



## UNIVERSAL DESTINATIONS & EXPERIENCES UK PROJECT

Former Kempston Hardwick Brickworks  
and adjoining land, Bedford

### Equalities Information Report

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# Equalities Information Report – Document 6.6

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June 2025

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# 1. Introduction

- 1.1 This Equality Information Report (“EIR”) has been prepared on behalf of Universal Destinations & Experiences (UDX) (“the Promoter”) which is seeking planning permission for the construction and operation of a Universal Entertainment Resort Complex (ERC), and associated development, in Bedford. The proposal is sponsored by the Department for Culture, Media and Sport (“DCMS”). The Department for Transport (“DfT”) and its associated arm’s-length bodies have assisted in the development of the highways and rail related elements of the proposal with Bedford Borough Council (“Bedford BC”). The proposal intends to provide sufficient information to enable the Secretary of State for Housing, Communities and Local Government (“MHCLG”) to consult on and consider making a planning decision.
- 1.2 The Site (defined in **paragraph 2.3**) is located south-west of Bedford, Bedfordshire and is broadly to the east of the A421 and west of the Midland Main Line and is on the former Kempston Hardwick brickworks and agricultural land. The Site is divided into four main land areas referred to as the Core Zone, Lake Zone, West Gateway Zone, and East Gateway Zone. The proposed ERC lying within these zones would allow a theme park and associated uses including retail, dining, entertainment; visitor accommodation; sport, recreation, leisure and spa facilities; venues with conference and convention spaces; associated services and uses for any operational or administrative functions; utilities generation, storage, collection, treatment, and processing facilities associated with the ERC; vehicle and cycle parking, maintenance and servicing, and transportation hubs; access routes and circulation spaces; landscaping; utility infrastructure; and use of land necessary to support construction (the Proposed Development).
- 1.3 The planning proposal also includes a series of infrastructure improvements including:
- A new A421 Junction;
  - An expanded railway station on the Thameslink/Midland Main Line at Wixams;
  - Improvements to Manor Road; and
  - Improvements to certain other local roads.
- 1.4 It also safeguards land for a potential new railway station on the proposed EWR Bletchley to Bedford line, should this come forward in the future.

## The role of this EIR

- 1.5 An Equality Impact Assessment (EqIA) is a way of taking equal opportunities into consideration when making planning decisions. EqIAs are usually undertaken for largescale projects and/or projects that have significant potential to change the levels of services, infrastructure or amenities in an area.
- 1.6 The Proposed Development is likely to result in both positive and negative effects on the people living around, working at and visiting the venue. The Equality Act 2010 provides the legal framework to protect the rights of individuals and advance equality of opportunity for all.<sup>1</sup> Some groups within the general population are expected to experience the effects of the Proposed Development in a different way as a result of their particular characteristics. There are several reasons why EqIAs are undertaken:
- To eliminate discrimination, harassment, victimisation and any other conduct prohibited by or under the Equality Act 2010, thereby protecting people who share protected characteristics;
  - To advance equality of opportunity between people who share protected characteristics and those that don’t; and

<sup>1</sup> Legislation.gov.uk (2024) *Equality Act 2010*. Available at: <https://www.legislation.gov.uk/ukpga/2010/15/contents> [Accessed 19 May 2025].

- To foster good relations between people who share a protected characteristic and those who don't.

1.7 The purpose of this EIR is to set out the relevant population baseline, explain how different groups may experience the Proposed Development's impacts, and assess the resulting equality effects. The analysis is provided so that MHCLG, when exercising its decision-making functions in relation to the Proposed Development, can have due regard to the matters in section 149(1) of the Equality Act 2010 namely, to the need to eliminate discrimination, harassment, victimisation and other prohibited conduct; advance equality of opportunity between persons who share a protected characteristic and persons who do not; and foster good relations between people who share a protected characteristic and those who do not. The Equality Impact Assessment contained in this EIR provides information to MHCLG to enable it to comply with its duty in section 149 of the Equality Act 2010.

## Report structure

1.8 The structure of this report is as follows:

- **Scope and methodology** – outlines the scope of this report, including how relevant groups with protected characteristics are identified, and the study areas included;
- **Baseline** – contains a detailed baseline identifying the prevalence of equality groups in the study areas;
- **Literature review** – contains relevant literature identifying which equality groups may potentially be at risk of experiencing differential effects; and
- **Equality effects** – contains an assessment of equality effects arising from the Proposed Development.

## 2. Scope and methodology

### Scope

2.1 The Equality Act 2010 was passed to protect individuals from unfair discrimination and ensure equal accessibility in terms of employment, services, education and buildings, amongst others. The act provides the essential legal framework to protect the rights of individuals and advance equality of opportunity for all. The act identifies nine protected characteristics:<sup>2</sup>

- Age;
- Disability;
- Gender and gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race (ethnic or national origins, colour, nationality);
- Religion or belief;
- Sex; and
- Sexual orientation.

2.2 Although marriage and civil partnership is a protected characteristic under the Equality Act 2010, it is not covered by the public sector equality duty.<sup>3</sup> Therefore, the scope of this report covers the remaining eight groups.

### Study Areas

2.3 The relevant study areas included in this EIR are presented below:

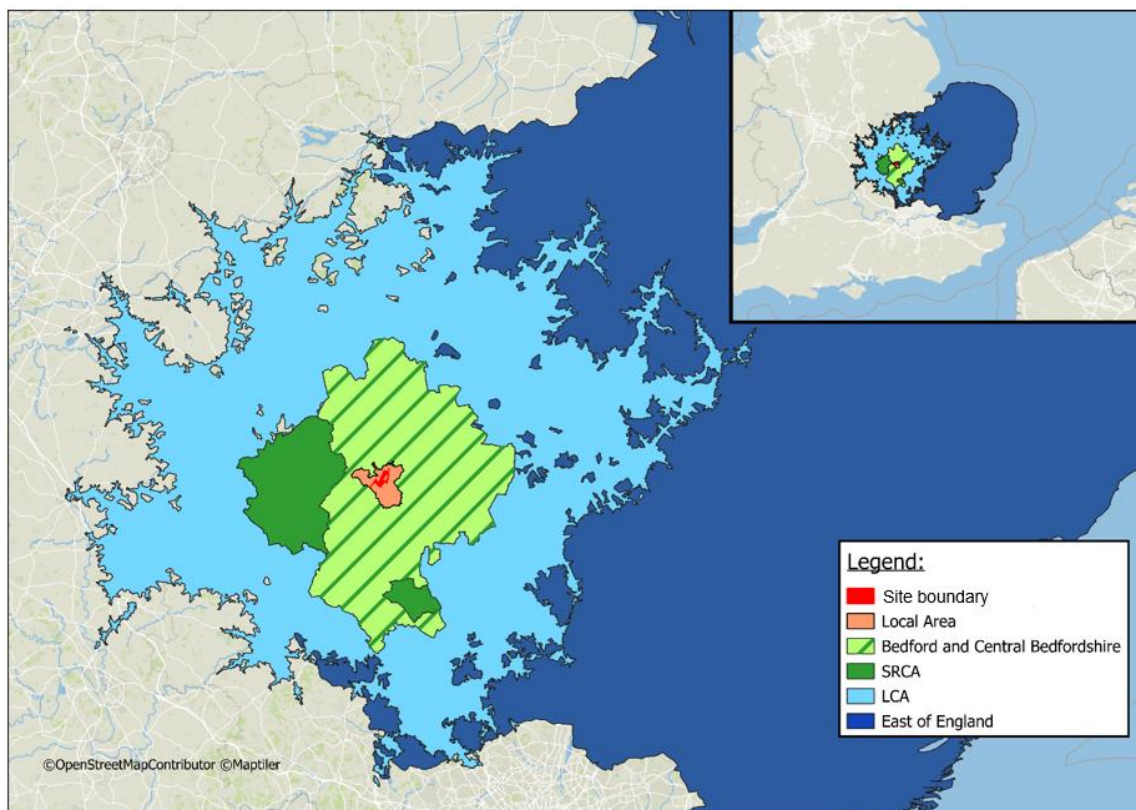
- **The Site** – The Site represents everything within the project red line boundary;
- **Local Area** – This is comprised of lower layer super output areas that intersect with a 500m radius around the red line boundary of the site,<sup>4</sup>
- **Bedford and Central Bedfordshire** – The site is located within the local authority of Bedford, but it is located at the south of the district boundary, in close proximity to Central Bedfordshire;
- **Sub Regional Context Area (SRCA)** – The local authority boundaries of Bedford, Central Bedfordshire, Milton Keynes and Luton;
- **Labour Catchment Area (LCA)** – This area is comprised of all middle layer super output areas that fall more than 50% within a 60-minute drive time from the Proposed Development. Where MSOA data isn't available all local authorities that fall more than 50% within a 60-minute drive time from the Proposed Development are utilised;
- **East of England** – Bedford (and the Proposed Development) is located in the East of England. At times, evidence is drawn from relevant sources which cover this region for useful comparison; and
- **National** – The national area is defined as England (UK where possible).

<sup>2</sup> Legislation.gov.uk (2024) *Equality Act 2010*. Available at: <https://www.legislation.gov.uk/ukpga/2010/15/contents> [Accessed 19 May 2025].

<sup>3</sup> Citizens Advice (no date given) *When can you use the public sector equality duty?* Available at: <https://www.citizensadvice.org.uk> [Accessed 15 August, 2024].

<sup>4</sup> The Local Area is made up of 12 of these LSOAs. These LSOAs are: Bedford 018E, Bedford 018G, Bedford 018H, Bedford 020B, Bedford 020C, Bedford 020D, Bedford 020E, Bedford 020F, Bedford 022B, Bedford 022C, Central Bedfordshire 008F, and Central Bedfordshire 008G.

Figure 1 – Study area boundaries



## Potential equality effects

- 2.4 Disproportionate and differential equality effects are defined here. The information presented to inform consideration of whether disproportionate or differential equality effects may occur is then explained.

## Disproportionate effects

- 2.5 Disproportionate equality effects can occur where an impacted community contains a disproportionate number of individuals with a given protected characteristic, or where an impacted asset is disproportionately used by an equality group.
- 2.6 Baseline data is used to identify outliers within the study area(s). The presence in the study area(s) of individuals, or assets likely to be used by individuals, with a given protected characteristic is compared to both the region and national averages and groups with disproportionately higher presence are identified.
- 2.7 For example, the Local Area has a much higher proportion of 0 to 9 year-olds compared to geographic comparators, which means young children could be disproportionately impacted by certain elements of the Proposed Development.
- 2.8 The summary of this baseline data can be found in **Table 2**.

## Differential effects

- 2.9 Differential equality effects can occur where members of a protected characteristic group are likely to be affected in different ways from the general population. Differential effects may be because of specific needs, or a recognised sensitivity or vulnerability associated with their protected characteristics. Disproportionate effects account for the number of people affected, but their differential effects are possible even if the number of people affected is small. A protected group could experience both disproportionate and differential effects at the same time.
- 2.10 A review of existing academic and policy literature relevant to the likely impacts of the Proposed Development has been carried out. This review provides a summary of the protected groups with the potential to experience effects more acutely or in a different manner to others.<sup>5</sup> Consideration has been given to whether or not the Proposed Development would result in some people being treated less favourably than others because of a protected characteristic, either directly or indirectly.
- 2.11 For example, most theme parks have been constructed prior to accessibility regulations enforcement and are therefore often not fully compliant for guests with special needs. The presence or absence of accessible features in amusement and theme parks impacts the overall guest experience differently for those requiring special accommodations.
- 2.12 A combination of literature review and professional judgement has been applied to identify the protected groups with the potential to be differentially affected by the Proposed Development. This summary can be found in **Section 4 – Literature review**.

## Stakeholder engagement and consultation

- 2.13 While there is no explicit legal requirement under the Equality Act 2010 to engage with people with different characteristics, it does require companies to have an adequate evidence base for their decision-making, and engagement can assist with developing that evidence base. Engaging with stakeholders and residents helps companies to base their decision on evidence, rather than assumptions.
- 2.14 UDX has been working closely with key stakeholders since completing the purchase of land in August 2023. Initial engagement was held with local and national Government bodies and other statutory consultees to be able to set out at a high-level the strategic case for the potential project and to discuss how these aligned with local, regional and national policy.
- 2.15 A period of more focused public engagement was undertaken from Friday 5 April until Friday 3 May 2024. During this time UDX sought a number of one-to-one meetings with local groups that voiced a specific interest in the development. Meetings were held with Officers from Bedford BC, Central Bedfordshire Council, Milton Keynes Borough Council and Luton Council, representatives from business and education groups (including young people), blue light services, religious groups and community and voluntary organisations, councillors and the Gypsy & Traveller community. Furthermore, two public consultation events were held in locally accessible places (Kimberley College and Bedford College), inviting comments on particular aspects of the Proposed Development, as well as inviting general comments on the proposals. Informal engagement with key statutory bodies including Bedford Borough Council, Central Bedfordshire Council, DfT, and National Highways was also undertaken from Autumn 2023 through Spring 2024.

<sup>5</sup> Morgan (2020) *'It's An Accessible World After All': Evaluation of Amusement Park Accessibility and Accommodations for Guests with Disabilities*. Available at: [https://encompass.eku.edu/honors\\_theses/741](https://encompass.eku.edu/honors_theses/741) [Accessed 17 April 2024].



## 3. Baseline

- 3.1 This section outlines baseline data indicators on protected characteristics within the relevant study areas. It aims to understand whether the local population contains protected characteristic groups that may be affected by the Proposed Development. A greater prevalence of any particular group could translate into disproportionate effects. Disproportionate effects are defined from **paragraph 2.5**.
- 3.2 Receptors to be considered for the assessment of effects are workers, residents, visitors, or community facilities and their users. The level of data available differs by receptor. There is much more data available about the residential population than the other receptors, and this section focuses on that data. It clearly explains where judgements about the receptor characteristics are made.

### Data sources

- 3.3 A combination of desk-based and data driven research has been carried out to inform this EIR. The data sources used to inform the socio-economic baseline are summarised in **Table 1**, which sets out the data, the source, the year and the confidence. Confidence is a measure of the reliability of the data source. Where any data is presented in this report, the source is also provided below the map or table.

**Table 1 – Data sources used to inform baseline**

Data	Source	Latest data year	Confidence
<b>Population data:</b>			
Population estimates	ONS Population Estimates - population estimates by single year of age	2022	High
	ONS Census – Subnational population projections for England: 2018-based	2020	High
Disability	ONS Census – Disability	2021	High
	ONS Subnational indicators dataset	2024	
Religion and philosophical belief	ONS Census – Religion	2021	High
Race	ONS Census – Ethnic group	2021	High
Sex	ONS Census – Sex	2021	High
Gender	ONS Census – Gender Identity	2021	High
Sexual orientation	ONS Census – Sexual orientation	2021	Medium <sup>6</sup>
Pregnancy	ONS Life events – Live births in England and Wales: birth rates down to local authority areas	2021	High

<sup>6</sup> There may be reliability issues due to the high number of 'Not Answered' responses in the data

Data	Source	Latest data year	Confidence
	ONS Census – Age by five-year age bands	2021	High
<b>Community infrastructure:</b>			
School pupil numbers School capacity	DfE – Get information about schools	2023	High
GP and patient numbers	NHS Digital – General Practice Workforce Statistics	2024	High
GP and patient numbers benchmarks	NHS London – HUDU Planning Contribution Model Guidance Notes	2009	High
A&E performance metrics	NHS – A&E Attendances & Emergency Admissions	2024	High

## Vulnerable population groups

- 3.4 This section summarises the vulnerable population groups present across respective study areas. The proportional population share of vulnerable groups is compared across study areas to determine if certain vulnerable population groups are present in a disproportionate manner in a specific study area. The relative presence of vulnerable population groups for each effect informs the sensitivity of the receptor population.
- 3.5 **Table 2** summarises the data on the presence of vulnerable populations within each of the study areas. Vulnerable population groups are as defined by the Equality Act 2010 and specific vulnerable population groups that have been identified through a process of desk-based research are included.

**Table 2 – There is a higher proportion of younger people and ethnic minorities living in the Local Area in relation to comparator geographies**

Identified vulnerable population groups across geographies

Potential vulnerable group	Local Area	Bedford and Central Bedfordshire	East	National Area
<b>Vulnerable groups identified by the Equality Act 2010</b>				
Younger people (aged 0-19)	<b>28%</b> <b>(5,075)</b>	24% (114,160)	24% (1.5m)	23% (13.1m)
Older people (65+)	12% (2,170)	18% (83,970)	20% (1.2m)	18% (10.4m)
People with long-term illness or disabilities	12% (2,215)	15% (72,760)	17% (1.1m)	17% (9.8m)
Ethnic minority groups	<b>20%</b> <b>(3,495)</b>	15% (73,755)	14% (856,705)	19% (10.7m)

Potential vulnerable group	Local Area	Bedford and Central Bedfordshire	East	National Area
Religious groups (% of residents identifying as having a religious belief)	53% (9,435)	55% (263,415)	54% (3.4m)	57% (32.4m)
Female	51% (9,100)	51% (243,000)	51% (3.2m)	51% (29m)
Male	49% (8,700)	49% (236,000)	49% (3.1m)	49% (28m)
Trans woman	-	0.10% (315)	0.09% (4,600)	0.08% (46,000)
Trans man	-	0.10% (325)	0.09% (4,400)	0.08% (47,000)
Gay or Lesbian	1.3% (390)	1.1% (4,425)	1.2% (63,000)	1.5% (710,000)
Birth rate per 100 of female population	-	2.3	2.1	2.1
<b>Specific disproportionately represented groups identified through desk-based research</b>				
Sikh (ethnicity)	0.12%	0.04%	0.01%	0.04%
Indian or British Indian	5.8%	3.1%	2.2%	3.3%
White and Black Caribbean	2.2%	1.4%	0.8%	0.9%
Polish	1.6%	1.7%	1.0%	1.0%

Source: ONS (2021) Census. Available at: <https://www.ons.gov.uk/census> [Accessed 19 May 2025]. Note: - = no data due to limited availability

## Population data

### Population size

3.6

**Table 3** outlines the size of the population across each study area.

**Table 3 – There are 18,000 residents in the Local Area according to the 2021 Census**

Total population size across study areas, 2021

Area	Total population size 2021
Local Area	18,000
Bedford and Central Bedfordshire	479,000
SRCA	992,000
LCA	2.6m
East	6.3m

Area	Total population size 2021
National Area	56.5m

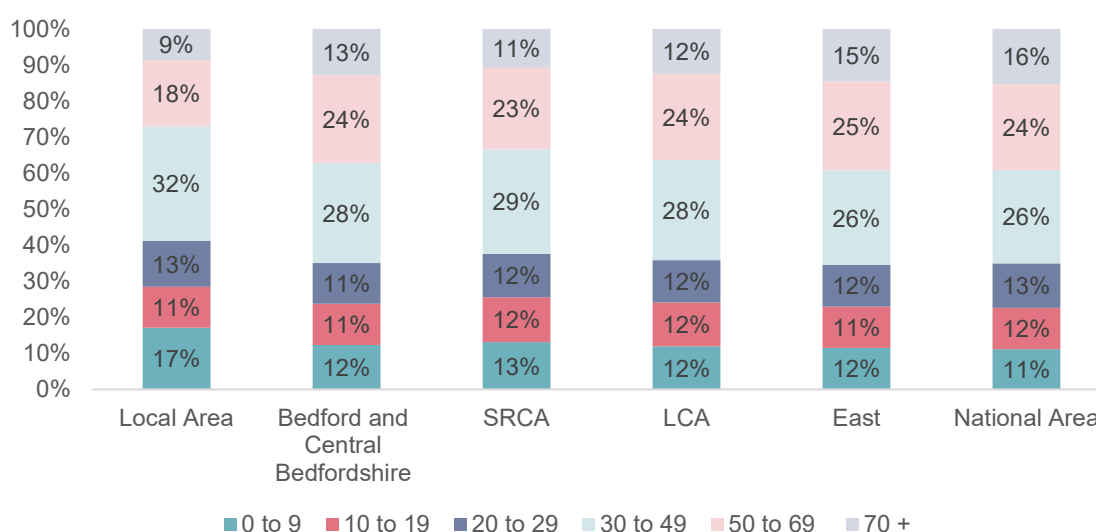
Source: ONS (2021) Census. Available at: <https://www.ons.gov.uk/census> [Accessed 19 May 2025].

## Age

- 3.7 **Figure 2** and **Table 4** illustrate the population demographics across the relevant study areas in 2021. Notably, the Local Area has a much higher proportion of 0 to 9 year-olds compared to geographic comparators. The proportion of residents aged between 0 and 9 in the Local Area is 17% (3,000 people). The second highest proportion of all geographic comparators is 13%.
- 3.8 The Local Area also has a larger proportion of residents aged between 20 and 49, 45%, than comparators. This is equivalent to 8,000 people in this age bracket. The proportion of this age group that make up the Local Area is four percentage points higher than any other geographic comparator, with the second highest being the SRCA with 407,000 people or 41% of the population aged between 20 and 49.
- 3.9 Both the Local Area (9% or 1,500 people) and Bedford and Central Bedfordshire (13% or 61,000 people) have a lower proportion of older people aged over 70 than is recorded nationally (16% or 7.6m people).

**Figure 2 – Children aged 0 to 9 have a higher presence in the Local Area than in comparator geographies**

Population by age group by geography, 2021



Source: ONS (2021) Census. Available at: <https://www.ons.gov.uk/census> [Accessed 19 May 2025].

**Table 4 – There are more residents between the ages of 0 to 9 in the Local Area (3,000) than there are over the age of 70 (2,000)**

Population by age group by geography, 2021, absolute values

Area	0 to 9	10 to 19	20 to 29	30 to 49	50 to 69	70+
Local Area	3,000	2,000	2,300	5,700	3,300	1,500
Bedford and Central Bedfordshire	59,000	55,000	54,000	133,000	117,000	61,000
SRCA	130,000	124,000	120,000	287,000	224,000	107,000
LCA	317,000	321,000	311,000	734,000	633,000	329,000
East	730,000	728,000	730,000	1.7m	1.6m	924,000
National Area	6.4m	6.6m	7.1m	14.9m	13.7m	7.6m

Source: ONS (2021) Census. Available at: <https://www.ons.gov.uk/census> [Accessed 19 May 2025]. Note: Figures may not sum due to rounding.

## Disability

3.10

**Table 5** below depicts the distribution of disabilities across the study areas. Bedford and Central Bedfordshire has a lower proportion of disabled residents (4.7% or 835 people) compared to the regional and national rates.

**Table 5 – The Local Area and Bedford and Central Bedfordshire have a lower proportion of residents defined as disabled than the regional and national level**

Distribution of disabilities across study areas, 2021

Area	Disabled under The Equality Act 2010: day-to-day activities limited a lot		Disabled under The Equality Act 2010: day-to-day activities limited a little		Total proportion of residents deemed disabled under The Equality Act 2010	
	Absolute	%	Absolute	%	Absolute	%
Local Area	835	4.7%	1,380	7.7%	2,215	12.4%
Bedford and Central Bedfordshire	28,000	5.8%	45,000	9.4%	73,000	15.2%
SRCA	59,000	5.8%	88,000	9.0%	146,000	14.8%
LCA	159,000	6.0%	249,000	9.4%	407,000	15.4%
East	420,000	6.6%	633,000	10.0%	1.1m	16.6%
England	4.1m	7.3%	5.6m	10.0%	9.8m	17.3%

Source: ONS (2021) Census. Available at: <https://www.ons.gov.uk/census> [Accessed 19 May 2025]. Note: Figures may not sum due to rounding.

3.11

**Table 6** sets out the subnational indicators on mental health, ranked out of ten. Bedford performs slightly negatively relative to the national average for feeling anxious (3.4 out of 10 compared to 3.2 out of 10 nationally), while positively for life satisfaction (7.5 out of 10 compared to 7.4 out of 10 nationally). When it comes to happiness, Bedford and Central Bedfordshire are broadly in line with the national average (7.6 and 7.3 out of 10 compared to 7.4 out of 10 nationally).

**Table 6 – Overall, Bedford and Central Bedfordshire are in line with or better than the national average for life satisfaction and happiness**

Subnational indicators on mental health by geography, 2022

	Bedford	Central Bedfordshire	East	England
Life satisfaction	7.5	7.3	7.5	7.4
Worthwhile	7.7	7.8	7.8	7.7
Happiness	7.6	7.3	7.4	7.4
Anxiety	3.4	3.2	3.2	3.2

Source: ONS (2024) Subnational indicators dataset. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/wellbeing/datasets/subnationalindicatorsdataset> [Accessed 19 May 2025].

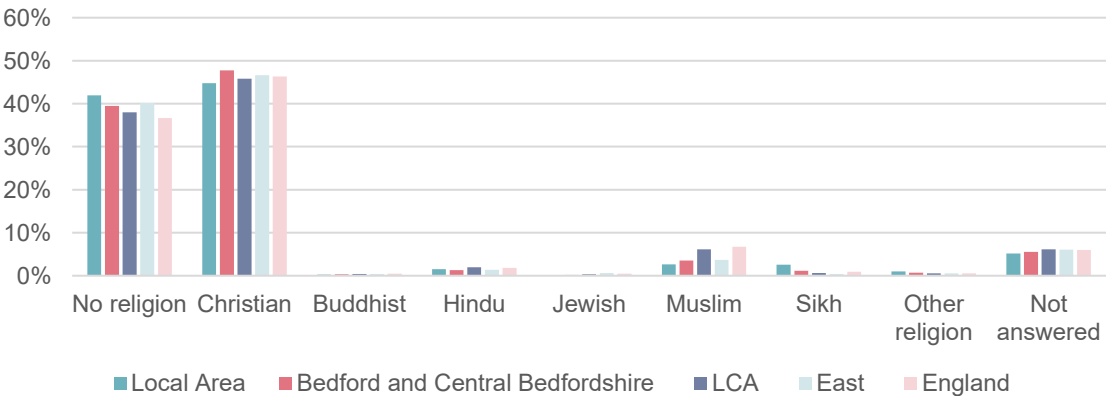
## Religion and philosophical belief

3.12

Overall, the Local Area and Bedford and Central Bedfordshire is largely on trend for the proportion of religions or philosophical beliefs. Bedford and Central Bedfordshire has a marginally higher proportion of Christians (48% or 229,000 people) than regionally (47% or 3.0m people) or nationally (46% or 26.2m people).

**Figure 3 – There is a marginally higher proportion of Christians in Bedford and Central Bedfordshire relative to geographical comparators**

Religious affiliation by geography, 2021



Source: ONS (2021) Census. Available at: <https://www.ons.gov.uk/census> [Accessed 19 May 2025].

**Table 7 – There are 229,000 Christians in Bedford and Central Bedfordshire of which 8,000 are in the Local Area**

Religious affiliation by geography, 2021, absolute values

Religion	Local Area	Bedford and Central Bedfordshire	LCA	East	England
No religion	7,500	189,000	1.0m	2.5m	20.7m
Christian	8,000	229,000	1.2m	3.0m	26.2m
Buddhist	50	1,600	12,000	27,000	262,000
Hindu	270	6,100	52,000	87,000	1.0m
Jewish	15	850	8,000	42,000	269,000
Muslim	475	17,000	162,000	235,000	3.8m
Sikh	455	5,500	18,000	24,000	520,000
Other religion	170	3,400	15,000	36,000	332,000
Not answered	925	26,700	162,000	385,000	3.4m

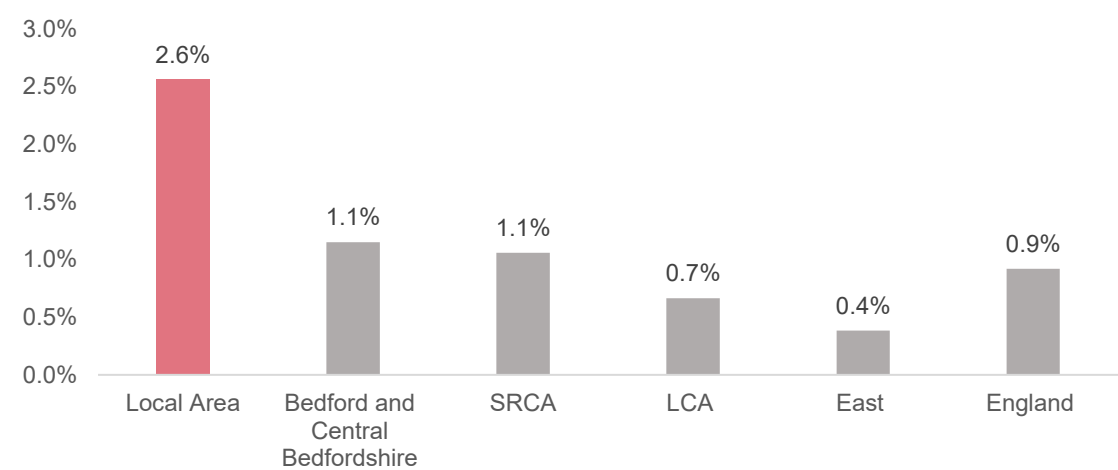
Source: ONS (2021) Census. Available at: <https://www.ons.gov.uk/census> [Accessed 19 May 2025]. Note: Figures may not sum due to rounding.

3.13

Notably, the Local Area has a significantly higher proportion of its population that are Sikh relative to geographical comparators. In the Local Area, 2.6% of the population (455 people out of 18,000) are Sikh, compared to 0.4% of the population across the East of England (24,000 people out of 6.3m) and 0.9% of the population nationally (520,000 people out of 56m).

**Figure 4 – There is a significant religious Sikh population in the Local Area**

Sikh population by geography, 2021



Source: ONS (2021) Census. Available at: <https://www.ons.gov.uk/census> [Accessed 19 May 2025].

**Table 8 – There are 455 Sikhs in the Local Area**

Sikh population by geography, 2021, absolute values

Area	Sikh population (absolute)
Local Area	455
Bedford and Central Bedfordshire	5,500
SRCA	11,000
LCA	18,000
East	24,000
England	520,000

Source: ONS (2021) Census. Available at: <https://www.ons.gov.uk/census> [Accessed 19 May 2025]. Note: Figures may not sum due to rounding.

## Race

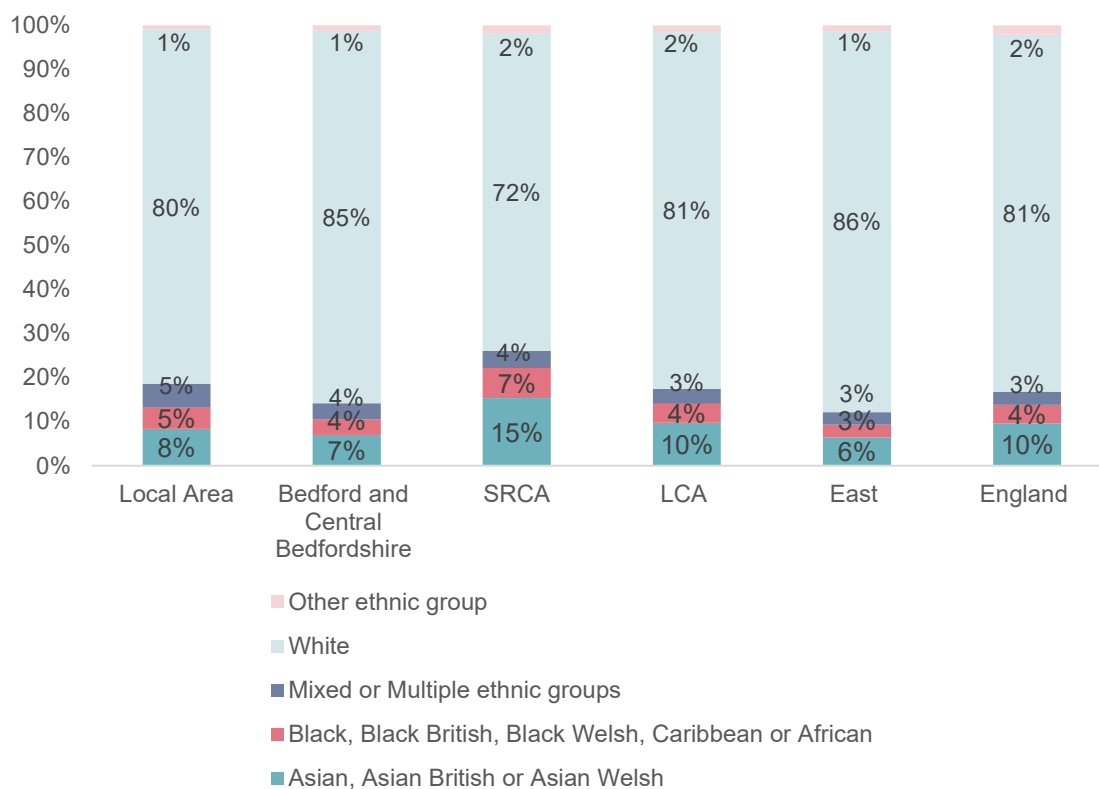
3.14

**Figure 5** and **Table 9** illustrate that the Local Area has a lower proportion of its population that is white (80% or 14,000 relative to geographical comparators). The Local Area has a greater proportion of its population that is mixed or from multiple ethnic groups (5% or 960) than geographical comparators (all 4% or 3%).



**Figure 5 – In the Local Area there is a lower proportion of the population that is white than is recorded across comparator geographies, there is also a greater proportion of the population that is mixed or from multiple ethnic groups**

Ethnicity distribution by geography, 2021



Source: ONS (2021) Census. Available at: <https://www.ons.gov.uk/census> [Accessed 19 May 2025].

**Table 9 – There are 14,000 white people in the Local Area, which is lower than across comparator geographies**

Ethnic groups by geography, 2021, absolute values

Area	Other ethnic group	White	Mixed or multiple ethnic groups	Black, Black British, Black Welsh, Caribbean or African	Asian, Asian British or Asian Welsh
Local Area	180	14,000	960	870	1,500
Bedford and Central Bedfordshire	5,800	406,000	17,000	17,000	34,000

Area	Other ethnic group	White	Mixed or multiple ethnic groups	Black, Black British, Black Welsh, Caribbean or African	Asian, Asian British or Asian Welsh
SRCA	19,000	714,000	39,000	67,000	153,000
LCA	41,000	2.1m	89,000	114,000	257,000
East	86,000	5.5m	180,000	185,000	406,000
England	1.2m	45.8m	1.7m	2.4m	5.4m

Source: ONS (2021) Census. Available at: <https://www.ons.gov.uk/census> [Accessed 19 May 2025]. Note: Figures may not sum due to rounding.

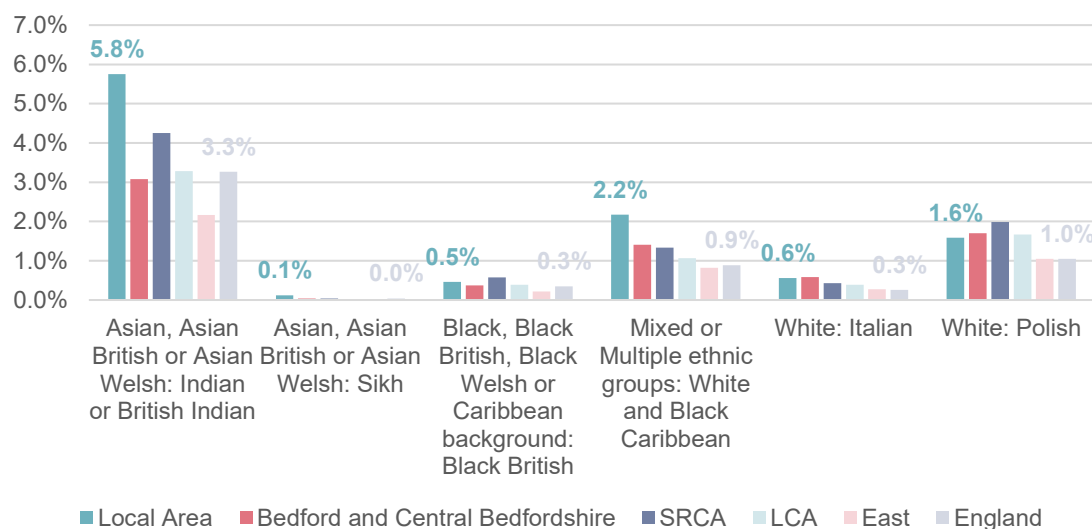
3.15

When looking at the ethnic breakdown in more detail, there are several specific ethnic groups that are disproportionately represented in the Local Area relative to geographic comparators. **Figure 6** and **Table 10** illustrate the presence of these ethnic groups as a proportion of the total population in their respective geographies. Specific ethnic groups that are disproportionately represented in the Local Area include:

- Indian or British Indian;
- Sikh;
- Black British;
- White and Black Caribbean;
- Italian; and
- Polish.

**Figure 6 – There are several specific ethnic groups that are disproportionately represented in the Local Area**

Minority ethnic group distribution, 2021



Source: ONS (2021) Census. Available at: <https://www.ons.gov.uk/census> [Accessed 19 May 2025].

**Table 10 – There are several specific ethnic groups that are disproportionately represented in the Local Area**

Minority ethnic group distribution, 2021, absolute values

	Local Area	Bedford and Central Bedfordshire	SRCA	LCA	East	England
Asian, Asian British or Asian Welsh: Indian or British Indian	2,200	15,000	42,000	92,000	137,000	1.8m
Asian, Asian British or Asian Welsh: Sikh	45	170	415	710	800	23,000
Black, Black British, Black Welsh or Caribbean background: Black British	175	1,500	5,700	11,000	16,000	194,000
White: Italian	210	2,800	4,200	11,000	17,000	146,000
White: Polish	600	8,100	20,000	47,000	66,000	593,000

Source: ONS (2021) Census. Available at: <https://www.ons.gov.uk/census> [Accessed 19 May 2025]. Note: Figures may not sum due to rounding.

3.16

In addition, baseline research and pre-engagement identified that a Gypsy & Traveller community is located adjacent to the Site. The community currently has 22 pitches, with plans to extend to 24. Most pitches have two adults and the community has more than 50 children living in it. Conversations held during pre-

engagement revealed that 75% cannot read or write English. This group is considered to be disproportionately represented in the Local Area.

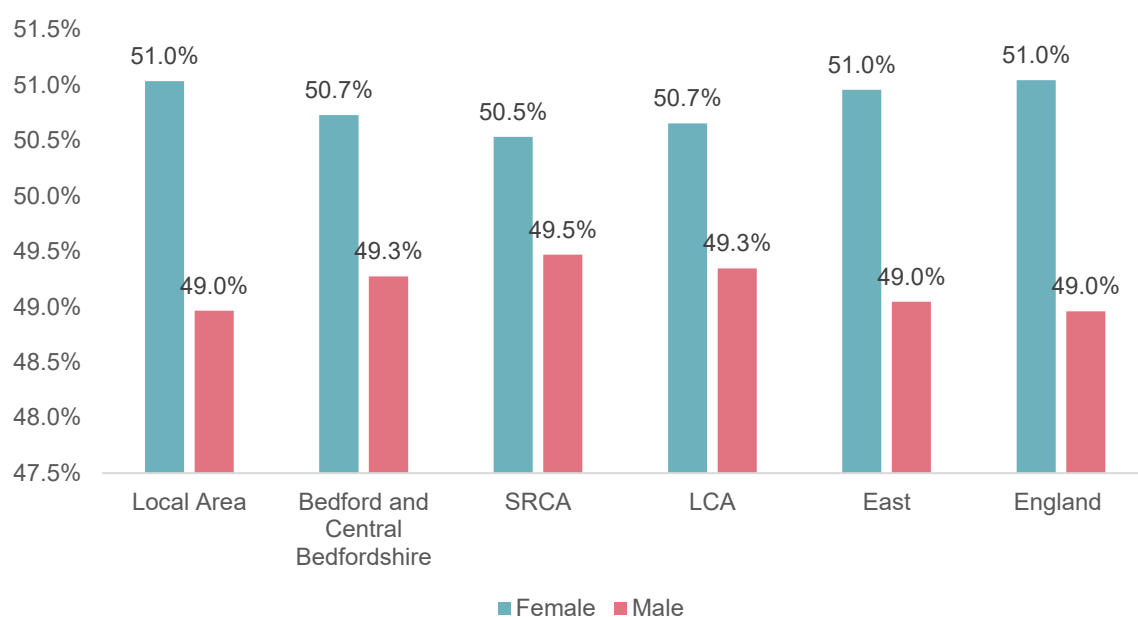
## Sex

3.17

The proportion of males and females in the Local Area is in line with what is recorded regionally and nationally. Across Bedford and Central Bedfordshire there is a marginally higher proportion of males and a lower proportion of females than is recorded across geographical comparators.

**Figure 7 – The proportion of males and females in the Local Area and across Bedford and Central Bedfordshire is broadly on trend with what is recorded nationally**

*Female to male proportions by geography, 2021*



Source: ONS (2021) Census. Available at: <https://www.ons.gov.uk/census> [Accessed 19 May 2025].

**Table 11 – There are 9,100 females and 8,700 males in the Local Area**

Female/male distribution by geography, 2021, absolute values

Area	Female	Male
Local Area	9,100	8,700
Bedford and Central Bedfordshire	243,000	236,000
SRCA	501,000	491,000
LCA	1.3m	1.3m
East	3.2m	3.1m
England	28.8m	27.7m

Source: ONS (2021) Census. Available at: <https://www.ons.gov.uk/census> [Accessed 19 May 2025]. Note: Figures may not sum due to rounding.

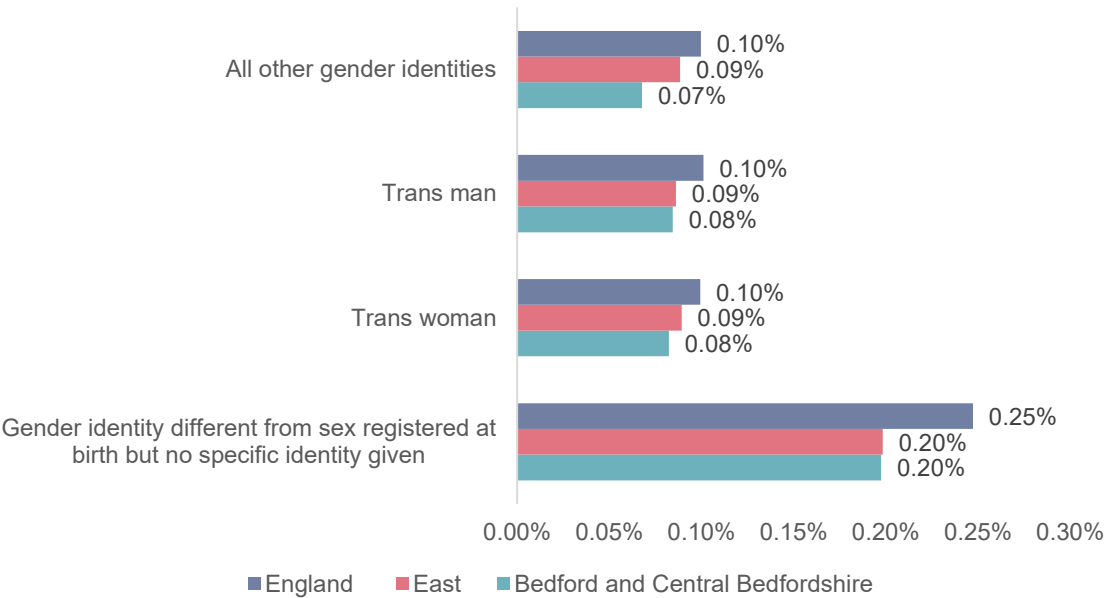
## Gender (reassignment and identities)

3.18

**Figure 8** and **Table 12** provide a breakdown of specific gender identities across geographies. They illustrate that across Bedford and Central Bedfordshire there is not a disproportionate representation of any specific gender identities relative to what is recorded nationally.

**Figure 8 – There is not a disproportionate representation of any specific gender identity across Bedford and Central Bedfordshire**

Gender identities by geography, 2021



Source : ONS (2021) Census. Available at: <https://www.ons.gov.uk/census> [Accessed 19 May 2025]. Note: Due to availability of data, unable to present this at the local level.

**Table 12 – 760 people in Bedford and Central Bedfordshire have a gender identify different from sex registered at birth**

Breakdown of specific gender identities by geography, 2021, absolute values

Gender Identity	Bedford and Central Bedfordshire	East	England
Gender identity different from sex registered at birth but not specific identity given	760	10,000	114,000
Trans woman	315	4,600	46,000

Gender Identity	Bedford and Central Bedfordshire	East	England
Trans man	325	4,400	47,000
All other gender identities	260	4,600	46,000

Source : ONS (2021) Census. Available at: <https://www.ons.gov.uk/census> [Accessed 19 May 2025]. Note: Due to availability of data, unable to present this at the local level. Note: Figures may not sum due to rounding.

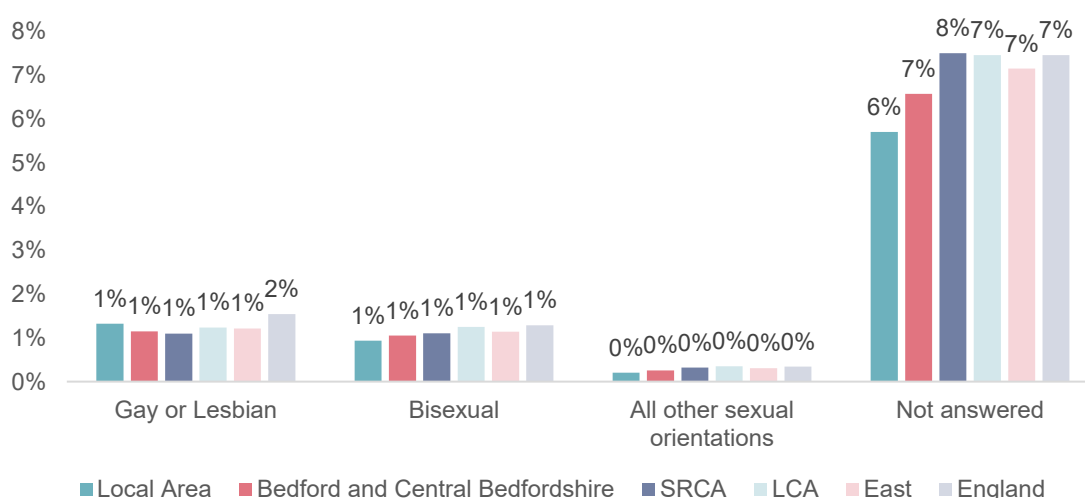
## Sexual orientation

3.19 The proportion of residents who identify as heterosexual or straight is slightly higher across the Local Area (27,000 people or 92%) and Bedford and Central Bedfordshire (350,000 people or 91%), compared to the regional (4.6m people or 90%) and national level (41.1m people or 89%).<sup>7, 8</sup>

3.20 As illustrated in **Figure 9** and **Table 13**, no other sexual orientation groups across the Local Area or Bedford and Central Bedfordshire are represented to a greater proportion than they are nationally.

**Figure 9 – Aside from those that are heterosexual or straight, there is no other sexual orientation group that is represented disproportionately across the Local Area or Bedford and Central Bedfordshire**

Proportion of LGBTQ+ residents in % terms (2021)



Source : ONS (2021) Census. Available at: <https://www.ons.gov.uk/census> [Accessed 19 May 2025].

<sup>7</sup> ONS (2021) Census. Available at: <https://www.ons.gov.uk/census> [Accessed 19 May 2025].

<sup>8</sup> Deviation in overall totals is caused by limited availability of data. Local Area has been assessed using MSOA boundaries rather than LSOA boundaries as this data isn't available at LSOA level. MSOA boundaries cover a slightly larger area, hence why the figure above differs from what is reported for the population of the Local Area elsewhere in the report.

**Table 13 – There are 390 people with gay or lesbian sexual orientation in the Local Area and 4,400 in Bedford and Central Bedfordshire**

Proportion of LGBTQ+ residents, 2021, absolute values

Area	Gay or Lesbian	Bisexual	All other sexual orientations	Not answered
Local Area	390	275	60	1,700
Bedford and Central Bedfordshire	4,400	4,100	980	25,000
SRCA	8,600	8,600	2,500	59,000
LCA	27,800	28,200	7,800	167,000
East	63,000	59,000	16,000	368,000
England	710,000	592,000	158,000	3.4m

Source : ONS (2021) Census. Available at: <https://www.ons.gov.uk/census> [Accessed 19 May 2025].

## Pregnancy and maternity

3.21

**Table 14** illustrates the birth rate in 2021 per 100 of the female population across geographies. As a result of the high birth rate across Bedford and Central Bedfordshire, it can be assumed that there is a greater proportion of pregnant women than there would be regionally and nationally. Additionally, despite the absence of local data, it is deemed reasonable to assume the same trend locally. This is supported by the fact that the population is younger in the Local Area than it is across Bedford and Central Bedfordshire (Figure 2).

**Table 14 – There is a higher birth rate per 100 of the female population in Bedford and Central Bedfordshire than comparator geographies**

Birth rate per 100 females across geographies

Area	Birth rate per 100 females
Bedford and Central Bedfordshire	2.3
East	2.1
England	2.1

Source: ONS (2021) *Live births in England and Wales : birth rates down to local authority areas*. Available at: <https://www.nomisweb.co.uk/datasets/lebirthrates> [Accessed 19 May 2025]. ONS (2021) Census. Available at: <https://www.ons.gov.uk/census> [Accessed 19 May 2025].

Community infrastructure

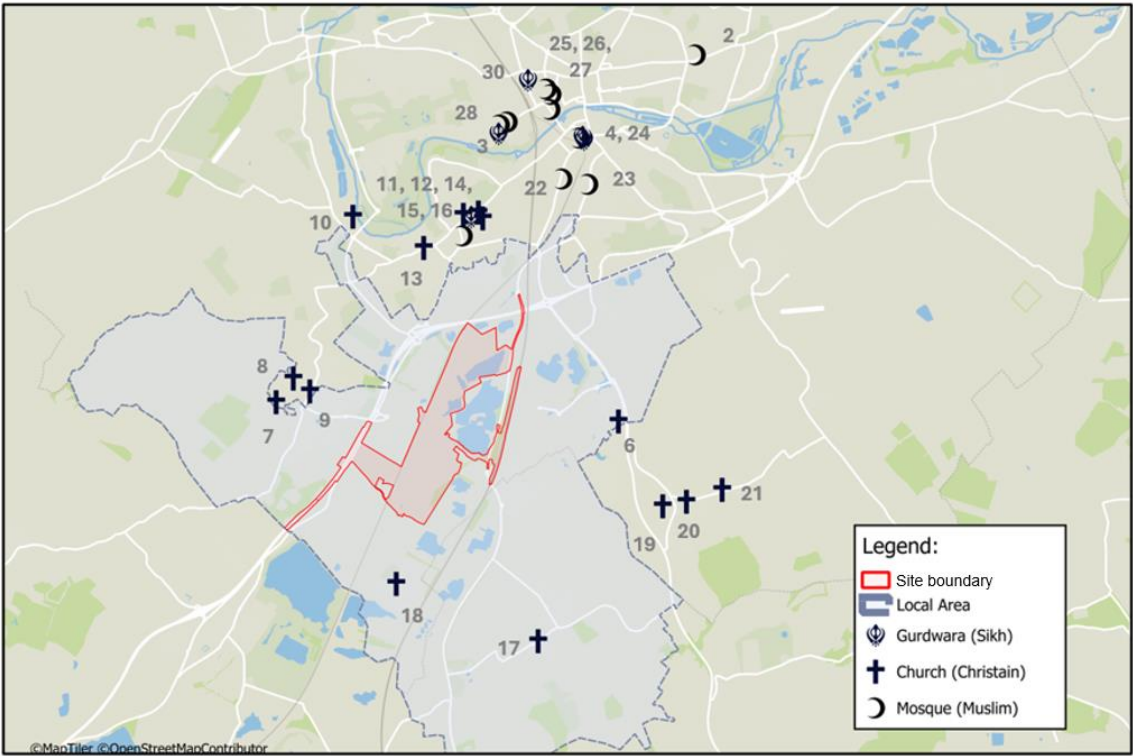
3.22 This section lays out the various infrastructure available in the Local Area. This includes religious institutions, community halls, schools and healthcare facilities.

Religious institutions

3.23 Religious institutions are frequented by individuals of that religion, and they have the potential to be impacted by the Proposed Development. It is notable that there are only churches located within the Local Area and more mosques and gurdwaras located further north in Bedford. **Figure 10** maps all the religious institutions in and surrounding the Local Area

Figure 10 – There are only churches located within the Local Area

Religious institutions located around the Site



Source: Volterra research, 2025; Note: point 1 is outside the scope of this map

Table 15 – There are 29 religious institutions located around the Site

Religious institutions located around the Site

Number	Religious institution
1	Diocese of St. Albans



Number	Religious institution
2	University of Bedfordshire (multi-faith prayer room)
3	Guru Nanak Gurdwara Bedford
4	Ramgarhia Sikh Society
5	Bedford Council of Faiths
6	Christ the Word Church Wixams
7	St Mary's Church (Wootton)
8	Wootton Methodist Church
9	Wootton Baptist Church
10	All Saints Kempston
11	Catholic Church of Our Lady (Kempston)
12	Kempston East Methodist Church
13	Kempston West Methodist Church
14	Parish Church of the Transfiguration (Kempston)
15	Kempston Gospel Hall
16	Salaam Masjid (Mosque) Kempston
17	Church of All Saints Houghton Conquest
18	Stewartby United Church
19	All Saints' Church (Wilstead)
20	Wilstead Methodist Church
21	Wilstead Evangelical Church
22	Dar AlHuda Masjid
23	South Bedford Masjid
24	Al-Haramain Mosque and Education Centre
25	Bangladesh Islamic Centre
26	Bedford Al Falaah Islamic Centre
27	Bedford Central Jammee Masjid
28	Guru Nanak Gurdwara Temple (Ford End Road)
29	Gurdwara Guru Ravidass Sabha, Bedford

## Community halls

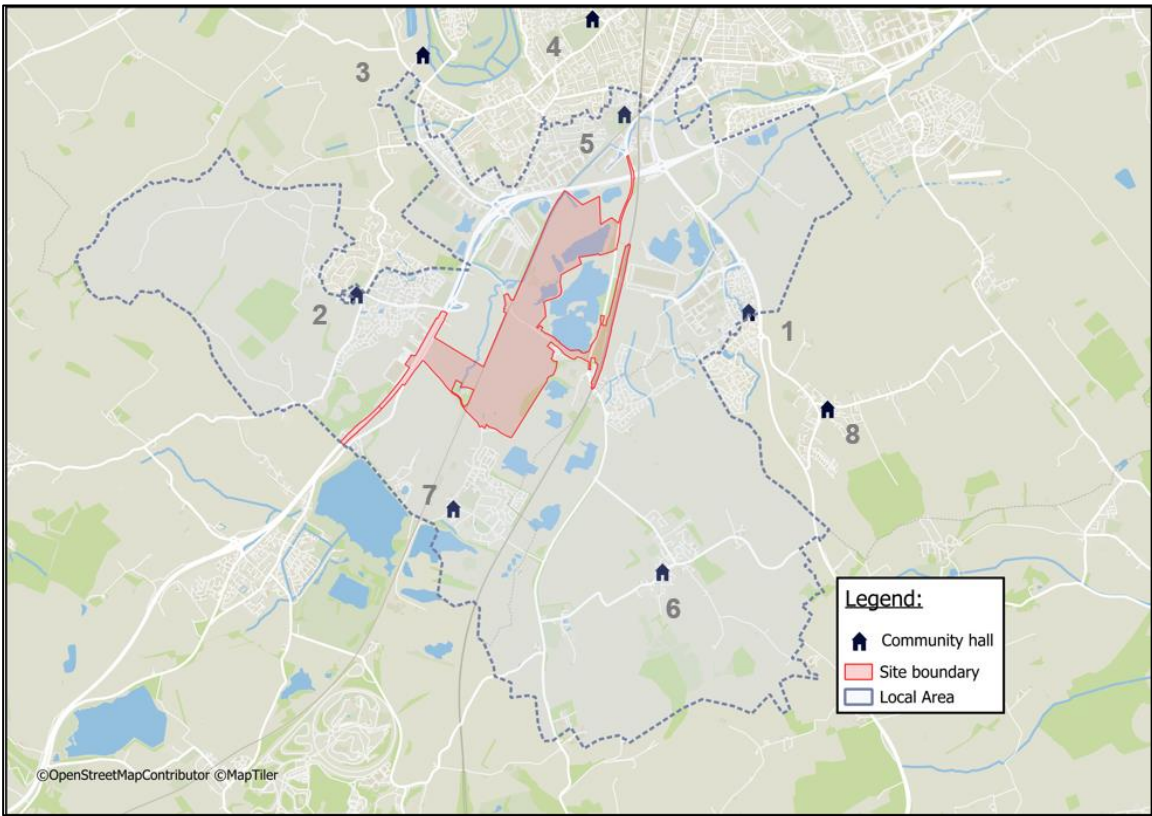
3.24

Community halls in the Local Area are mapped in **Figure 11**. Community halls are a place of gathering for both formal and informal meetings and events, and available for all in the Local Area to use. The recommended capacity for a community hall is 7,000 – 11,000 residents per community hall, however the

population size required to maintain one community hall in terms of viability is 4,000.<sup>9</sup> Currently there is one community hall per approximately every 3,600 residents in the Local Area.

**Figure 11 – There are 5 community halls located in the Local Area**

Community halls located around the Site



Source: Volterra research, 2024

**Table 16 – There is one community hall per approximately every 3,600 residents in the Local Area**

Community halls in the Local Area

Number	Community hall
1	Lakeview Village Hall (Wixams)
2	Wootton Village Hall
3	All Saints Church Hall (Kempston)
4	Addison Centre (Kempston)
5	Southfields Community Centre

<sup>9</sup> Barton, Grant and Guise (2003) *Shaping Neighbourhoods: A Guide for Health, Sustainability and Vitality*.

Number	Community hall
6	Houghton Conquest Village Hall
7	Stewartby Village Hall
8	Wilstead Village Hall

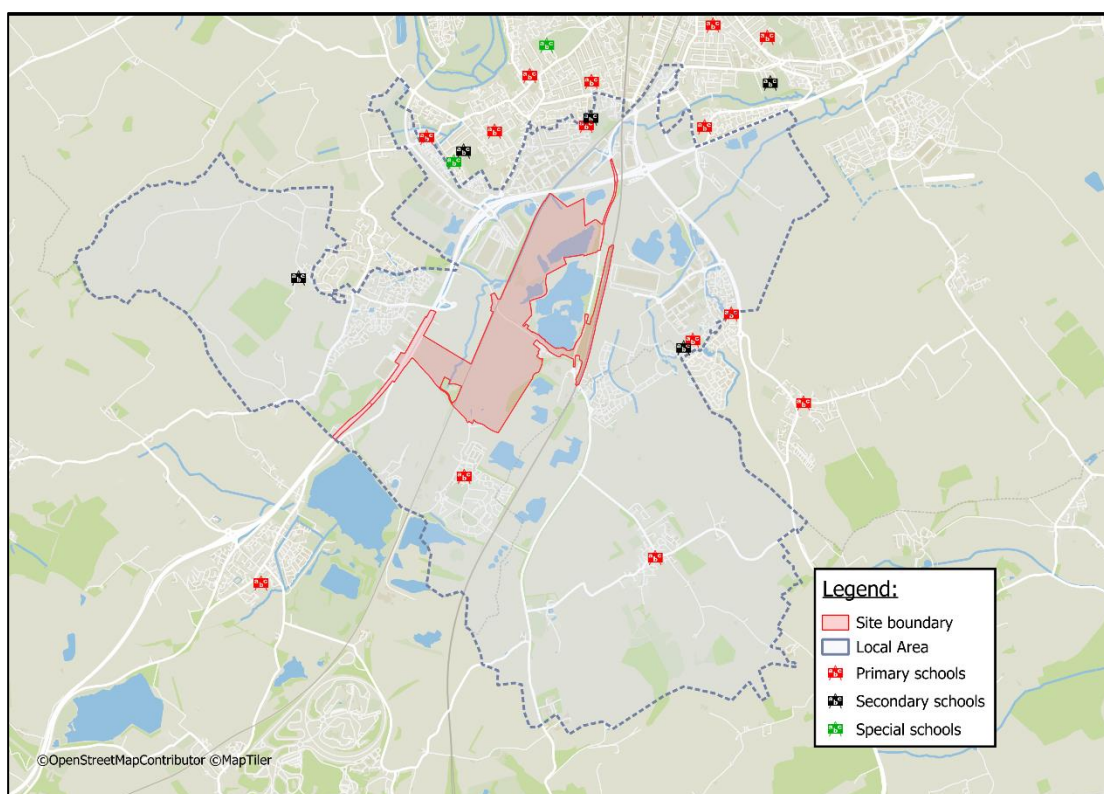
## Schools

3.25

**Figure 12** illustrates the schools located around the Site. It is clear that there is a significant amount of primary and secondary schools located in the Local Area.

**Figure 12 – There are several schools located within close proximity of the Site**

Schools located around the Site



Source: Volterra research, 2025; DfE (2025) Get Information about Schools. Available at: <https://get-information-schools.service.gov.uk/> [Accessed 19 May 2025].

3.26

The average travel distance to primary school is approximately 1.6 miles.<sup>10</sup> Given the size of the Site and the nature of the data source which provides data from a specific postcode, a further buffer of 1.6 miles has

<sup>10</sup> School Streets Initiative (no date given) *Independent Mobility*. Available at: <https://schoolstreets.org.uk/> [Accessed 15 August 2024]

been added to this radius, creating a 3.2 mile buffer. This additional 1.6 miles represents the furthest distance within the Site from the specific postcode that the data regarding schools is collected from. This approach ensures all schools that fall within appropriate average travel distances to any point within the Site are captured.

3.27 A list of the 19 primary schools that fall within this 3.2-mile radius of the Proposed Development can be found in **Table 17** below.<sup>11</sup>

3.28 The primary schools collectively have a total capacity of 8,440 pupils and a current roll of 7,980 pupils. This equates to these primary schools operating at 95% capacity.

**Table 17 – There are 19 primary schools that fall within 3.2 miles of the Site**

Primary schools within 3.2 miles of the Site

Primary school	Capacity	Number of pupils
Houghton Conquest Lower School	145	135
Camestone School	420	415
Kempston Rural Primary School	420	440
Balliol Primary School	440	390
Broadmead Lower School	210	230
Wilstead Primary School	210	195
King's Oak Primary School	935	850
Westfield Primary School	400	235
Lakeview School	420	440
Great Denham Primary School	650	645
Queen's Park Academy	375	450
St Joseph's and St Gregory's Catholic Primary School and Nursery	525	325
Wixams Tree Primary Academy	420	500
Elstow School	420	410
Cauldwell School	420	415
Shackleton Primary School	540	475
Springfield Primary School	420	390
Marston Moreteyne VC School	650	645
Bedford Road Primary Academy	420	390
<b>Total</b>	<b>8,440</b>	<b>7,980</b>

<sup>11</sup> Note: there are a total of 22 primary schools within the defined radius, however data is available for 19.

Source: DfE (2025) *Get Information about Schools*. Available at: <https://get-information-schools.service.gov.uk/> [Accessed 19 May 2025].  
Note: Figures may not sum due to rounding.

3.29 The average travel distance to secondary school<sup>12</sup> is approximately 3.4 miles.<sup>13</sup> Again, a buffer of 1.6 miles (furthest distance from Site centre point) has been added to this radius. A list of the nine secondary schools that fall within this 5.0-mile radius of the Proposed Development can be found in **Table 18** below.<sup>14</sup>

3.30 The secondary schools collectively have a total capacity of 9,230 pupils and a current roll of 8,875 pupils. This equates to these secondary schools operating at 96% capacity.<sup>15</sup>

**Table 18 – There are nine secondary schools that fall within 5.0 miles of the Site**

Secondary schools within 5.0 miles of the Site

Secondary school	Capacity	Number of pupils
Biddenham International School and Sports College	1,500	1,355
Bedford Academy	1,440	1,330
Goldington Academy	750	930
Redborne Upper School and Community College	1,420	1,580
Wootton Upper School	1,220	890
Daubeney Academy	600	505
Bedford Free School	500	530
Kempston Academy	980	835
Wixams Academy	825	925
<b>Total</b>	<b>9,230</b>	<b>8,875</b>

Source: DfE (2025) *Get Information about Schools*. Available at: <https://get-information-schools.service.gov.uk/> [Accessed 19 May 2025].  
Note: Figures may not sum due to rounding.

3.31 Special schools<sup>16</sup> provide education for children aged 3-19 with a special educational need or disability. The average travel distance to special schools in urban areas is approximately 4.0 miles.<sup>17</sup> Again, a buffer of 1.6

<sup>12</sup> Note: Secondary education in the UK generally covers students from ages 11 to 18. This corresponds to Years 7 to 13 in England and Wales.

<sup>13</sup> Department for Transport (2014) *National Travel Survey 2014: Travel to School*. Available at: <https://assets.publishing.service.gov.uk/media/5a8040f240f0b623026926cd/travel-to-school.pdf> [Accessed 19 May 2025].

<sup>14</sup> Note: there are a total of 10 secondary schools within the defined radius, however data is available for nine.

<sup>15</sup> Note: Figures may not sum due to rounding.

<sup>16</sup> Note: special schools provide education to children with special educational needs and disability. These schools can support children aged 2 – 19.

<sup>17</sup> Education Policy Institute (2018) *Access to special schools in England*. Available at: <https://epi.org.uk/publications-and-research/access-special-schools-england/> [Accessed 19 May 2025].

miles (furthest distance from Site centre point) has been added to this radius. A list of the three that fall within this 5.6-mile radius of the Proposed Development can be found in **Table 19** below.<sup>18</sup>

- 3.32 The special schools collectively have a total capacity of 455 pupils and a current roll of 435 pupils. This equates to these special schools operating at 96% capacity.

**Table 19 – There are three special schools that fall within 5.6 miles of the Site**

Special schools within 5.6 miles of the Site

Primary school	Capacity	Number of pupils
Ridgeway School	125	105
St John's School	180	185
Grange Academy	150	150
<b>Total</b>	<b>455</b>	<b>435</b>

Source: DfE (2025) *Get Information about Schools*. Available at: <https://get-information-schools.service.gov.uk/> [Accessed 19 May 2025].

Note: Figures may not sum due to rounding.

## Healthcare

- 3.33 Typically, individuals register with GPs close to their place of residence. However, since January 2015, GPs have been allowed to accept patients who are living outside of their practice boundaries, although it is for the practice to decide whether this is appropriate. A GP can refuse patients if:

- It has no capacity to take on new patients;
- It is not accepting patients that do not live within its practice boundary; or
- It is not appropriate for an individual to register with a practice that is a long way from where they live.

- 3.34 There are 43 GP catchment areas that fall more than 50% within Bedford and Central Bedfordshire, of which 36 have data available. **Table 20** below shows that these GPs have a total patient number of approximately 476,820 patients and a full-time equivalent GP number of approximately 230.<sup>19</sup> This equates to a patient to GP full-time equivalent ratio of approximately 2,070 patients per GP full-time equivalent. This is higher than the benchmark of 1,800 patients to fully qualified GP FTE ratio outlined within the HUDU Planning Contribution Model, suggesting that GP services across Bedford and Central Bedfordshire are constrained.<sup>20</sup>

<sup>18</sup> Note: there are a total of four special schools within the defined radius, however data is available for three.

<sup>19</sup> NHS Digital (2024) *General Practice Workforce Statistics*. Available at: <https://digital.nhs.uk/data-and-information/publications/statistical/general-and-personal-medical-services> [Accessed 19 May 2025].

<sup>20</sup> NHS London (2009) *HUDU Planning Contribution Model Guidance Notes*. Available at: <https://www.healthyrurbandevelopment.nhs.uk/wp-content/uploads/2013/03/GuidanceNotes-2009.pdf> [Accessed 19 May 2025].



**Table 20 – The 36 GP catchment areas for which data is available have a total patient number of approximately 476,820 patients and a full-time equivalent GP number of approximately 230**

Patient and full-time equivalent GP numbers for GP Practices that fall more than 50% within Bedford and Central Bedfordshire

Practice	Patients	Full-time equivalent GPs	GP full-time equivalent ratio
Greensand Surgery (Amptill)	10,210	4.9	2,080
Salisbury House Surgery	11,970	4.5	2,685
Harrold Medical Practice	6,670	2.0	3,380
Wheatfield Surgery	12,320	10.1	1,220
West Street Surgery	12,445	7.2	1,735
Flitwick Surgery	14,300	8.8	1,630
London Road Health Centre	22,625	13.2	1,710
Queens Park Health Centre	22,605	6.8	3,310
Larksfield Surgery Medical Partnership	19,545	3.6	5,470
Sharnbrook Surgery	6,145	4.1	1,490
Houghton Regis Medical Centre	13,540	5.6	2,420
Putnoe Medical Centre Partnership	17,775	12.7	1,405
Cauldwell Medical Centre	10,955	2.6	4,215
Great Barford Surgery	5,150	2.4	2,145
Shefford Health Centre	20,000	12.4	1,610
Toddington Medical Centre	7,965	3.6	2,230
Sandy Health Centre	9,665	3.8	2,570
Ivel Medical Centre	13,125	0.4	30,015
The De Parys Group	37,005	23.9	1,545
King Street Surgery	21,770	13.2	1,650
Cranfield Surgery	10,815	6.9	1,570
Leighton Road Surgery	20,135	3.0	6,710
Kingsbury Court Surgery	10,270	2.7	3,850
Dr Hughes & Partners	12,055	7.8	1,535
Goldington Avenue Surgery	18,240	9.0	2,025
Priory Medical Centre	7,760	3.0	2,550
Asplands Medical Centre	12,735	11.5	1,110
Kirby Road Surgery	8,130	1.0	8,470

Practice	Patients	Full-time equivalent GPs	GP full-time equivalent ratio
Saffron Health Partnership	22,010	10.9	2,025
Linden Road Surgery	6,005	4.7	1,280
Dr Collins And Carragher And Neal	7,115	3.0	2,360
Caddington Surgery	5,005	2.9	1,700
Houghton Close Surgery	11,750	8.3	1,415
Ashburnham Road Surgery	4,235	2.6	1,630
Eastgate Surgery	7,420	1.2	6,185
Wootton Vale Healthy Living Centre	17,355	6.0	2,880
Total	476,820	230	2,070

Source: NHS Digital (2024) General Practice Workforce Statistics. Available at: <https://digital.nhs.uk/data-and-information/publications/statistical/general-and-personal-medical-services> [Accessed 19 May 2025]. Note: figures may not sum due to rounding.

3.35

The Site falls within the catchment area of the GP practices listed in **Table 21**.

**Table 21 – Within the catchment area of the Site, there is a total patient to GP full-time equivalent ratio of approximately 2,095 patients per GP full-time equivalent**

Patient and full-time equivalent GP numbers for GP Practices for which the Site falls into the catchment area

Practice	Patients	Full-time equivalent GPs	GP full-time equivalent ratio
Greensand Surgery (Amphill)	10,210	4.9	2,080
London Road Health Centre	22,625	13.2	1,710
Queens Park Health Centre	22,605	6.8	3,310
Cauldwell Medical Centre	10,955	2.6	4,215
King Street Surgery	21,770	13.2	1,650
Goldington Avenue Surgery	18,240	9.0	2,025
Houghton Close Surgery	11,750	8.3	1,415
Ashburnham Road Surgery	4,235	2.6	1,630
Wootton Vale Healthy Living Centre	17,355	6.0	2,880



Practice	Patients	Full-time equivalent GPs	GP full-time equivalent ratio
Total	139,745	66.7	2,095

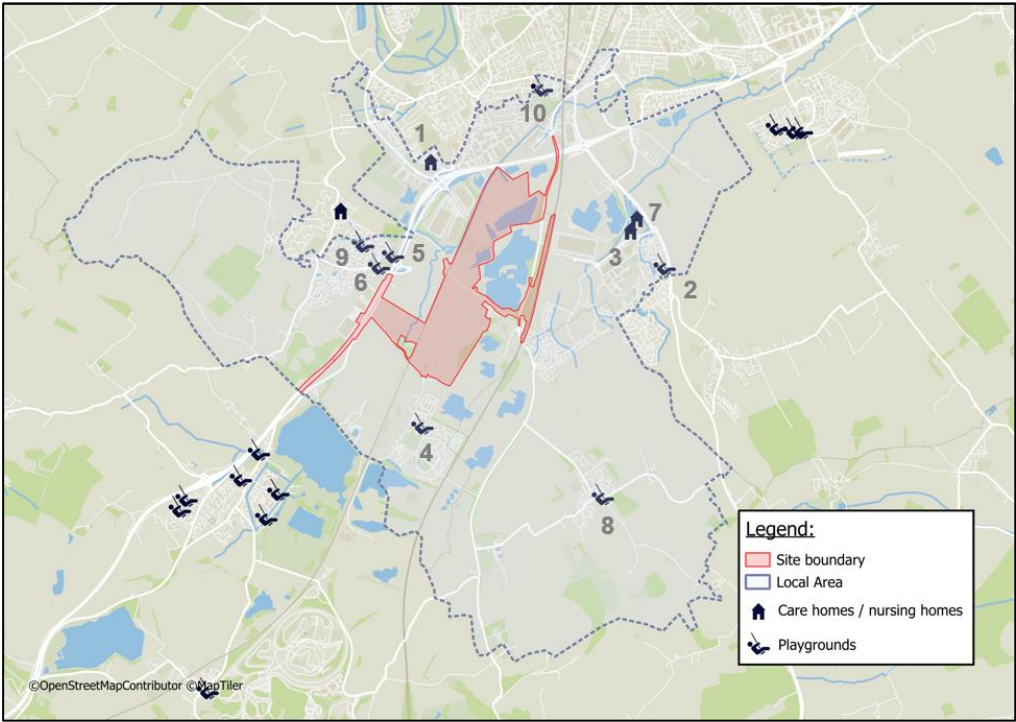
Source: NHS Digital (2024) General Practice Workforce Statistics. Available at: <https://digital.nhs.uk/data-and-information/publications/statistical/general-and-personal-medical-services> [Accessed 19 May 2025]. Note: figures may not sum due to rounding.

3.36 The Accident and Emergency operators serving the site would be Bedford Hospital, which is operated by the Bedfordshire Hospitals NHS Foundation Trust. According to the most recently available data, accident and emergency performance across Bedfordshire has been below average.<sup>21</sup> Bedfordshire Hospitals NHS Foundation Trust saw 72.6% of accident and emergency patients within 4 hours. This compares negatively to the national rate of 73.4%.

### Other sensitive receptors

3.37 There are a number of other sensitive receptors in the Local Area, as depicted in **Figure 13** and **Table 22**.

**Figure 13 - There are three nursing homes and seven playgrounds that fall in the Local Area of the Site**



<sup>21</sup> NHS (2025) A&E Attendances & Emergency Admission monthly statistics, NHS and independent sector organisations in England. Available at: <https://www.england.nhs.uk/statistics/statistical-work-areas/ae-waiting-times-and-activity/> [Accessed 19 May 2025].

Source: Volterra research, 2025.

**Table 22 – There are three nursing homes and seven playgrounds in the Local Area**

Number	Community hall
1	Fernleigh Court Care & Nursing Home
2	Woodpecker Play Area
3	Elstow Manor Care Home
4	Kiln Drive Playground, Stewartby
5	Wootton bike park
6	Play Park (Fields Road)
7	Wixams Retirement Village
8	Children's Play Area, 3 Daysfield
9	Playground, 26 Robinson Cl
10	Springfield playground

*Note: Although Wixams Retirement Village is not strictly a nursing or care home, it provides care and support for retired persons, with specialised facilities, including a dementia & wellbeing suite, a multi-function games room, a bistro/restaurant and a library. This means a high number of older residents will be located there.*

## 4. Literature Review

- 4.1 A review of existing academic and policy literature relevant to the likely impacts of the Proposed Development has been carried out. This section summarises the findings around which equality groups may potentially be at risk of experiencing differential effects. The definition of differential effects can be found in **paragraph 2.9**.
- 4.2 This literature relates to general differential effects that equality groups could experience from development and are not necessarily anticipated effects of the Proposed Development. Where there is an absence of literature, there is not assumed to be a relevant link between the target group and the potential equality effect.

### Age

- 4.3 Parental unemployment can enhance stress and anxiety in children, as well as reducing educational attainment.<sup>22</sup> Unemployment for over 50s is associated with difficulty gaining re-employment as younger candidates are deemed preferable.<sup>23</sup> This is relevant because the Proposed Development is providing jobs on a large scale (8,050 in the first year of operation), some of which may go to previously unemployed people and/or those with children.
- 4.4 Literature suggests that developments which provide spaces for children to be involved in the community can be beneficial in early childhood.<sup>24</sup> Moreover, community involvement in schemes of a similar nature and scale to the Proposed Development is considered beneficial in early childhood. The Promoter has thus engaged extensively with and involved the community to date, including children.
- 4.5 Pollution can be particularly damaging to children, as their lungs are still developing. Equally, older people are more likely to suffer from cardiovascular and respiratory conditions due to poor air quality.<sup>25</sup> This is relevant in particular to the construction phase of the Proposed Development, during which there is likely to be an increase in the movement of heavy duty vehicles (HDVs).
- 4.6 Literature finds that children surrounded by antisocial behaviour are more likely to experience negative outcomes such as criminal behaviour and substance dependence.<sup>26</sup> This is relevant as the Proposed Development is likely to impact the layout of public and open spaces, which can affect levels of crime and antisocial behaviour.

<sup>22</sup> Stevens and Schaller (2011) *Short-run effects of parental job loss on children's academic achievement*.

<sup>23</sup> Agediscrimination.info (no date) *A practical guide to age discrimination law*. Available at: <https://www.agediscrimination.info/practical-guide> [Accessed 19 May 2025].

<sup>24</sup> Eden Academy (2025) *The Importance of Community in Early Childhood: Why Strong Connections Matter for Children, Families, and Providers*. Available at: <https://edenacademy.com.au/the-importance-of-community-in-early-childhood/> [Accessed 19 May 2025].

<sup>25</sup> Asthma + Lung UK (2022) *How does air pollution affect children's lungs?*. Available at: <https://www.asthmaandlung.org.uk/support-parents-carers/risks-your-childs-lungs/how-does-air-pollution-affect-childrens-lungs#:~:text=If%20your%20child%20breathes%20in,wheezing> [Accessed 19 May 2025].

<sup>26</sup> Fergusson, Boden and Horwood (2009) *Situational and generalized conduct problems and later life outcomes: Evidence from a New Zealand birth cohort*.

- 4.7 Prolonged exposure to high levels of noise can cause a higher prevalence of cardiovascular disease, strokes, and dementia, of which older people are already at risk.<sup>27</sup> This is relevant for both the construction and operation phases of the Proposed Development where noise levels are likely to be impacted.
- 4.8 Leisure is known to have the potential to benefit young people through enhanced cohesive and healthy relationships between families.<sup>28</sup> Family recreation may serve as 'purposeful leisure' and can be used as an important vehicle for child development.<sup>29</sup>
- 4.9 Limited mobility, caused by reduced access to Public Rights of Way (PRoW) can lead to increased isolation for older people, reduced independence, and poorer health outcomes due to decreased physical activity and limited social interactions.<sup>30</sup> This has the potential to be of relevance during the construction and operation phases of the Proposed Development.
- 4.10 Younger people are particularly vulnerable to the presence of a major construction workforce. The noise, machinery and several unfamiliar adults can lead to children feeling intimidated and scared, disrupting their sense of safety.<sup>31</sup> This is relevant because there would be a considerable influx of construction workers to the Local Area.
- 4.11 Elderly individuals benefit significantly from improved public transport systems, which enhance their autonomy, independence and social inclusion. Accessible and sustainable transport options are crucial in helping older adults maintain an active lifestyle and prevent social isolation. The Proposed Development would bring about significant changes to the local public transport systems, making this a relevant factor to consider.

## Disability

- 4.12 There are strong links between unemployment and negative health outcome indicators for those with a pre-existing health conditions, including overall mortality and cardiovascular disease.<sup>32</sup> This is relevant because the Proposed Development would create jobs on a large scale.
- 4.13 Proportions of green and open space have also been linked to self-reported levels of health and mental health through an improved sense of identity and belonging, as well as increased levels of happiness.<sup>33</sup> The Proposed Development is likely to impact the existing green and open space provision, so has been included in this literature review.
- 4.14 Those with disabilities or long-term health problems may have an increased sensitivity to loud noises. Changes in noise exposure can differentially affect this vulnerable group, in particular, those living with

<sup>27</sup> Harding, A-H et al. (2013) *The case of hypertension-related ill-health attributable to environmental noise*.

<sup>28</sup> Lee (2021) *Family Recreation and Theme Parks, Visions in Leisure and Business: Vol. 23: No. 1, Article 5*. Available at: <https://scholarworks.bgsu.edu/visions/vol23/iss1/5/> [Accessed 17 April 2024].

<sup>29</sup> Kelly (1996) *Leisure*. Needham, MA: Allyn & Bacon

<sup>30</sup> McMaughan et al. (2020) *Socioeconomic Status and Access to Healthcare: Interrelated Drivers for Healthy Aging, Frontiers in Public Health: Vol. 8*.

<sup>31</sup> National Center for Construction Education & Research (2022) *Long-Term Health Concerns in Construction & How to Overcome Them*. Available at: <https://www.nccer.org/newsroom/long-term-health-concerns-in-construction-how-to-overcome-them/> [Accessed 19 May 2025].

<sup>32</sup> European Society of Cardiology (2017) *Unemployment associated with 50% higher risk of death in heart failure patients*. Available at: <https://pmc.ncbi.nlm.nih.gov/articles/PMC5558129/> [Accessed 19 May 2025].

<sup>33</sup> White (2013) *Would you be happier living in a greener urban area? A fixed-effects analysis of panel data*.

- epilepsy, acting as an additional trigger that may cause a seizure. This is relevant for both the construction and operation phases of the Proposed Development where noise levels are likely to be impacted.
- 4.15 Disabled people have been found to experience more crime than non-disabled people. 22% of disabled 10-15 year-olds in England and Wales have been the victim of crime over the course of a year, compared to just 12% of non-disabled people.<sup>34</sup> This is relevant as the Proposed Development is likely to impact the layout of public and open spaces, which can affect levels of crime and antisocial behaviour.
- 4.16 Discrimination against disabled people may occur by not providing disabled parking, not having accessible disabled toilets, having narrow entrances or non-step-free access.<sup>35</sup> This is relevant because the Proposed Development would provide both disabled parking and accessible disabled toilets to cater to the needs of those with reduced mobility.
- 4.17 Since most theme parks have been constructed prior to accessibility regulations enforcement, they are often not fully compliant for guests with special needs. The presence or absence of accessible features in amusement and theme parks is directly related to the overall guest experience for individuals who require special accommodations.<sup>36</sup> This is relevant because the Proposed Development would be delivered taking into full account the needs of those requiring special accommodations.
- 4.18 Reduced access to PRowS significantly affects disabled people, particularly in terms of mobility and independence. Research highlights that disabled individuals face considerable challenges in accessing necessary facilities and services due to inadequate public infrastructure. This lack of access can restrict participation in societal activities and lead to social isolation.<sup>37</sup> This has the potential to be of relevance during both the construction and operation phases of the Proposed Development. However, it is noted that at no point would the Proposed Development have an impact on PRowS that would make accessibility around the Site worse.
- 4.19 Improved public transport systems are crucial for disabled individuals as they significantly enhance their ability to access jobs, education, healthcare and social activities. Enhanced mobility through accessible transport systems helps break the cycle of social and economic isolation that many disabled persons face.<sup>38</sup> The Proposed Development would bring about significant changes to the local public transport systems, making this a relevant factor to consider.

## Religion and philosophical belief

- 4.20 In 2013, the percentage of people in England from a religious minority in employment was lower (58.7%) than those with no religion (75.8%) and Christians (74.8%).<sup>39</sup> Muslims face worse employment discrimination than any other group, with a Muslim man being 76% less likely to have a job compared to a

<sup>34</sup> Coleman et al. (2016) *Crime and disabled people: Measures of disability-related harassment*.

<sup>35</sup> Historic England (no date) *Improving Access to Historic Buildings and Landscapes*. Available at: <https://historicengland.org.uk/advice/technical-advice/easy-access-to-historic-buildings-and-landscapes/> [Accessed 19 May 2025].

<sup>36</sup> Morgan (2020) *'It's An Accessible World After All': Evaluation of Amusement Park Accessibility and Accommodations for Guests with Disabilities*.

<sup>37</sup> Tyers et al. (2022) *Access to transport for disabled people*, House of Commons Library.

<sup>38</sup> The World Bank (2015) *For Persons with Disabilities, Accessible Transport Provides Pathways to Opportunity*, Available at: <https://www.worldbank.org> [Accessed 13 May 2024].

<sup>39</sup> Equality and Human Rights Commission (2015) *Is Britain Fairer? Key facts and findings on religion and belief*. Available at: [https://www.equalityhumanrights.com/sites/default/files/2021/is-britain-fairer-findings-factsheet-religion\\_1.pdf](https://www.equalityhumanrights.com/sites/default/files/2021/is-britain-fairer-findings-factsheet-religion_1.pdf) [Accessed 19 May 2025].

white, British man.<sup>40</sup> Indeed, 3% of employees have faced discrimination due to their religion.<sup>41</sup> The gap in economic outcomes for religious minority groups remains a considerable issue. For example, 26.6% of Muslims live in social rented housing, a rate significantly higher than the national average.<sup>42</sup>

4.21 This is relevant for this EIR because the Proposed Development would create a significant number of jobs.

## Race

4.22 Black and Asian ethnic minority (BAME) communities are disproportionately represented amongst the unemployed.<sup>43</sup> Analysis of national unemployment trends highlights that the rate of national unemployment is typically almost 8% for BAME groups compared with 4% for white British people. Graduates from a black or ethnic minority background face significant employment penalties relative to white graduates, partially due to racial discrimination, making it harder to access employment opportunities.<sup>44</sup> Data from the Institute for Fiscal Studies (IFS) reveals that despite educational improvements among ethnic minorities, there remains a persistent pay gap.<sup>45</sup> Even with similar qualifications and job roles, ethnic minorities often earn less than their White counterparts, highlighting discrimination and other structural barriers in the labour market.

4.23 Research has found that ethnic groups that fall under the umbrella 'BAME' comprise around 1 in 6 (17%) of the hospitality workforce, compared to 12% of the workforce in other sectors. This amounts to around 300,000 hospitality workers from a 'BAME' background.<sup>46</sup> These findings are relevant for this EIR because the Proposed Development would create a significant amount of jobs.

4.24 Ethnic minority groups are particularly vulnerable to the presence of a major construction workforce. Research has found that minorities may feel intimidated by the presence of predominantly white male construction workforces.<sup>47</sup> This is relevant because there would be a considerable influx of construction workers to the Local Area.

<sup>40</sup> BBC News (2017) *Is it easier to get a job if you're Adam or Mohamed?*. Available at: <https://www.bbc.co.uk/news/uk-england-london-38751307#:~:text=A%20job%20seeker%20with%20an,name%2C%20a%20BBC%20test%20found.> [Accessed 19 May 2025].

<sup>41</sup> Applied (2021) *Religious discrimination in the workplace (mini report)*. Available at: <https://www.beapplied.com/post/religious-discrimination-in-the-workplace-mini-report#:~:text=The%20survey%20of%20984%20British,against%20because%20of%20their%20faith.> [Accessed 19 May 2025].

<sup>42</sup> ONS (2021) *Census 2021*. Available at: <https://www.ons.gov.uk/census> [Accessed 19 May 2025].

<sup>43</sup> Runnymede Trust (2016) *Ethnic Inequalities in London: Capital for All*. Available at: <https://www.runnymedetrust.org/publications/ethnic-inequalities-in-london-capital-for-all> [Accessed 19 May 2025].

<sup>44</sup> The Resolution Foundation (2018) *Opportunities Knocked? Exploring pay penalties among the UK's ethnic minorities*. Available at: <https://www.resolutionfoundation.org/publications/opportunities-knocked-exploring-pay-penalties-among-the-uks-ethnic-minorities/>

<sup>45</sup> Institute for Fiscal Studies (2022) *UK ethnic minorities seeing sharp progress in education, but wages and wealth lag behind*. Available at: <https://ifs.org.uk/inequality/press-release/uk-ethnic-minorities-seeing-sharp-progress-in-education-but-wages-and-wealth-lag-behind/#:~:text=Most%20ethnic%20minority%20groups%20in%20the%20UK%20are%20doing%20better,their%20education%2C%20background%20and%20occupation.> [Accessed 19 May 2025].

<sup>46</sup> The Resolution Foundation (2020) *Ethnic minorities in the hospitality sector*. Available at: <https://www.resolutionfoundation.org/publications/ethnic-minorities-in-the-hospitality-sector/> [Accessed 19 May 2025].

<sup>47</sup> Personnel Today, 2009. *Ethnic minorities make up just 3.3% of construction industry workers*. Available at: <https://www.personneltoday.com/hr/ethnic-minorities-make-up-just-3-3-of-construction-industry-workers/> [Accessed 19 May 2025].



- 4.25 Those that belong to traveller communities have a life expectancy that is 10 to 12 years shorter than the non-traveller population.<sup>48</sup> In England, 42% of residents of traveller groups suffer from long-term health conditions compared to 18% of the general population. Suicide rates among those that belong to traveller communities are six times higher for women and seven times higher for men compared to the general population.<sup>49</sup>
- 4.26 The above is relevant in the context of the Proposed Development, as the Site falls directly adjacent to a prominent gypsy and traveller community. The Promoter met with Council representatives overseeing the gypsy and traveller community in Bedford, took advice on the most appropriate method of engaging with this group, and carried out an engagement event accordingly. Many at the site engaged and shared their views around the Proposed Development and potential employment opportunities, which should be taken into consideration in the design process.

## Sex

- 4.27 Women are more likely to feel threatened by the opposite sex in public places,<sup>50</sup> which is relevant because the Proposed Development would impact the make-up of public and open spaces in the Local Area. From the age of eight, less girls are using public parks, and girls are 10 times more likely to feel insecure in these places. This is partly because of social norms, but also because parks are not designed or equipped to cater for girls.<sup>51</sup> Similarly, whilst women are motivated to travel actively for physical and mental health reasons, worries about their personal safety, convenience (particularly when taking multi-stop trips) and appearance are all barriers to preventing them from cycling and walking.<sup>52</sup> Furthermore, a gender gap in contact with nature, where men visit natural environments more frequently than women, has been observed in a number of large-scale empirical studies.<sup>53</sup> This is relevant because the Proposed Development would create new landscape areas and enhance existing landscape areas, which would impact access to green and open spaces.
- 4.28 Women also face many barriers in the labour market, experiencing discrimination as employers may only recruit full-time workers.<sup>54</sup> 38% of women are employed part-time compared to 13% of men.<sup>55</sup> Women also face the burden of a significant gender pay gap, and higher unemployment rates. Women make up the majority of workers in the tourism industry worldwide, meaning tourism has the potential to boost women's employment and entrepreneurship prospects.<sup>56</sup> Indeed, tourism is a highly gendered industry, where gender

<sup>48</sup> UK Parliament (2019) *Tackling inequalities faced by Gypsy, Roma and Traveller communities*. Available at: <https://publications.parliament.uk/pa/cm201719/cmselect/cmwomeq/360/full-report.html> [Accessed 19 May 2025].

<sup>49</sup> Public Health Scotland (2022) *Health Inequalities in the Gypsy, Roma and Traveller Community – How we are making change happen?*. Available at: <https://publichealthscotland.scot/our-blog/2022/june/health-inequalities-in-the-gypsy-roma-and-traveller-community-how-we-are-making-change-happen/> [Accessed 19 May 2025].

<sup>50</sup> TfL (2019) *Travel in London: understanding our diverse communities*. Available at: <https://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf> [Accessed 19 May 2025].

<sup>51</sup> White Arkitekter (2017) *Flickrum – Places for girls, Stockholm University*. Available at: <https://whitearkitekter.com/project/places-for-girls/> [Accessed 18 April 2024]

<sup>52</sup> Sustrans (2018) *Exploring gender and active travel*. Available at: <https://www.sustrans.org.uk/our-blog/research/exploring-gender-and-active-travel/> [Accessed 19 May 2025].

<sup>53</sup> Bowker et al. (2006) *Wilderness and primitive area recreation participation and consumption: An examination of demographic and spatial factors*.

<sup>54</sup> Citizen's advice (no date) *Discrimination because of sex*. Available at: <https://www.citizensadvice.org.uk/law-and-courts/discrimination/discrimination-because-of-sex-or-sexual-orientation/discrimination-because-of-sex/> [Accessed 19 May 2025].

<sup>55</sup> House of Commons Library (2021) *Women and the Economy*. Available at: <https://commonslibrary.parliament.uk/research-briefings/sn06838/> [Accessed 19 May 2025].

<sup>56</sup> Baum (2013) *International perspectives on women and work in hotels, catering and tourism*.

roles are often reproduced.<sup>57</sup> Women in tourism are often concentrated in jobs related to care or jobs that require interpersonal skills, with little representation in physically intensive jobs or key managerial positions.<sup>58</sup> This is worth considering when developing employment approaches for the Proposed Development.

- 4.29 Finally, women particularly benefit from improved public transport systems as they can face unique mobility and safety concerns. Improved public transport can enhance a woman's access to education, employment, healthcare and social services, thereby promoting gender equality and empowerment.<sup>59</sup> The Proposed Development would bring about changes to the local public transport systems, making this a relevant factor to consider.

## Gender (reassignment and identities)

- 4.30 A study published by the Scottish Transgender Alliance reported that a fifth of transgender respondents experience harassment in the workplace, and 18% believe they have been turned down from a job due to their gender identity.<sup>60</sup> This is relevant to the Proposed Development as it would generate a significant amount of jobs, open to transgender people. Women have also been found to experience Transport Related Social Exclusion (TRSE).<sup>61</sup>

## Sexual orientation

- 4.31 Gay and lesbian employees are more likely to face harassment at work.<sup>62</sup> This is relevant because of the significant number of jobs the Proposed Development would generate.

## Pregnancy and maternity

- 4.32 Literature suggests greenness of the environment has a positive effect on pregnancy outcomes, for example healthy birthweights.<sup>63</sup> Furthermore, environmental factors, including aspects of the physical environment (e.g., street connectivity) influence physical activity in pregnancy and postpartum.<sup>64</sup> This is relevant because the Proposed Development would impact the make-up of public spaces in the Local Area.

<sup>57</sup> Genç (2018) *The impact of tourism in the reduction of gender inequality*.

<sup>58</sup> UNWTO (2019) Global Report on Women in Tourism. Available at : <https://www.e-unwto.org/doi/book/10.18111/9789284420384> [Accessed 19 May 2025].

<sup>59</sup> The World Bank (2024) *Closing Gender Gaps in Transport*. Available at: <https://www.worldbank.org/en/topic/transport/brief/closing-gender-gaps-in-transport> [Accessed 13 May 2024].

<sup>60</sup> Scottish Transgender Alliance (2016) Non-binary peoples' experiences in the UK. Available at: <https://www.scottishtrans.org/wp-content/uploads/2016/11/Non-binary-report.pdf> [Accessed 19 May 2025].

<sup>61</sup> Urban Transport Group (2022) Transport and Social Inclusion. Available at: <https://www.urbantransportgroup.org/system/files/general-docs/Social%20inclusion%20briefing%202022%20final.pdf> [Accessed 13 June 2025].

<sup>62</sup> Drydakis (2019) *Sexual orientation and labor market outcomes*. IZA World of Labor 2019.

<sup>63</sup> Kyung Ju Lee (2020) *Greenness, civil environment, and pregnancy outcomes: perspectives with a systematic review and meta-analysis*.

<sup>64</sup> Porter et al. (2019) *The Association between Neighbourhood Environments and Physical Activity from Pregnancy to Postpartum: a Prospective Cohort Study*, *Journal of Urban Health*, 96 (5).



- 4.33 High levels of noise can lead to increased risk of the baby suffering hearing loss, premature delivery and a low birthweight.<sup>65</sup> Also, short-term exposure to air pollution increases the risk of losing a pregnancy by 16%.<sup>66</sup> This is relevant for both the construction and operation phases of the Proposed Development, as noise levels are likely to be impacted during both phases, while there is likely to be an increase in the movement of HDVs and increased road congestion during construction.
- 4.34 The Department for Business, Innovation and Skills (BIS) and the Equality and Human Rights Commission found in 2015 that 11% of mothers reported they were either dismissed or made compulsorily redundant where others in their workplace were not.<sup>67</sup> This is relevant because the Proposed Development would bring about significant employment.

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<sup>65</sup> What to expect (2021) *Loud noises during pregnancy*. Available at: <https://www.whattoexpect.com/pregnancy/ask-heidi/loud-noises.aspx> [Accessed 19 May 2025].

<sup>66</sup> The Guardian (2019) *Air pollution 'as bad as smoking in increasing risk of miscarriage'*. Available at: <https://www.theguardian.com/environment/2019/jan/11/air-pollution-as-bad-as-smoking-in-increasing-risk-of-miscarriage> [Accessed 19 May 2025].

<sup>67</sup> Equality Human Rights (2018) *Pregnancy and maternity discrimination research findings*. Available at <https://www.equalityhumanrights.com/guidance/business/pregnancy-and-maternity-discrimination-research-findings#:~:text=Around%20one%20in%20nine%20mothers,as%2054%2C000%20mothers%20a%20year>. [Accessed 19 May 2025].

## 5. Potential equality effects

- 5.1 **Table 23** lays out the potential equality effects arising from the Proposed Development that should be considered in an assessment of impacts on equality groups, given the findings presented in **Chapter 3 Baseline** and **Chapter 4 Literature Review**.
- 5.2 This project is unique in its nature. In order to arrive at this list of potential impacts, EqlAs for projects of a similar scale / importance (such as Nationally Significant Infrastructure Projects (NSIPs)) were reviewed as well as EqlAs for major leisure developments, along with the technical documents accompanying this planning proposal.
- 5.3 In addition, we conducted an extensive literature review above, to assess which Protected Characteristic groups have the potential to experience differential effects as a result of these potential impacts, in what manner, and to what extent. For each impact listed, the relevant groups identified as disproportionate in the relevant study area (from **Chapter 3 Baseline**) and the relevant groups at risk of differential effects (as identified by the literature summarised in **Chapter 4 Literature Review**) are listed.

**Table 23 – Potential impacts arising from the Proposed Development**

Impact	Geography	Justification Relevant groups to consider
Inclusive design and access	Site	Both staff and visitors could be affected by the design and access of the Proposed Development once it is operational. Attractions, facilities, eating areas and walkways would be designed to be inclusive to everyone. This would lead to benefits for both staff and visitors. This effect is not relevant during construction. Disproportionate: unknown <sup>68</sup> Differential: age, disability, religion and philosophical belief, and pregnancy
Presence of construction workforce	Local Area	There is a potential that the influx of construction workers could cause equality groups to be at a greater risk of feeling intimidated. Disproportionate: age, race, and pregnancy Differential: age and race
Impact on community facilities and places of worship		Users of community facilities and places of worship could be affected by noise during both construction and operation. Disproportionate: age, race and pregnancy Differential: age, disability and religion and philosophical belief

<sup>68</sup> It is not known whether there will be disproportionate representation of equality groups within the workers or visitors at the Proposed Development.

Impact	Geography	Justification Relevant groups to consider
Neighbourhood amenity		Local residents, staff and visitors could be impacted by changes to neighbourhood amenity, which is broadly defined as including factors relating to the physical environment (air quality, noise levels, open space, green infrastructure, etc.) which together combine to represent one's enjoyment of their surroundings, or their neighbourhood amenity. Disproportionate: age, race, and pregnancy Differential: age, disability, and pregnancy
Connectivity		Local residents, staff and visitors are all likely to be impacted (potentially positively or negatively) from changes to local road and rail infrastructure networks. Disproportionate: age, race, and pregnancy Differential: age, gender, and disability
Employment and skills (job creation)	Bedford and Central Bedfordshire	The Proposed Development would generate thousands of additional employment and skills opportunities, during both the construction and operational phases. Disproportionate: pregnancy Differential: age, disability, race, sex, gender and pregnancy

## Equality effects assessment

- 5.4 This section assesses the scale of the impact the Proposed Development will generate under each topic area (e.g. Inclusive Design and Access, Neighbourhood Amenity, etc.). **Chapter 4 Literature Review** highlights how these impacts will generate differential impact on certain protected groups. The scale of the impact generated will also have disproportionate impacts on population groups that are overrepresented at the study area at which the respective impact is assessed. The summary section under each effect clearly outlines which groups are expected to be affected differentially and disproportionately.
- 5.5 Where this EIR states that mitigation is outlined in **Appendix 2.3 – Outline Construction Environmental Management Plan (Volume 3) and Employment and Skills Plan (Document 6.12)**, such mitigation is secured by the controlling documents as detailed in the **Proposed Operative and Controlling Documents (Document Reference 1.16.0)** and the **Proposed Conditions (Document Reference 1.5.0)**.

## Inclusive design and access

### Operational phase

- 5.6 It is anticipated that, like UDX's other theme parks and resorts around the world, the Proposed Development would be at the forefront of inclusive design, delivering a park which is accessible and inclusive for all.

- 5.7 The **Design and Access Statement (Document 6.2.0)** states that UDX is committed to creating a theme park experience that is inclusive and accessible to everyone, regardless of ability levels. Accessibility is built into many aspects of the design of the theme park and resort, including:
- Pathways are wide and smooth, making it easy for guests using wheelchairs or mobility aids to navigate with ease;
  - Ramps and elevators are strategically placed, to ensure that each corner of the park is accessible to all;
  - Toilet blocks have accessible facilities and are placed in easy-to-navigate locations;
  - Attractions are designed to accommodate a wide range of ages and abilities. Typically, an attraction or roller coaster would have one seat or row that can accommodate guests with walking impairments or wheelchair users; and
  - UDX provides state-of-the-art assistive technology to enhance the experience for guests with sensory, visual or hearing impairments. This includes captioning, audio description services for shows and attractions, as well as tactile maps and guides.
- 5.8 UDX provides mandatory varied ability training for all employees across all locations (and makes a point of using the term ‘varied abilities’, rather than ‘disabilities’). Training is specifically around how to sensitively deal with customers of varied abilities. UDX already offers quiet rooms for autistic guests, and works in close partnership with Lighthouse, a visual impairment charity in Orlando.
- 5.9 Questions raised and discussions held during pre-engagement resulted in suggestions for prayer rooms to be incorporated into the design of the Proposed Development, as well as offering a range of dietary options for purchase, including halal. Whilst this level of detailed design is not yet available and these measures are not currently secured, UDX intends to consider inclusivity in its design and operation for both guests and team members. Assuming that these measures would be included in the design of the Proposed Development, Protected Characteristic groups such as minority religious groups are likely to experience positive differential effects, in particular, Sikhs, as outlined in **Chapter 3 Baseline**.
- 5.10 The Proposed Development would result in positive differential effects for younger people, older people, residents with long-term illness or disability, those with a religion or philosophical belief, and pregnant residents. This is due to improvements to the accessibility and inclusive design elements throughout the Site. Refer to **Chapter 4 Literature Review** for further detail.
- 5.11 Transgender people and physically disabled people are, however, likely to experience negative differential effects, should facilities such as toilets not be made to cater to their needs. It is understood that “family” toilets are usually built in private rooms, which can be used by anyone. If this were to be put in place for the Proposed Development, it is deemed there would be no significant effect felt in this regard.

## Summary assessment

- 5.12 Protected groups are likely to benefit from designs that are catered to their needs. In particular, those who are disproportionately represented. This impact is measured at the Site level, and would be experienced by visitors to, and workers at, the Proposed Development, for whom it is not possible to get data on disproportionately represented groups.

Overall, it is expected that the **differential impact** on certain groups would be **positive**. These groups include:

- Younger people;
- Older people;
- Long term illness or disability;
- Those with a religion or philosophical belief; and
- Pregnant residents.

## Presence of construction workforce

### Construction phase

- 5.13 The Proposed Development will generate a significant influx of construction workers into the local area. Existing evidence highlights the potential impact of an influx of construction workers on community cohesion and therefore health, with some studies finding that the presence of construction workers causes some groups to feel intimidated (see **Literature Review** for further detail).
- 5.14 The presence of construction workforce can negatively affect some groups near the Site. The presence of construction workers could also result in anti-social behaviour.
- 5.15 The total construction workforce (5,380 at peak) has the potential to increase the population of the Local Area by approximately 30% if all construction workers were to move to the Local Area. However, the majority of construction workers would be expected to live within a commutable distance of the Site. The peak workforce would take up 3% of the residents of the LCA who live within 60-minutes of the Site. Workers commuting from this distance would be expected to not require any accommodation, and therefore not move to the Local Area. Further information can be found within the **ES Appendix 13.1 – Temporary Workforce Accommodation Strategy (Volume 3)**.
- 5.16 Construction workers will be living or staying near to the Site. Construction workers are not expected to regularly engage with local communities. In the most likely scenario, there is not envisaged to be a need for an on Site campus for construction workers. Where construction workers do relocate, this impact will be minimal as it will be disaggregated across the CSA.
- 5.17 **ES Appendix 2.3 – Outline Construction Environmental Management Plan (Volume 3)** states that construction workers will adhere to a code of conduct and therefore anti-social behaviour is expected to be minimal and appropriately managed. In preventing anti-social behaviour, this mitigation measure will reduce the impact that the Proposed Development is likely to have on children as **Chapter 4 Literature Review** finds that children surrounded by antisocial behaviour are likely to experience negative effects. It concludes that after mitigation, it is likely that there will be a negligible residual effect. This measure is detailed in **ES Appendix 2.3 – Outline Construction Environmental Management Plan (Volume 3)**.

### Summary assessment

- 5.18 Given the minimal uplift in the population of the Local Area, as well as the information provided in **ES Chapter 17: Population and Human Health (Volume 1)**, it is expected that the **disproportionate and differential impact** on equality groups would be **neutral**.
- 5.19 Equality groups that will be disproportionately impacted include:
- Younger people;
  - Ethnic minority groups; and
  - Pregnant residents.
- 5.20 Equality groups that will be differentially impacted include:
- Younger people; and
  - Ethnic minority groups.

## Impact on community facilities and places of worship

### Construction phase

- 5.21 Community facilities and places of worship have been identified in the **Baseline**. The scale of construction activities would require a significant workforce, with considerable traffic movement (particularly HDV (heavy duty vehicle) movement). However, the changes in air quality and noise during the construction period are not expected to be significant following mitigation. This is summarised in the **ES Chapter 8: Air Quality (Volume 1)**, the **ES Chapter 9: Noise and Vibration (Volume 1)** and **ES Appendix 2.3 – Outline Construction Environmental Management Plan (Volume 3)**.
- 5.22 **ES Appendix 2.3 – Outline Construction Environmental Management Plan (Volume 3)**, for example, outlines that UDX through their Principal Contractor(s) would adhere to key elements regarding HDV routes, including:
- Wherever possible, HDVs should use the strategic road network; and
  - Suppliers of materials would make use of the strategic road network.
- 5.23 Moreover, **ES Appendix 2.3 – Outline Construction Environmental Management Plan (Volume 3)** outlines various mitigation measures that would take place throughout the construction phase of the Proposed Development, which would mitigate the impact of traffic disruption. These include:
- HDV deliveries will occur during set permitted times; and
  - Routes and access points to the Site of the Proposed Development would be carefully selected to avoid sensitive community assets and schools.
- 5.24 The Local Area has a significantly higher proportion of its population that is Sikh relative to geographical comparators. As long as 'sensitive community assets' in the mitigation measure outlined above, include places of worship, then this should be sufficient in preventing the Local Area's Sikh worshippers from experiencing disproportionate and/or differential effects. While there are no gurdwaras directly within the Local Area, increased traffic caused by construction could disproportionately affect Sikhs attempting to access their local gurdwara outside the Local Area. However, if the aforementioned mitigation measures are put in place, this will be negligible.
- 5.25 The influx of construction workers does have the potential to impact community facilities and places of worship. This is because a small proportion of construction employees are likely to relocate for work, and may therefore utilise local community facilities and places of worship in the Local Area instead of the facilities they would attend at home. While there are several places of worship near the Proposed Development, there are only churches located within the Local Area, with more gurdwaras located further north in Bedford. Therefore, Christians (who are not disproportionately represented in the Local Area) are the only religious group with the potential to experience these effects from the Proposed Development.
- 5.26 Construction of the Proposed Development could temporarily cause minor inconvenience to those wishing to access community facilities located in nearby residential areas. Population groups with protected characteristics that are particularly reliant on these community assets, such as younger and older people, those with mental health problems and socio-economically disadvantaged groups, have a higher chance of experiencing a differentially negative effect due to disruption. However, the changes in air quality, noise and even traffic movement during the construction period are not expected to be significant following mitigation, as outlined in **ES Chapter 8: Air Quality (Volume 1)**, **ES Chapter 9: Noise and Vibration (Volume 1)**, **ES Chapter 5: Traffic and Transport (Volume 1)** and **ES Appendix 2.3 – Outline Construction Environmental Management Plan (Volume 3)**.

- 5.27 The Local Area has a higher proportion of 0 to 9 year-olds compared to geographic comparators, accompanied by a significant number of primary and secondary schools in the area. In addition, the changes in air quality and noise during the construction period are not expected to be significant following mitigation, as outlined in **ES Chapter 8: Air Quality (Volume 1)**, the **ES Chapter 9: Noise and Vibration (Volume 1)** and **ES Appendix 2.3 – Outline Construction Environmental Management Plan (Volume 3)**.
- 5.28 The Local Area has a disproportionate representation of care leavers, who are acutely reliant on community facilities, which play a crucial role in their transition from care to independent living. A number of community halls are located near the Proposed Development. However, there are more community halls than is recommended to support the local population size. Therefore, it is unlikely that they should be differentially and/or disproportionately impacted by the Proposed Development.
- 5.29 In light of this assessment, the **disproportionate and differential impact** on younger and older people, those with mental health problems and socio-economically disadvantaged groups is expected to be **neutral**.

## Operational phase

- 5.30 The nature of impact generated by the Proposed Development would be different in the operational phase compared to the construction phase, with a high presence of visitors, as opposed to inconvenience typically associated with construction, such as a high presence of HDVs. **ES Chapter 9: Noise and Vibration (Volume 1)** states that the worst noise and vibration effects are likely to occur during Halloween Horror Nights, Holiday operating hours, and Special Events, when additional activities exceed those of normal operation, particularly at night. The control of noise from the operation of the Proposed Development is based around the achievement of noise limits at the RCLs, rather than relying on and committing to specific mitigation measures. Achieving noise limits at the RCLs located in the closest proximity to the Site will ensure that there are not high levels of noise in the wider Local Area.
- 5.31 This assessment deems that equality groups as identified in **paragraph 5.34** are likely to experience a **neutral differential** effect concerning access to, and usage of, community facilities and places of worship.
- 5.32 While there is a **disproportionate** presence of practicing Sikhs in the Local Area who would be differentially affected by the Proposed Development, the location of their places of worship are far enough away to ensure the ultimate impact on this Protected Characteristic group is expected to be **neutral**.

## Summary assessment

- 5.33 Based on a conservative and worst-case assessment, it is expected that the **disproportionate and differential impact** on equality groups would be **neutral**.
- 5.34 Equality groups that will be disproportionately impacted include:
- Younger people;
  - Ethnic minority groups; and
  - Pregnant residents.
- 5.35 Equality groups that will be differentially impacted include:
- Younger people;
  - Those with long-term illness or disability; and
  - Those with a religion or philosophical belief.



## Neighbourhood amenity

### Construction phase

- 5.36 **ES Chapter 8: Air Quality (Volume 1)** states that the receptors most at risk are those within 200m of the modelled road network, comprising:
- Twenty-six locations within Bedford Town Centre Air Quality Management Area (AQMA) including: 24 residential properties (five on Prebend Street where annual mean NO<sub>2</sub> concentrations are just below the air quality standard), Bedford Hospital, and Bedford Free School; and
  - Seventy-two locations outside of the AQMA to the south of Bedford including: 70 residential properties within Marston Moretaine, Caulcott/Lower Shelton Wootton, Kempston Hardwick, Wixams, Stewartby, and along Woburn Road and Ampthill Road; and two schools (Blue Orkids Wootton Nursery and Lakeview School, Wixams).
- 5.37 In terms of road traffic emissions, **ES Chapter 8: Air Quality (Volume 1)** concluded that the magnitude of change for annual mean NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> concentrations at all receptors is negligible, and the overall effect is therefore negligible.
- 5.38 In any case, **ES Appendix 2.3 – Outline Construction Environmental Management Plan (Volume 3)** states how the number of HDV movements permitted as part of the site works would be capped, and a Delivery Management System (DMS) would be used to achieve the following objectives:
- Regulate the flow of HDVs to and from the site; and
  - Ensure HDV arrivals do not exceed the hourly HDV upper limit (other than in exceptional circumstances).
- 5.39 Assuming the aforementioned ‘exceptional circumstances’ are indeed ‘exceptional’, it is unlikely that there would be a significant impact on neighbourhood amenity for protected groups that are identified as sensitive to changes in air quality (older people) as a result of changes in air quality.
- 5.40 **ES Chapter 9: Noise and Vibration (Volume 1)** determines the sound levels around the Site. It advises that the Principal Contractor should employ Best Practicable Means (BPM) to limit construction noise. This measure is detailed in **ES Appendix 2.3 – Outline Construction Environmental Management Plan (Volume 3)**. **ES Chapter 9: Noise and Vibration (Volume 1)** also suggests that effective design and management of the Site could substantially reduce Operational Phase noise levels at receptors. This mitigation measure will have a beneficial effect on older people, as **Chapter 4 Literature Review** finds that prolonged exposure to high levels of noise can cause a higher prevalence of cardiovascular disease, strokes, and dementia, of which older people are already at risk. This mitigation measure will also benefit residents with long-term disabilities and illnesses, and pregnant residents as **Chapter 4 Literature Review** identifies these groups as being particularly sensitive to loud noises.
- 5.41 **ES Appendix 2.3 – Outline Construction Environmental Management Plan (Volume 3)** states that subcontractors would be encouraged to minimise HDV movements to the Site by means of consolidating payloads and aggregate supplies. The DMS described above would reduce vehicular movements and thus noise and vibration impacts. In addition, the construction workforce would be encouraged to make use of active travel (walking and cycling), use public transport, use shuttle buses provided by contractor and car sharing to minimise the number of vehicles on the network.
- 5.42 UDX will compel the Principal Contractor(s) to issue “look-ahead” bulletins detailing the location, nature, timing and expected duration of any works scheduled outside standard hours, together with the noise-control measures to be employed. Information will be distributed at least five working days in advance



through real-time updates via a project website and/or SMS alert system. This measure is detailed in **ES Appendix 2.3 – Outline Construction Environmental Management Plan (Volume 3)**.

5.43 A dedicated Community Liaison Officer will act as the single point of contact for residents, Bedford Borough Council and other stakeholders. This measure is detailed in **ES Appendix 2.3 – Outline Construction Environmental Management Plan (Volume 3)**. Responsibilities will include:

- Maintaining the notification systems above;
- Logging, investigating and responding to all noise - related enquiries;
- Reporting quarterly to the Principal Contractor(s) and MHCLG on enquiries received and actions taken; and
- Attending meetings with socio-economic taskforce.

5.44 **ES Chapter 9: Noise and Vibration (Volume 1)** concludes that after mitigation measures are implemented, the noise and vibration impacts generated by the Proposed Development in the construction phase will be negligible in day-time hours. These Noise sensitive receptors include two schools whereby younger people could be disproportionately impacted in day-time hours to a negligible extent.

5.45 During the construction phase, given the mitigation measures mentioned above, the Proposed Development would result in **negative differential and disproportionate effects** from changes to neighbourhood amenity for certain groups with Protected Characteristics, including younger people, older people, and those from disadvantaged socio-economic backgrounds.

## Operational phase

5.46 **ES Chapter 8: Air Quality (Volume 1)** provides an operational assessment of pollution generated by the Proposed Development. The report concludes that the change in levels of pollutants created by the Proposed Development is expected to be minor to negligible adverse.

5.47 **ES Chapter 9: Noise and Vibration (Volume 1)** states that the noise impact assessment is based on achieving a Core Zone noise limit of 60 dB LAeq,1hr during the day and 55 dB LAeq,15min during the night at the nearest Receptor Control Locations (RCLs), for which consent is being sought. This represents a cautious worst case and would include contributions from all Core Zone activities, including Halloween Horror Nights, Holidays and Special Events. Under normal theme park hours operation (which make up the majority of the year), Core Zone noise levels would be anticipated to be lower than during Halloween Horror Nights, Holidays and Special Events, particularly during the night and the extent of significant effects will be reduced. However, occasional evening event noise could impact younger people who are disproportionately represented at the Local Area level. Pregnant residents are also disproportionately represented at the Local Area level and could experience slight increases in stress or sleep disturbance during peak-season night-time events

5.48 UDX have identified a set of mitigation measures which can be pursued if required. These measures will be implemented in the design phase if noise modelling shows they are required to meet noise limits. In addition, the Proposed Development will include certain embedded mitigation, including:

- Speaker and PA system directional placement to avoid projecting into the community.
- Use of buildings around the park to act as noise barriers.
- Event stages are strategically placed to direct sound away from sensitive areas.
- Significant noise generating attractions and events will have a predictive noise assessment completed to minimise noise levels.

- 5.49 During the operational phase, the significant changes to neighbourhood amenity caused by the Proposed Development would result in **negative disproportionate and differential effects** for certain groups, including younger people, older people, and those from disadvantaged socio-economic backgrounds.

## Summary assessment

- 5.50 Overall, it is expected that the **disproportionate and differential impact** for certain protected characteristic groups in the Local Area would be **negative**. Some mitigation measures would be put in place, however, some impacts are unavoidable in an area undergoing a development of this scale.
- 5.51 Note that this impact is judged to be negative based on a conservative and worst-case assessment. It is primarily driven by a small selection of noise impacts, where certain groups with protected characteristics are likely to be exposed in both a disproportionate and differential way.
- 5.52 Equality groups that will be disproportionately impacted include:
- Younger people;
  - Ethnic minority groups; and
  - Pregnant residents.
- 5.53 Equality groups that will be differentially impacted include:
- Younger people;
  - Older people;
  - Those with long-term illness or disability; and
  - Pregnant residents.

## Connectivity

- 5.54 Women have been found to suffer disproportionately from TRSE. Planned station improvements would disproportionately benefit this group. The benefit of these improvements was reinforced during pre-engagement, when people from a range of groups stated that the infrastructure improvements included within the Proposed Development would be fundamental changes that they have been wanting for many years and which would positively improve their quality of life.

## Construction phase

- 5.55 The Proposed Development is likely to cause some inconvenience to private property, businesses and community assets. The scale of construction activities would require a significant workforce, and there would be inconvenience generated by vehicles and the delivery of supplies.
- 5.56 There are several residential areas located nearby the Proposed Development. Those that are located on the same side of the A421 as the Proposed Development, such as Wixams, are expected to experience higher levels of inconvenience than residential areas located on the opposite side of the A421, such as Wootton. This has the potential to disproportionately impact younger people on their journey to school due to their overrepresentation in the Local Area. This will also disproportionately impact ethnic minority groups and pregnant residents.
- 5.57 In the Local Area, there is a strong presence of industrial and logistics businesses. These businesses are inherently reliant on access to, and the efficiency of, the local road network, to conduct business operations. Therefore, changes to the local road network would have more impact on these businesses.

- 5.58 Retail businesses in the Local Area are expected to face a lesser impact. These establishments largely serve the local community in which they are located and are accessed by foot.
- 5.59 There are several other private businesses that operate in office spaces. Business operations at these businesses would be disrupted by traffic delays during peak hours.
- 5.60 Moreover, **ES Appendix 2.3 – Outline Construction Environmental Management Plan (Volume 3)** outlines various mitigation measures that would take place throughout the construction phase of the Proposed Development, which would mitigate the impact of traffic disruption. These include:
- HDV deliveries will occur during set permitted times; and
  - Routes and access points to the Site of the Proposed Development would be carefully selected to avoid sensitive community assets and schools.
- 5.61 These measures are detailed in **ES Appendix 2.3 – Outline Construction Environmental Management Plan (Volume 3)**. These mitigation measures will benefit residents with long-term health issues and disabilities and older residents who may face mobility issues and are therefore reliant on the effectiveness of the local road network. It would also benefit women who have been identified as suffering from TRSE.
- 5.62 The equality groups likely to be most likely affected by this impact are identified in **paragraph 5.73**, none of whom are disproportionately represented in the Local Area. With mitigation, these groups are likely to experience a **neutral differential effect** in the construction phase.

## Operational phase

- 5.63 The nature of the impact generated by the Proposed Development would be different in the operational phase compared to the construction phase with a high presence of visitors as opposed to inconveniences typically associated with construction, such as a high presence of HDVs.
- 5.64 The proposed level of car parking at the Proposed Development can accommodate the forecast visitor demand and the forecast team member demand. As detailed in **ES Appendix 5.1 – Transport Assessment (Volume 3) – Annex 10 – Parking Note**, the guiding principle is that parking supply will always meet parking demand. Therefore, car parking should not impact roads outside the Proposed Development. This ensures that those that are reliant on the local road network will not be negatively impacted.
- 5.65 **ES Appendix 5.1 – Transport Assessment (Volume 3)** concludes a major positive effect is the substantial counter tidal flow in the morning from London. At present, the morning movement by train on the Midlands Mainline Railway is commuters heading to London. These trains make the return journey almost empty. In contrast, the peak movement for the Site is out of London at the end of the morning 'rush hour' and can go a long way to filling the seating capacity of those trains. This is a very substantial benefit for the efficient operation of the railway infrastructure. This ensures that those that are reliant on railway infrastructure will not be negatively impacted.
- 5.66 UDX, having worked closely with the Department for Transport (DfT), has demonstrated that the proposed location of the Entertainment Resort Complex is excellent in terms of its inclusive connectivity to the UK population. It has also demonstrated the excellence of the location in terms of attracting international visitors to the UK.
- 5.67 **ES Appendix 5.1 – Transport Assessment (Volume 3)** states that the transport infrastructure improvements that the planning proposal includes are necessary and proportionate. They strike the appropriate balance between travel modes, which similarly reinforces the inclusive nature of the Proposed Development and maximises its transport sustainability credentials.

- 5.68 **ES Appendix 5.1 – Transport Assessment (Volume 3)** concludes that there is no transport reason to resist this scheme, and good transport reason to conclude that if this Proposed Development can be attracted into the UK, that this is the place to put it.
- 5.69 The **Design and Access Statement (Document 6.2.0)** confirms that the railway station will be fully Disability Discrimination Act compliant. This means it will be inclusive for residents with disabilities.
- 5.70 The delivery of improved infrastructure, including station improvements is likely to deliver a **positive differential effect** for equality groups such as older people, disabled people (including those suffering from mental health problems, who are disproportionately represented in the local area), and women.

## Summary assessment

- 5.71 While there is expected to be some negative impacts during the construction phase, it is expected that after mitigation, the **differential impact** on the equality groups identified in **paragraph 5.74** would be **neutral**.
- 5.72 The Proposed Development would have a **positive equality effect during the operational phase**, regarding connectivity. While there would undoubtedly be effects on connectivity during the operational phase due to increased traffic flow, the impacts of this would be heavily outweighed by the benefits that would result from the improved connectivity which would result from infrastructure improvements.
- 5.73 Equality groups that will be disproportionately impacted include:
- Younger people;
  - Ethnic minority groups; and
  - Pregnant residents.
- 5.74 Equality groups that will be differentially impacted include:
- Older people;
  - Women; and
  - Those with long-term illness or disability; and

## Employment and skills

- 5.75 Providing pathways for those most in need is a vital strategy in enhancing employment opportunities, addressing skills mis-matches and promoting social inclusion. Residents with inadequate skills can face exclusion from the labour market and vocational apprenticeships can provide residents with skills required by the labour market to enhance their employability. The area has a disproportionate representation of Gypsy & Traveller communities, for example, where unemployment amongst young people is more prevalent.

## Construction phase

- 5.76 The construction of the Proposed Development would directly support and generate thousands of jobs (refer to **ES Chapter 13: Socio-economics (Volume 1)** and **ES Appendix 13.1 – Temporary Workforce Accommodation Strategy (Volume 3)** for further detail).
- 5.77 UDX is committed to ensuring a broad supplier base and has an inclusive process that is comprehensively designed to ensure that all businesses, including those that have historically played a smaller role in the supply chain, have an equal opportunity to compete for our business. Provided that UDX follows its supplier inclusive process in the context of this Proposed Development, younger people, socio-economically

disadvantaged groups, care leavers and minority ethnic (including Gypsy & Traveller communities) would be expected to experience a positive differential impact.

- 5.78 The 5% Club is a movement of UK based builders, developers and contractors providing 'earn and learn' opportunities to develop the skills and talents people need to become more employable and create meaningful careers. As outlined in **Employment and Skills Plan (Document 6.12)**, UDX will require that Principal Contractors have 5% Club or equivalent accreditation.

The Proposed Development is therefore expected to have a positive differential impact on younger people, those from socio-economically disadvantaged backgrounds, care leavers and minority ethnic groups, including Gypsy & Traveller communities, who would benefit from the employment opportunities the construction phase of the Proposed Development would provide.

## Operational phase

- 5.79 UDX provides extensive training opportunities to its employees which allows them to increase their skills and experience across multiple disciplines. UDX has a track record of promoting initiatives which positively impact local communities. UDX is committed to working with Bedford and Central Bedfordshire to help roll out programmes designed to help target the specific employment and skills needs of the area.
- 5.80 It is estimated that the Proposed Development would directly provide 8,050 jobs in the opening year. These jobs would include full-time and part-time opportunities supporting different elements of the Proposed Development. Some of the part-time roles would also likely be seasonal opportunities – these are most likely to be within the categories of park & resort operations, revenue operations and entertainment, with some (but more limited) seasonal roles expected in the visitor accommodation.
- 5.81 The Universal apprenticeship programme, a collaborative effort between the organisation, local colleges, and students, is aimed at individuals aspiring for careers in technical and mechanical trades but needing support to enter these fields. The structured programme offers apprentices the opportunity to engage in classroom training, role rotations and on-the-job learning. It is tailored for candidates with limited experience, and these apprenticeships enable participants to qualify for various technical roles. The Proposed Development would provide 70 apprenticeships annually by the fifth full year of operation.
- 5.82 During the operational phase, due to the substantial employment opportunities benefiting Bedford and Central Bedfordshire residents, younger and older people, those with pre-existing health conditions, disabled people, those suffering from mental health problems, minority religious groups, those from minority ethnic backgrounds, women, transgender people, socio-economically disadvantaged groups, care leavers, the LGBTQIA+ community and pregnant women are expected to experience a positive differential equality effect.

## Summary assessment

- 5.83 The above, along with further measures designed to enhance employment and skills opportunities for local residents, are outlined in the **Employment and Skills Plan (Document 6.12)**, and secured by the controlling documents as detailed in the **Proposed Operative and Controlling Documents (Document Reference 1.16.0)**.
- 5.84 As far as employment and skills is concerned, it is expected that the **disproportionate and differential impact** on relevant equalities groups at the Bedford and Central Bedfordshire level would be **positive**.
- 5.85 Equality groups that will be disproportionately impacted include:
- Pregnant residents.

5.86 Equality groups that will be differentially impacted include:

- Younger people;
- Older people;
- Those with long-term illness or disability;
- Ethnic minority groups;
- Women; and
- Pregnant residents.



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