exhaustive review of all potential impacts. There remains a possibility that some individuals with protected characteristics could be affected by activities associated with the Kent Onshore Scheme in ways that are not foreseeable at the time of writing.
- 9.1.5 A judgement has been made as to the potential impacts on protected characteristic groups using the documents prepared as part of the application for development consent, wider evidence such as the legislation and policy review, the equalities baseline, and consultation information and responses. In particular, the assessment draws upon evidence from the following sources:
- **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport; Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality; Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration; Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism; Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing; and Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects;**
 - **Application Document 5.1 Consultation Report;**
 - **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent;**
 - **Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan;**
 - **Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan;**

- **Application Document 7.5.6.2 Outline Air Quality Management Plan – Kent**
- **Application Document 7.5.8.2 Outline Construction Noise and Vibration Management Plan – Kent; and**
- **Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent.**

9.1.6 In considering the impact of potential cumulative effects, the assessment of ‘total cumulative effects’ of developments taken through to Stage 4 assessment in **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects** have been used to inform the impacts identified in this EqIA.

9.2 Consultation

Positive: Accessible and inclusive community consultation

9.2.1 The consultation undertaken in Kent, in terms of methods of information dissemination, options for providing feedback, and efforts to engage with seldom heard groups, are consistent with those undertaken in Suffolk. Therefore, the associated impacts between the two geographies are also assessed to be consistent and are outlined in detail under Section 8.2 of this EqIA.

9.3 Construction

9.3.1 The assessment of construction-related equality impacts is informed by effects assessed in relevant technical chapters of the Environmental Statement which consider embedded mitigation and control and management measures. The conclusion of each equality impact takes into account these effects and any additional mitigation measures.

Positive: Temporary employment generation during construction

9.3.2 During construction there is potential for positive equality impacts associated with temporary employment generation required to construct the Kent Onshore Scheme. **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism** predicts that, accounting for leakage, displacement and the multiplier effect, during the construction period the Kent Onshore Scheme would support an average of 50 total net jobs per annum. It is expected that of these 50 jobs, 15 jobs per annum would be taken up by residents within a 60-minute drive time from the Order Limits.

9.3.3 Whilst it cannot be guaranteed that the local employment opportunities would be targeted at specific groups, given the high levels of employment deprivation in Thanet District the 15 local jobs could potentially benefit residents who are disproportionately affected by unemployment, such as young people and people with disabilities.

9.3.4 In conclusion, while the construction of the Kent Onshore Scheme presents the potential for positive equality impacts through job creation, the realisation of these benefits may be limited by the specialised nature of the roles required. The 15 local jobs expected to be filled within a 60-minute drive of the site could benefit individuals with protected characteristics in an area where employment deprivation is prevalent. Similarly, the remaining 35 jobs may offer opportunities for protected characteristic

groups beyond the local area. However, without measures to target specific groups it would be challenging to ensure that these opportunities are accessible to those who could benefit the most. As a result, the positive equality impacts, while possible, are not guaranteed and may require additional measures to be fully realised.

- 9.3.5 In relation to inter-project cumulative effects on employment generation during construction, **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects** assesses that there are no expected significant cumulative effects.

Negative: Temporary public rights of way (PRoWs) changes during construction

- 9.3.6 During construction there is potential for negative equality impacts associated with temporary changes, such as closures and diversions, to PRoWs that are within the Kent Onshore Scheme Order Limits. The potential impacts assessed in this EqlA are informed by the effects detailed in **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism**, such as journey lengths and times, local travel patterns, and severance, and **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport** which also covers severance, as well as pedestrian delay.
- 9.3.7 **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism** highlights that there are 10 PRoWs within the Kent Onshore Scheme Order Limits that would be affected to some extent during the construction phase.
- 9.3.8 Diversions or closures to PRoWs have the potential to have a greater impact on users who are older or disabled. Research highlights that these groups are more likely to rely on consistent and familiar routes due to cognitive or physical limitations, and any changes to these routes can lead to confusion, reduced mobility, and a reluctance to travel independently (Wiener, 2021). Whilst the usage of the affected PRoWs by protected characteristic groups is unknown, there is potential for negative equality impacts to arise in relation to specific changes that would occur during construction of the Kent Onshore Scheme.
- 9.3.9 PRoW Footpath TE37 would be changed throughout construction of the Kent Onshore Scheme. As detailed in **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism**, PRoW Footpath TE37 would be diverted by approximately 60m along the northern verge of Cottington Lane. **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport** also assesses the impact on PRoW Footpath TE37 to be significant in terms of severance and pedestrian delay.
- 9.3.10 PRoW Footpath TE37 is primarily used for recreation and connects to other PRoWs in the local area. St Augustine's Golf Club is nearby, with its entrance located at the intersection of Cottington Lane and Cottington Road. While certain protected characteristic groups are more likely to be golf club members - 75% of UK club members are male, and 70% are over 50 (Dunsmuir, 2022) – it cannot be assumed that these groups are the primary users of the PRoW. Additionally, golf club members, particularly older individuals, are more likely to drive to the club due to the need to transport their equipment. The diversion to TE37 has been designed so that it is of an equivalent nature, length, and connectivity as the existing section of the route which is to be closed, as a result the overall impact is expected to be minimal.

- 9.3.11 **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** contains additional and site-specific mitigation measures intended to mitigate or offset the significant effects identified in **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport**. In relation to severance and pedestrian delay caused by the diversion to PRoW Footpath TE37, appropriate site fencing will be installed along the diverted route before it connects into the existing route.
- 9.3.12 The residual (i.e. after embedded and additional mitigation measures) construction effects of PRoW diversions, particularly in relation to PRoW TE37, are assessed to be not significant in **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism** and minor in **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport**. In relation to inter-project cumulative effects on PRoW Footpath TE37, **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects** assesses that no cumulative effects are anticipated.
- 9.3.13 In conclusion, the potential equality impacts arising from diversion to PRoW TE37 are not considered to be substantial and likely to only occur on an infrequent individual basis.

Negative: Noise, vibration, and air quality impacts during construction

- 9.3.14 During construction there is potential for negative equality impacts associated with increased noise and vibrations, and changes to air quality. The potential impacts assessed in this EqlA are informed by the noise and vibration effects of construction on people in buildings, and of construction traffic noise, which are detailed in **Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration**. In relation to air quality, the impacts in this EqlA are considered in relation to the effects of construction dust emissions, construction vehicle emissions, and Non-Road Mobile Machinery (NRMM) emissions, as detailed in **Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality**.
- 9.3.15 Any increased levels of noise and vibrations, or increased emissions resulting in changes to air quality, could have negative differential impacts on certain protected characteristic groups. Disabled people, especially those with mental health impairments and neurological disorders, are more likely to have heightened sensitivity to noise and vibrations that means even minor increases can have a negative impact resulting in increased stress, anxiety, or discomfort. Decreases in air quality resulting from emissions can also differentially impact disabled people with physiological vulnerabilities such as weakened immune systems, with this potential impact also being true for older people and young children.
- 9.3.16 **Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration** assesses that there are potential significant adverse effects caused by construction noise at five Noise Sensitive Receptors (NSRs) during daytime works in the week and at weekends. One of these NSRs, the Great Oaks Small School, is highly sensitive. According to the school website, the school caters for students who experience a range of disabilities; for example, students who exhibit behaviours or have diagnosis of Autism Spectrum Disorder (ASD), Speech, Language and Communications Needs with or without high anxieties, and students with social emotional difficulties (Great Oaks Small School, n.d.). These students may therefore experience negative differential equality impacts; research highlights that autistic children are particularly sensitive to the changes in their

environment and can experience severe discomfort caused by uncharacteristic, loud noises (Spark, 2023). **Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration** assesses that there would not be any significant adverse effects caused by construction vibrations. However, similar differential equality impacts as due to construction noise could arise due to construction vibrations, particularly at Great Oaks Small School.

- 9.3.17 **Application Document 6.3.3.9.C ES Appendix 3.9.C Kent Construction Traffic Noise Assessment** assesses that there would not be any significant adverse noise effects caused by construction traffic, however, equality impacts could still arise. Descriptions of the road links used to inform the assessment are reviewed in detail in **Application Document 6.3.3.7.J Appendix 3.7.J Traffic and Transport Assessments**. The majority of the road links are described as being located in a rural setting with no sensitive users present and no pedestrian facilities. However, road link K-RL7 is described as having nearby residential dwellings (Sandwich Road). Whilst details of specific individuals living at these residential properties is unknown, there is potential for any residents who are older or experience a disability to be differentially impacted, as well as pregnant women and those with babies or young children as these groups are more likely to spend more time at home and have existing vulnerabilities.
- 9.3.18 In relation to construction dust, **Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality** identifies high sensitivity receptors in the local area, including Great Oaks Small School and residential properties in Minster and Richborough. Similarly to the construction noise and vibration impacts, construction dust could have a differential negative equality impact on students at Great Oaks Small School who may have heightened sensitivity caused by physiological disabilities. Whilst characteristics of individual residents are unknown, if there are older people, disabled people, pregnant women or people with babies or young children living at the residences in Minster and Richborough, there is potential for occasional differential impacts due to them having heightened sensitivity, and because they are more likely to spend more time at home. Construction vehicle flows have been deemed as not sufficient to require screening of resultant emissions, according to **Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality**. However, negative equality impacts could still occur. Residential properties near road link K-RL7 (Sandwich Road) would experience a peak flow of 16 LGVs per day and 8 HGVs. Therefore, whilst the details of specific residents living at properties is not known, if there are residents who are older, experience a disability, are pregnant, or caring for babies and young children, then differential negative impacts may arise as these groups are more likely to have heightened physiological sensitivity to emissions and spend more time at home.
- 9.3.19 **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** contains additional and site-specific mitigation measures intended to mitigate or offset the significant effects identified in **Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration**. In relation to construction noise, National Grid has committed to employ Best Practice Measure (NV01) to reduce the identified adverse effect of construction noise. This means that construction works would be undertaken within the agreed working hours set out within the DCO. Best practicable means to reduce construction noise are set out within the **Application Document 7.5.3 Outline Onshore Construction Environment Management Plan**. However, without commitment to additional noise reduction measures such as screening and enclosures, it is unlikely that negative differential equality impacts would be mitigated, particularly on sensitive receptors such as Great Oaks Small School. As **Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air**

Quality does not identify any significant adverse effects, no additional mitigation measures are required.

- 9.3.20 The residual (i.e. after embedded and additional mitigation measures) construction effects of noise and vibration are assessed to be of minor significance in **Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration**, and not significant in **Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality**. In relation to inter-project cumulative effects on noise and vibrations and air quality, **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects** assesses that there is not anticipated to be any cumulative effects.
- 9.3.21 In conclusion, the potential equality impacts are not considered to be substantial but could arise on an individual basis at the sensitive residential and educational receptors identified. Students who attend Great Oaks Small School may be particularly sensitive to noise, vibration and air quality changes and, whilst mitigation measures are proposed, further actions could be considered such as noise screening and dust control measures that would actively reduce potential impacts on the school.

Negative: Construction-related traffic impacts

- 9.3.22 During construction there is potential for negative equality impacts associated with increased construction traffic movements on the local road network. The potential impacts assessed in this EqlA are informed by the effects detailed in **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport**; namely severance, pedestrian delay, non-motorised user amenity, and fear and intimidation.
- 9.3.23 **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport** identifies a daily peak of 254 vehicles (508 movements) associated with the Proposed Project, in terms of HGV movements, there would be a daily peak of 108 HGVs (216 movements) associated with the Proposed Project. HGVs are considered the most influential construction vehicles in terms of negative equality impacts due to their potential to contribute to severance, pedestrian delay, non-motorised user amenity, and fear and intimidation.
- 9.3.24 **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport** does not identify any significant adverse effects relating to severance, pedestrian delay, non-motorised user amenity, or fear and intimidation on the local road network. However, negative equality impacts could still occur on an individual basis, in particular at road links K-RL7 and K-RL8, which have nearby residential dwellings and pedestrian facilities. Whilst the details of residents are unknown, any older or disabled people living at these properties could experience differential equality impacts relating to construction traffic. These groups are likely to have lower confidence as road users (both driving and as pedestrians) and therefore could be more susceptible to the impact of HGV movements and consequent feelings of fear and intimidation or perceived severance and pedestrian delay. In relation to inter-project cumulative effects on K-RL7 and K-RL8, **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects** assesses that there is not expected to be potential for cumulative effects.
- 9.3.25 In conclusion, although impacts may occur on an individual basis, such as for vulnerable groups near road links K-RL7 and K-RL8, they are likely to be minimal in nature due to the predominantly rural nature of the local road network and low number of sensitive receptors.

Negative: Visual amenity impacts during construction

- 9.3.26 During construction there is potential for negative equality impacts associated with changes to views (i.e., visual amenity). The potential impacts assessed in this EqIA are informed by the effects detailed in **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual**, namely changed views for residential receptors. Effects on changed views for recreational receptors haven't been assessed here because the usage of these receptors by protected characteristic groups who may be differentially impacted is likely to be on an infrequent, individual basis.
- 9.3.27 **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual** highlights that there are five (out of 14) representative viewpoints that include residential receptors (excluding those residential receptors whose views are screened to some extent by vegetation). Of these five representative viewpoints, two (representative viewpoints 5 and 11) are assessed in **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual** to experience moderate or major (significant) adverse effects arising from construction of the Suffolk Onshore Scheme.
- 9.3.28 Although the specific protected characteristics of residents at these two affected properties are not known, there is potential for negative equality impacts to occur, particularly for protected characteristic groups that may be more sensitive to changes in the familiar views they regularly experience. For example, disabled and neurodivergent individuals, such as those with autism, may rely on consistent visual environments to feel safe and secure. Sudden changes to familiar landscapes or the introduction of new visual stimuli can increase stress and anxiety levels, potentially affecting their mental health and overall well-being (Greven, 2019).
- 9.3.29 **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual** outlines that, because landscaping proposals have responded to the design of the Proposed Project throughout its development, the embedded mitigation within the design has addressed visual effects wherever possible. As a result, the residual visual effects on the two residential receptors remain significant.
- 9.3.30 In conclusion, whilst the characteristics of individual residents cannot be confirmed, there is potential that negative equality impacts may arise on the individuals living at the residential receptors which comprise representative viewpoints 5 and 11, which are assessed to be significantly impacted in **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual**.

9.4 Operation

Neutral: Permanent employment generation during operation

- 9.4.1 **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism** states that operational employment has been scoped out of assessment on the basis that the scale of employment would be very limited. Positive equality impacts are therefore not expected.

Negative: Permanent public rights of way changes (PRoWs) changes during operation

- 9.4.2 During operation there is potential for negative equality impacts associated with permanent PRow diversions, however, these are considered to be unlikely. **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism** highlights that there may be one permanent PRow diversion during the operational phase; approximately 150m of Footpath TE39 would be diverted as it interacts with the proposed compound, haul road, HVDC cable, and permanent access route. The significant length of the proposed diversion could pose a differential impact for protected characteristic groups such as older people with mobility issues as they may perceive the extended distance to be unmanageable.
- 9.4.3 In conclusion however, the potential equality impact is expected to be minimal in nature as the PRow runs through an agricultural area and does not experience heavy footfall. The diversion to PRow TE39 would also be mitigated with fencing, gates, full-time monitoring and dropped-kerbs at crossing points.

Neutral: Noise, vibration, and air quality impacts during operation

- 9.4.4 During operation there is potential for negative equality impacts associated with operational and maintenance activities. However, these potential impacts are considered unlikely and would only affect individuals on an incidental basis if they happened to be in the proximity of specific noise, vibration, dust or emission generating activities.
- 9.4.5 As outlined in **Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration**, the effects of operational noise and vibration from the proposed Minster Substation and Minster Converter Station are assessed to be negligible and not significant. **Application Document 6.3.3.9.D ES Appendix 3.9.D Kent Operational Noise Assessment** highlights that the nearest receptors, namely Great Oaks Small School and a residential receptor, are approximately 650m to the east of Minster Substation and Minster Converter Station. Given this distance, potential differential equality impacts on protected characteristic groups, such as children with disabilities at Great Oaks Small School, are unlikely.
- 9.4.6 **Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality** highlights that during the operational and maintenance phases the Proposed Project would be manned by a limited number of operatives across the site, with additional infrequent trips associated with maintenance/inspections or repairs when required. Vehicle emissions would therefore be negligible and equality impacts unlikely. The proposed back-up generators for the Substation and Converter Station would require diesel fuel, however, there is a less than 1% chance that these would be required per year. Potential equality impacts relating to emissions from the back-up generators are therefore unlikely.
- 9.4.7 In conclusion, potential operational and maintenance noise, vibration, and air quality impacts on equality are not expected to occur.

Neutral: Operational-related traffic impacts

- 9.4.8 As detailed in **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport**, there are anticipated to be two operatives across the Kent Onshore Scheme during operation resulting in up to four daily car/LGV trips (HGVs would only access the site on the rare occasion that equipment needs replacing). There are not expected to be any operational related traffic equality impacts.

Negative: Visual amenity impacts during operation

- 9.4.9 As detailed in **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual**, representative viewpoint 5 would also be significantly impacted during operation and maintenance. Any potential equality impact would be similar to that experienced during construction.

9.5 Decommissioning

Positive: Temporary employment generation during decommissioning

- 9.5.1 As **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism** outlines, in the event that the Kent Onshore Scheme is decommissioned, the workforce required for decommissioning of the assets would be lower than the number required during construction. An estimated peak of 150 people would be required to decommission the Kent Onshore Scheme across 2 years, compared to the 5 years for construction. However, the exact timing of decommissioning is unknown.
- 9.5.2 No further differentiation between the construction and decommissioning phase that would lead to additional impacts on equality groups is identified. There would be similar methods, equipment, construction compounds and working hours to that used during construction for decommissioning. It is therefore considered reasonable to assume that the impacts of the decommissioning phase would be the same as, or not greater than, the construction phase.

Negative: Temporary public rights of way (PRoWs) changes during decommissioning

- 9.5.3 As **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism** and **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport** outline, the effects and conclusions on the potential equality impact of PRoW changes during construction are applicable to the decommissioning phase.

Negative: Noise, vibration, and air quality impacts during decommissioning

- 9.5.4 As **Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration** and **Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality** outline, the potential equality impacts during decommissioning are expected to be less than those experienced during construction. Noise, vibration, dust, and emissions are predicted to have negligible or minor effects due to reduced activity levels and the implementation of mitigation measures.

Negative: Decommissioning-related traffic impacts

- 9.5.5 **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport** identifies that during decommissioning, there are expected to be fewer HGV, LGV and worker arrivals and departures associated with the decommissioning phase of the Kent Onshore Scheme than during the construction phase.
- 9.5.6 It is therefore considered reasonable to assume that the impacts of the decommissioning phase would be the same as, or not greater than, the construction phase.

Negative: Visual amenity impacts during decommissioning

- 9.5.7 **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual** highlights that the effects at decommissioning would be no greater than the effects identified at construction.
- 9.5.8 It is therefore considered reasonable to assume that the impacts of the decommissioning phase would be the same as, or no greater than, the construction phase.

9.6 Summary of impacts – Kent

- 9.6.1 Table 9.1 provides a summary of the potential consultation, construction, operation and decommissioning equality impacts of the Kent Onshore Scheme. This provides an assessment of potential disproportionate and differential impacts on groups with protected characteristics.

Table 9.1 Summary of the potential equality impacts of the Kent Onshore Scheme

Impact		Disproportionately/ Differentially Affected Protected Characteristic Groups											Planned Mitigation	
		Age			Sex	Ethnicity	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage and civil partnership		Overview of Potential Effects
		Children	Young People	Older People										
Consultation														
Beneficial	Accessible and inclusive community consultation			✓		✓		✓					National Grid's pre-application consultation has promoted positive equality outcomes by using inclusive, accessible engagement methods, targeting seldom-heard groups, and providing multiple information and feedback channels. This potentially	N/A

Impact		Disproportionately/ Differentially Affected Protected Characteristic Groups												Planned Mitigation
		Age			Sex	Ethnicity	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage and civil partnership	Overview of Potential Effects	
		Children	Young People	Older People										
													facilitated participation for protected characteristic groups that otherwise may have faced barriers, for example people with disabilities, the elderly, and those with mobility issues.	
Construction														
Beneficial	Temporary employment generation		✓				✓						The construction of the Kent Onshore Scheme could create positive equality impacts by generating local job opportunities,	N/A

Impact		Disproportionately/ Differentially Affected Protected Characteristic Groups												Planned Mitigation
		Age			Sex	Ethnicity	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage and civil partnership	Overview of Potential Effects	
		Children	Young People	Older People										
													particularly benefiting young people and those with disabilities.	
Adverse	Temporary public rights of way changes during construction			✓				✓					The construction of the Suffolk Onshore Scheme may cause negative equality impacts due to diversions and closures of PRowS, particularly affecting older individuals those with disabilities.	Diversions to PRowS have been designed so that, as far as possible, they are of a similar nature, length and connectivity as existing PRow.

Impact		Disproportionately/ Differentially Affected Protected Characteristic Groups											Planned Mitigation	
		Age			Sex	Ethnicity	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage and civil partnership		Overview of Potential Effects
		Children	Young People	Older People										
	Noise, vibration, and air quality impacts during construction	✓		✓				✓			✓		Construction of the Kent Onshore Scheme may cause negative equality impacts due to increased noise, vibration, and air quality changes, potentially having differential effects on disabled individuals, older people, pregnant women, and young children. There is also a school that caters to students with disabilities in proximity to the construction works which could experience	National Grid has committed to employ Best Practice Measure (NV01) to reduce the adverse effects of construction noise. Additional temporary noise mitigation measures such as screening would also be introduced at specific locations.

Impact		Disproportionately/ Differentially Affected Protected Characteristic Groups											Planned Mitigation	
		Age			Sex	Ethnicity	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage and civil partnership		Overview of Potential Effects
		Children	Young People	Older People										
													adverse noise and vibration impacts.	
Operation														
Adverse	Permanent public rights of way changes during operation			✓				✓					Permanent diversions to PRoWs during operation of the Kent Onshore Scheme could pose a differential impact for protected characteristic groups such as older people with	The permanent diversion to PRoW Footpath TE39 would be minimised as far as practicable to reduce the diversion distance and re-connect it with the original alignment.

Impact		Disproportionately/ Differentially Affected Protected Characteristic Groups											Planned Mitigation	
		Age			Sex	Ethnicity	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage and civil partnership		Overview of Potential Effects
		Children	Young People	Older People										
													mobility issues as the extended distance may be unmanageable.	
Decommissioning														
Beneficial	Temporary employment generation		✓				✓						Nature of the potential impact is consistent with the construction phase.	N/A

Impact		Disproportionately/ Differentially Affected Protected Characteristic Groups											Planned Mitigation	
		Age			Sex	Ethnicity	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage and civil partnership		Overview of Potential Effects
		Children	Young People	Older People										
Adverse	Temporary public rights of way changes and access to services												Nature of the potential impact is consistent with the construction phase.	Specific mitigation measures for affected PRowS during decommissioning are not yet known due to the timeframe of when impacts are likely to arise.
	Noise, vibration, and air quality impacts during decommissioning	✓		✓				✓					Nature of the potential impact is consistent with the construction phase.	Specific mitigation measures for affected receptors during decommissioning are not yet known due to the timeframe of when impacts are likely to arise.

Impact		Disproportionately/ Differentially Affected Protected Characteristic Groups											Planned Mitigation		
		Age			Sex	Ethnicity	Religion	Disability	Transgender	Sexual Orientation	Pregnancy/ Maternity	Marriage and civil partnership		Overview of Potential Effects	
		Children	Young People	Older People											
	Decommissioning-related traffic impacts	✓		✓				✓						Nature of the potential impact is consistent with the construction phase.	Specific mitigation measures for affected receptors during decommissioning are not yet known due to the timeframe of when impacts are likely to arise.

10. Summary and Conclusions

- 10.1.1 The Proposed Project is of national significance and is required to reinforce the transmission network in the South East of England and East Anglia. The Proposed Project would play an important role in enabling an energy system that meets the UK's commitment to reduce carbon emissions and create a secure, reliable and affordable energy supply for consumers.
- 10.1.2 This EqlA demonstrates whether and how National Grid has paid due regard to the needs of protected characteristic groups in line with the Equality Act 2010 and the PSED. It provides the Secretary of State with the necessary information to have regard to the requirements of the Equality Act 2010 and the PSED when determining the application.
- 10.1.3 Demonstration of due regard has been provided through the assessment of potential direct and indirect equality impacts (both adverse and beneficial) associated with the consultation, construction, operational, and decommissioning phases of the Proposed Project on protected characteristic groups as defined by the Equality Act 2010. This assessment has been informed by policy and legislation review, an overview of the Proposed Project, equalities baseline as well as consultation activities.
- 10.1.4 This EqlA has identified the key issues and potential impacts related to protected characteristic groups with regards to both the Kent Onshore Scheme and the Suffolk Onshore Scheme. The Summary of Impacts tables presented at the end of Chapter 8 and Chapter 9 provide a summary of key impacts, mitigation measures, and actions to enhance benefits that have been planned or identified.
- 10.1.5 A judgement has been made as to the potential impacts on protected characteristic groups using the documents prepared as part of the application for development consent. However, given the qualitative nature of EqlAs, this assessment does not provide an exhaustive review of all potential impacts. There remains a possibility that some individuals with protected characteristics could be affected by activities associated with the Suffolk Onshore Scheme and Kent Onshore Scheme in ways that are not foreseeable at the time of writing.
- 10.1.6 Regarding both the Suffolk Onshore Scheme and Kent Onshore Scheme, National Grid has undertaken a wide range of engagement and consultation activities with relevant parties, providing opportunities from the early stages of the process where there is the greatest scope for consultees to influence the design of the Proposed Project, as well as consulting seldom heard groups. This has been judged to be an accessible and inclusive community consultation, yielding positive equality effects and National Grid's due regard to the PSED.
- 10.1.7 There is potential for positive equality impacts associated with temporary employment generation required to construct and decommission both the Suffolk Onshore Scheme and Kent Onshore Scheme. However, for these positive impacts to be fully realised, it would require measures to target protected characteristic groups.
- 10.1.8 During both construction and operation phases, there is potential for negative equality impacts associated with temporary changes, such as closures and diversions to PRowS that are within both the Suffolk Onshore Scheme and Kent Onshore Scheme Order Limits. However, in both instances they are not considered to be substantial and likely

to only occur on an infrequent individual basis. Both PRow diversions run through agricultural areas and do not experience heavy footfall. Regarding the Suffolk Onshore Scheme, the magnitude of impact is reduced because the additional diversion journey length has been minimised as far as practicable and provides a connection with PRow E-354/007/A before re-joining the original alignment. Regarding the Kent Onshore Scheme, appropriate site fencing will be installed along the diverted route before it connects into the existing route.

- 10.1.9 Within the construction phase, there is potential for negative equality impacts associated with increased noise and vibration, and changes to air quality, as well as increased construction traffic movements on the local road network. With proposed mitigation measures, they are not considered to be substantial but could arise on an individual basis at the sensitive receptors identified. National Grid has committed to employ Best Practice Measure (NV01) to reduce the identified adverse effect of construction noise, and temporary noise mitigation measures such as screening as part of the Suffolk Onshore Scheme (no additional mitigation measures have been included as part of the Kent Onshore Scheme). Regarding the Kent Onshore Scheme, construction traffic impacts are likely to be minimal due to the rural nature of the local road network and low number of sensitive receptors. In Suffolk, whilst there are planned thresholds for construction traffic levels, the Proposed Project intends to have construction works on Sundays/Bank Holidays which may worsen the impacts. During the decommissioning phase, the potential for negative equality impacts would be the same as, or not greater than, the construction phase due to reduced activity levels (including fewer vehicles) and mitigation measures included above. Impacts are low to zero across the operational phases.
- 10.1.10 In conclusion, after implementing the mitigation measures described above, the potential negative equality impacts of the Proposed Project are considered to be minimal.

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